

# This is our way

Coloplast Business Ethical Standards (Coloplast BEST)



# The Coloplast BEST is our Code of Conduct and takes its name from Business Ethical STandards.

Coloplast conducts business globally, and we are subject to international laws as well as the laws of every country where we operate. The Coloplast BEST applies everywhere we operate, but if local laws, regulations or standards are stricter than the Coloplast BEST you must always follow the stricter rules.

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Please note that you will find an explanation of key terms on the last pages of Coloplast BEST. In the electronic version of Coloplast BEST the key terms are hyper linked to the explanation. Just click the term!

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### **Who is required to follow the Coloplast BEST?**

We all are. The Coloplast BEST applies to all Coloplast employees around the world, including executives, officers, directors, managers, employees, and the board of directors. Third parties working on Coloplast's behalf – whether employed or engaged by Coloplast A/S or by any of Coloplast's subsidiaries and associated companies – are also expected to follow the principles set out in the Coloplast BEST, and to comply with all relevant laws, regulatory, and contractual requirements.

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# Coloplast

## - this is our way

Coloplast's reputation, as one of the world's most ethical companies, is one of our most valuable assets. However, whilst a reputation cannot be bought or sold, it can be destroyed immediately by a single act.

Dear colleagues,

We have earned our reputation by hard work and a long history of doing the right thing. By living what we believe is right, and by always doing business with respect and uncompromising integrity.

Coloplast's good reputation is a prerequisite for our continuous support of consumers with our products and services, for creating business value, and for being a company where people are proud to work.

It is essential that we keep it that way.

### **We must all take on the responsibility**

Coloplast is a global company of more than 10,000 people. Each of us has a personal responsibility to sustain Coloplast's good reputation. This means, we have a responsibility to comply with the Coloplast BEST, and with the applicable laws and regulations in our respective countries.

The Coloplast BEST is not a substitute for good judgement, but it will help guide you in our commitment to live up to Coloplast's values, and to the ethics, laws, and regulations of our global business.

### **Reach out**

It is important to ask questions whenever you are uncertain of the right thing to do. It is also important to speak up anytime you see or suspect activity that could harm Coloplast and its reputation.

Your managers and compliance officers are here to listen and provide guidance, and they will always support people who raise concerns in good faith – so please reach out with any issue or doubts.

Executive Management and the Coloplast Board of Directors are confident that – with your help – integrity and honesty will continue to permeate how we do business, and that our values and reputation will live long into the future.

Thank you for keeping us among the most ethical companies in the world.

Yours sincerely,  
Lars Rasmussen  
President, CEO

# Our actions and values must match

“Better no business than bad business”

Closeness – to better understand  
 Passion – to make a difference  
 Respect and responsibility – to guide us



At Coloplast, we represent and form an innovative, global healthcare company focused on our mission of making life easier for people with intimate healthcare needs. In order to live, work, and deliver on this mission, we need to match our actions with our values – without exceptions or excuses.

Coloplast BEST is our guide leading the way to global excellence when it comes to operating an ethical company. A guide that will help us to act professionally, when our gut-feeling or our knowledge of what is right is challenged.

We are a company of more than 10,000 people, working in more than 40 countries.

Whilst Coloplast BEST is a useful guide, it cannot address all of the ethical issues that we will encounter, so it is important that we always use our good judgement and common sense at all times.

## ‘THE BUSINESS ETHICS TEST’ - A GOOD TOOL FOR FACING BUSINESS DILEMMAS

How to act		
<p>If you are faced with an ethical dilemma and are unsure about how to act.</p> <p>Ask yourself all of the following questions:</p> <ul style="list-style-type: none"> <li>· Is it legal?</li> <li>· Is my behaviour in compliance with the Coloplast BEST?</li> <li>· Would I be comfortable if my behaviour was reported in the media?</li> <li>· Would I be happy to tell my colleagues or people outside of Coloplast about this?</li> </ul>	          	<p>If your answer is a clear ‘Yes’, you can proceed</p>          <p>If your answer is ‘No’ or ‘I don’t know’ to just one of the questions, you should consult with your manager, Corporate or local Compliance or Legal or other appropriate functions or people in Coloplast.</p>

# How to raise a concern?

Coloplast encourages an open and honest culture, where employees feel free to raise concerns, and where each and every one of us is responsible for maintaining Coloplast's integrity and reputation.

Coloplast will not accept retaliation against an employee raising a concern out of good faith. It is our duty to promptly raise ethics and compliance questions, and immediately report any suspected or actual breaches of the Coloplast BEST or other unethical, illegal or suspicious behaviour.

If you have any concerns or want to report a breach of the Coloplast BEST or any other guidelines, the first thing to consider is to talk to your manager.

If you are not comfortable raising the issue with your manager, please contact one of the following:

- Corporate or local Compliance
- Corporate or local Legal
- Corporate or local Human Resources

You can find an updated list of global contacts on Corporate Compliance's intranet site.

Remember, it is always better to ask for advice than to put your own and Coloplast's reputation at risk. Do not ever turn a blind eye to wrongdoing.

Mistakes do happen, and it may not always be easy to come forward during an ethical dilemma. This is why Coloplast has established an independent third party whistle-blower hotline where concerns can be reported anonymously.

#### **What happens if I fail to comply with the Coloplast BEST?**

Unethical or illegal behaviour may subject Coloplast to civil and criminal penalties, industry sanctions, and reputational harm.

If you violate the Coloplast BEST, you may personally – depending on the severity of the violation – risk civil damages, criminal prosecution, and disciplinary action up to and including termination of your employment in serious cases.

Similarly, any supplier, distributor, or other business partner working for or on behalf of Coloplast, who fails to comply with the principles described in the Coloplast BEST, may have their contract terminated.

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You should immediately contact your manager to discuss how to handle the situation if you realise that you have made a mistake or if you become aware of a violation of the Coloplast BEST.

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If you are not comfortable speaking to your manager, you should contact Corporate or Local Compliance or file a report using the whistle-blower hotline.

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# People are the backbone

People are the backbone of Coloplast – we define our company and are ambassadors of our values, both internally and externally. It is vitally important to create a healthy, safe and diverse work environment where employees can turn their passion into tangible solutions for Coloplast’s customers.

**Diversity, equal opportunities and non-discrimination**

As a global organisation, we respect and foster diversity. We regard a diverse workforce as a competitive advantage, and see it as a blueprint for success. We will not tolerate discrimination or harassment of any kind and in relation to any particular group. This is why we strive to create a dynamic and professional environment, and are committed to fair and equal treatment of all employees – including all people seeking a job at Coloplast.

**DIVERSITY, EQUAL OPPORTUNITIES AND NON-DISCRIMINATION - DO'S & DON'TS**

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<p>Do:</p> <ul style="list-style-type: none"> <li>· Act with decency and respect for the dignity of others</li> <li>· Show respect for different ideas, opinions and cultures</li> <li>· Let skills, experience and personal talent lead in decision-making on issues such as recruitment, compensation, and career development</li> <li>· Inform your manager or HR manager if you or another employee are subject to discrimination or harassment in the workplace</li> </ul>	<p>Don't:</p> <ul style="list-style-type: none"> <li>· Discriminate against anyone in the workplace on the grounds of race, colour of skin, age, gender, nationality, social or ethnic origin, religion, disability, sexual orientation, marital status, medical condition, genetic information, or any other category mentioned in any relevant regulations</li> <li>· Harass or encourage harassment of anyone, or turn a blind eye to it</li> <li>· Accept harassment of others</li> </ul>

**Health and safety**



The same health and safety standards apply to all our colleagues – no matter what part of the world or organisation they work in. We use the international standards<sup>1</sup> for occupational health and safety as a way to make sure that we adhere to the same rules globally and continuously improve the performance.

We systematically consider health and safety issues when we develop new products, production methods, and establish new sites or refurbish existing facilities. We use the feedback from our colleagues, business partners, and other stakeholders to improve working conditions, and fully acknowledge that we all share the responsibility for health and safety in the workplace.

All Coloplast managers as leaders are ultimately responsible for health and safety in their unit and must ensure that their employees understand their role in maintaining and improving the work environment at Coloplast. The managers are also responsible for employees’ access to necessary instructions, training and resources to carry out their work safely. Please contact EHS Development for further information.

Travel safety is important to us. Employees travelling on behalf of Coloplast must observe company policies on travel safety.

**HEALTH AND SAFETY - DO'S & DON'TS**

	
<p>Do:</p> <ul style="list-style-type: none"> <li>· Conduct yourself in a safe manner</li> <li>· Understand and follow Coloplast’s health and safety requirements in order to manage the potential risks and dangers of your job</li> <li>· Observe local requirements for reporting accidents, injuries, and unsafe working conditions</li> <li>· Play an active part in improving the work environment</li> </ul>	<p>Don't:</p> <ul style="list-style-type: none"> <li>· Disregard any instructions on health, safety, and the use of safety equipment</li> <li>· Hesitate to ask questions if you are in doubt about any instructions on health and safety</li> </ul>

<sup>1</sup>) OHSAS 18001

**Human rights and labour rights**

*The commitment*

We respect and support internationally recognised human rights including labour rights as made operational by the UN Guiding Principles on Business and Human Rights (UNGPs) and as framed in the first six principles of the UN Global Compact, which Coloplast became a member of in 2002.

It is essential to Coloplast not only to implement the management system outlined in the UNGPs internally, but also to extend the internationally expected minimum standard of the UNGPs to our business partners by expecting them to follow the principles.

We respect all human rights including labour rights referenced in the International Bill of Human Rights (consisting of the Universal Declaration of Human Rights (UDHR), the International Covenant on Civil and Political Rights (ICCPR), and the International Covenant on Economic, Social and Cultural Rights (ICESCR)) including the International Labour Organisation’s Declaration on Fundamental Principles and Rights at Work (ILOD).

*Our expectations*

We expect our employees to avoid and mitigate all negative human rights impacts and to inform, through our management system or grievance mechanisms, any breach of this expectation or doubts that our expectations are being met.

We expect our business partners and all other strategic partners to understand and address our expectations related to human rights. We expect our business partners and strategic partners to inform employees of Coloplast or through our grievance mechanism if our expectations are not being met.

*The grievance mechanism*

Remember that you can report through our Whistle-blower Hotline, if you are uncomfortable raising the issue with your manager.

**Remember that you can report through our Whistle-blower hotline, if you are uncomfortable raising the issue with your manager.**



# Business integrity

Our value 'Respect and Responsibility' requires each and every one of us to always act with integrity. All interaction with all stakeholders must therefore be based on the highest standards of transparency.

When acting on behalf of Coloplast, we should always introduce ourselves to government officials, business partners, or other stakeholders and state our relation to Coloplast.

#### Anti-corruption

Our policy on bribery is clear: We prohibit bribery or any other form of corrupt behaviour, whether conducted by a Coloplast employee or a third party acting on our behalf.

As a general principle, we must never offer anyone anything that could be perceived as an attempt to inappropriately influence his or her decision to purchase, use, sell, or recommend our products. We should not directly or indirectly offer, make, or authorise payment of money or anything of value, to unlawfully:

- Influence the judgment or conduct of any individual, customer, or company;
- Win or retain business;
- Influence any act or decision of any governmental official; or
- Gain an advantage.

Coloplast regards facilitation payments as bribes. You must always refuse to pay facilitation payments, and if you are asked to make one, explain that facilitation payments are contrary to our policies, and then inform your manager of the request.

#### Commercial bribery

Coloplast employees or third party acting on our behalf must never offer, give or receive commercial bribery.

#### Third parties acting on our behalf

When engaging with a third party as an intermediary on Coloplast's behalf, we must ensure that such third party commits to follow business ethical standards similar to ours. As an example our close distribution business partners are required to follow our Distributor Code of Conduct.

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#### NO bribery



Always refuse to give or accept bribes, and if a bribe is offered to you or demanded from you, you must immediately inform your manager. Managers must then report the incident to Corporate Compliance.

An updated list of global contact persons can be found on Corporate Compliance's intranet site.

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**ANTI-CORRUPTION - DO'S & DON'TS**

	
<p>Do:</p> <ul style="list-style-type: none"> <li>· Immediately report if a bribe has been offered to you or demanded from you</li> <li>· Follow applicable local law and industry codes, if stricter than Coloplast BEST</li> <li>· Remember only to provide a benefit to a business partner if the following requirements are met:                             <ul style="list-style-type: none"> <li>· It is permitted according to applicable local laws</li> <li>· It is transparent and properly registered in company books and records</li> <li>· It is NOT a bribe or a facilitation payment</li> </ul> </li> </ul>	<p>Don't:</p> <ul style="list-style-type: none"> <li>· Offer or give any bribe or other form of improper advantages including facilitation payments to government officials or our business partners</li> <li>· Receive/accept any bribe or other form of improper advantages from a business partner or others</li> <li>· Pay a tender committee to win a tender or get inside information</li> <li>· Pay healthcare professionals per new patient discharge or prescription</li> <li>· Pay healthcare professionals or public officials to choose our products</li> <li>· Pay in order to unlawfully get a registration, a permit or to get products on a reimbursement list, etc.</li> <li>· Give gifts or cash to a customs officer to get goods across the border faster (facilitation payments)</li> <li>· In any way tie gifts, hospitality, etc., to past, present or potential future use or recommendation of Coloplast's products</li> </ul>

**Political activities and support**

Coloplast supports your right to engage personally in political activity. You should, however, use your own time and money for such activity, and never use Coloplast facilities or resources to support political candidates or parties.

You must not give the impression that Coloplast supports or endorses any candidate, campaign, or issue with which you are personally involved.

Coloplast does not grant financial support to political parties or political campaigns, but may support third-party organisations that provide such support, for example industry associations or political think tanks.

**Trade restrictions and export control laws**

Coloplast is committed to follow laws which restrict trade with and export to certain countries, organisations and individuals. We acknowledge that these restrictions may apply even to trade within Coloplast companies, and to transactions with suppliers, manufacturers, and business partners.



If you are involved with import or export of goods, you must ensure that transactions have been cleared as permissible under trade restriction and export control laws.

Please contact Corporate Legal, if you have questions or concerns related to import or export control laws.

**Donations and sponsorships**

Coloplast regularly provides donations and sponsorships to support local communities, the scientific community, and certain other organisations. The purpose of these contributions is to foster goodwill, and they must never be used, or give the impression of being used, as a cover for bribery. Remember that perception is very important. If you are in doubt about whether a donation is legitimate then you must consult with Corporate Legal and Compliance.

**DONATIONS AND SPONSORSHIPS - DO'S & DON'TS**

	
<p>Do:</p> <ul style="list-style-type: none"> <li>· Ensure, that all donations and sponsorships are transparent and recorded in Coloplast's books and records</li> <li>· Remember only to grant charitable donations to organisations/institutions and to always comply with applicable laws and regulations</li> <li>· Make proper reports of sponsorships/donations to public authorities, if public reporting is required by local laws and/or applicable industry standards</li> <li>· Consult the section on interaction with healthcare professionals, if you want to sponsor a healthcare professional or an event for healthcare professionals<sup>2</sup></li> </ul>	<p>Don't:</p> <ul style="list-style-type: none"> <li>· Offer or give donations or sponsorships with the expectation or suggestion that Coloplast will receive any improper advantage</li> <li>· Grant charitable donations to individuals</li> <li>· In any way tie donations to past, present or potential future use or recommendation of Coloplast's products or services or to any promise of influence or outcome</li> </ul>

2) For sponsorships involving healthcare professionals, please see Coloplast's Policy on interaction with healthcare professionals


**Fair competition**

Coloplast is committed to the principle of fair, open, and unrestricted competition, and we believe that our product portfolio is strong enough to win fair competition against our competitors.

We are committed to comply with all applicable competition and antitrust laws and regulations, and we support and respect all efforts to promote and protect fair and open competition. Coloplast therefore expects all employees, who deal with competition issues, to know and follow the basic principles of competition law.

Keep in mind that we must never agree to coordinate or cooperate with competitors in any way to fix prices, conduct illegal exchange of confidential data, establish a minimum price level, or to unify other significant conditions of supply. We must also not agree to arrangements with competitors to allocate production or sales quotas, divide markets by sharing customers or geographic areas, or otherwise to achieve 'order in the market place'.

**FAIR COMPETITION - DO'S & DON'TS**

	
<p>Do:</p> <ul style="list-style-type: none"> <li>· Comply with all applicable competition and antitrust laws</li> <li>· Always involve Corporate Legal if competitors, authorities, distributors, suppliers, or other stakeholders bring up issues that may affect competition</li> <li>· Always bid for tenders and Requests for Proposals (RFPs) independently from our competitors</li> <li>· Only gather information about competitors using ethical means and from lawful sources</li> <li>· Seek advice from your manager or from Corporate Legal if you have any questions or concerns regarding competition or antitrust issues</li> </ul>	<p>Don't:</p> <ul style="list-style-type: none"> <li>· Enter into agreements, coordinated practices, or understandings that could restrict competition</li> <li>· Exchange information that is competitively sensitive</li> <li>· Share pricing information or information that could affect pricing with competitors</li> <li>· Place business partners at an unjustified disadvantage, in particular in countries where Coloplast holds a dominant position</li> </ul>

**Seek advice**

The penalties for violating competition laws are severe. Do not hesitate to seek advice from your manager or Corporate Legal if you have any questions or concerns regarding competition or antitrust issues. You may also seek further guidance in the Coloplast Competition law policy.

# What kind of issues could affect fair and open competition?

Any issue that might affect pricing, create a monopoly in a market, amount to abuse of a dominant position in the market or lead to markets being shared between competitors, could affect fair and open competition.

These are some examples of the competition and antitrust topics that you must share with your manager or Corporate Legal:

- Pricing policies among competitors, or pricing practices for distributors
- Trading terms
- Market sharing or sales territory divisions
- Boycotts or cutting off customers
- The sale of products at extremely low prices (e.g. below manufacturing costs)
- External discussions of production levels

Please note that issues affecting open and fair competition are not limited to the examples given here.



# Personal integrity

As Coloplast employees, we must always make decisions that are free from bias, matching with our values, and in the best interests of Coloplast.

## Conflict of Interest

We strive to maintain a transparent, open, and honest culture where potential or actual conflicts of interest are promptly reported and resolved.

We must remove ourselves from the decision-making process when an actual or potential conflict of interest has been identified, and instead we must refer such matters to a superior who has no actual conflict of interest (e.g. your manager) or to local or Corporate Compliance.

## Resolving conflicts of interest

Normally, an actual or potential conflict of interest can be resolved in an acceptable way for both the employee and Coloplast, but it is important that the decision on how to resolve the issue is made by the right people.

## CONFLICT OF INTEREST - DO'S & DON'TS

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<p>Do:</p> <ul style="list-style-type: none"> <li>· Ensure that your actions are made in Coloplast's best interests</li> <li>· Decline any gift or invitation which might make you feel under an obligation or which might give the appearance of an obligation</li> <li>· Avoid situations where your personal interests conflict with Coloplast's best interests</li> <li>· Remove yourself from the decision-making if you have a potential conflict of interest – let a manager without any conflict of interest make the decision</li> <li>· Immediately inform your manager of situations where personal interests <i>could</i> conflict with Coloplast's best interests</li> </ul>	<p>Don't:</p> <ul style="list-style-type: none"> <li>· Use your position with Coloplast to gain an improper benefit for yourself or any of your relatives or close associates</li> <li>· Engage in any outside employment that negatively affects your job performance or interferes with your responsibilities at Coloplast</li> <li>· Engage in any outside activity that competes or appears to compete with Coloplast or violates any of your obligations to Coloplast</li> <li>· Use Coloplast equipment, facilities or resources (including confidential information or intellectual property) in connection with any of your outside activities – unless specifically approved prior to the use</li> </ul>

**Fraud**

Fraud is entirely contrary to our values and culture. Good sales figures, excellent performances, or titles are never an excuse for fraud – large or small. Do not ever commit fraud, and do not ever turn a blind eye to it.

**Gifts, hospitality and other advantages to business partners and government officials**



Coloplast promotes successful working relationships and goodwill with our business partners, who are vital to our success.

As appropriate, we may consider offering a gift or hospitality to a business partner. In such case we should be careful not to create a situation that would suggest a conflict of interest, divided loyalty, or the appearance of an improper attempt to influence business decisions. In many countries stricter rules apply for gifts and hospitality provided to government officials, and violations of such rules may be perceived as corruption. Be cautious to always comply with all applicable rules on interaction with government officials.

Always make sure that hospitality and other advantages are appropriate, legal, and accurately documented according to applicable laws and internal reporting requirements for the protection of both Coloplast's and your own integrity.

Be aware that gifts, hospitality and other advantages offered to healthcare professionals are subject to stricter rules and specific reporting requirements in some markets, and may even be prohibited in some countries. Please see the section on interaction with healthcare professionals.

**GIFTS, HOSPITALITY AND OTHER ADVANTAGES TO BUSINESS PARTNERS AND GOVERNMENT OFFICIALS - DO'S & DON'TS**

	
<p><b>Do:</b></p> <ul style="list-style-type: none"> <li>Remember to only offer reasonable – not lavish – gifts, hospitality and other advantages when allowed and appropriate</li> <li>Offer gifts, hospitality and other advantages openly and ensure accurate documentation</li> <li>Inform your manager or his/her manager immediately, if you have doubts whether gifts, hospitality or other advantages may raise any question on your or Coloplast's integrity, if offered to a business partner</li> </ul>	<p><b>Don't:</b></p> <ul style="list-style-type: none"> <li>Offer gifts, hospitality or other advantages beyond common/local courtesy</li> <li>Offer gifts, hospitality or other advantages that could be perceived to inappropriately influence business decisions</li> <li>Offer gifts, hospitality and other advantages tied to any obligations or expectations</li> <li>Offer gifts, hospitality and other advantages if not conforming to the recipient's rules and local law</li> </ul>

**Gifts, hospitality and other advantages offered to Coloplast employees by external partners**



Coloplast accepts that its employees receive appropriate hospitality and token gifts from business partners as this is an ordinary way of building business relations in many markets,

Employees must never accept or receive gifts exceeding token value.

Gifts and hospitality are often exchanged with good intentions, but may be misunderstood, and can create a perception of improper influence. Therefore, Coloplast employees should not accept any gifts, hospitality, or other advantages that could raise concerns regarding Coloplast's or the employee's integrity.

Be aware that the timing and offer of a gift or hospitality may be very important to the perception of whether it is appropriate to accept the offer. As an example, it is likely to be improper to accept gifts or hospitality during a tender process or before a final sourcing agreement has been signed.

**GIFTS, HOSPITALITY, AND OTHER ADVANTAGES OFFERED TO COLOPLAST EMPLOYEES BY EXTERNAL PARTNERS - DO'S & DON'TS**

	
<p><b>Do:</b></p> <ul style="list-style-type: none"> <li>Remember to only accept gifts if they are in accordance with local laws, regulations, and business practices</li> <li>Remember to only accept reasonable – not lavish – hospitality</li> <li>Remember to only accept gifts, hospitality or other advantages if they could not be perceived to influence business decisions</li> <li>Inform your manager if you have doubts whether gifts, hospitality or other advantages may raise any question on your or Coloplast's integrity</li> </ul>	<p><b>Don't:</b></p> <ul style="list-style-type: none"> <li>Accept monetary gifts or gifts exceeding token value</li> <li>Accept gifts, hospitality or other advantages beyond common courtesy</li> <li>Encourage or solicit gifts, hospitality, or other advantages from any current or potential third party of Coloplast</li> <li>Accept gifts, hospitality or other advantages, if your acceptance may raise any question on your or Coloplast's integrity</li> </ul>

# When can conflicts of interest occur?

A conflict of interest may occur if you or your spouse, partner, relative, or close friend have a personal interest in a business decision being made. There are many situations where your personal interests *could* conflict with the interests of Coloplast. You must be especially careful when:

- Transactions involve your spouse or partner, relatives, or friends – if, as an example, you are to enter into a contract with a company which is owned by your spouse or a friend.
- Transactions involve a company in which you, your spouse or partner, relatives, or friends have a business, financial, or personal interest – if, as an example, you are to enter into a contract with a company in which your parents have recently made a large investment.
- You are involved in hiring or managing your spouse, partner, relatives, or friends
- You have professional engagements outside of Coloplast – for example outside employment, business ventures, investments, board memberships or government roles

# What do I do, if a conflict of interest occurs?

It is better to be safe than sorry when it comes to conflicts of interest.

- Proactively report all potential or actual conflicts of interest that you may have, whether they involve you or a colleague
- Immediately remove yourself from any decision making if you have a conflict of interest, and let a manager without any conflict of interest make the decision
- Managers must immediately resolve conflict of interest issues, and the resolution must be recorded in writing



# Interaction with HCPs\*

Coloplast interacts with healthcare professionals all the time in order to ensure optimal use of our products by consumers. Healthcare professionals collaborate with us in developing and improving products, raising awareness about our products, and in exchanging scientific and developmental information.

We therefore must be familiar with, and always follow, applicable laws, regulations, ethical codes, and industry standards – both in our own country and in the country of the healthcare professional.

## General guidelines

As a general principle, we must never offer a healthcare professional anything that could be viewed as an attempt to inappropriately influence his or her decision to purchase, use, prescribe or recommend our products. We must always be able to demonstrate the professional purpose of interacting with a healthcare professional.

If an activity involves more than one country (for example a healthcare professional from one country performing services in another), we need to comply with requirements in both countries, to the extent they apply. Be aware that some countries require reporting of fees, gifts, and hospitality provided to healthcare professionals. Such reporting requirements may apply across boundaries, and negligence of the requirements may be subject to substantial fines.

## Gifts, hospitality and other advantages to healthcare professionals

Many national laws and regional or local industry codes regulate gifts, hospitality and other advantages offered to healthcare professionals and healthcare organisations. Therefore, we must always consult applicable local law and industry codes as well as global and local Coloplast policies, before offering gifts or hospitality to a healthcare professional. If it is permissible to give gifts to healthcare professionals, such gifts must always be of moderate value and have a professional or educational purpose or benefit patients.

Coloplast only provides hospitality (including meals) to healthcare professionals if it is legal and in accordance with applicable industry regulations, and within the context of a legitimate event or meeting. Events and meetings must always take place in appropriate venues with suitable settings for the event or the meeting. Any hospitality occurring in conjunction with an event must be kept at a moderate and reasonable level, and must be subordinate in time and focus for the primary purpose of the event or the meeting. Travel arrangements must similarly be kept at a reasonable level. We never pay for spouses or other guests of healthcare professionals to travel.

Find more information on gift and hospitality policies in Coloplast's Global policy on interaction with healthcare professionals and in local policies.

## Consultancy and speakers' fees

In order to safeguard the quality of our products and secure the highest possible expertise in our fields, we have a legitimate need to obtain the advice of experts and specialists from time to time.

The hiring of healthcare professionals as consultants or speakers must therefore be based solely on the healthcare professional's suitability for the job and her or his professional abilities and qualifications. A consulting agreement shall not be used to induce a healthcare professional to purchase or recommend Coloplast products.

\* Healthcare professionals

When engaging a healthcare professional, we must ensure that the compensation is proportionate to the services delivered, consistent with fair market value, and kept transparent. The details of the engagement must always be documented in a written agreement.

#### Product promotion and training activities

Through our product promotion and training activities, we play an important role in informing healthcare professionals and others about the safe and effective use of our products. We are committed to applying good practices relating to product promotion by complying with applicable laws, regulations, and industry codes.

Managers must therefore make sure that anyone involved in promoting our products is trained in all applicable laws and regulations as well as Coloplast and industry standards.



Product promotion must be based on valid scientific evidence and provide accurate, objective, and complete information about the product. You must only use promotional materials that are current and have been approved as defined by applicable SOPs.

#### Sponsorships and educational grants

Coloplast provides sponsorships and educational grants according to applicable laws and regulations, including local and regional industry codes. Please follow any local process established in our business, e.g. a Grants Committee.

Find more information in Coloplast's Global Policy on interaction with healthcare professionals.

#### INTERACTION WITH HEALTHCARE PROFESSIONALS - DO'S & DON'TS

	
<p><b>Do:</b></p> <ul style="list-style-type: none"> <li>Be sure that you can demonstrate the professional purpose of interacting with a healthcare professional and/or a healthcare organisation</li> <li>Consult applicable local law and industry codes as well as global and local Coloplast policies, before offering gifts or hospitality to a healthcare professional</li> <li>Only provide hospitality to a healthcare professional when allowed and appropriate under applicable laws and regulations, and keep the hospitality at a reasonable and moderate – not lavish - level</li> <li>Only provide gifts and other advantages to a healthcare professional when allowed and appropriate – if gifts are permissible, such gifts must always be of moderate value and have a professional or educational purpose or benefit patients</li> <li>Observe applicable reporting requirements</li> <li>Ask your manager, local or Corporate Compliance, if you are in doubt</li> <li>Inform your manager or his/her manager immediately, if you have doubts whether gifts, hospitality or other advantages may raise any question on your or Coloplast's integrity, if offered to a healthcare professional</li> </ul>	<p><b>Don't:</b></p> <ul style="list-style-type: none"> <li>Offer gifts, hospitality or other advantages that could be perceived to inappropriately influence the healthcare professional or a healthcare organisation</li> <li>Offer gifts, hospitality and other advantages tied to any obligations or expectations</li> <li>Offer gifts, hospitality or other advantages beyond common/local courtesy</li> <li>Offer gifts, hospitality and other advantages if not conforming to the applicable laws and regulations</li> <li>Give gifts in the form of cash or cash equivalents</li> <li>Pay fees exceeding fair market value</li> <li>Pay for spouses or other guests</li> </ul>

# How do you engage...

... a healthcare professional as a consultant or speaker?

When engaging a healthcare professional:

- Make sure that you can demonstrate a legitimate business need
- Obtain proper documentation for her or his professional competencies and experience
- Inform the healthcare professional's employer (hospital, clinic, university, etc.)<sup>3</sup>
- Always draw up a written contract using the Coloplast template contract for speakers, consultants, etc.
- Make sure that any fee paid to the healthcare professional reflects fair market value – if in doubt ask your manager or local or Corporate Compliance
- Document the work done by the healthcare professional and that it has been successfully completed
- Make proper reporting – if required by law or industry code in your or the healthcare professional's country

3) Different rules on the information of a healthcare professional's employer apply in China and the US – please consult with local Compliance and local policies

# Product quality and innovation

The Coloplast name is – and will continue to be – associated with innovative products and services to help people with intimate healthcare needs. Our reputation for quality and innovation gives us a competitive edge, and we will never compromise our high standards.

## Product quality and patient safety

Compliance with both internal and external quality standards, regulatory requirements and international practices is essential to maintain the trust of customers, authorities, and business partners, and to meet their expectations regarding the quality, safety, and usefulness of our products. We always prioritise safety and quality from the early stages of designing a new product and throughout its life cycle.

In order to monitor, analyse, evaluate, and control the risks related to our products, Coloplast has established a post-market surveillance process in accordance with regulatory requirements. If we become aware of a complaint, we will follow the complaint registration process, which ensures timely reporting to authorities and gives valuable input for improvement of the product quality.

## Innovation, clinical trials and general product development ethics

Coloplast strives to set the industry standard for listening and responding to our users' needs through innovative solutions within all of our business areas. This means that we conduct our research and development in close cooperation with our consumers and healthcare professionals with expert knowledge.

Coloplast conducts clinical trials in accordance with regulatory requirements and internationally recognised guidance. We collect and promptly report required data to relevant regulatory authorities, and retain clinical data in accordance with applicable law.

When developing new products, we comply with regulatory design control requirements, with Coloplast processes and quality procedures as well as common ethical product development principles.

## Animal testing

When developing products for people with intimate healthcare needs, limited animal testing is sometimes required in order to ensure the safety of our products. Furthermore, some authorities require documentation obtained through animal testing to achieve product approval. For these reasons, we cannot completely avoid animal testing in the development and approval of our products. Nonetheless, we will always attempt to replace animal testing by using non-animal testing methods, when possible. When animal testing is required, we refine and reduce the testing by testing devices at the latest possible stage of development, and by using the test methods that cause the least distress to the animals.

Additionally, we only use suppliers who comply with legislation and international standards relating to animal welfare, and we regularly monitor our suppliers to ensure compliance.

For more information on Coloplast's animal care, please see our Animal Testing Policy.



# Coloplast assets and information

Every one of us is responsible for protecting Coloplast assets. This means taking good care of equipment, protecting physical assets, and ensuring that they are used for legitimate purposes only.

It also means safeguarding confidential information and intellectual property, securing personal data, and keeping accurate and complete books and records.

#### Confidential information and intellectual property

Our confidential business information is very valuable and must always be protected. As employees at Coloplast, we have access to confidential business information in many ways. This is why we are all expected to respect Coloplast's proprietary and confidential information, not to disclose it to any unauthorised third party, and only use it for Coloplast's legitimate business.

We must always be careful about where, when, and with whom we discuss Coloplast matters involving confidential information. When in public spaces we need to be especially aware that some third parties may strive to obtain confidential information. Always follow both local and global IT policies and guidelines.

It is important that we never provide third parties with confidential information unless a confidentiality agreement has been signed, or the nature of the relationship between Coloplast and the third party ensures sufficient confidentiality (for example external financial or legal advisor bound by professional duty of confidentiality).

We will always respect the confidentiality of information belonging to third parties. If third parties have entrusted us with confidential information, we will only use their confidential information for legitimate business purposes, and will take all reasonable precautions to protect third party confidential information. If you are aware of an unlawful disclosure of confidential information, immediately inform Corporate Legal.

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#### Are you aware of an infringement of intellectual property rights or insider trading?



Immediately inform Corporate Legal or Investor Relations – find contact details on Corporate Compliance's site on Connect.

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We are known for our innovative product portfolio and are dependent on intellectual property rights. Therefore, it is very important that we also guard our intellectual property rights by only sharing information about our intellectual property with people who have a legitimate need to know.

**CONFIDENTIAL INFORMATION - DO'S & DON'TS**

	
<p>Do:</p> <ul style="list-style-type: none"> <li>· Execute confidentiality agreements with people outside of Coloplast (e.g. suppliers and external consultants) before disclosing confidential information</li> <li>· Respect third parties' confidential information and use other parties' confidential information only for legitimate business purposes</li> <li>· Think carefully about how you handle confidential information in public spaces</li> <li>· Avoid unintentional sharing of company information</li> <li>· Use the VPN when connecting to non-company internet</li> </ul>	<p>Don't:</p> <ul style="list-style-type: none"> <li>· Share confidential information with a person who has no need to receive the information</li> <li>· Copy, take, or retain any Coloplast confidential information or intellectual property for personal use or advantage</li> <li>· Use improper means to acquire confidential information from other parties</li> <li>· Make use of Coloplast confidential information after the termination of your employment</li> <li>· Bring large amounts of print-outs when travelling</li> </ul>

**Insider trading**

Insider information is information that is unknown to the public, which – if it were known – would either be likely to affect the price of shares in a company, or be likely to affect people's decision to buy or sell such shares.

You must never trade, disclose, or tip others while in possession of insider information. This can be a serious criminal offence, which can result in imprisonment. If you are in doubt about any actions which you think may constitute insider dealing then you must contact Corporate Legal or Investor Relations.



**Personal data**

Coloplast respects people's privacy and recognises the importance of protecting personal data. We handle personal data ethically and responsibly to support our goal of being both a responsible employer and a trusted partner to our consumers and business partners.

Coloplast may have to collect, use, and transfer personal data about employees and third parties (consumers, patients, business partners, medical practitioners, representatives of scientific communities, etc.) to meet legal requirements, or enable effective business operations and services. There are many national and international laws regulating collection and processing of personal data. Not handling personal data according to laws may harm the individual whose data are held. In some countries, misuse of personal data is a criminal offence, and misuse may have a serious negative impact on Coloplast.

Coloplast's Global Personal Data Policy requires us to collect, handle, and secure personal data properly. If you have questions about handling of personal data, please contact the Data Protection office.

**PERSONAL DATA - DO'S & DON'TS**

	
<p>Do:</p> <ul style="list-style-type: none"> <li>· Comply with applicable legislation and Coloplast's Global Personal Data Policy</li> <li>· Remember to only collect, use, disclose or store personal data for a specific legitimate and necessary purpose</li> </ul>	<p>Don't:</p> <ul style="list-style-type: none"> <li>· Retain personal data any longer than necessary for the purpose for which they are collected and used</li> <li>· Compromise on the security of personal data</li> <li>· Transfer personal data outside of Coloplast without a consent, recipient evaluation and/or data processor agreement</li> </ul>

**Books and record keeping**

Accurate and thorough records are essential to Coloplast's business success. These records are used to make vital business decisions and to ensure that Coloplast's executive management and board are able to obtain an accurate, complete, and transparent view of our business operations and performance. Timely and accurate handling and reporting of financial data are therefore at the core of our commitment to do business honestly and ethically.

We must at all times comply with laws and regulations, reporting and accounting guidelines from Corporate Finance as well as any other policies and guidelines on books and record keeping. This is why we keep company books and records for as long as they are needed for business purposes, or longer if required by law.



**Accounting issues**

If you have concerns about inaccurate or improper books and record keeping or financial accounting, you must immediately contact Corporate Finance or Corporate Legal.

It is equally important that we take extra care in relation to financial information, which is subject to additional laws relating to the accuracy and completeness of books and records. Be aware that in many markets non-compliance bears the risk of harming Coloplast's position in the participation of tenders, and can potentially threaten our relationship with public authorities.

Managers must ensure that adequate internal controls are in place, so that it complies with laws and regulations as well as the procedures and guidelines issued by Corporate Finance. Weaknesses in our internal controls could lead to inaccurate reporting, lack of segregation of duties, inadequate protection of our assets, and fraud.

#### BOOKS AND RECORD KEEPING - DO'S & DON'TS

	
<p>Do:</p> <ul style="list-style-type: none"> <li>· Accurately and thoroughly record information required for your role and maintain required documentation</li> <li>· Have an increased focus on revenue recognition, operating expenses, cut off items and accruals</li> <li>· Remember to only destroy company records if they are no longer needed for business purposes, if you have an obligation to do so, and if there is no legal requirement for them to be retained</li> </ul>	<p>Don't:</p> <ul style="list-style-type: none"> <li>· Falsify books or records</li> <li>· Deliberately or negligently record inaccurate information</li> </ul>



#### Communication and social media

Protecting Coloplast's image and reputation is important to us. Our communication helps us connect with each other and our stakeholders. We should always communicate in ways that demonstrate our values, advance our purpose, and enhance our reputation and brand.

Therefore, only designated employees trained in how to respond on behalf of Coloplast are authorised to speak on our behalf about our company or our products. Sometimes external parties – the press, industry analysts or members of the financial community, etc. – contact Coloplast's employees directly in an attempt to seek information about our business, employees, customers, or partners. Any employee interaction with these parties regarding our company must be coordinated with Investor Relations and Corporate Communication. If contacted by an external party, you should always obtain details of the caller and forward these to an appropriate person for them to be dealt with. Find the list of contacts on Corporate Compliance's site on Connect.

Any Coloplast employee can obviously participate actively in any non-business related use of social media in accordance with applicable local laws and regulations. However, it is important that we always keep in mind that any use of social media by Coloplast employees, including any private use, could be attributed to Coloplast, and negatively influence our image and reputation. Consequently, we must always use social media in a responsible manner. For more guidance, you can consult our global and local policies on the use of social media or contact Corporate Communications.

#### COMMUNICATION AND SOCIAL MEDIA - DO'S & DON'TS

	
<p>Do:</p> <ul style="list-style-type: none"> <li>· Give only truthful and factually correct information about anything relating to Coloplast</li> <li>· Be objective and professional in your communication, and use reasonable etiquette both externally and internally</li> <li>· Avoid offensive, inflammatory or aggressive language, as well as anything that would embarrass or disparage Coloplast</li> </ul>	<p>Don't:</p> <ul style="list-style-type: none"> <li>· Speak to the press about Coloplast unless you are specifically authorised to do so</li> <li>· Imply Coloplast endorsement of your personal views by mixing your professional and personal communication</li> <li>· Disclose confidential information belonging to Coloplast or others, except to those who have a legitimate need and are authorised to see the information</li> <li>· Discuss off-label use or advise on unconventional use of Coloplast products</li> <li>· Speak on behalf of Coloplast online in a mis-leading setting</li> </ul>

# Caring for the environment

We honour our values of passion, respect, and responsibility in our commitment to do our part in addressing global environmental challenges related to climate change, resource scarcity and the use of hazardous substances.

## Environmental issues

Our environmental management system is certified according to the international ISO 14001 standard to ensure compliance with legislation and systematic commitment to continuously improve our impact on the environment.

When developing products, Coloplast addresses environmental challenges by incorporating ecodesign-principles in all stages of the development. This means:

- Utilising raw materials with lower environmental impact
- Improving waste management systems and recycling
- Minimising the use of energy required in production

Life cycle assessments guide Coloplast's environmental efforts, covering everything from raw materials to waste management, energy consumption, disposal, and transportation of goods. Our strategy is to avoid raw materials that stress the environment, and to continuously reduce usage of such materials.

All employees at Coloplast are expected to limit the daily impact of their activities on the environment, and share good ideas on how to do so. We are also expected to report any situation likely to pose a risk to the environment to managers or the Environment, Health & Safety department.



# Explanation of terms

Terms	Explanation
Bribery	Bribery is the use of money, gifts, or favours to influence the behaviour of a government official or a business relation with the intention of gaining an undue advantage.
Commercial bribery	<p>Commercial bribery is a form of bribery which involves corrupt dealing with the agents or employees of potential buyers in order to secure an advantage over business competitors. It is a form of corruption which does not necessarily involve public officials or facilities.</p> <p>A common type of commercial bribery is the 'kickback'. As an example, a supplier of goods or services from 'Company A' pays a 'kickback', if the vendor offers the procurement manager of 'Company B' a payment to the procurement manager's private account with the purpose of having the procurement manager choose Company A as supplier of goods or services to Company B.</p> <p>Bid-rigging in non-governmental contracts is another example of commercial bribery.</p> <p>As with bribery of public officials, the bribe may take various forms: payments, advantages, services, etc.</p> <p>Coloplast allows NO commercial bribery.</p>
Confidential information	<p>Confidential information is information that you know due to your position in or relation to Coloplast or any other party, but which is not publically available. It includes information about our business, performance and products, as well as information that customers and business relations have entrusted to us.</p> <p>Examples include but not limited to: Financial data, master data, manufacturing methods, technical information, information on intellectual property, research and development projects, business plans, mergers and acquisition activities, information on prices, customers, consumer data, and suppliers/vendors, personal employee information, etc.</p>

Terms	Explanation
Donations and sponsorships	<p>A donation is a voluntary gift given without return consideration or compensation. A donation can have many forms, e.g., money, services, second hand equipment, or knowledge sharing.</p> <p>A sponsorship is the situation when Coloplast provides financial support for a project or an event, or supports an organisation in return for advertising opportunities, e.g. the display of a logo at sports events, favourable mentioning in a magazine, etc.</p>
Facilitation payments	Facilitation payments are small payments to government officials made to perform or speed up a routine task – e.g. clearing customs, getting a visa that you are legally entitled to, or renewing license plates. In Coloplast, this is considered a bribe.
Fraud	<p>Fraud is a deception deliberately made in order to secure unfair or unlawful gain. Fraud includes:</p> <ul style="list-style-type: none"> <li>· Stealing or not returning office equipment, including computers and phones, for example, or unauthorised transferring Coloplast funds and office equipment</li> <li>· Stealing or not returning workshop tools, production materials, including waste and products. Misusing company resources for private purposes, for example:             <ol style="list-style-type: none"> <li>a) Privately renting out Coloplast company cars, using machinery for private production, getting preferential treatment or free goods or services from Coloplast suppliers for private purposes, or reporting private expenses as business related</li> <li>b) Making false expense claims</li> <li>c) Forging invoices or documentation</li> <li>d) Stealing intellectual property; and</li> <li>e) Intentionally filing false financial records or statements</li> </ol> </li> </ul>
Gifts, hospitality and other advantages	Gifts, hospitality and other advantages means anything of value.

Terms	Explanation
Harassment	Harassment can be physical, visual or verbal in nature. Examples of prohibited harassment include, but are not limited to, notes, letters, statements, slurs, e-mails or other electronic communication. It also includes pictures, drawings, gestures, and other types of gestures and other types of actions that are unwanted and based on an individual's race, colour of skin, age, gender, nationality, social or ethnic origin, religion, disability, medical condition, sexual orientation, or marital status.
Healthcare organisation	A healthcare organisation is any organisation (irrespective of the legal or organisational form) that is a healthcare, medical, or scientific association or organisation which may have an influence on the prescription, recommendation, purchase, order, supply, utilisation, sale, or lease of healthcare products or services such as a hospital, clinic, laboratory, pharmacy, research institution, foundation, university or other teaching institution, or learned society (except for patient groups); or through which one or more healthcare professionals provide services.
Healthcare professional	A healthcare professional is any individual (clinical or non-clinical, including but not limited to, physicians, nurses, technicians, and research co-ordinators) or entity (such as hospitals or group purchasing bodies) that directly or indirectly recommend, purchase, lease, use, prescribe, or arrange for the purchase or use of our products. The interaction with healthcare professionals is strictly regulated. Extra care must be taken when healthcare professionals are employed or funded by government – many healthcare professionals are.
Improper advantage	Improper advantage means an advantage to which the company is not clearly entitled, and may include for example a price increase approval, contract award, favourable product specification selection, grant of operating permits or licenses, product use/registration approval, favourable court decision, or tax dispute settlement.
Intellectual property	Intellectual property is a term referring to intangible assets to which rights are recognised, e.g.: patents, patent applications, trade secrets, trademarks, copyrights, domain names, and related rights.

Terms	Explanation
Kickback	Kickback is a form of negotiated bribery where a company pays something of value to a recipient as compensation or reward (quid pro quo) for providing favourable treatment. Examples of kickback situations are a vendor submitting a fraudulent or inflated invoice with an employee of a company assisting in securing payment, or a vendor paying an amount or a percentage of a contract revenue to a government official in order for the government official to choose the vendor's bid over those of other vendors.
Personal data	Personal data is information that can be used to identify a specific person, e.g. name, address, phone numbers, social security numbers and passport numbers. Some personal information is considered sensitive, e.g. data on ethnic or racial origin, political opinions, religious beliefs, trade union membership, health-related information, sex life, criminal offences, serious social problems, and other purely private matters.
Social media	<p>The term social media refers to blogs, wikis, social networks/media, video and photo sharing websites, mobile applications, online forums, virtual worlds and any other form of publishing or discussion via the internet or mobile communications technologies. Almost all corporations/businesses maintain a social media presence or interact on social sites.</p> <p>Social media typically have the following characteristics:  They often support global collaboration and sharing of opinions, insights, experiences and perspectives often with strangers.  The content within them, and often the functionality, is managed and regulated by the user community itself and not the provider of the tool or a third party institution.</p>

Coloplast develops products and services that make life easier for people with very personal and private medical conditions. Working closely with the people who use our products, we create solutions that are sensitive to their special needs. We call this intimate healthcare.

Our business includes ostomy care, urology and continence care and wound and skin care. We operate globally and employ more than 10,000 people.

Ostomy Care  
Urology & Continence Care  
Wound & Skin Care

