

Mölnlycke Code of Conduct



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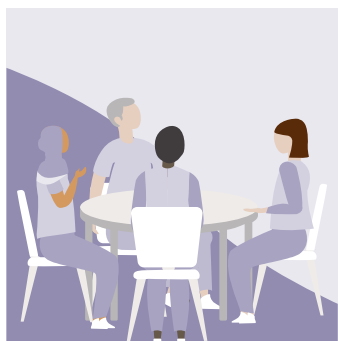
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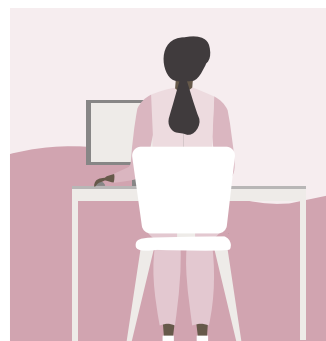
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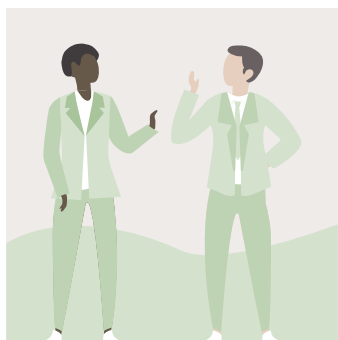
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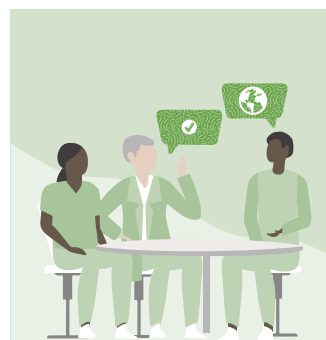
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Dear colleagues,

At Mölnlycke, we have a reputation for producing high-quality products and having integrity. Our products and integrity are our most valuable assets after you and all our colleagues who showcase high standards and integrity daily. We have earned this reputation by fulfilling our purpose to revolutionise care for people and planet while adhering to our principles for nearly two centuries.

Our Code of Conduct defines the principles by which we run our business, the Mölnlycke way, by outlining our commitment to fairness, ethical behaviour, and integrity in all our dealings. Our Code of Conduct guides our daily actions and decisions, establishing the standard for our collective behaviour and culture. This helps us navigate an increasingly complex business environment and make the right decisions.

At Mölnlycke, we go beyond policies and written statements – we embed an integrity mindset throughout the company. To us, acting with integrity means being trustworthy, accountable and fair and doing business ethically and sustainably.

Upholding our Code of Conduct is crucial to being a responsible corporate citizen, creating sustainable value for all stakeholders, and establishing a culture that fosters trust, innovation, and collaboration. A culture where everyone can express their opinions and bring their best selves to work. It is up to all of us to be alert, identify potential integrity risks and opportunities, and course-correct if necessary.

We care, for patients, the planet, society, and each other. This is the Mölnlycke way. I appreciate your commitment and thank you for maintaining our valuable reputation!



Kind regards,
Zlatko Rihter, CEO



Introduction

As a world-leading medical products and solutions company, we want to create value and contribute to the societies where we do business. Our desire to help patients and healthcare professionals (HCPs) to achieve the best possible outcome is always at the core of what we do. We deliver on this commitment through uncompromising integrity.

Mölnlycke aims to act in a socially responsible way and promote ethical conduct. Our Code of Conduct sets out how we expect our employees to behave to best represent the company and live our values. It reflects our commitment to ethical behaviour and how we treat each other and our stakeholders. Mölnlycke is signatory to the United Nations Global Compact and our Code participates in incorporating the Ten Principles of the UN Global Compact in our ways of working. The Code also describes what it means for Mölnlycke to conduct business with integrity: we comply with applicable laws, regulations and medical device industry standards. As we do this, we apply an ethical business mindset:

- ✓ **Be respectful, inclusive and fair.**
- ✓ **Protect our brand and reputation.**
- ✓ **Think about how our stakeholders and the public will react to, or be affected by, the way we do business.**

Although the Code provides an overview on how to do the right thing and make ethical decisions, it can't cover every situation. For more detailed guidance, employees can consult their manager, contact the Business Ethics Compliance team, or look at our policies and procedures. Further information can also be found on the Hub.

Third parties

In addition to this Code, we have a Supplier Code of Conduct and a Distributor Code of Conduct. These reinforce our commitment to business ethics and compliance throughout our supply and distribution networks, and provide specific guidance relevant to each group.

Purpose and values

Our purpose is the reason we exist and a compass for the future. It guides our culture, our strategy and our innovations process. Revolutionise care for people and planet means that we drive change that improves the health and well-being of patients and those who care for them while reducing the environmental footprint of healthcare.

Our values are:



Be bold

At Mölnlycke we have always encouraged exploration. We have the courage to disrupt the status quo and shape the future. We act decisively, continuously challenging ourselves and the industry norm. And we embrace risk as a natural part of breaking new ground.



Lead with passion

Passion is at the heart of everything we do. It fuels our creativity, encourages us to tackle challenges with enthusiasm and continuously seek ways to improve performance.



Embrace partnership

We cultivate a diverse and inclusive environment that inspires and empowers partnerships, external and internal. Where different perspectives can thrive, meet and give birth to new ideas. By embracing partnerships we build a sustainable company fit for the future.



How to use the Code of Conduct

- This Code of Conduct has been adopted by the Mölnlycke Board of Directors to guide our employees in taking an ethical approach to all business activities.
- It's every employee's responsibility to read the Code, follow it, and ask for clarification from their manager or the Business Ethics Compliance team if needed.
- The expectations in the Code apply to all employees at all levels, including the Board and the Executive Leadership Team. It applies to everyone who represents Mölnlycke, including permanent and temporary workers, and consultants, collectively referred to as Mölnlycke employees throughout the Code.
- Any breach of our Code may result in disciplinary action, including termination of employment.

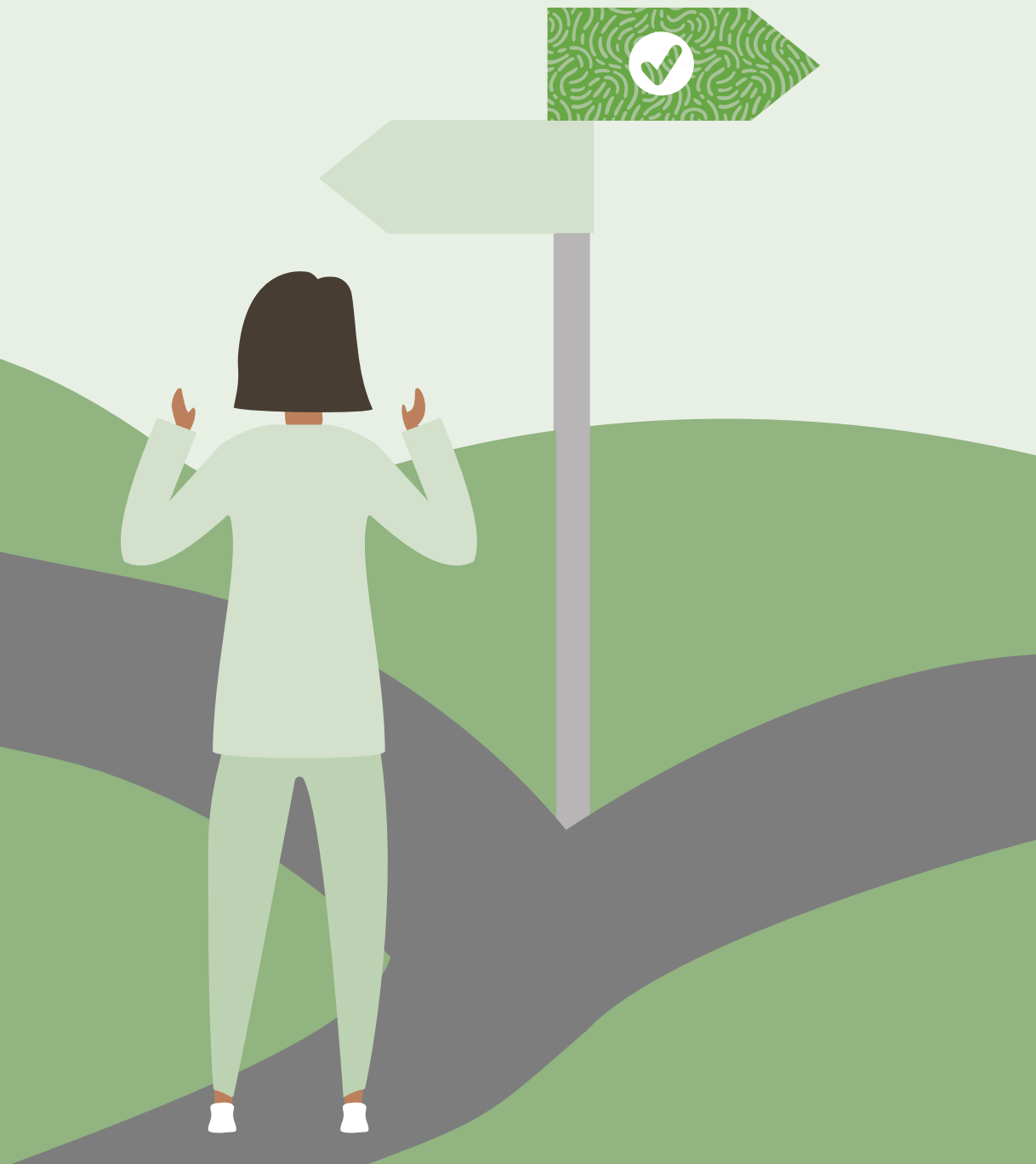
Manager's spotlight

Managers have additional responsibilities in relation to the Code, including leading by example, demonstrating the desired behaviour, and being the first point of contact for raising questions or concerns.

One way to promote an ethical culture is to regularly talk with your team about the Code and set clear expectations.

- Make sure that your team is familiar with and understands the Code.
- Be a role model in your own behaviour and in following the Code and its spirit.
- Promote our Code and values and emphasise the importance of doing the right thing and demonstrating ethical behaviour. Provide concrete and actionable examples of what this means in your team.
- Encourage people to speak up when they have a concern.
- Listen carefully when someone raises a concern and provide information to the Business Ethics Compliance team to make sure it is followed up appropriately.





1.1

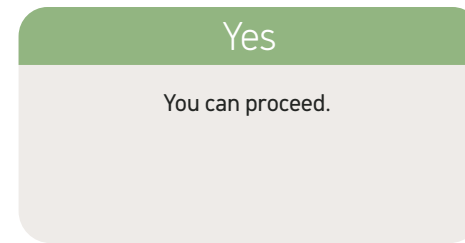
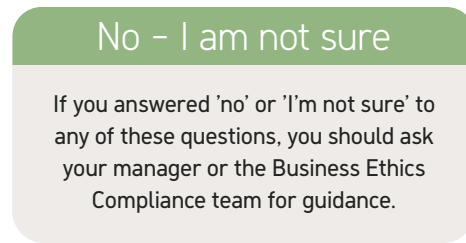
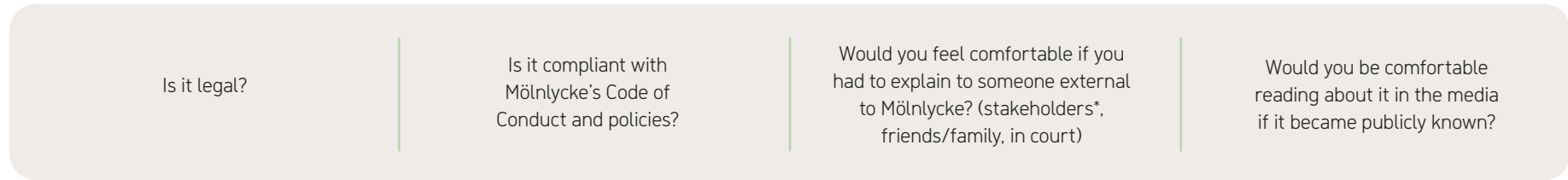
Ethical decisions

Making a decision is part of everyone's work at Mölnlycke. When we make the right decision, in line with our values and ethics, it reinforces our commitment to integrity. But knowing the ethical thing to do can sometimes be difficult. To help with this, we have identified key questions to ask to assess the action that's planned and how it could impact our stakeholders. If there is any doubt, employees should reach out to their manager or the Business Ethics Compliance team.

Acting with integrity – the key questions to ask yourself to make the right decision

Always consider the risks linked to the actions and decisions you make.

More detailed guidance on identifying and assessing risks can be found on the Hub.



*Stakeholders are persons or organisations that have an interest in Mölnlycke: our customers, our owners, our employees, our distributors, our suppliers etc



1.2

Speak up, we listen

At Mölnlycke, we encourage all employees to uphold our culture of integrity and trust. That means we must be willing to speak up – asking questions when we are curious, seeking advice when we are uncertain, and raising concerns when we suspect that any laws or regulations have been broken, or that our Code or company policies have been breached.

A culture that encourages healthy challenge and constructive questioning builds resilience and means that our company is always ready to understand and evaluate the impact of our decisions. It keeps us aware of potential risks and vigilant about any misconduct that might occur. Not only is this the right thing to do, it also helps us to reduce our risks and gain a competitive advantage.

Definitions

Retaliation

A hostile action or behaviour against a colleague who raises a concern, has a critical viewpoint, reports misconduct or is a witness in an investigation. Examples include demoting an employee involved in an investigation, assigning them mundane tasks, excluding them from team activities, bullying or threatening them.



Possible scenarios

You suspect someone of bribing a doctor by providing gifts and luxury entertainment that are not allowed. What should you do?

- Speak up! You must immediately report your concerns. You can either contact a Compliance Officer or use the Ethics Hotline. If you are within the European Union, you might also have a local channel you can use to make a report.
- If you're in any doubt, go to the Hub, where you'll find detailed guidance.

You are contacted by an investigator who is looking into suspicions of harassment against your manager. They would like to interview you as a witness. What should you do?

- Answer truthfully, stating what you know for a fact.
- Keep the matter confidential, both before and after your interview.
- If you fear or experience retaliation from your manager, you should contact the Ethics Hotline or discuss the matter with the investigator.

Zero tolerance for retaliation

Mölnlycke does not tolerate retaliation against an employee who raises a concern in good faith. If you experience it or witness it, you should report it immediately to the Business Ethics Compliance team or the Ethics Hotline. Managers or other employees who retaliate will be held accountable in line with our policy and procedures. We manage any retaliation risk proactively, for example by reaching out to employees who have been involved in an investigation (as reporter or witness) and checking on their well-being after the investigation has concluded.

Any employee who raises a concern in good faith acts in the interest of Mölnlycke, and doing so deserves positive acknowledgment. Mölnlycke does not tolerate false allegations made with the intention to hurt someone's reputation or to be malicious.

What does this mean for you?

- ✓ Speak up when you have a concern or if you witness or strongly suspect a breach of Mölnlycke's Code of Conduct, our policies, or the law.
- ✓ Make sure you're familiar with the channels that you can use to raise concerns.
- ✓ Use the Ethics Hotline to report an issue anonymously.
- ✓ If you're questioned as part of an investigation, you must keep all matters confidential.
- ✗ Never retaliate against anyone for raising a concern or participating in an investigation.
- ✗ Never attempt to conduct an investigation yourself.
- ✗ If you suspect that there's an internal investigation going on, do not try to uncover what it is about or who is involved.

Manager's spotlight

- Make sure you regularly talk with your team about the importance of speaking up and share information on the different ways to report concerns.
- Look at the resources available on the Hub for tips on fostering a speak-up culture within your team.

Making a report

Mölnlycke employees and external stakeholders are encouraged to report any concerns they might have regarding any wrongdoing or a behaviour that goes against the law, our Code of Conduct or our policies and procedures. If you have a concern, you can report it in person, on the phone, in writing or online.

If you're unsure about anything, you can reach out to your manager, the Business Ethics Compliance team, or a People Partner at any time. They will be able to give you guidance or answer any questions you have.



How do I report my concern?

You can choose any of the reporting channels shown on this page, depending on which you feel most comfortable with.



Ethics Hotline

Investigations

At Mölnlycke we strive to foster a culture where everyone can speak up and where the concerns raised are taken seriously, investigated and addressed and where the employees are supported. We have dedicated processes to investigate concerns raised through any of the channels. Both issues and investigations will vary, but the main steps of an internal investigation are the same.



1 A report is submitted through one of the dedicated channels.



2 Investigators review the report and assess the level of severity and the risks it might present.



3 Investigators prepare a plan, including who needs to be interviewed and the facts that need to be gathered. The plan is reviewed and approved by our Ethics Hotline Committee before the investigation can start.



4 After the plan has been implemented and the investigation carried out, investigators present the findings to the Ethics Hotline Committee. A report and recommendations are then presented to management.



2.1

Diversity, equity and inclusion in the workplace

Mölnlycke is a dynamic and diverse organisation, composed of a rich mix of employees with different backgrounds, experiences and perspectives. We firmly believe that diversity is our strength because it drives creativity, innovation and better solutions for our internal and external stakeholders.

Mölnlycke is committed to creating an inclusive environment where every employee feels valued and respected for who they are – regardless of their culture, age, gender, religion, language, nationality, ethnicity, disability, sexual orientation, education, occupation, or socio-economic background. The company does not tolerate any form of discrimination, bullying or harassment.

We're dedicated to ensuring all employees have equitable compensation, benefits, and opportunities for growth and advancement. Our approach is based on merit, performance, potential and experience, rather than personal characteristics. Mölnlycke believes that our employees are our most valuable asset. We're committed to supporting their professional development and helping everyone achieve their full potential.

Definitions

Discrimination

The practice of treating one person or group of people less fairly than other people, based on their background or characteristics such as ethnicity, sex, age or disability.

What does this mean for you?

- ✓ All employees are encouraged to build relationships based on respect, mutual trust and inclusion.
- ✓ Always try to see the positive intent in your colleagues' behaviour and be open to different perspectives and opinions.
- ✓ Encourage diversity within your teams and see it as an opportunity to work towards better outcomes.
- ✓ Speak up if you see behaviours that are not aligned with the company culture and our principles of diversity, equity and inclusion, or which you believe constitute bullying, harassment or discrimination.



Manager's spotlight

- Lead by example and create a work environment that fosters respect and inclusivity by setting a positive tone and attitude.
- Actively seek to attract, develop and retain diverse talent, and be aware of the existence of unconscious bias when making decisions.
- Create opportunities to talk about diversity, equity and inclusion with your teams, encouraging open and honest dialogue about different perspectives.
- Celebrate diversity in the workplace and seek to include everyone's opinion.

Possible scenarios

You have recently been assigned to a new project, and will be working with a very diverse group of people. You notice that team members have different opinions and, as a result, it takes a lot of time to discuss and agree on every single task. What should you do to make the best of this opportunity, and ensure the project delivers on time?

- Think of creative ways to collect opinions in advance to help maximise the time you have together in project meetings.
- Remember: a diverse group of people ensures that more perspectives and scenarios are considered and that a better outcome is achieved.

You notice one colleague consistently interrupts and talks over other colleagues in meetings. What should you do?

- Consider addressing the behaviour in a respectful and non-confrontational way by saying something like: 'I've noticed that you often interrupt and talk over people in meetings. It can be difficult for them to share their thoughts and ideas when they are constantly interrupted. Let's try to give everyone an opportunity to speak.'
- If you are uncomfortable bringing up the issue directly with the colleague, you can bring it up with your manager or People Partner. They can investigate the situation and take appropriate action to make sure our workplace remains inclusive and respectful.



2.2

Fair working conditions

At Mölnlycke, we are committed to providing fair working conditions that prioritise the safety, health, and well-being of our employees. The company strives to comply with all relevant labour laws and regulations in the countries where we operate. We make sure our employees receive fair compensation and benefits that meet or exceed legal requirements on minimum wage, overtime and other employment regulations.

Mölnlycke respects and recognises the right of all employees to join or form a union or other association to represent their rights. We also respect employees' right to bargain collectively and aim to maintain an open dialogue with our employees, either directly or through their unions or associations. Employees in all parts of the business need to be at least 15 years old. Employees under the age of 18 must not be employed in any hazardous work. We do not tolerate forced labour in any form. This includes situations where government-issued documents, such as passports and identity cards, are withheld.

Mölnlycke understands the importance of work-life balance in promoting employee well-being and productivity, and seeks solutions that support employees' needs, such as the Employee Assistance Program (EAP). Wherever possible, we strive to offer flexible working arrangements to help employees balance their personal and professional lives.

Definitions

Employee Assistance Program (EAP)

This is a confidential and voluntary program that provides resources and services to help employees address personal or work-related challenges that may affect their mental health, emotional well-being, or overall quality of life. Through our EAP, we offer professional assistance and support to employees facing a wide range of issues including stress, anxiety, depression, substance abuse, relationship problems, financial concerns, legal issues, parenting challenges, and more.

Possible scenarios

You have read through your employment contract and don't understand some of the terms. What should you do?

- Talk to your manager if you have questions or concerns about your contract.
- Contact internal experts in employment law via the Mölnlycke Service Portal (MSP).

You have been working long hours consistently for several weeks. You're feeling tired and unmotivated. What should you do?

- Talk to your manager or People Partner.
- Ask for a clear explanation of the company's policies around overtime in your country, and for alternative ways to handle your workload.
- Contact our Employee Assistance Program for support and guidance on dealing with work-related stress.

What does this mean for you?

- ✓ You should prioritise your own and your colleagues' safety, health, and well-being. (See section 2.3 for more on health and safety.)
- ✓ All employees, as required by law in their respective countries, must have a written and legally binding contract.

Manager's spotlight

- As a manager, you should lead by example and prioritise the safety, health, and well-being of your team members.
- You must ensure compliance with all relevant labour laws and regulations in the countries where your teams are based.
- Encourage open communication and feedback from employees on workplace conditions and work-life balance, and strive to offer flexible working arrangements wherever possible to promote employee well-being and productivity, in line with company guidelines.
- Inform your teams about the options offered by the Employee Assistance Program and encourage them to use it.



2.3

Occupational health and safety

As a responsible employer, Mölnlycke works to establish a culture of care for all of our employees. This starts with a commitment to safety.

Our ambition is to achieve zero injuries and harm through a high level of occupational health and safety (OH&S) performance, standards and capability.

All Mölnlycke employees are encouraged and empowered to contribute to a positive OH&S culture. We have health and safety committees, made up of managers, safety responsables and works council or employee representatives, at all our manufacturing locations and HQ sites.



Definitions

Occupational health and safety (OH&S)

Practices that aim to prevent physical and mental work-related injuries and illnesses, and promote workers' health.

The Mölnlycke safety principles

A set of eight principles with a golden rule of 'Stop if unsafe conditions or behaviours are present'.

The eight principles are:



Be aware

Pay attention to your surroundings. Do not rush. Stop if you're distracted or in an unsafe condition.



Ready to work

Ensure you have the capability, permit, and training for the task, and have reviewed the relevant risk assessments. Do not work under the influence of drugs or alcohol.



Clean for safety

Maintain good housekeeping to eliminate hazards.



Respect machines

Check guarding and isolation, review risk assessments, then operate within procedures. Never override safety controls.



Stop

If unsafe conditions or behaviours are present.



Communicate

Highlight unsafe conditions, acts or behaviours. Inform others about hazards and listen to warnings.



Handle carefully

Correct posture protects your health. Follow the Mölnlycke global program for safe manual handling (the Pristine principles).



Drive safely

Follow all rules and be careful, whether you're in your own car, a forklift or a manual truck.



Protect yourself

Wear the proper personal protective equipment (PPE) correctly at all times and ensure it's in good working order.

What does this mean for you?

- ✓ You must report any work-related injury or ill health to your manager without delay.
- ✓ Conduct behaviour-based safety observations in your workplace, reporting unsafe acts or conditions in line with local procedures.
- ✓ Follow the Mölnlycke safety principles in place at our manufacturing and HQ sites, and stop work if you see any unsafe behaviours or conditions.
- ✓ Actively participate in, and put into practice, any health and safety training you're given.
- ✓ Follow risk assessments and safe operating procedures, and help to create these when asked for your input.
- ✗ Never hide or cover up any work-related incidents.
- ✗ You must not allow unsafe conditions or behaviour to continue and you should never breach any of the Mölnlycke safety principles.

Manager's spotlight

- You should model safe and healthy behaviours to ensure a good OH&S workplace for all our employees and contractors.
- You must immediately acknowledge and act upon employees' health and safety concerns, and report incidents to local authorities as required by national legislation.
- Always lead by example within your own workplace, for example by carrying out management safety walks in line with local programs.

Possible scenarios

You are working in the maintenance workshop and a hazardous chemical is spilled and comes into contact with your skin. What should you do?

- Get immediate medical attention from a first aider.
- Report the incident to your line manager as soon as you can.

You have a health and safety concern about pedestrians and vehicles sharing the same space in your workplace. What should you do?

- Raise it with your manager, or your local Environment, Health and Safety (EHS) manager if you work at a manufacturing site or HQ. Alternatively, you can report it through the Ethics Hotline.





3.1

Bribery and corruption

Mölnlycke has zero tolerance for all forms of corrupt practices such as bribery, fraud, embezzlement, theft or any granting of improper advantages.

Our policy applies to any action or omission related to our business or the business of third parties that we associate or collaborate with.

We strive to understand the risks of corruption in our activities and relationships, actively work to prevent them, and take a firm stance for the well-being of the societies we operate in. We comply with anti-bribery and anti-corruption laws and regulations, we take an active part in industry association initiatives to raise the standards of business ethical conduct, and we abide by the high standards set in industry association codes of conduct.

Any violation of anti-bribery and anti-corruption laws and regulations would expose our company to significant financial and reputational risk. Corruption and bribery can also have a devastating impact on societies, contributing to both poverty and market disruption. Our efforts to fight corruption are part of our contribution to reduce the adverse impact of business on human rights, as outlined in UN Sustainable Development Goal 16: Peace, Justice and Strong Institutions.

Definitions

Facilitation payment

A small amount paid to a government official to speed up the performance of a routine legal process, such as granting customs clearance or issuing permits.

Government official

A government or public official or employee is someone who holds a legislative, administrative, or judicial position of any kind within national, local or municipal government. They may be elected or employed. They include people who work for any public agency or public enterprise (for example, public health agencies and officers exercising public functions in state-owned enterprises). Government officials also include those linked to a political party, including candidates or prospective candidates for political office, those associated with an international governmental organisation, state-owned enterprise, or entity-owned or controlled by a government unit.

A bribe

Any benefit or item of value given or received in order to influence someone's actions in breach of their official or legal duties. A bribe can take the form of money, gifts or lavish hospitality, or could be a service offered.

What does this mean for you?

- ✓ Remember that a bribe is “anything of value” and that providing a service can be seen as a bribe. The promise or offer of a bribe is classified as actual bribery even if the bribe is neither given nor received.
- ✓ All business expenses you provide must be reasonable and appropriate, as well as modest in value and frequency.
- ✓ Carry out risk-based due diligence before initiating relationships with third parties, and be extra cautious when doing business in markets with high corruption risk.
- ✓ Make sure that any business expense you provide is based on a legitimate business purpose and complies with our procedures.
- ✗ Never offer or accept any offer with the intention to improperly influence an act or decision to obtain or retain business, or gain a business advantage. Examples of business advantage include regulatory approvals, prescriptions, tender awards, business leads and licenses.
- ✗ Never accept anything of value for personal gain (actual or perceived), such as a gift, entertainment or other favours from individuals or entities that Mölnlycke is doing, or is seeking to do business with, unless you have obtained prior written approval from the management.
- ✗ Never offer facilitation payments, even if local laws permit them.
- ✗ Never make corrupt or improper payments through a third party on Mölnlycke's behalf.

Possible scenarios

You are responsible for a new warehouse and you need an environmental license.

The environmental inspector has been on site today and has not found any issues, but he tells you 'I will issue the permit, but I need you to help me out too. You need to select the company Waste Inc. for your waste handling, as I get a percentage of their benefits.' What should you do?

- This is not acceptable. The inspector (who is a government official) is informing you that he is getting money from this specific waste handling company and that to issue the environmental license you must contract them. It would be an indirect form of bribe.
- You should politely decline and explain that Mölnlycke supplier and service provider selection process is independent. You should reach out to the Business Ethics Compliance team and Legal team who will help you define the right next course of action.

A government official says that she would like to purchase products from Mölnlycke, but only if you ensure that her son will get an internship at the company. What should you do?

- You respond that you're unable to offer an internship as this could be seen as a bribe, and that all internships are posted on our website. Her son is welcome to apply, and the application will be treated in the same way as all other applications.
- A bribe is not always money or an item, it can be 'something of value' such as a service like here an internship



3.2

Conflict of interest

Mölnlycke employees should always make decisions that match our company values and are in the company's best interests. A conflict of interest is where an employee's personal interests, or the interests of someone close to them, conflict with the interests of Mölnlycke, or may appear to do so. It can also be when a personal situation may influence or appear to influence an employee's professional judgement. Often, these situations can be resolved in a way that works for both the employee and for Mölnlycke, but it's important that those decisions are made by the right people within the company.

Here's an overview of some typical situations where conflict of interest needs to be worked out, and how that should be done:



Personal relationships

Hiring or promoting relatives/friends/romantic partners.

How can we resolve it?

- Be transparent about the relationship. Let the People team know you're connected to the candidate.
- Remove yourself from any decision-making within the recruitment or management process.



Professional engagements

An employee who is seeking or already has:

- additional employment,
- membership of another company's board,
- membership of a scientific board, or
- a role as a consultant/advisor to another company's board.

How can we resolve it?

- Be transparent about the relationship.
- Seek written approval from Mölnlycke's management.



Personal interests/ business courtesies

An employee being offered gifts and hospitality.

How can we resolve it?

- Be transparent. Let your manager know about any gifts or hospitality you're offered.
- Remove yourself from the decision-making.



Financial interests

- Ownership in a company, including owning a large number of shares.
- Ownership or relatives having ownership of a business partner, for example a distributor or a supplier.

How can we resolve it?

- Be transparent about the relationship.
- Remove yourself from the decision-making.
- Ownership of business partners will require prior written approval, but will usually NOT be accepted by Mölnlycke.

Situations involving a perceived conflict of interest may damage an employee's professional reputation and may also have a negative impact on Mölnlycke. There may be occasions when employees believe they are making impartial decisions and working in Mölnlycke's best interest, but others may perceive them to be acting in their own interest. In order to manage this perception, it's essential that employees are always transparent about any potential conflict of interest.

What does this mean for you?

- ✓ Base business decisions on documented merit and not on who you know.
- ✓ Be transparent and declare any actual or potential conflict of interest in writing to your direct manager without delay.
- ✓ Be mindful that offering or accepting gifts or hospitality can create a perceived conflict of interest.
- ✓ Always consider how a situation could be perceived by others and how it might impact your professional reputation as well as Mölnlycke's reputation.
- ✗ Don't use your position with Mölnlycke to gain any improper advantage for yourself or someone close to you.
- ✗ Avoid situations where your personal interests conflict with Mölnlycke's interests.

Manager's spotlight

- Employees may come to you to disclose conflicts of interest. Seek resolution by removing the employee from the situation as soon as possible.
- Contact the People team or the Business Ethics Compliance team for guidance and support.
- Document your decisions in writing including how any conflict of interest was disclosed and managed.

Possible scenarios

You have recently been promoted and now supervise a team of ten people. One of the team members is a close friend and another is your cousin. What should you do?

- It will be a challenge to treat your friend and cousin just as you treat your other colleagues. Every decision you make regarding them might be viewed as though you are favouring them. This could create tensions within your team. Disclose this situation to your manager in writing right away.
- Your manager will identify a way to resolve the conflict of interest, with the help of the People team.

You've been helping to select a service supplier for a project, and want to suggest your brother's company. Is this OK?

You can suggest a company you have private ties with, as long as you follow some simple rules:

- Disclose the relationship in writing to the people who will conduct the review and selection.
- Step away from any meetings or discussion where the selection will be made.
- Do not share company information with your brother in the hope that he can gain an advantage.



3.3

Accurate records and fraud

Acting with integrity means ensuring that all financial information we report is accurate, complete and timely. This ensures that we can meet our legal and regulatory obligations and is critical in preventing any fraudulent activities. Our records form the basis of external reports and statements to the public, our investors, and government authorities. They also guide our strategy development and decision-making.

Mölnlycke Group financial reporting complies with International Financial Reporting Standards (IFRS), as stated in the 'Mölnlycke group accounting manual', and statutory reporting follows applicable local regulations.

Definitions

Fraud

An intentional act of deception for personal advantage. It can take many forms including theft and the falsification of records.



Possible scenarios

You become aware of a situation that might lead to a compensation claim or perhaps a lawsuit against Mölnlycke. What should you do?

- Make sure that the Legal team is informed about the potential lawsuit and inform your Finance Partner immediately, as a claim of this kind could lead to a future settlement and cash outflow, even if the case is pending.

To hit a quarterly sales target, your manager wants a customer to order products and then cancel the order and return the products after the quarter closes. Is this OK?

- No, this is not OK. We conduct business with integrity and honesty. We do not intentionally perform questionable transactions for personal gain or other reasons to inflate sales numbers.
- A transaction of this kind could result in revenue recognition errors and may then be considered manipulation of the revenue records.
- You should immediately report this sort of behaviour to the Corporate Controller, the Business Ethics Compliance team, or through the Ethics Hotline.

What does this mean for you?

- ✓ Ensure that your accounting and reporting records and supporting documents are authentic and reflect the true nature of any transactions.
- ✓ Tell your Finance Partner if you receive any information that you believe should be reflected in the accounting records, or if you suspect any misleading or fraudulent transactions.
- ✓ Only make payments on approved contracts or as authorised by the payment approver.
- ✗ You must never falsify or alter records.
- ✗ Never manipulate or unlawfully influence financial targets.
- ✗ Never hide or delay recording of transactions or include misleading information in the records.
- ✗ Don't accept payments from a third party if their involvement is not covered by a contract.
- ✗ Never engage in fraudulent or any other dishonest conduct, including asset thefts, falsifying payments or altering expense claims.
- ✗ Never use assets, resources, knowledge or information belonging to Mölnlycke for your personal gain or that of friends or family members.

Manager's spotlight

- Raise awareness about company fraud risks and remind staff to be vigilant in their activities.
- When approving your employees' expenses, remember to review the items and receipts carefully to make sure claims are correct.



3.4

Trade compliance

Mölnlycke is committed to complying with sanctions and export control laws, regulations and administration orders, and customs laws. Violation of trade laws causes damage to society, carries significant penalties, and may result in loss of export privileges and potential reputational harm to our brand.

Due to sanctions, business in certain countries, or with certain third parties, may be limited or prohibited. To ensure responsible and compliant business, Mölnlycke performs sanctions screening prior to initiating business in high-risk countries or with third parties based in high-risk countries.



Possible scenarios

You're planning to work with a new distributor in Africa. How do you ensure compliance with relevant trade laws?

- Seek guidance from the Business Ethics Compliance team, and share all the information you have about the distributor.

You would like to sell products to a new customer in the Middle East. How do you know if your customer is sanctioned?

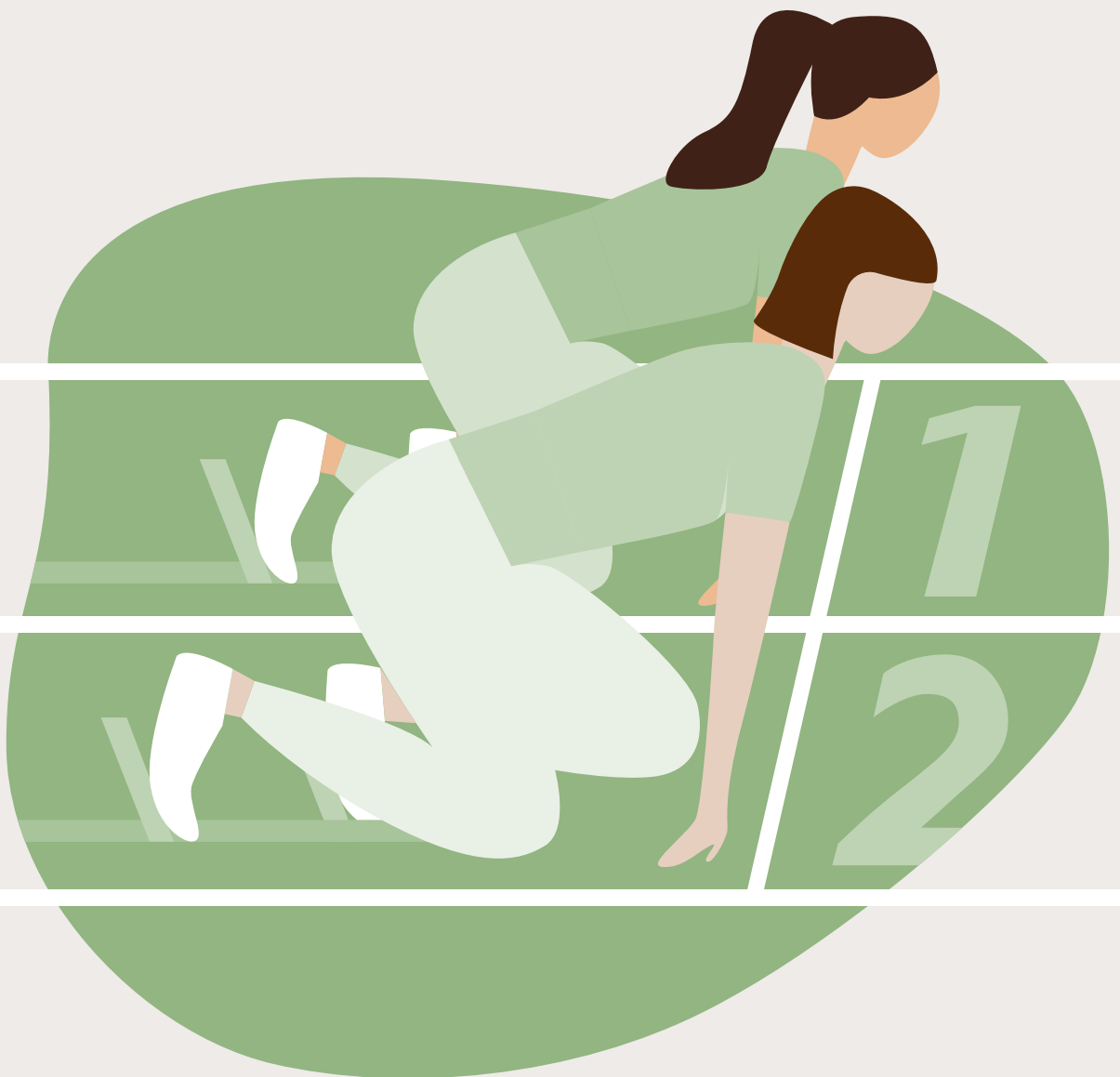
- Reach out to the Business Ethics Compliance team for screening and guidance.
- Remember: doing business with sanctioned parties is a serious breach of the sanctions laws and carries consequences.

What does this mean for you?

- ✓ Observe all import and export control requirements, including sanctions screening, and documentation related to product classifications, product valuation and country of origin.
- ✓ Before engaging with new business partners, make sure that they are screened against national and international sanctioned party lists.
- ✓ Consult the Business Ethics Compliance team if you have any questions about trade laws, or need up to date advice about how sanctions affect a particular country, company or individual.
- ✗ Never do business with individuals or organisations listed on sanctions lists.
- ✗ Never conduct indirect trade with individuals or organisations on sanctions lists. This includes trade through a third party and trade with a company, or its subsidiary, that is owned or controlled by a listed person or organisation.

Manager's spotlight

- Be mindful of how trade laws may apply to your area of responsibility.
- Make sure your team is aware and understands the importance of all relevant trade laws.
- Ensure employees working with third parties have training on trade compliance.
- Always contact the Business Ethics Compliance team if the answer to a trade compliance question is not clear.



3.5

Fair competition

Mölnlycke supports all efforts to promote and protect fair competition. The company and its employees are subject to competition laws around the world, including EU competition law, US antitrust law, and Chinese anti-monopoly laws. Please see Mölnlycke's 'Competition law policy' for further information and guidance.

Competition law ensures that businesses and companies compete fairly with each other, which reduces prices, improves quality, and creates better choices for consumers. To achieve this, competition law prevents:

- formal and informal agreements between competitors, suppliers, distributors, or customers that restrict, distort, or impair competition
- abuse of market dominance

The penalties for violating competition laws are severe and may include liability for the individual employee engaged in anti-competitive behaviour.

Definitions

Commercially sensitive information

This is confidential business information that is not public and that could influence the behaviour of a competitor if it was shared with them. Commercially sensitive information generally includes pricing, cost structures, production capacity, R&D, and plans to target certain customers, markets, or tenders.

A dawn raid

This is an unannounced inspection by an authority (usually a competition authority) to gather evidence if they suspect an infringement of law.

Possible scenarios

You're at a tradeshow when you meet a former colleague. She now works for a competing company that also produces surgical gloves. She mentions how well her new company is doing and how their big investment in a new technology is predicted to massively increase their turnover in the next quarter. What should you do?

- Remember: a chat with an old colleague may seem harmless, but a conversation with someone who works for a competing business should not involve commercially sensitive information such as predicted turnover, R&D, or new products.
- Tell your former colleague that she should not share non-public information about her company with you.

You're attending a trade association meeting. During one of the breaks some of the other members start talking about their prices to customers. What should you do?

- Remember: it is illegal for competitors to work together to fix prices. Exchanging information about current or future prices may be prohibited as it makes it easier to predict a competitor's behaviour and adjust your own behaviour in response.
- You should remind the members that their discussions may be illegal and refuse to discuss the subject.
- Leave the meeting and make sure your withdrawal is noted in the minutes.
- Inform your manager and the Legal team of the incident and provide detailed notes of what happened.

What does this mean for you?

- ✓ You must comply with applicable competition, antitrust and anti-monopoly laws and not seek to disturb any legitimate competition in an anti-competitive way.
- ✓ Involve the Legal team early in any work that may have competition law aspects.
- ✓ Inform management and the Legal team if competitors, authorities, distributors, suppliers, or other stakeholders bring up issues that may affect competition.
- ✓ Tell management and the Legal team if any commercially sensitive information has been inadvertently shared or received when interacting with competitors.
- ✓ Respect the tender process and follow all applicable procedures to ensure transparency throughout the procurement cycle.
- ✓ In case of a dawn raid, fully cooperate with the authorities and do not destroy any documents, data or official seals.
- ✗ Never make unlawful anti-competitive agreements with competitors, customers, suppliers, or any other business partners.
- ✗ Do not exchange commercially sensitive information with competitors unless you have involved the Legal team first.
- ✗ Never get involved in rigging the outcome of a tender process.
- ✗ If Mölnlycke has a significant market power in a particular market, never use this to eliminate competitors or take advantage of customers or suppliers.

Manager's spotlight

- Make sure your team is aware of and understands the importance of complying with competition laws.
- Ensure employees who need it are properly trained on competition law and dawn raid.
- Always contact the Legal team if the answer to a competition law question is not clear.



4.1

Interactions with healthcare professionals and patient organisations

Mölnlycke's products and services have a significant impact on patients and the quality of care they receive. Interactions with healthcare professionals (HCPs) are crucial for us to understand and identify the needs of both patients and HCPs, and also enable knowledge sharing and access to clinical expertise.

However, these interactions must be transparent and ethical, with appropriate safeguards in place to avoid real or perceived conflicts of interest, and to ensure patient safety. We follow best practice in the industry as outlined in industry association codes, such as the MedTech Europe and the AdvaMed code.

We also interact with patient organisations in various ways, such as by providing donations, and meeting with patients to better understand and raise awareness of their needs. These interactions are highly valuable to gain insights and knowledge directly from patients. Integrity, respect, mutual benefit and transparency are fundamental values in these interactions.

Definitions

Healthcare professional (HCP)

An individual employed by (or representing) a public or private healthcare service. This includes (but is not limited to) clinical and non-clinical roles such as physicians, nurses, technicians, laboratory scientists, researchers and research coordinators. It also includes procurement professionals who directly or indirectly purchase, lease, recommend, prescribe, administer, use or supply medical technologies, medicinal products or related services.

Fair market value

The hourly fee agreed by two independent parties for a particular service, ensuring the service is fairly remunerated. Fair market value for healthcare services is based on data collected from the industry.

Possible scenarios

You would like to organise an educational event for operating room nurses at a four-star hotel in a touristic village near the Mediterranean sea in April. Is this OK?

- You should consider if the location is suitable and ensure that you keep in mind the perception. It is OK as long as the hotel is well suited for business purposes, not luxurious and easily accessible for the majority of participants.
- It is important to note that it is outside of the tourist season.
- Always make sure you follow our 'Meeting and venue policy' when planning an event, and if in doubt, reach out to the Business Ethics Compliance team.

You have engaged a well-known HCP to perform a limited service for Mölnlycke. She claims that she doesn't want any compensation, so you decide you don't need a contract and the HCP agrees. Is this OK?

- No. A written contract signed by both the HCP and Mölnlycke is always needed before starting any engagement, irrespective of whether compensation is paid or not.

What does this mean for you?

- ✓ Always keep in mind the importance of perception of any interaction with HCPs.
- ✓ Follow the global business procedure governing engagements with HCPs.
- ✓ Make sure any interaction has a professional and legitimate purpose, and ensure we have agreements in place for all HCP engagements.
- ✓ Make sure any compensation to an HCP performing a service for Mölnlycke is based on fair market value.
- ✓ Make sure you follow applicable transparency laws and internal procedures on reporting financial relationships with HCPs.
- ✓ In countries where it's permissible, you may provide reasonably priced educational items that relate to the HCP's practice, benefit patients, or serve a genuine educational purpose.
- ✓ Only provide hospitality to HCPs in compliance with applicable laws, industry codes and Mölnlycke's internal regulations, and only within the context of a legitimate meeting with a professional purpose.
- ✓ Keep congresses and events professional, reasonable, and modest.
- ✓ Any product samples provided to HCPs for evaluation must be reasonable in number, and must not improperly induce HCPs to purchase the products.
- ✓ Any donations or sponsorship to a patient organisation need to comply with our internal guidelines.
- ✗ Providing gifts to HCPs is not allowed.
- ✗ Never give or offer a HCP anything which could be perceived as an illegal inducement to impact their decision to buy, prescribe, use or recommend our products and services.

Manager's spotlight

- Make sure you have a clear understanding of the types of interactions your team has with HCPs and the risks these might involve.
- Review planned activities involving HCPs before giving your approval.
- Make sure employees in your team who interact with HCPs, or are involved in event planning, receive targeted training on how to manage those interactions.



4.2

Quality assurance

Mölnlycke's name is associated with high quality products, and maintaining high quality standards is key in every area of our business - from assuring new product approvals to maintaining our reputation with healthcare professionals, patients and health authorities. Quality is every user's right and every employee's responsibility. It's a prerequisite for our license to operate. We also expect high quality standards from our business partners.

As a manufacturer and supplier of medical devices and pharmaceutical products, we must follow defined regulations to manufacture, sell and distribute safe and effective products for our users and customers. To comply with these regulations, we're required to implement and maintain a quality management system (QMS).

Everyone at Mölnlycke is responsible for identifying and reporting product complaints. All product complaints are documented in the QMS and are reviewed by external auditing bodies and applicable health authorities.

Definitions

A product complaint

Any written, electronic or verbal communication from a customer or user that alleges a deficiency related to the identity, quality, durability, reliability, safety, effectiveness or performance of a Mölnlycke medical device after it's distributed to the commercial market or a clinical trial.

An adverse event

An untoward (unexpected) medical occurrence in a patient or clinical investigation subject who has been administered a pharmaceutical product and which does not necessarily have to have a causal relationship with this treatment. An adverse event can be any unfavourable and unintended sign, symptom or disease temporally associated with the use of a medical product, whether considered related to the medical product or not.

Serious incident

Any incident with the use of a medical device that directly or indirectly led, might have led, or might lead to:

- the death of a patient, user, or other person;
- the temporary or permanent serious deterioration of a patient's, user's, or other person's state of health.
- a serious public health threat.

Serious public health threat

An event which could result in imminent risk of death, serious deterioration in a person's state of health, or serious illness, that may require prompt remedial action, and that may cause significant morbidity or mortality in humans, or that is unusual or unexpected for the given place and time.



What does this mean for you?

- ✓ Make sure you're familiar with the policies, procedures, or standard operating procedures (SOPs), that apply to your role and follow the steps outlined. These are contained in the QMS or your local document process.
- ✓ Complete the trainings you've been assigned on the learning management system - either iLearn or your local training process.
- ✓ Report any complaints to your local market complaint initiator as listed on the Hub.
- ✓ Provide all available information when you report a complaint. The more information you provide, the better the investigation, outcome and response to the customer will be.
- ✓ If you suspect an adverse event or serious incident may cause substantial harm to public health, or are unable to reach the local market complaint initiator, contact vigilance@molnlycke.com immediately.

Manager's spotlight

- Make sure all new employees in your team are familiar with our QMS and how the system works.
- Always encourage a systematic and compliant approach with your teams.

Possible scenarios

You often refer to various policies and procedures from the QMS, and you think it would save time to save these on your desktop. Is that OK?

- No, because the documents would then be classified as uncontrolled.
- Always access quality documents from 'Master control document module' or your local document system.

You work in production, and have noticed that foam is cut in a way that leads to the final foam dressing not meeting Mölnlycke's quality standards. What should you do?

- Inform your manager and someone from the Quality team immediately.



4.3

Regulatory requirements

Mölnlycke develops, manufactures and distributes products in compliance with regulatory requirements. The medical device industry is a highly regulated industry, which means we must comply with regulations and directives globally. Mölnlycke needs to make sure that all products meet the relevant global regulatory requirements and are safe and effective for their intended use.

Definitions

Claims

Statements or assertions made by a company or manufacturer about the performance, efficacy, safety, or other characteristics of a product or service. Claims are usually a part of marketing messages.

Possible scenarios

A customer asks you to explain how they can be sure that our products are safe and effective. What should you say?

- Mölnlycke devices are marked with a CE mark. This signifies that products sold in the EEA have been assessed to meet high safety and health requirements.
- The CE mark is also recognised globally.

You would like to promote Mölnlycke devices as “the best dressings ever”. Is that OK?

- No, all claims related to Mölnlycke products must be true and accurate with no intention to mislead customers or patients regarding the device’s intended purpose, safety and performance, or create a false impression regarding treatment or diagnosis, or the functions or properties of the device.
- Mölnlycke products can only be described with verified and validated functions and properties. Mölnlycke keeps a central repository of approved claims and marketing messages.
- We must also inform customers and patients of any likely risk associated with the device when used for its intended purpose.

What does this mean for you?

- ✓ Be aware that regulatory requirements differ depending on the geographic area and product properties.
- ✓ Make sure you understand the impact regulatory requirements might have on your product or project.
- ✓ Always follow applicable approval procedures for new products to make sure they meet legal and regulatory requirements.
- ✓ Before placing any product on the market, make sure all claims and marketing messages have been verified.





4.4

Governmental affairs

Regular interactions with policymakers and industry associations help Mölnlycke stay up to date with what's happening in our industry and give us opportunities to contribute to shaping policies.

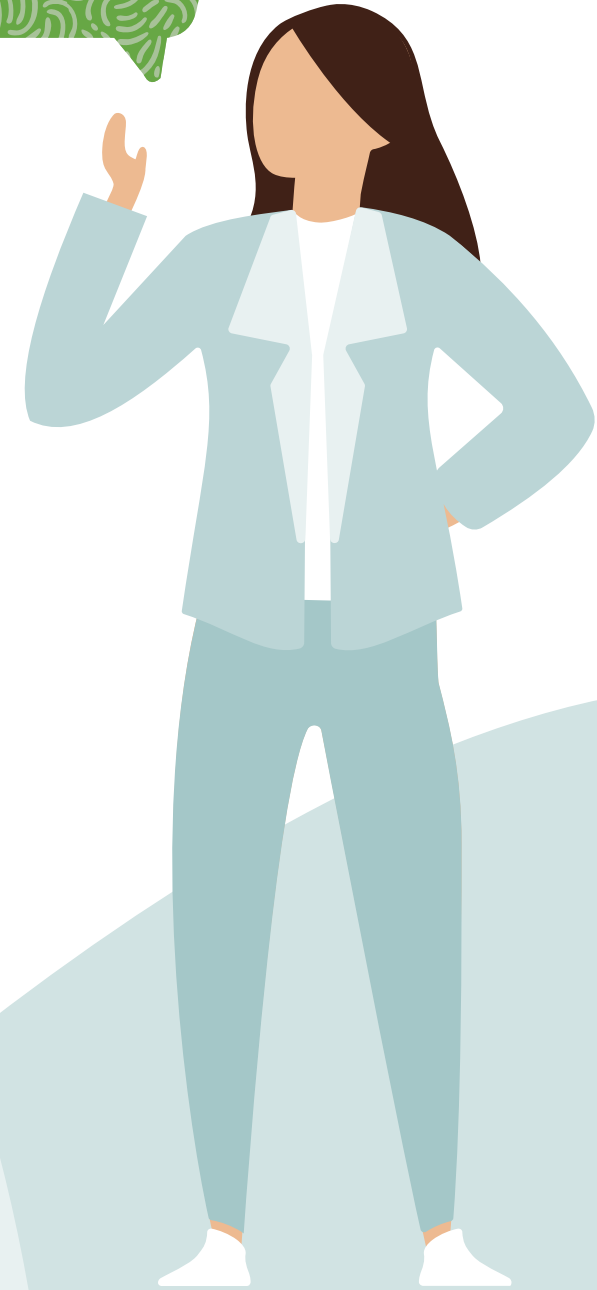
These engagements can be in the form of taskforces, committees, or industry associations, where specific challenges or risks to our industry are being discussed.

This is a great opportunity for Mölnlycke to gain a better understanding of upcoming regulatory changes. However, as these interactions often include our competitors, it also exposes us to risks. It's essential that colleagues who engage in these activities are aware of the rules to follow.

We are politically neutral and it's not allowed to make payments or donations to political parties or candidates. However, for topics relevant for our business, we may engage in policy debates through for example lobbying.

What does this mean for you?

- ✓ Liaise with your manager and the Governmental Affairs team before joining an industry association working group or similar forum to understand what's expected of you.
- ✓ Always be mindful of competition law risks related to these types of engagements. You can find guidance on the rules related to competition law in chapter 3.5 Fair competition. If in doubt reach out to the Governmental Affairs team or the Legal team.
- ✗ Be aware of any risks associated with information you're sharing in these forums and don't share confidential information. If in doubt, reach out to the Legal team.



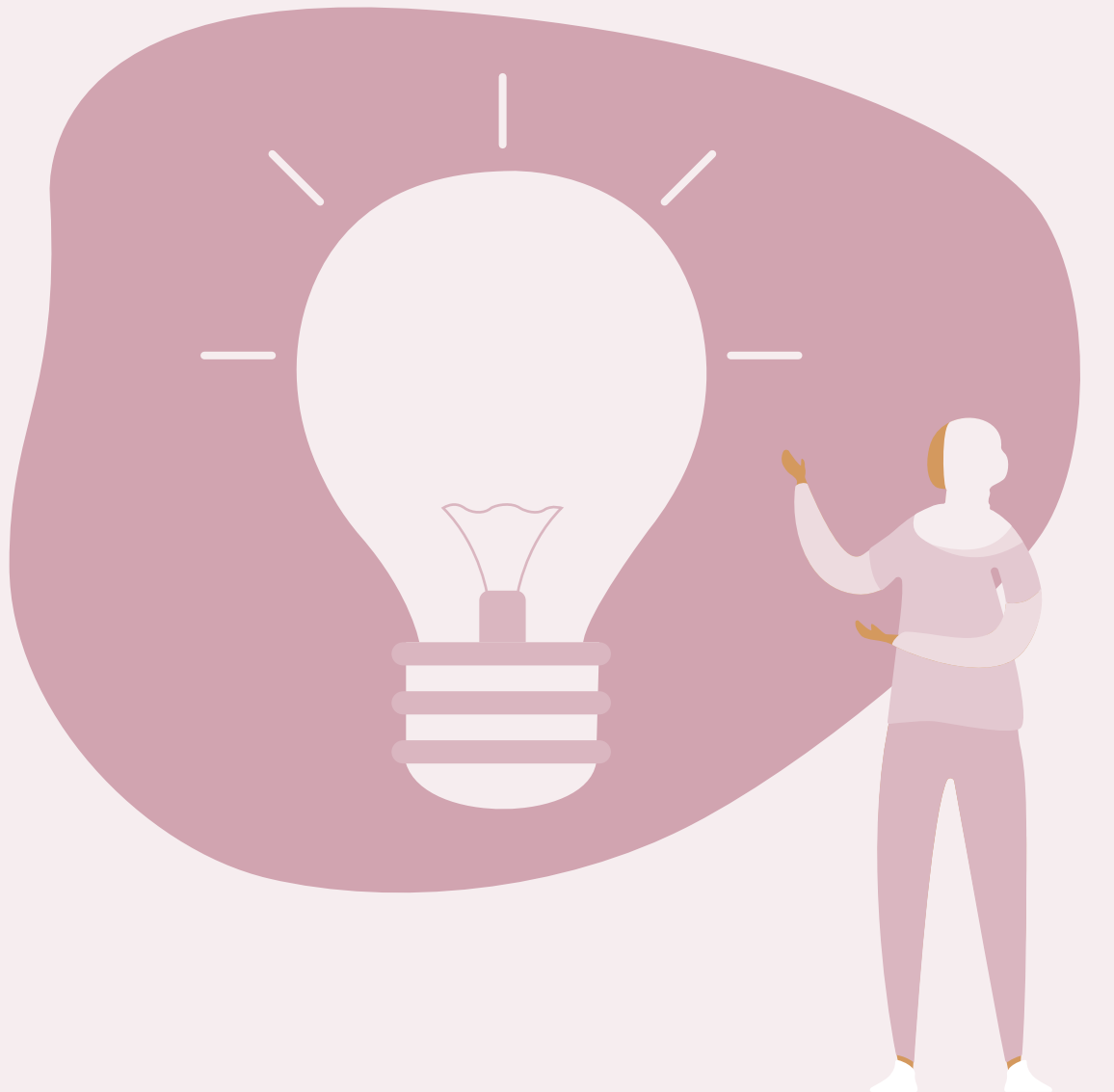
Possible scenarios

You're in a meeting with other members of an industry association and a conversation starts about investment in innovation. Are you allowed to discuss the company's commitment to innovation in financial terms?

- You're allowed to say that Mölnlycke is strongly committed to investment in innovation, but you can't discuss the company's financial commitments.

You've been talking to a competitor representative within a working group and realise you share similar approaches to customer engagement. Should you share details of Mölnlycke's value-based procurement strategy with them?

- It's fine to discuss the broader aspects of value-based procurement and the external hurdles, but you must not share details of corporate strategy or specific Mölnlycke policies with any potential competitor.



5.1

Intellectual property

Mölnlycke's intellectual property rights (IPRs) include patents, copyrights, trademarks, designs, and trade secrets. IPRs can be seen as a return on investment, as they may provide a competitive advantage. They can also make us a more attractive partner to third parties, such as suppliers and collaborators. These highly valuable assets may be lost if misused or improperly disclosed. Violations of our IPRs may also harm Mölnlycke's company assets as well as our reputation.

While our focus is on strengthening our IPR position, respecting the IPRs of third parties is equally important to avoid lawsuits or damage to Mölnlycke's reputation.

Definitions

Trademark

Can be any word, phrase, symbol, design, sound, or a combination of these things, that identifies a company's products or services. It's a distinguishing sign that provides legal protection for the brand, and helps guard against infringements, counterfeiting and fraud.

Patent

Can be granted for new technological solutions solving a problem. A patent gives the owner exclusive rights to use the invention for up to 20 years. No one else is allowed to manufacture, sell or import the invention in countries where the patent is valid without the owner's permission.

What does this mean for you?

- ✓ Register all new ideas and improvements in the Invention Portal on the Hub. This ensures that the Intellectual Property (IP) team can identify potential IP assets at an early stage, and start the process to protect them if needed.
- ✓ If you're working with third parties, the Legal team will help you set up appropriate agreements.
- ✓ Involve the IP team at an early stage during concept and product development, and when discussing new product names and trademarks. The IP team will take appropriate action to avoid or mitigate the risk of infringing IPRs owned by others.
- ✓ Raise a report via the Infringement Report Portal on the Hub if you suspect others are using our IP assets, such as trademarks or patent protected concepts.
- ✓ If you're contacted by someone claiming that Mölnlycke is infringing their IPRs, you should forward the information directly to the IP team.

Possible scenarios

You and your team make a slight modification to an existing product and you're not sure if this can be described as a new invention. What should you do?

- Register the changes in the Invention Portal on the Hub, and the IP team will make an assessment.
- Remember: design updates and small improvements to our existing products can often be regarded as inventions, and we may need to seek protection.

You're planning to collaborate with an external firm or person during the product development process. What should you do?

- When third parties are involved in a project, you'll need an agreement on the conditions for the cooperation, signed by both parties. This agreement may outline how confidential information should be handled, and which party should own any IPRs, for example.
- Contact the Legal team for assistance with the agreement.





5.2

IT and information security

We are all responsible for protecting Mölnlycke's assets and for safeguarding confidential information

By information security standards we can protect Mölnlycke and our partners, and keep our personal information safe from illegal and damaging actions.

IT tools issued to employees by the company, including our internet platform, intranet, apps, data, IT workplace, and IT equipment, are the property of Mölnlycke. These tools should only be used for legitimate business purposes.

Mölnlycke employees, including contractors, consultants, temporary staff and other workers, must comply with relevant Mölnlycke IT policies. By using the company's IT tools, users are agreeing to follow these policies.

Definitions

Social engineering

Cyber criminals pretending to be someone else in order to access data or an IT system. For example, they could send an email that looks as though it's from your manager, asking you to transfer a payment or share sensitive information. Or they might pretend to be an IT support person asking you to share your passphrase.

Ransomware

A type of malicious software that's spread through embedded links or email attachments. It's designed to block access to a computer system or to encrypt files until a sum of money is paid.

Malware

A type of malicious software designed to cause damage to a computer, server or network.

Possible scenarios

You receive a call claiming to come from Mölnlycke IT Service Desk, alleging the company is under cyber attack. The person on the phone asks for your current passphrase so that they can change it for you.

What should you do?

- Hang up immediately.
- Tell your manager about the call.
- Report this as a security incident via the Mölnlycke Service Portal.
- Remember: Mölnlycke IT Service Desk never calls or emails users asking them to share personal information.

You get an email telling you that your Microsoft Office 365 passphrase is going to expire in 24 hours. It asks you to click on a link to keep or change your passphrase.

What should you do?

- This is a phishing email. Report it in your mailbox by clicking on 'report message' and selecting 'phishing'.
- Remember: Mölnlycke never includes a link in email reminders when a passphrase change is due.

What does this mean for you?

- ✓ When you're using our IT workplace, IT systems, data or any other information asset, you must follow our 'Information security policy', 'Acceptable use of IT equipment policy', and 'Access control policy'.
- ✓ Prevent unauthorised access to company systems by locking your computer when you leave it, and making sure you use different passphrases for different accounts.
- ✓ Report any IT security incidents and any loss of corporate IT equipment immediately via the Mölnlycke Service Portal.
- ✓ Create a unique passphrase for your Mölnlycke device and system, and make sure you keep it secret. You should never share it – even with your local IT Service Desk team.
- ✓ If you're faced with a suspected ransomware attack, you should shut down your device immediately and hand it over to your local IT Service Desk for advice about what to do next.
- ✓ If you're faced with a suspected phishing or social engineering call or email, hang up the phone or ignore the email and tell your manager. You should then report the incident through the Mölnlycke Service Portal.
- ✗ Stay alert to suspicious emails or requests that don't align with normal business processes, and never click on suspicious links or attachments in emails or text messages.
- ✗ Be wary of emails and websites that encourage you to act right away, offer something that is too good to be true, or ask for personal information.
- ✗ Never use your Mölnlycke email address to register on non-work-related websites.





5.3

Data privacy

At Mölnlycke, we respect people's privacy and it's important for us to process personal data ethically and responsibly, both as an employer and as a trusted business partner. National and international laws regulate the way Mölnlycke collects and processes personal data. Our internal privacy policies and procedures also require us to meet legal obligations around privacy in the jurisdictions where we operate.

Data protection laws apply to all processing of personal data by Mölnlycke. Complying with these laws is essential to ensure that Mölnlycke operates in an ethical and responsible manner. We respect the privacy and rights of individuals whose personal data is processed by our company, regardless of whether they are customers, business partners, healthcare professionals, employees, or patients.

Definitions

Personal data

Any information that can directly or indirectly identify a person, such as name, email address, photos or IP address.

Possible scenarios

A customer has asked you to remove their personal data from company systems. You're reluctant to do so because you think the company might need this data to comply with the Medical Device Regulation (MDR). What should you do?

- You should assess the situation carefully and determine if you have a legal obligation to retain the data. Consult Mölnlycke's Chief Privacy Officer before making a decision.
- If it's decided that we do have a legal obligation to keep the data, explain to the customer why we need to keep their data and reference the relevant provision in the MDR.
- If it's decided that we don't have a legal obligation to retain the data, erase it as the customer has requested.

You suddenly realise you've sent an email with medical research materials to the wrong colleague. What should you do?

- You should immediately report this potential data privacy breach to your manager and Mölnlycke's Chief Privacy Officer.
- You should provide as much detail as possible, including the type of personal data included in the email and any actions that you've taken to mitigate the breach, such as if you've asked your colleague to delete the email.
- You should also ensure that you do not discuss the potential breach with anyone who does not need to know about it, as this could increase the risk of further breaches.

What does this mean for you?

- ✓ Protect the confidentiality and safeguard the security of any personal data that you have access to, and prevent disclosure to anyone not expressly authorised to receive it.
- ✓ Consider the privacy of individuals involved or affected when you start any new project.
- ✓ Use the personal data you have access to only for the purposes for which it was initially collected.
- ✓ Make every effort to prevent fraudulent use, destruction, or loss of personal data.
- ✓ Immediately report any situation that may threaten the confidentiality or security of personal data.
- ✓ Make sure third parties that process personal data on Mölnlycke's behalf comply with data protection laws, and make sure appropriate data protection measures are in place.

Manager's spotlight

- Work with the Chief Privacy Officer to provide regular training to employees to make sure they're aware of their responsibilities when handling personal data. Topics you should cover include privacy policies, personal data breaches, consent management and data subject rights.
- Conduct regular reviews of your organisation's privacy practices, identify areas for improvement and implement changes as needed.





5.4

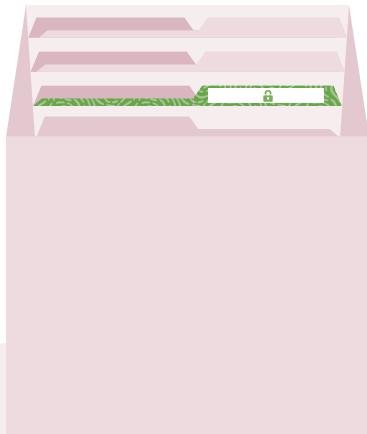
Confidential information

Mölnlycke's confidential information is a highly valuable asset and needs to be handled and safeguarded carefully. Unauthorised disclosure or misuse of confidential information could cause significant and irreparable harm to our company. To be a successful company and build trust with our partners, it's crucial that Mölnlycke protects information and ideas, including those belonging to others.

Definitions

Confidential information

Confidential Information means all processes, material, data, knowledge, information, samples, and software of any kind relating to Mölnlycke, including information related to finance, marketing, sales, research and development, business plans, innovations, formulations, testing, technology, know-how, and Confidential Information provided by a third party.



Possible scenarios

You're travelling with a colleague and want to make good use of the journey time by discussing Mölnlycke's new marketing strategy during the flight. Can you do this?

- No. You need to be alert to the risk of someone from a competitor company overhearing information that would give them a competitive advantage.
- Always handle confidential information in public places with extreme care.

You receive some interesting confidential information from a collaboration partner under a non-disclosure agreement. Can you share this information with your colleagues at Mölnlycke?

- No. Confidential information – whether internal or generated by external parties – should only be shared with colleagues on a need-to-know basis.

What does this mean for you?

- ✓ Make sure you safeguard confidential information appropriately.
- ✓ Be careful when looking at confidential information in public places, such as on trains and at airports.
- ✓ Check that there's a confidentiality agreement in place covering the subject you'd like to discuss before sharing any confidential information with third parties.
- ✓ Continue to respect confidentiality obligations after the end of your employment at the company.
- ✓ Always assume that all non-public information is confidential.
- ✗ Never discuss confidential information in a public place or leave confidential material unattended, not even in the office.
- ✗ Never share company confidential information with Google Translate, AI chatbots such as ChatGPT, or on social media – not even in closed groups.
- ✗ Never recruit someone with the intent to obtain any third-party confidential information.
- ✗ Never make any personal investment decisions or actions based on confidential information obtained during your employment with Mölnlycke, as this could violate insider-trading regulations. If you have any questions about this, or about the confidentiality of any information, reach out to the Legal team.
- ✗ Do not share confidential information with colleagues more than on a strict need-to-know basis.

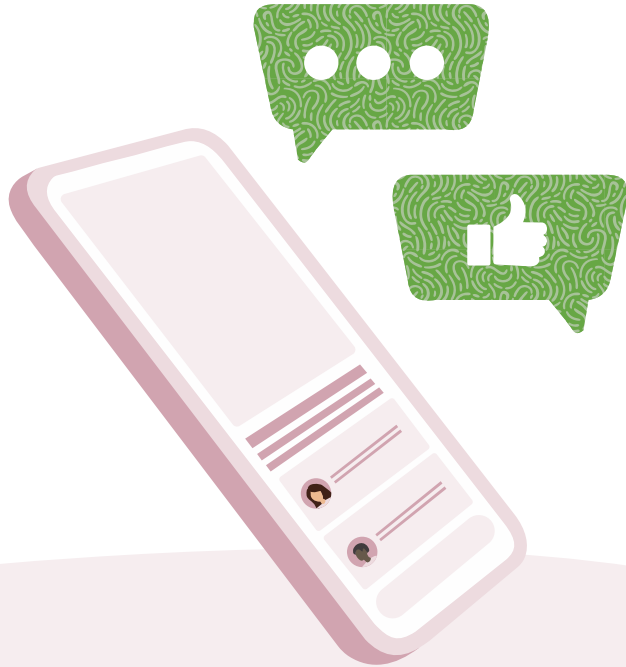


5.5

Social media

At Mölnlycke, we use a variety of social media channels to communicate with the world around us, including our customers, partners, investors, key opinion leaders and our colleagues.

Employees are welcome to share Mölnlycke posts via their own social media. However, we need to be careful about what we say and how it might be interpreted. We have developed guidelines to protect our employees, our company, and our partners.



Possible scenarios

You notice customers posting questions in the comment section of a Mölnlycke social media post. You consider replying to them publicly with your email address and phone number so you can follow up. Is that OK?

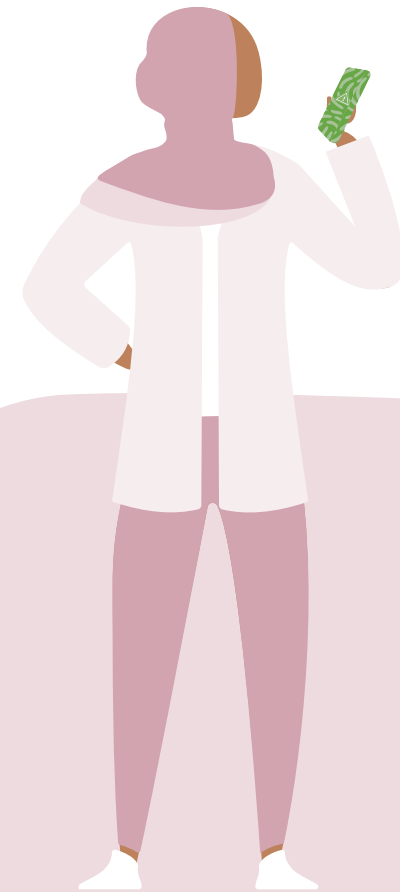
- You should not reply yourself. Comments from interested customers will be picked up by the Group Brand & Communications team which monitors our social media channels daily.
- Never post your private information publicly. Someone might take your information and use it to send spam or malicious emails (see section 5.2 on IT and information security).

A friend of yours has been using a Mölnlycke product and praises it over our competitors' products. You're thinking of posting their feedback on social media and mentioning it in your personal blog. Is that OK?

- You must never create your own messaging about our products. In our industry, product communication is highly regulated, and any comments about our products could be perceived as product promotion which is prohibited in some of our markets.

What does this mean for you?

- ✓ Always use social media in a responsible way and show consideration for your readers, your colleagues and your workplace.
- ✓ If you share Mölnlycke posts or post comments about the company, we encourage you to include a statement in your account profile to indicate that the views you express are your own and not official statements on behalf of Mölnlycke or any other organisation.
- ✓ Always inform the Global Vigilance team at vigilance@molnlycke.com if you see a product complaint, or get news of a possible adverse event or serious incident, while using social media.
- ✗ Never create your own content about the company or its products as this may not conform to industry regulations.
- ✗ Don't set up Mölnlycke accounts or channels without prior agreement with the Group Brand & Communications team.





6.1

Green mindset

Mölnlycke's ambition is to transform our business and become a global leader in sustainable healthcare.

We're transforming our business to decouple our growth from resource constraints. We've committed to achieving Net Zero greenhouse gas (GHG) emissions along the entire value chain by 2050 at the latest, and we're setting ambitious, science-based targets, aligning with the 1.5°C pathway under the Science Based Targets initiative (SBTi) to track our progress. We ramp up the development and delivery of sustainable solutions to support the transition to a low-carbon economy, building a strong growth strategy and accessing new markets along the way.

Our ambition is to reduce the need to recycle by 'designing out' waste from our production processes and solutions.

We also proactively identify, manage and remove hazardous substances in all our products and processes to ensure safe use and to future-proof our products against changes in regulation.

Definitions

Sustainable healthcare

A healthcare system based on sound environmental, social and economic approaches that eliminates negative social, environmental and economic impacts.

Sustainable solutions

Solutions which provide clear sustainability benefits to our customers. Solutions are assessed across their lifecycles and benchmarked against current market mainstream applications. These solutions match the standard offerings in all respects and either exceed or are comparable to them in at least one of the following sustainability parameters: GHG emissions and energy efficiency, use of natural resources, waste, packaging, inclusivity, health and well-being.

The Science Based Targets initiative (SBTi)

This initiative defines best practice in science-based target setting to help companies reduce GHG emissions.

Greenwashing

Using claims and marketing deceptively to persuade people that an organisation or its products or solutions are greener than they really are.

Possible scenarios

You're invited to a meeting with some global colleagues in another country. You would like to go, but don't feel you have a lot to contribute to the topic that is going to be discussed. What should you do?

- Discuss with your manager if your physical presence in the meeting will add value. Consider other ways to give input, such as joining the meeting virtually.
- Remember: Mölnlycke is committed to reducing our GHG emissions. This means eliminating unnecessary travel as outlined in our travel policy.

You need to use a hazardous substance in your work. It's just a one-off substitution and it needs to happen urgently. You don't have time to carry out a risk assessment. What should you do?

- Remember: risk assessments are in place to keep our people safe and make sure there is no accidental release of hazardous substances into the environment.
- You must never work with a hazardous substance if it doesn't have a risk assessment you are familiar with.

What does this mean for you?

- ✓ **Travel:** If you're travelling for work, try to use the most efficient and fossil-free form of transport possible.
- ✓ **Electricity:** Avoid wasting energy by turning off lights and unused equipment and only using air conditioning when necessary.
- ✓ **Waste:** Whenever possible, separate waste, including packaging, so that it can be recycled.
- ✓ **Upstream procurement:** Work to increase the use of fossil-free and/or recycled raw materials, such as bio-based plastics and recycled fibres.
- ✓ **R&D:** Work to improve product formulations to reduce their environmental impact while guaranteeing the same performance.
- ✓ **Marketing and sales:** Provide customers with information about the environmental impact of our products.
- ✓ **Transportation:** Find ways to improve our logistics performance, for example, by reducing the environmental impact of transportation of raw materials and final products.
- ✓ **Supply chain:** Encourage suppliers to make the transition to a low-carbon economy.
- ✗ **Never greenwash** as this could damage the company's reputation. Only use the approved sustainability claims and marketing messaging according to the claims approval procedure.

Manager's spotlight

- Make sure the WeCare roadmap is implemented according to plan at your site or within your function.
- You can get corporate and Business Area-specific WeCare roadmaps from our Corporate Sustainability Committee representatives or from the Global Sustainability function.



6.2

Community engagement

At Mölnlycke, we strive to have a positive long-term impact and create shared value for our stakeholders, whether we're helping people to heal or giving back to the communities we serve. We contribute to society by investing in communities where we operate and by supporting charities that share our goals.

By donating time, products, funds and expertise, we help improve the lives of patients and support those who care for them. We strive to be responsible partners to the organisations we support by helping them to become sustainable in the long term.

The non-governmental organisations (NGOs) we support are all in the medical field, and work to improve patients' lives, to improve medical staff protection, or to increase the level of knowledge in the medical field and provide credible and measurable results. The initiatives we support must be in line with relevant industry associations' ethical codes and other guidelines.

Definitions

Corporate social responsibility (CSR)

The approach a company takes to demonstrate its responsibility and accountability towards the societies and communities in which it operates.

Non-governmental organisations (NGOs)

Organisations which have a charitable goal and operate independently of any government.

What does this mean for you?

- ✓ You can become a CSR champion for a market or a site and be part of a global network driving community support and engagement.
- ✓ You can become an Operation Smile field volunteer. See the Hub for more information.
- ✓ Remember that the decision-making/review process for donations needs to be based on a written request, be made by the Global Donation Committee and should not include sales and/or commercial colleagues.
- ✓ All donations – of time, products or funds – must comply with local laws and regulations.
- ✓ Remember: you should always follow our 'Community support principles' when making a donation.
- ✗ You must never make charitable donations to individual HCPs.

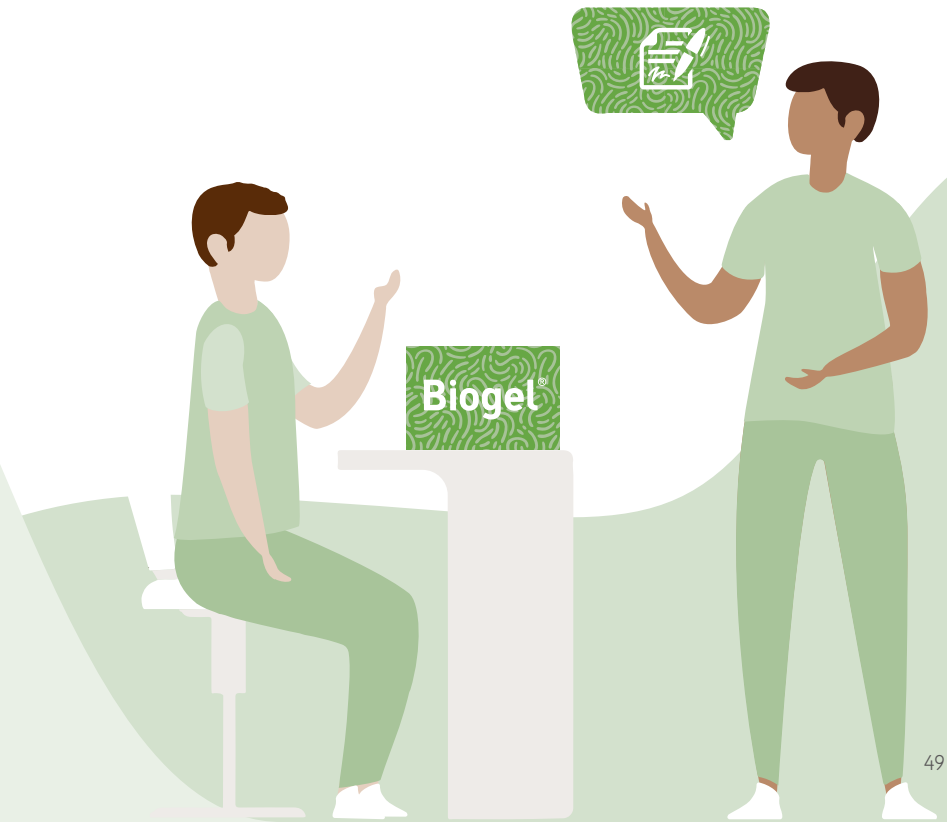
Possible scenarios

You would like to support a local NGO by donating several boxes of Biogel® gloves. What should you do to be sure you're following the correct procedure?

- Fill out the 'Request for donation' form on the Hub.
- Send the completed form for review and approval by the Global Donation Committee.

You're collaborating with a surgeon at a local hospital. She tells you that she will be going on a medical mission to Rwanda later this year, and asks you to provide a number of boxes of Mepilex® Border. What should you do?

- Explain that this is not possible. Mölnlycke only makes donations to organisations following a careful examination of each request to ensure donations are responsible and ethical, and comply with laws and regulations.
- Remember: making charitable donations to individual HCPs is not allowed.



Additional information

Further information and guidance can be found on the Code of Conduct page on the Hub, including links to our internal policies and procedures covering the topics in the Code.



Find out more at www.molnlycke.com

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