

# DISCLOSURE OF INFORMATION

# HEVERT BUSINESS PARTNERS



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November 2024**



**HEVERT**  
**ARZNEIMITTEL**

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## 1. Company data

### 1.1. Company information

Company name, legal form:	Hevert-Arzneimittel GmbH & Co. KG		
Street:	In der Weiherwiese 1		
ZIP/postal code, Town/city	55569 Nussbaum, Germany		
Postfach:		ZIP/postal code, Town/city	
Phone:	+49 6751-910-0	Fax:	+49 6751-910-150
Date founded:	1956	Web:	www.hevert.com
Place of foundation:	Bad Sobernheim		
Bank reference:	Volksbank Rhein/Nahe/Hunsrück, registered office in Bad Kreuznach		

### 1.2. Company management

Managing Director(s):	Marcus Hevert Mathias Hevert
Head of Finance:	Stephanie Moritz
Division directors:	Aline Beck-Dreschel, Carsten Büttner, Thomas Gutheil, Dr. Tilmann Laun, Thomas Prinz, Dr. Ralf Weirich
Ownership structure:	Parent company: HG Holding GmbH & Co. KG

### 1.3. Company description

Hevert-Arzneimittel GmbH & Co. KG (hereinafter referred to as "Hevert") has been committed to naturopathy and the development of natural medicines for over 65 years and is a German manufacturer of homeopathic and herbal medicines as well as micronutrient preparations and dietary supplements.

Hevert is active in Germany, Austria, United Kingdom, Ukraine, China, Mongolia, India, Colombia, the United Arab Emirates, Luxembourg, the USA and Chile.

Hevert currently employs 196 people<sup>1</sup> and generates an annual turnover of EUR 33.8 million (as of 2023).

Hevert has never filed for insolvency.

## 2. International laws and standards

Hevert has policies and procedures in place to ensure that third parties engaged by Hevert comply with all applicable laws as well as compliance and human rights standards.

Hevert complies with applicable laws, regulatory requirements, and internationally recognized principles, including the United Nations Global Compact Initiative and the OECD Guidelines for Multinational Enterprises.

Hevert complies with the German Supply Chain Due Diligence Act (LkSG), which is based on the United Nations Guiding Principles on Business and Human Rights, the conventions of the International Labour Organization and the United Nations Declaration of Human Rights.

<sup>1</sup> Gender-neutral language is used throughout this document.

### **3. Ethics and governance**

#### **3.1. Corruption/Criminal offenses**

Hevert does not practice or tolerate any form of bribery or corruption.

Hevert has enforced this in a guideline on antitrust law (see also 3.4.) and by measures to prevent corruption and other criminal offenses.

Furthermore, no employee, division director, shareholder, owner, etc. at Hevert has ever been charged with or investigated for a criminal offense, including corruption, bribery, fraud, money laundering or conflicts of interest.

#### **3.2. Whistleblowing**

The German government has passed the Whistleblower Protection Act, which came into force on July 2, 2023.

Accordingly, all companies with more than 50 employees in Germany are obliged to set up an "internal reporting office" to which employees can contact confidentially if they wish to report violations of the law within the company. The internal reporting office is charged with receiving reports, checking their legitimacy and initiating suitable follow-up measures in consultation with the Managing Directors. Confidentiality must be maintained at all times in the process.

In accordance with Section 14 (1) of the Act, the establishment and operation of the internal reporting office can also be outsourced to an external service provider. Hevert has entrusted the bitbase Group with the development and operation of the (outsourced) internal reporting office.

Violations of laws, internal guidelines or the Hevert values system can have far-reaching consequences. There is a risk of fines, claims for damage or the forfeit of profits. This can also result in massive and long-term damage to the company's image.

Hevert employees and business partners can submit reports to the internal reporting office, which is accessible to all Hevert employees via a link on the intranet.

#### **3.3. International trade control**

Hevert complies with applicable export control, sanctions and customs laws and regulations and ensures that neither Hevert nor its stakeholders are on any applicable sanctions list or subject to any embargoes.

#### **3.4. Fair competition**

The Managing Directors and the Advisory Board of Hevert are firmly committed to ensuring that employees comply with the provisions of antitrust law and anti-corruption law in all their activities. They have therefore adopted the following "Antitrust Law Guidelines," which all Hevert employees must sign in recognition of their binding nature. Hevert conducts all business in accordance with fair competition and all applicable competition and antitrust laws.

##### **3.4.1 Guideline on antitrust law**

###### **1. General activities**

- **Internal activities**

Every company employee is obliged to refrain from making suggestions and expressing opinions that are not permitted under antitrust law when communicating internally or writing internal memos and other documents (e.g. draft letters, expert opinions).

- **Activities with third parties**

Every Hevert employee is obligated:

- to make decisions on the basis of uniform and transparent criteria when concluding contracts and to neither demand nor accept personal advantages.

- not to promise or grant personal advantages to employees of customers, suppliers or prescribers in order to promote the conclusion of contracts, regulations or recommendations of company products.
- to refrain from colluding with competitors in the marketing of company products with regard to prices, conditions and market delimitation.

## 2. Events

- At events organized by Hevert (information events, conferences and meetings) and at internal meetings, it must be ensured that:
  - agenda items and meeting documents do not contain any topics relevant to antitrust law.
  - they do not serve to create or promote opportunities to discuss competition-related topics between meeting participants or to reach agreements relevant to competition.
  - the results of the meeting are fully and properly documented, and the meeting minutes do not contain any passages that are inadmissible or misleading under antitrust law.
  - immediate action is taken against spontaneous statements with content relevant to antitrust law and the meeting is adjourned, if necessary.
- At meetings organized by third parties Hevert employees:
  - may not participate if the agenda contains items or documents relevant to antitrust law.
  - must leave immediately if topics relevant to antitrust law are (spontaneously) raised.
  - must ensure and, if necessary, request in writing that their refusal to discuss content relevant to antitrust law is documented in the minutes of the meeting.

### 3.5. Money laundering/terrorist financing

Hevert has internal policies and procedures in place to prevent money laundering and terrorist financing.

#### 3.5.1 Policy on the prevention of involvement in money laundering and terrorist financing

- Objectives
 

The law aims to prevent the infiltration of illegal funds into the legal economy (known as money laundering) and the frequently associated procurement of funds for terrorist activities, i.e., terrorist financing, by means of various measures.

For certain business transactions, commercial goods dealers, art brokers, and art storage companies are obliged by the Money Laundering Act to introduce risk management, comply with customer due diligence obligations and report suspicious cases. Hevert does not belong to any of the sectors listed above, but nevertheless has internal guidelines that are based on the Money Laundering Act.

This policy explains measures to prevent the financing of terrorism and money laundering by means of the German Money Laundering Act (GwG) and beyond.
- Scope and responsibilities
 

This policy applies to all Hevert employees.
- Implementation
  - Definition of money laundering and terrorist financing
 

The technical terms "money laundering" and "terrorist financing" are defined below.
  - What is money laundering?

Money laundering is a process in which the origin of illegally acquired funds (e.g. from robbery, extortion, drug or arms trafficking) is concealed in order to make them appear legal.

- What is terrorist financing?  
Terrorist financing is the acquisition, collection or provision of funds that can be used to support terrorist activities or organizations.
- Measures to prevent money laundering and terrorist financing
  - Risk management (organizational duties)  
Germany's Money Laundering Act stipulates that goods dealers must have an "effective risk management system" only in cases where these transactions are
    - worth at least EUR 10,000 for works of art
    - high-value goods in accordance with Section 1 (10) sentence 2 no. 1 GwG, for which they make or receive cash payments of at least EUR 2,000 by themselves or via third parties.
    - transactions involving other goods for which they make or receive cash payments of at least EUR 10,000 themselves or through third parties.
  - As Hevert does not engage in any of the transactions listed above, the company is not obliged to have an effective risk management system, but does provide an internal risk management system.
  - This internal risk management system has the following protective measures:
    - Transfers of amounts outside the internal system-controlled approval process are made only after consultation with the management.
    - Prevention of phishing e-mails and their effects (payment requests) by limiting banking authorization exclusively to selected persons in the Finance department.
    - Domestic and international payments are made, managed and controlled securely using the Profi cash banking software.
  - Customer-related duties of care  
If circumstances/transactions or facts described above occur that indicate money laundering or terrorist financing, these will trigger customer-related due diligence obligations for commercial goods dealers, art brokers, and art storage companies. As already described in the previous item, Hevert does not enter into any of these transactions.  
However, the company enforces the following customer-related obligations:
    - Identification of contract partners
    - Identification of messengers or authorized representatives acting on behalf of the contract partner and checking their authorization, e.g. power of attorney
    - Identification and determination of beneficial owners
    - Monitoring of business relationships

For verification of beneficial owners, since 2018 there has been a "transparency register" to make it easier for obliged companies to identify themselves.

In addition, Hevert submits a query to the service company Creditreform to identify contract partners and foreign customers.
  - Suspicious activity reports  
If there is any suspicion of a financial transaction in connection with money laundering or terrorist financing, please contact the following:  
General Customs Directorate  
Central Office for Financial Transaction Investigations (FIU)  
Postfach 85 05 55

### 3.5.2 Conflict minerals

Hevert does not sell any products that contain conflict minerals and materials that directly or indirectly finance or benefit armed groups and cause human rights violations.

### 3.6. Animal welfare

Hevert attaches great importance to animal welfare and does not test on animals.

### 3.7. Information security, data protection

Hevert protects all information with regard to confidentiality, integrity and availability in accordance with the required level and the applicable international information security standards.

All applicable data protection laws are complied in particular with regard to personal data of consumers, customers, employees and shareholders, when data is collected, stored, hosted, processed, transferred, used or deleted.

Hevert undertakes to protect and use confidential information appropriately and to comply with all contractual requirements for data protection and information security and not to disclose any information that is not publicly known.

### 3.8. Politics

No government officials, former government officials, party officials, candidates for political office or relatives of such persons work at Hevert, nor do any of these persons have an interest in Hevert. Hevert does not maintain contacts with government officials and/or will not do so in the provision of services.

## 4. Compliance

Hevert has a corporate compliance management system and compliance guidelines to ensure that the company complies with applicable laws and regulations.

Employees at Hevert have signed the following provisions:

### 4.1. Corporate compliance

The term "corporate compliance" refers to the entire category of all reasonable measures that establish the compliant behavior of a company, its organizational members and its employees with regard to all legal requirements and prohibitions. Furthermore, entrepreneurial behavior should meet all social guidelines and values, morals and ethics.

Hevert wants to be successful in competition through competence, quality and reliability. In this process, company-specific and legal regulations must be met. These include:

- Awareness of and compliance with applicable laws and regulations
- Respectful and inclusive dealings with colleagues and customers
- Environmental protection and sustainable use of resources

Hevert invites all employees to use the necessary sources of information and offers consultation to prevent violations of laws and regulations. In addition, the Hevert Mission Statement, the basic principles for leadership and cooperation, and the Corporate Behavior Policy are just a few examples of the guidelines for cooperation, professional interaction and environmental responsibility.

The following content is intended to supplement these existing principles in the area of corporate compliance. They highlight focal points that are of particular importance in business practice.

#### 4.1.1 Pharmaceutical industry – transparency requirement

Hevert stands for transparency, trustworthiness and reliability in the collaboration with health care practitioners, pharmacists, patients and other healthcare partners.

The pharmaceutical industry is often publicly criticized of unduly influencing physicians and others in the healthcare industry. Integrity and the focus on a purely professional exchange with various cooperation partners in the healthcare sector apply to cooperation with external stakeholders at Hevert.

In this context, Hevert initiates and supports numerous events to promote the continuing education of physicians and other cooperating partners and to facilitate the exchange of scientific information. Hevert concentrates on professional discussions; leisure activities are never the main focus, but at most complement an event in an appropriate manner.

The principles of cooperation with our partners are set out in the Hevert Mission Statement and are available for viewing on the Hevert website.

#### 4.1.2 Gifts

People enjoy receiving gifts and often deserve them because they have fulfilled a task above and beyond the normal level of commitment. Gifts are therefore permitted at Hevert, as long as they are within reasonable limits.

## 5. Human rights and fair working conditions

Hevert has implemented measures within the company to comply with human rights, environmental and sustainability laws and the conventions of the International Labour Organization (ILO) and respects the UN Declaration of Human Rights.

### 5.1. Prohibition of forced labor and disciplinary measures

Hevert does not tolerate any form of forced labor such as slavery, prison labor or other forms of forced labor. All work must be voluntary. Hevert does not use practices that force employees to work or prevent employees from leaving the employer. Psychological or physical coercion and the use of security forces to support such practices are prohibited. Hevert does not take any disciplinary measures that are not permitted by law and does not withhold any personal identification documents.

### 5.2. Ban on child labor

Hevert does not tolerate child labor. Hevert does not employ children under the legal school-leaving age and in no case under the age of 14 (or in accordance with national legislation if the minimum age is higher). Any form of exploitation of children is prohibited. Working conditions that are similar to those of slavery or that harm the health of children are prohibited. Hevert complies with the national regulations for the protection of young employees.

### 5.3. Freedom of association and collective bargaining

Hevert respects the right of all employees to form and join trade unions and to engage in collective negotiations or the right to strike. Preventive or obstructive measures that serve to impair this right will not be tolerated by Hevert. In countries where the right of assembly and collective bargaining is restricted by law, it will provide alternative ways of organizing and negotiating independently and freely. Employee representatives have free access to the workplaces of their members.

### 5.4. Wages and working hours

Every employee receives a legally valid employment contract. Employees receive at least the statutory minimum wage or industrial wage or an appropriate wage in the region in order to be able to earn a living. Employees are paid on time and on a transparent basis.



Working hours comply with statutory regulations or the industry standard, whichever is stricter. The maximum weekly working hours permitted under national legislation apply. Overtime may be worked only on a voluntary basis, and measures to avoid excessive physical and mental fatigue and rest breaks must be implemented.

#### **5.5. Prohibition of discrimination**

Hevert does not tolerate harassment, threats or intimidation of any kind. Equal treatment and equal opportunities must be guaranteed, and the diversity of employees must be valued. Hevert selects its employees on the basis of their skills and talents and does not accept discrimination with regard to ethnic origin or nationality, race or skin color, age, gender or sexual orientation, religion or beliefs, disability or other characteristics protected by law.

#### **5.6. Occupational health and safety/law**

Hevert offers its employees fair working conditions and rejects all forms of child labor and forced labor. Hevert also confirms that no discrimination, harassment, or intimidation will be tolerated. Equal treatment and diversity of employees is valued.

Hevert complies with the regulations for establishing and maintaining a safe working environment (in particular the Working Hours Act and the Occupational Health and Safety Act) as well as the health and safety guidelines and conducts regular training courses on occupational safety.

## **6. Environmental responsibility**

### **6.1. Corporate social responsibility**

Hevert complies with all applicable environmental laws, standards, and regulations.

Hevert publishes a sustainability report every year (see [reports on corporate social responsibility](#)).

Hevert also has environmental protection guidelines, programs, and training courses for employees to improve environmental protection. Hevert offers its employees a variety of programs and training courses as part of our corporate social responsibility.

### **6.2. Livelihood**

Everyone's livelihood must be secured. Harmful soil changes, water and air pollution, harmful noise emissions or excessive water consumption that significantly impair the natural basis for the preservation and production of food, impede access to drinking water or sanitary facilities or are harmful to health are prohibited. In addition, the unlawful clearance and use of land, forests, and waters for the purpose of acquiring, developing, or otherwise using them is prohibited if their use secures a person's livelihood.

### **6.3. Pollutants and waste**

In particular, Hevert implements procedures and standards for waste management (including the ban on the export and import of hazardous waste in accordance with the Basel Convention), the handling of chemicals and other hazardous substances (e.g. mercury-contaminated products in accordance with the Minamata Convention) and their disposal.

Hevert has no persistent organic pollutants (POPs) in any of its products or manufacturing processes. Mercury or mercury compounds are contained in few Hevert products in homeopathic doses.

Hevert has a system in place to identify and eliminate potential environmental hazards, dispose of waste in an environmentally conscious manner, and avoid the use of toxic raw materials.

## 7. Confirmation


We hereby declare that all information contained in this document is true and correct.

Nussbaum, November 18<sup>th</sup>, 2024

Place, date

Marcus Hevert, Managing director

Name, position

  
Marcus Hevert (Nov 18, 2024 10:40 GMT+1)

Signature

Mathias Hevert, Managing director

Name, position

  
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Signature