

# MMGH Third-Party Code of Conduct

## 1. Introduction

This Code of Conduct outlines the expectations for all third parties ("Third Parties") working with MMGH Consulting GmbH.

This Code is informed by international best practices and standards, including the UN Global Compact principles and the OECD Guidelines for Multinational Enterprises, and applies to all suppliers, contractors, consultants, vendors, distribution channels, invitees to events, and any other individuals or entities that associate themselves with MMGH Consulting GmbH or the MMGH Consulting GmbH brand.

By partnering with us, Third Parties agree to uphold these standards of ethical and responsible business conduct. Third Parties' employees, contractors, sub-contractors, consultants and anyone Third Parties work with or contract with as part of their relationship with MMGH Consulting GmbH, should understand and comply with this Code.

MMGH Consulting GmbH is committed to conducting business with integrity and expects the same commitment from its Third Parties.

## 2. Legal Compliance

Third Parties must comply with all applicable laws, rules, and regulations in the countries where they operate, including but not limited to data protection laws, anti-corruption laws, competition laws, and export control laws.

Third Parties shall support the principles of the United Nations Global Compact relating to human rights, labour, environment, and anti-corruption, as derived from the Universal Declaration of Human Rights, the International Labour Organization's Declaration on Fundamental Principles and Rights at Work, the Rio Declaration on Environment and Development, and the United Nations Convention Against Corruption.

## 3. Ethical Conduct

### 3.1. Anti-Corruption and Bribery

Third Parties shall not engage in any form of corruption, bribery, or improper payments, whether directly or indirectly. This includes offering, promising, giving, or accepting anything of value to influence a decision or gain an unfair advantage. Facilitation payments are also prohibited.

### 3.2. Conflicts of Interest

Third Parties must avoid any conflicts of interest that could compromise their objectivity or loyalty to MMGH Consulting GmbH. Any potential or actual conflicts of interest must be disclosed promptly, as part of an ongoing obligation whereby Third Parties must disclose any situation where a potential conflict of interest may arise, as soon as Third Parties become aware.

### 3.3. Fair Competition

Third Parties must engage in fair competition and comply with all applicable antitrust and competition laws. Agreements that restrict competition, fix prices, or allocate markets are strictly prohibited.

### **3.4. Economic Crime and Money Laundering**

Third Parties shall not participate in any activities that facilitate economic crime, money laundering, or terrorist financing. Third Parties must implement appropriate measures to prevent and detect such activities.

### **3.5. Gifts, Hospitality & Entertainment**

MMGH Consulting GmbH values integrity as a key principle in everything it does, and expects all Third Parties with whom our employees interact, to share our core values, and to adopt the appropriate behaviour at all times.

## **4. Human Rights and Labor Practices**

### **4.1. Modern Slavery and Human Trafficking**

MMGH Consulting GmbH has a zero-tolerance approach to modern slavery and human trafficking. Third Parties must ensure that their operations and supply chains are free from any form of forced labor, slavery, servitude, or human trafficking, in accordance with applicable laws, including the UK Modern Slavery Act. Third Parties should conduct due diligence to identify and address risks of modern slavery in their supply chains.

### **4.2. Child Labor**

Third Parties must not employ child labor. The minimum age for employment shall be in accordance with applicable laws and regulations.

### **4.3. Fair Employment Practices**

Third Parties must provide equal employment opportunities and shall not discriminate against any individual based on race, ethnicity, gender, religion, age, disability, sexual orientation, or any other characteristic protected by law.

### **4.4. Wages and Working Conditions**

Third Parties must comply with all applicable wage and hour laws and regulations, including minimum wage requirements. Working hours and overtime must be reasonable and comply with local laws. Third Parties should provide a safe and healthy working environment for their employees.

### **4.5. Freedom of Association**

Third Parties must respect the rights of employees to form and join trade unions and engage in collective bargaining.

### **4.6. Harassment and Discrimination**

Third Parties must maintain a workplace free of harassment, discrimination, intimidation, and any form of disrespectful conduct.

## **5. Data Protection and Confidentiality**

### **5.1. Data Protection**

Third Parties must comply with all applicable data protection laws. Third Parties must implement appropriate technical and organizational measures to protect personal data against unauthorized access, use, or disclosure.

### **5.2. Confidentiality**

Third Parties must protect the confidentiality of MMGH Consulting GmbH's proprietary information, including trade secrets, business plans, customer data, and any other non-public information. This information must not be disclosed to third parties without prior written consent.

## **6. Environmental Responsibility**

### **6.1. Environmental Stewardship**

MMGH Consulting GmbH is committed to minimizing its environmental impact. Third Parties are encouraged to adopt environmentally responsible practices, including reducing greenhouse gas emissions, conserving resources, and minimizing waste.

### **6.2. Compliance**

Third Parties must comply with all applicable environmental laws and regulations.

## **7. Information Security**

Third Parties must implement appropriate security measures to protect MMGH Consulting GmbH's information and assets from unauthorized access, use, or disclosure. Third Parties must comply with MMGH Consulting GmbH's IT security policies and procedures.

## **8. Reporting and Compliance**

### **8.1. Reporting Concerns**

Third Parties must report any suspected violations of this Code of Conduct or any unethical or illegal conduct to MMGH Consulting GmbH's designated contact person or through MMGH Consulting GmbH's anonymous reporting channel (QR code below). MMGH Consulting GmbH prohibits retaliation against anyone who reports concerns in good faith.

### **8.2. Due Diligence and Monitoring**

MMGH Consulting GmbH may conduct due diligence assessments to ensure compliance with this Code of Conduct. Third Parties are expected to cooperate fully with these assessments and provide accurate and complete information.

### **8.3. Consequences of Non-Compliance**

Failure to comply with this Code of Conduct may result in corrective actions, including termination of the business relationship with MMGH Consulting GmbH.

## **9. Acknowledgement**

By working with MMGH Consulting GmbH, Third Parties acknowledge that they have read, understood, and agree to comply with this Third-Party Code of Conduct.

## **10. Contact Information**

If you have any questions or concerns about this Code of Conduct, please contact:

MMGH Consulting GmbH SA  
Legal & Compliance Department  
Kürbergstrasse 1  
8049 Zürich  
Switzerland  
Email: [legal@mmglobalhealth.org](mailto:legal@mmglobalhealth.org)

Or alternatively, scan this QR code to file a complaint:



## 11. Review and Updates

MMGH Consulting GmbH may update this Code of Conduct from time to time. Third Parties will be notified of any material changes. The most current version of this Code of Conduct will be available on MMGH Consulting GmbH's website.

This latest version of the Third-Party Code of Conduct is effective as of December 1, 2025.

Date, Place

Third Party Signature

Code of Conduct Approved by:

A handwritten signature in black ink, appearing to read 'Stephan Melcher', written in a cursive style.