

CODE OF CONDUCT OF THE UNIVERSITY MEDICAL CENTRE GÖTTINGEN



Staff Unit Compliance

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CODE OF CONDUCT OF THE UNIVERSITY MEDICAL CENTRE GÖTTINGEN

FOREWORD

The University Medical Centre Göttingen (UMG) is one of the leading university medical institutions in Germany, as measured by the number of students. It is one of the largest medical faculties and works with high quality standards in patient care, research, teaching, transfer and in the service sector. Behaviour that is harmful to the institution, or even acts of a criminal nature, are not compatible with this above-mentioned claim. With the understanding of value-oriented compliance management, we can only be perceived as a trustworthy and reliable partner by our patients, by all those with whom we have business connections, as well as by students, science, practice, politics and the public if we act in a responsible, legal and ethical manner.

With this Code of Conduct, we have established the essential rules and principles of conduct both internally and towards external partners and the public. It is intended to serve as a guideline for all those involved – the committees and members of the Board of Management of the UMG, as well as the executives and all employees – to help them live up to the values of the UMG in their day-to-day business. The decision-making bodies and those in management positions in particular, are required to set an example by behaving in accordance with this code and to ensure that employees are also

aware of, understand and implement the behavioural requirements. The management of the affiliated companies and the students of the UMG are also called upon to align themselves with the values and framework conditions agreed upon for the UMG. We like to think that our business and scientific partners apply comparable principles and standards to their actions. This common understanding of values should form the mandatory basis of conduct for each and every individual and thus make an important contribution to the credibility and integrity of the UMG.

Göttingen, July 2022

A blue ink signature of Prof. Dr. Wolfgang Brück, written in a cursive style.

Prof. Dr. Wolfgang Brück
Board Member Research and Teaching
Dean of the Faculty of Medicine
Spokesman of the Board

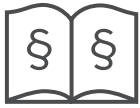
A blue ink signature of Prof. Dr. Lorenz Trümper, written in a cursive style.

Prof. Dr. Lorenz Trümper
Executive Board Member Medical Care

A blue ink signature of Jens Finke, written in a cursive style.

Jens Finke
Executive Board Member Finance Management
and Administration

1. SCOPE OF APPLICABILITY AND LEGAL COMPLIANCE



This Code of Conduct sets out the most important rules and regulations which are binding for all supervisory and management bodies, management and executive staff, and employees of the UMG (Faculty of Medicine and University Clinic). In addition, the UMG is obliged to comply with the legal requirements applicable to its services and to fulfil its contractual agreements. Similarly, collective agreements, works agreements and internal regulations (including procedural and official instructions, statutes, regulations, safety and quality regulations) remain unaffected. Knowledge of and compliance with the laws, professional standards, relevant provisions and internal regulations applicable to the respective work environment is the responsibility of both management and executive staff as well as all employees. Violations of legal, official or contractual regulations may result in consequences under labour law, claims for damages and criminal sanctions. Ignorance cannot justify misconduct and does not protect against sanctions. This also applies to internal rules and regulations, provided that it was possible to obtain knowledge of them in a reasonable way.

2. ETHICAL CONDUCT



For the UMG, compliance with ethical standards is an indispensable prerequisite in dealing with patients, business contacts and also in dealing with each other. This includes the strict rejection of any form of discrimination, insult, harassment and assault based on ethnic origin, gender, age, mental or physical disability, religious belief, sexual orientation or other personal characteristics. Psychological, physical, sexual or verbal coercion as well as insults and every other form of personal attack will not be tolerated.

The UMG expects and promotes an atmosphere of appreciation, respect, tolerance and open cooperation. Equal treatment and equal opportunities are the foundation of collaboration both internally and externally. Employees are entitled to fair and respectful treatment, freedom of expression and privacy. The management style at the UMG should be characterised by exemplary action, reliability, transparency of decisions and personal responsibility on the part of employees. In dealing with patients and business contacts appreciation and fairness should also play a key role.

3. INTEGRITY AND TRANSPARENCY



In accordance with the aforementioned ethical standards, even the semblance of illegal behaviour must be avoided; in particular, any form of corruption (including bribery and corruptibility, the acceptance and granting of advantages) is prohibited. Employees must not take advantage of their position to accept or demand personal benefits. If employees are offered prospective personal benefits, this is considered a reportable conflict of interest. Conflicts between professional and private interests must be avoided. This includes notifying the UMG of secondary employment in good time. Any cooperation whatsoever, both with industry and with practising doctors and other clinics, must align with the legal and internal requirements. At no time may objective medical decisions be influenced by an offer, promise or granting of direct or indirect advantages for oneself or third parties.

The UMG does not make any direct or indirect payments or grant any other benefits to external persons, in particular civil authorities, company representatives or government officials, nor will these be promised, approved, confirmed or offered. In addition, as a public contracting authority, the UMG is subject to public procurement law. Both the legal requirements of public procurement and competition law and the internal procurement regulations must be strictly adhered to. This, if nothing else, is in view of the UMG's importance as a regional economic factor, which imposes a particularly high obligation to maintain commercial neutrality when awarding contracts.

In the interests of correctness and transparency, all documentation, accounting and data collection must be complete, proper, correct and on time and must comply with legal, contractual and internal requirements.

Furthermore, the "[Anti-Corruption Directive](#) Georg-August University of Göttingen Foundation under Public Law including the University Medical Centre Göttingen (UMG) – Medical Faculty and University Clinic –" applies in its current version.

4.



QUALITY AND SAFETY OF SERVICES

The best possible quality of its medical services, primarily in the diagnosis and therapy of patients, must always be a priority at the UMG. In this context, too, laws, guidelines and standards of quality and safety must be consistently observed. This applies in particular to the employees in the individual clinics, institutes and other medical facilities when dealing with patients. The responsible point of contact in this context, independent of this Code of Conduct, is the staff unit Quality and Clinical Risk Management, which ensures compliance with the related requirements.

Research and teaching, not least because of their close connection to patient care and to the industry, must comply with legal requirements, contractual framework conditions and internal regulations as well as the principles of good scientific practice. Scientific misconduct, primarily the infringement of intellectual property, plagiarism, misrepresentation and interference with the research activities of third parties, will not be tolerated. In cases of suspected scientific misconduct, detached from the scope of this Code of Conduct, the Ombudsman Board of the Faculty of Medicine is solely

and independently responsible for the respective assessment of the facts and any consequences to be derived therefrom on the basis of the "[Ordnung der Georg-August-Universität Göttingen zur Sicherung guter wissenschaftlicher Praxis](#)".

5. GOOD CONDITIONS OF EMPLOYMENT



As an employer, the UMG takes its duty of caring for employees seriously and takes into account justified interests based on good working conditions. Compliance with the legal requirements and collective agreements forms the basis for this under labour law.

The UMG is a family-friendly company, actively committing itself to the compatibility of family and work and operates its own day care centre. As a large training company, it offers the opportunity to learn a variety of professions. The continuous further qualification of the employees is of particular importance. Further education and training courses are carried out and actively promoted.

In addition, health, safety and sustainability play an important role in the creation of work situations and working conditions. Compliance with the legal, official and internal regulatory requirements for the protection of the health and safety of employees is ensured outside of this Code of Conduct by the persons responsible for their departments, who are actively supported in this by the centre's occupational medical service, the staff safety and environmental protection unit as well as the staff occupational health and safety management and clinical radiation protection unit. This also includes the issues of environmental protection, radiation protection, genetic engineering, hazardous substances, the transport and disposal of hazardous goods.

6. HANDLING INFORMATION - CONFIDENTIALITY, DEALING WITH TRADE SECRETS AND DATA PROTECTION



The UMG is aware that information is a valuable asset and an important building block for the success of the organisation. Therefore, proprietary information is given special protection. In addition to the obligation to maintain strict confidentiality, this also implies protecting data and documents from unauthorised access by third parties. The same applies to confidential information of the UMG and its business contacts as well as to personal data, in particular that of patients which is not intended for the knowledge of third parties and must be protected from misuse. Confidential information or information protected by copyright is all information that is specifically marked accordingly or for which it can be assumed that it is neither publicly known nor intended to be made known. Confidential and also proprietary information, files and documents may not be used to gain an economic advantage for individuals or others and may not be disclosed to outsiders or uninvolved colleagues.

Since data protection regulations are subject to their own external requirements and monitoring, all data protection issues are regulated outside of this Code of Conduct. This area is the responsibility of a separate data protection authorized representative. The same applies to information security, which also has an explicitly regulated representative service.

7. SUSTAINABILITY, HANDLING AND USE OF RESOURCES



Careful use of existing corporate resources and sustainable action are part of corporate responsibility. The UMG is therefore committed to its responsibility for sustainability and environmental protection. All employees are required to consider the effects of their actions on the environment.

A prerequisite for this is, in particular, to use resources conscientiously and thus also to act in a budget-conscious manner, as well as to exercise care in dealing with company property and to protect it from damage, theft and destruction. Property includes not only tangible assets but also intangible assets (intellectual property, software). The UMG's property, possessions and other assets may only be used for the intended business purposes. When using resources and equipment (including telephone, PC, Internet), the relevant internal guidelines and regulations must be observed.

8. COMMUNICATION WITH THE PUBLIC AND THE MEDIA



Official statements by the UMG as well as communication with the public on behalf of the UMG shall only be made by the Board of Management, the Staff Unit for Corporate Communication, Press and Public Relations or by employees expressly authorised to do so in individual cases. This external communication must always be complete, correct and comprehensible. The journalistic independence is to be respected by the UMG at all times. Insofar as the interests of the clinics, institutes and central facilities are concerned, official communication is carried out by the respective management after consultation with the Board of Management or the Staff Unit for Corporate Communications, Press and Public Relations. Researchers who are contacted by the media on the basis of their specialist expertise are exempt from the aforementioned coordination obligations and processes. The UMG [Social Media Guidelines](#) apply to the publication of contributions in social networks.

9. REPORTING OF INFRINGEMENTS - REPORTING CHANNELS AND ADDRESSEES



The UMG expressly encourages its employees to confidentially report criminal offences and violations of the law, or suspicions of such offences at the workplace. Because criminal acts and behaviour that is harmful to the institution can have personal consequences not only for the individual person, but also for the UMG as such, a zero-tolerance principle applies here. In addition to possible material damage, unlawful and criminal conduct endangers the reputation and values embodied in the UMG.

Employees should inform their respective supervisor if they become aware of violations, criminal offences or if there are reasonable grounds for suspicion. If this does not seem appropriate or the reporting person wishes to remain anonymous, a report can be made discreetly and in a protected context, either by name or anonymously. For this purpose, the UMG provides a [whistle-blower portal](#), which is operated via an external server, meets the highest confidentiality and security standards and allows reports to be made via an encrypted connection (also in anonymous form), where it is impossible to trace them back to the reporting person. Third parties (e.g. patients, relatives, students or business contacts) can also submit reports via this channel. The information provided will be treated confidentially, also in order to protect whistle-blowers from possible repressive actions. Employees and third parties who have pointed out an actual or an alleged compliance violation in good faith may not be disadvantaged on the basis of this information.

Insofar as responsible officers, committees and staff units are named in this Code of Conduct for special focal points, reports concerning these focal points are to be submitted via the defined reporting channels and processed independently by the respective persons responsible outside of this Code of Conduct on the basis of the applicable regulatory requirements.

Employees can also contact the respective committees which represent interests of the UMG staff (staff council, youth and trainee representatives, representatives for the severely disabled) and the equal opportunities officer. Patients, relatives and visitors can contact the UMG's opinion and complaints management in the event of complaints of a general nature.

10. OBSERVANCE OF THE CODE OF CONDUCT



This Code of Conduct combines the legal and internal regulations applicable at the UMG's site. The obligation to comply with the (behavioural) rules laid down here arises either directly from statutory or other legally binding requirements, from internal rules and regulations or as a secondary obligation under employment law.

The rules laid down in this Code of Conduct cannot fully regulate the wide range of actions and fields of action of all persons acting in or for the UMG. Therefore, all employees should constantly ask themselves in their daily work whether their decisions and the resulting actions are legally sound and free of personal interests, comply with the principles and internal guidelines of the UMG and the effects of which could harm the reputation of the UMG. All employees should be aware that they harm both themselves and the UMG if they act unlawfully or violate internal regulations.

The establishment of this Code of Conduct expressly does not exempt any of the respective areas from their own responsibility. All employees, regardless of occupational group or hierarchical level, are responsible for observing the principles of this Code of Conduct. In this context, all managers and leaders are to be aware of their role model function and are to ensure that their employees are familiar with this Code of Conduct and comply with its rules.

IMPRINT

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