

CODE of CONDUCT

As an international company, we have a particular duty to respect, promote, and comply with the principles of ethical and social responsibility associated with human rights, the workplace, and working conditions, not to discriminate, to maintain equality and relations with the surrounding world.

The Mölnlycke Health Care Code of Conduct is a set of basic rules, guidelines and criteria that comply with established international standards and meet our customers' needs and expectations.

We also expect our suppliers to adhere to our Code of Conduct and have developed a Supplier Code which builds on our Code of Conduct and specifically targets issues and conduct that are more closely applicable to suppliers. As a large company and buyer we are in a position to affect working conditions in a positive way and promote workers' rights in our major suppliers' factories. We work actively with our suppliers to make sure we not only have an efficient relationship, but also take human rights and health and safety into consideration.

CODE OF CONDUCT

The Board of Directors has adopted this Corporate Code of Conduct to govern the behavior of our company – Directors of the Board, permanent and temporary employed, temporary workers and consultants. Everyone who represents Mölnlycke Health Care has a responsibility to be familiar with and comply with this Code. No code or set of standards can cover every possible business situation that may arise in the complex regulatory environment in which Mölnlycke Health Care operates.

Mölnlycke Health Care considers compliance with this Code to be vital. The Company's reputation for quality products and high standards and our passion for our Mission can only be maintained by consistently honest and ethical dealings.

COMPLIANCE WITH THE LAW

Mölnlycke Health Care and its employees shall comply with all applicable laws and regulations where we are operating. We act proactively when possible, such as with the recently enacted United States' Sunshine Act and the United Kingdom's Bribery Act. If it is not possible for Mölnlycke Health Care to participate successfully in any business opportunity in any part of the world while complying with this policy, Mölnlycke Health Care will not participate in that business opportunity.

EMPLOYEE RESPONSIBILITY

Managers are expected to know and follow the laws of each relevant market in which Mölnlycke Health Care does business. Employees are expected to comply with those laws, and Managers are expected to ensure compliance. As a Company, we provide relevant training and access to resources to assist.

CORPORATE SOCIAL AND ETHICAL RESPONSIBILITY

Our guidelines for this initiative are based on the principles outlined in the following documents:

- UN Agenda 21.
- ISO 26000 Guidance on Social Responsibility.
- UN Declaration on Human Rights.
- UN Global Compact.
- OECD Guidelines for multinational companies.
- Relevant ILO (International Labour Organisation) conventions.

The commitment also applies to our relations with business partners, suppliers, and subcontractors. If any human rights abuses are committed by our partners, then it is our duty to assist in ensuring that such violations cease, or if this fails, to stop working with that partner.

AT THE WORKPLACE

A strong and consistent relationship with all employees, built on mutual respect and dignity, is a vital concern for Mölnlycke Health Care. Our Core Values – Passion, Learning and Integrity guide us in our work and conduct.

We must work actively to promote equality in the workplace. Unlawful discrimination based on gender, age, sexual orientation, race, color, religion, ethnicity, social origin, disability, or political opinion will not be tolerated. Child labor as defined by ILO Conventions is prohibited.

Mölnlycke Health Care will comply with all applicable laws relating to forced labor, child labor, minimum national salaries, working hours, leave and overtime, and the timely and accurate payment of wages.

Employees are free to, and entitled to, form and/or join union organizations. Employees shall be able to report complaints about their working conditions without risking any negative consequences as a result of doing so.

RELATIONS WITH THE WORLD AROUND US

We must not be either directly or indirectly involved in situations that entail violations of human rights.

RESPECT IN THE WORKPLACE

No employee should be subjected to verbal or physical harassment, and such conduct will not be tolerated. Mölnlycke Health Care is committed to creating a work environment that is free from harassment in any form, a culture that recognizes and appreciates the advantages of a diverse work force, and a decision process which seeks to ensure that all employees are treated with dignity and respect.

100%

COMMITTED TO ENSURING THAT ALL OUR PRODUCTS AND SERVICES MEET THE HIGHEST LEVELS OF QUALITY AND SAFETY



ENVIRONMENTAL MANAGEMENT

Mölnlycke Health Care is committed to doing business in an environmentally responsible manner and will strive to improve its performance to benefit its employees, customers, communities, shareholders, and the environment.

HEALTH AND SAFETY

Mölnlycke Health Care is committed to providing a safe, healthy work environment for employees and guests to our premises that is in compliance with all applicable laws and regulations in the countries where we are operating and with our global health and safety policy. All employees are expected to develop a pro-active, cooperative attitude toward issues of health and safety throughout the Company.

CUSTOMER RELATIONSHIPS

No benefit will be given to a customer with an explicit or implicit requirement to use or purchase Mölnlycke Health Care products.

DONATIONS, GIFTS AND BUSINESS COURTESIES

The giving of gifts is generally prohibited. Donations to customers or organizations closely affiliated with customers must comply with local laws and standards and should promote a social benefit.

IMPROPER PAYMENTS

No bribes, kickbacks, or other payments for illegal purposes shall be made to or for the benefit of government employees or officials, any customers, or others. Nor shall such payments or benefits be accepted by any Mölnlycke Health Care employee.

PAYMENTS TO CUSTOMERS

Mölnlycke Health Care may compensate customers for consulting, research and other legitimate services rendered, and reasonable costs incurred where the services have value to Mölnlycke Health Care and are rendered for fair market value. In limited circumstances, Mölnlycke Health Care may underwrite clinical research or continuing education programs.

FAIR DEALING

All employees should deal fairly with Mölnlycke Health Care's customers, suppliers, competitors, and employees. No one should take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other unfair-dealing practice.

RECORDKEEPING

Mölnlycke Health Care entities will maintain accurate Company records and accounts in order to ensure legal and ethical business practices and to prevent fraudulent activities.

ANTITRUST/COMPETITION LAWS

Mölnlycke Health Care fully supports antitrust laws in the U.S. and competition laws outside the U.S. to ensure free and open competition in the marketplace. Violations of these laws by Mölnlycke Health Care and its employees are prohibited.

CONFLICT OF INTEREST

Mölnlycke Health Care employees are responsible for avoiding conflicts of interest as well as the appearance of such conflicts.

INTELLECTUAL PROPERTY AND CONFIDENTIAL INFORMATION

Mölnlycke Health Care invests substantial resources in developing proprietary intellectual property and confidential information, both of which are critical to the Company's future success. Mölnlycke Health Care protects its intellectual property by seeking patent, trademark, or trade secret protection. It protects its confidential information by taking precautions to prevent inappropriate disclosure or loss of such information. All employees share a responsibility to protect company intellectual property and confidential information.

CORPORATE OPPORTUNITIES

Employees may not take for personal use opportunities that are discovered through the use of corporate property, information or position, nor may they use corporate property, information or position for their own personal gain or to compete with Mölnlycke Health Care.

PROTECTION AND PROPER USE OF COMPANY ASSETS

All employees should protect Mölnlycke Health Care's assets and promote their efficient use. Theft, carelessness, and waste have a direct impact on Mölnlycke Health Care's profitability. All Mölnlycke Health Care assets should be used for legitimate business purposes.

CLINICAL, REGULATORY AFFAIRS AND QUALITY AFFAIRS

Mölnlycke Health Care products are heavily regulated by governmental agencies, health ministries, and other regulatory authorities worldwide.

Mölnlycke Health Care is 100% committed to ensuring that all our products and services meet the highest levels of quality and safety. To achieve this, we meticulously comply with the regulations, legislation and requirements of all the different regions in which we are present.

POLITICAL ACTIVITY

No corporate funds, or other corporate assets, may be contributed directly to any political party, political committee, or candidate for public office at the federal level, or at the state level unless permitted by law, with the exception of funds used to administer the corporate political action committee.

PEOPLE ACTING ON BEHALF OF MÖLNLYCKE HEALTH CARE

Mölnlycke Health Care expects its independent dealers, distributors, and agents to act consistently with the policies set out in this Code. The Mölnlycke Health Care Manager responsible for any such relationship must ensure that the terms of the relationship are set out in a written agreement, provide a copy of the Code, and require consistency with the Code in all dealings on Mölnlycke Health Care's behalf.

GOVERNMENT, ANALYST AND MEDIA INQUIRIES

Mölnlycke Health Care must be made aware of any inquiries from the government, the financial/analyst community, or the media so that it can properly and thoroughly respond.