

*Please note: This is not an official translation. In case of doubt, the German version shall prevail.*

## Code of Conduct

### Verhaltenskodex



***Please understand that internal links are not publicly available. However, we are happy to assist you with any questions you may have using the contact information provided below.***

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## 1. Foreword

The legal framework in the healthcare sector is subject to constant change, and social and technological developments create additional new challenges.

At **LMU Klinikum**, our public service mandate combines university research, excellent patient care, and teaching at the highest level.

We are aware of the responsibility that comes with this. This Code of Conduct reflects our shared values and fundamental principles and is intended to promote awareness and understanding of both legal and ethical risks. It is also intended to serve as a guide and resource for addressing legal and ethical concerns and uncertainties.

## 2. Scope

This Code of Conduct applies to everyone at **LMU Klinikum**, including all employees, managers and members of the Executive Board, as well as the subsidiaries of **LMU Klinikum**. It serves as a standard for legally and ethically appropriate conduct.

Given the broad scope of business and medical activities at a university hospital, this Code of Conduct does not constitute an exhaustive set of rules and is supplemented and clarified by additional documents. Specific provisions in laws, regulations, collective bargaining agreements, service agreements, internal guidelines (in particular procedural instructions, safety and quality regulations), etc., remain unaffected. It serves as a guide for us in our daily work. Only if we all adhere to these rules of conduct—act in a “compliant” manner—will we continue to be perceived by patients, business partners, and the public as a partner of integrity and reliability.

## 3. Responsible employer

**LMU Klinikum** is a responsible employer.

Compliance with legal, collective bargaining, and internal labor law requirements is a matter of course for us.

## 4. Interpersonal relations

People from a wide variety of nations and religions work together at **LMU Klinikum**. Discrimination or disadvantage, particularly on the basis of origin, religion, worldview, gender, sexual orientation or age, will not be tolerated.

We foster an appreciative, respectful and open approach to one another, regardless of hierarchical relationships.

We respect the dignity, individuality and privacy of every person.

## 5. Interaction with patients

At **LMU Klinikum**, the dignity and well-being of our patients are our top priority. We treat them with respect and consideration and inform them clearly, empathetically and in a timely manner about planned procedures. The measures to be taken are based on individual needs and the severity of the illness.

## 6. Dealing with contractual partners / collaborations

Business partners are treated fairly and respectfully. Collaborations must be in writing and are entered into only with reputable partners who also uphold our values and goals. They are based on objective criteria and are not guided by personal interests.

As a public-law institution, we comply with legal regulations regarding public procurement law as well as internal procurement guidelines.

We do not tolerate any business conducted through unfair means. Therefore, no benefits may be offered, promised, or granted—either directly or indirectly—that even appear to be capable of influencing objective and fair decisions.

Our [anti-corruption guidelines](#) must be followed.

## 7. Culture of accountability

Mistakes are a part of life and sometimes unavoidable. This makes how we deal with them all the more important. If a mistake occurs despite all due care, it is not ignored at **LMU Klinikum**. Only a transparent approach to mistakes allows us to analyze them and thereby minimize any consequences and prevent future harm.

We ensure this through a centralized quality and risk management system, which also includes the so-called CIRS (reporting of near misses).

We report serious or grave violations of this Code, as well as of the supplementary documents and legal regulations. For more information, please refer to Section 18 of this Code of Conduct.

Further information can be found on the [intranet page of the Quality and Risk Management Department](#).

## 8. Quality and (workplace) safety

High quality and excellent performance form the foundation of our university-based patient care. Concrete patient benefit and medical efficacy serve as the criteria for selecting diagnostic and therapeutic approaches. All tasks are performed exclusively by qualified personnel within the scope of their responsibilities, while strictly adhering to hygiene and safety regulations.

We are mindful of our responsibility for the health and safety of our employees in the workplace. We take all appropriate and legally required precautions. In addition, we comply with all applicable standards and internal guidelines to ensure that workplaces at **LMU Klinikum** provide a safe working environment.

Further information can be found on the [intranet page of the Security Office](#).

## 9. Conflicts of interest

Conflicts of interest are often the gateway to corruption and, at best, offer only short-term benefits to those involved. Situations that carry an increased potential for such conflicts should not arise in the first place. Secondary employment is particularly likely to foster conflicts of interest. For example, a long-standing and close working relationship can cause conflicts of interest. Therefore, all secondary employment must be disclosed transparently, with full details provided, before it begins. It is essential to avoid any conflict between professional and private (financial) interests.

If, as employees, we are in a position to potentially influence business relationships between **LMU Klinikum** and other business partners, we must disclose this fact early and in full.

The [anti-corruption guidelines](#) must be observed.

## 10. Benefits, gifts, hospitality, invitations

The permissibility of accepting gifts or other benefits is governed by the provisions of collective bargaining agreements or civil service law. These provisions consistently stipulate that employees may not accept gifts or other benefits related to their work. Exceptions to this are only possible or permissible with the employer's consent.

Consequently, we do not accept any gifts or other benefits. Should we be confronted with such a situation, we will report it.

Detailed regulations on this topic can be found in the [principles on the acceptance of benefits of monetary value](#), the [guidelines on the financing of entertainment expenses and tokens of appreciation](#), and the [anti-corruption guidelines](#).

## 11. Sponsorship and donations

Sponsorship refers to the support of scientific or social causes in the form of monetary contributions, in-kind donations, or services provided by companies or individuals, whereby the sponsor pursues its own promotional objectives. This must not compromise the independence and neutrality of **LMU Klinikum**.

Donations are voluntary contributions of money or goods made by a company or an individual free of charge to support eligible causes (promotion of research and teaching, education and continuing education) without any consideration in return.

We may accept donations and sponsorship contributions. In doing so, we strictly adhere to internal guidelines. Detailed regulations and forms can be found on the [intranet pages of the Legal and Compliance Department](#) and the [Finance Department](#).

## 12. Finance and accounting

All documentation, accounting, and data recording must be complete, proper, and accurate. We perform our duties in accordance with the principles of legality, efficiency, appropriateness, economy and transparency, and we use the financial resources of **LMU Klinikum** responsibly and economically.

We always carry out the billing of services, as well as budgeting, bookkeeping and financial reporting and manage records, cash and receipts in a complete, correct, clear and traceable manner and document these processes. We always comply with legal and professional regulations.

## 13. Research and teaching, handling of third-party funding

At **LMU Klinikum**, as the university hospital of Ludwig Maximilian University of Munich, academic research and teaching are inextricably linked. Legal and ethical standards of good scientific practice ("good clinical practice") are always followed; scientific misconduct is not tolerated.

In third-party funded research, we ensure in particular the appropriateness and balance of services and consideration, as well as the independence of the research. The selection of a contractual partner is therefore made exclusively based on the intended scientific objective. We do not allow ourselves to be guided by personal interests in this regard.

To this end, we adhere to the [guidelines for the management of third-party funds](#).

## 14. Sustainability

We are committed to sustainable business practices in accordance with the United Nations Sustainable Development Goals to enable a dignified life worldwide and to permanently preserve the natural foundations of life. As part of our [sustainability efforts](#), we contribute by minimizing the adverse impacts of our actions on the climate and natural resources throughout our value chain and by assuming social responsibility for our employees and our patients.

This also includes respect for human rights in accordance with the UN Guiding Principles on Business and Human Rights (and other frameworks). We also expect this from our suppliers of goods and services. **LMU Klinikum** has adopted a [policy statement on corporate due diligence in supply chains](#) and requires its suppliers to adhere to a [code of conduct for contractors](#). We act in accordance with this statement. As employees and affected parties in the supply chain, we report violations through the established, publicly accessible [complaint channel](#).

## 15. Data protection and confidentiality

Data protection and compliance with confidentiality are fundamental principles.

We collect, process and use patient, personal and business-related information and data only to the extent necessary for the lawful performance of our duties. We comply with all data protection regulations and [privacy policies](#).

Strict confidentiality is a matter of course. We protect data not intended for disclosure to third parties from misuse.

## 16. Property of LMU Klinikum and export control

All property, possessions, and other assets may generally be used only for official purposes. Use for private purposes is not permitted. When using resources and equipment (e.g., telephone, computer, internet), we adhere to the specific regulations in place for this purpose, particularly our internal guidelines.

The inventory and facilities of **LMU Klinikum** must be handled with care. We protect them from loss, damage and theft. Intellectual property and company data are also protected.

We commit to handling the property, assets and other resources of **LMU Klinikum** with care in accordance with export control regulations. We are aware of the risks associated with dual-use goods (goods that can serve both civilian and military purposes) and safeguard the interests of **LMU Klinikum** and the Federal Republic of Germany.

## 17. Communication with the public

Communication with the public and the media on behalf of **LMU Klinikum** is conducted exclusively by the Executive Board or by persons who are functionally authorized or expressly commissioned for this purpose. Any employee not authorized to communicate publicly must make it clear that he or she is speaking as a private individual. We forward all media inquiries to the Communications and Media Office.

Detailed regulations on this matter and on the use of social media are published on the [intranet page of the Communications and Media Office](#).

## 18. Compliance / implementation / notification

Compliance with the provisions of this Code of Conduct is the personal responsibility of each individual employee. All managers must ensure that their employees are familiar with the content of the Code of Conduct and are thus enabled to act accordingly.

Since a comprehensive overview is not possible due to the diversity of daily work activities, we encourage employees to ask themselves the following questions whenever in doubt:

- Does it feel right?
- Does my behavior comply with the principles and guidelines of **LMU Klinikum**?
- Could the situation potentially influence my decision?
- Do I feel obligated to do something because of my relationship with the third party?
- How would an outside third party (e.g. the press) judge my behavior?
- Could the consequences of my behavior harm the reputation of **LMU Klinikum**?

Non-compliant behavior harms not only the individual but also the reputation of **LMU Klinikum**.

Therefore, all employees are required to report serious or grave violations of this Code, as well as the supplementary documents and legal regulations. Reporting such incidents does not constitute a denunciation. Only through reporting can misconduct be uncovered, remedied, and appropriately punished—regardless of the person or their position—and serious consequences averted.

To this end, we at **LMU Klinikum** have established an internal reporting office in accordance with the Whistleblower Protection Act. All reports received will be treated with strict confidentiality.

You can contact the reporting office [here](#).

In addition, the following restricted-access email address is available to you:

[meldestelle@med.uni-muenchen.de](mailto:meldestelle@med.uni-muenchen.de)

However, in many cases, simply reaching out to the appropriate supervisor is also effective.

## 19. Contact Persons

If you have questions about appropriate conduct, your immediate supervisor is your first point of contact.

If you have questions about the Code of Conduct or uncertainties regarding its application or interpretation, please contact the Legal and Compliance Department, Division II Compliance.

## Contact:

Abteilung Recht und Compliance, Referat II – Compliance  
Marchioninstr. 15, 81377 München

## Contact:

**Nicole D'Este**, Head of the Compliance Unit  
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**20. Effective Date**

This Code of Conduct enters into force upon signature.

München, den 31.07.2025



Prof. Dr. Markus Lerch  
Ärztlicher Direktor



Prof. Dr. Thomas Gudermann  
Dekan der Medizinischen Fakultät



Markus Zandler  
Kaufmännischer Direktor



Carolin Werner  
Pflegedirektorin