

CODE OF CONDUCT

We, the seca group gmbh, based in Hamburg, Germany (hereinafter referred to as “seca”), are an internationally operating organization in the areas of medical devices and services.

seca will uphold the highest standard of ethics and integrity in all aspects of our business operations (“Our Standard.”). seca will also take appropriate measures to keep that standard (“How we achieve it.”).

This Code of Conduct shall apply to the seca group gmbh and all its affiliated companies, including the seca gmbh & co. kg. For the purposes of this Code, “affiliated companies” are defined as any business entity in which seca has a controlling interest, including but not limited to subsidiaries, joint ventures, or entities where seca holds a significant equity stake. Each affiliated company, irrespective of its geographic location or the nature of its business, is expected to adhere to the principles and standards set forth in this Code of Conduct. Compliance with this Code is mandatory for all employees, officers, and directors of seca and its affiliated companies.



Robert M. Vogel
co-CEO



Frederik Vogel
co-CEO

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OUR STANDARD

1. PRODUCT COMPLIANCE AND INFORMATION

seca will ensure that our products are safe, effective, and reliable.

We will monitor and assess the quality of our products to ensure that they meet the required standards.

We endeavor to keep interested external stakeholders updated about the characteristics of our products and services, where appropriate.

seca is committed to selling products and services that meet all applicable laws and regulations.

2. ENVIRONMENTAL PROTECTION

seca is committed to minimizing our impact on the environment.

We will reduce our waste and emissions and use sustainable practices wherever possible.

We will promote environmental awareness and responsibility among our employees.

We will comply with all applicable environmental laws and regulations.

3. LABOR

seca is committed to promoting fair labor practices.

We will provide a safe and healthy work environment for all employees.

We will comply with all applicable labor laws and regulations.

4. SLAVERY AND CHILD LABOR

seca has a zero-tolerance policy towards exploitation.

We will not engage in or support the use of forced labor, including human trafficking, debt bondage, or other forms of modern slavery.

We also strictly prohibit the employment of child labor in any form, adhering to the minimum age provisions of national labor laws and regulations, as well as international standards.

5. INTELLECTUAL PROPERTY

seca respects the intellectual property rights of others.

We will not knowingly infringe valid patents, trademarks, copyrights or other IP rights.

If we become aware of potential infringement, we will take prompt action to address the situation appropriately.

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6. FAIR COMPETITION

seca is committed to fair and free competition.

We will not engage in anti-competitive practices or unfair trade practices.
We will comply with all applicable laws and regulations related to competition.

7. BRIBERY, CORRUPTION AND ANTI-MONEY-LAUNDERING

seca is committed to conducting business ethically and with integrity.

We will not offer or accept bribes, kickbacks, or other forms of corruption.
We will comply with all applicable laws and regulations related to bribery and corruption.

8. BOOKKEEPING AND DOCUMENTATION

seca is committed to maintaining accurate and transparent financial records.

We will comply with all applicable accounting standards and regulations.
We will not engage in any fraudulent activities.
We will maintain proper documentation for all financial transactions.

9. DISCRIMINATION

seca is committed to promoting diversity and inclusivity.

We will not discriminate against any individual or group based on race, gender, religion, sexual orientation, or any other protected characteristic.
We will provide equal opportunities to all employees and job applicants.

10. HEALTH AND SAFETY

seca is committed to providing a safe and healthy work environment for all employees.

We will comply with all health and safety laws and regulations.
We will provide adequate training and resources to ensure the safety of our employees.

11. DATA PROTECTION

seca is committed to protecting the personal data of our customers, employees, and suppliers.

We will comply with all applicable data protection laws and regulations.
We will maintain the confidentiality and integrity of all personal data.
We will implement appropriate measures to prevent unauthorized access, use, or disclosure of personal data.

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HOW WE ACHIEVE IT

12. EMPLOYEE TRAINING

seca trains its employees about this Code of Conduct and its implications for their daily work.

13. DISCLOSURE/VOICING CONCERNS

seca encourages employees and partners to raise any concerns about potential unethical or unlawful conduct.

We will investigate all reported concerns thoroughly and impartially.

We prohibit retaliation against employees for submitting good faith reports of possible misconduct.

14. EVALUATING THE SUPPLY CHAIN

This Code of Conduct outlines the fundamental expectations we have for our product and service suppliers.

seca evaluates partners, such as suppliers and vendors, according to our Management Systems.

15. QUALITY MANAGEMENT

seca maintains multiple international Management Systems.

seca undergoes regular audits of the Management System, with the help of accredited third parties where necessary.

16. REMEDIAL MEASURES

If seca discovers that a violation of this Code of Conduct in its own business area or at a direct supplier has occurred or is imminent, we will take appropriate remedial measures to prevent or end this violation or to minimize the extent of the violation. The termination of business relationships is also explicitly considered as one of the measures.