

Anti-corruption policy

1. PURPOSE

Mölnlycke is committed to conducting business in an ethical way. The purpose of this Policy is to ensure Mölnlycke and Personnel comply with all relevant Anti-Bribery and Anti-Corruption Laws.

2. APPLICATION

This Policy applies to entities controlled by Mölnlycke AB and Personnel working for or on behalf of such entities. This Policy does not apply to entities governed solely by entity board of directors (namely, Tamer Mölnlycke Arabia - TMC).

3. PRINCIPLES

- 3.1. Mölnlycke prohibits all forms of bribery and corruption related to our business or the business of Third Parties that work for us or on our behalf.
- 3.2. Mölnlycke prohibits any offer, payment, promise of payment or authorisation of the payment of any money, gifts, loans or anything of value¹, whether given directly or indirectly, to any person, including any Government Official (GO) or private person, in order to influence any act or decision to obtain or retain business or gain any business advantage (e.g., regulatory approvals, prescriptions, tender awards, business leads, etc.).
- 3.3. Mölnlycke prohibits the receipt of anything of value by Personnel from suppliers, vendors or others who may seek thereby to influence any act or decision. Generally, gifts that are of modest value and can be shared with colleagues are allowed.
- 3.4. Mölnlycke prohibits facilitation payments irrespective of whether local laws permit facilitation payments. Facilitation payments are typically small, unofficial payments made to secure or expedite a routine government action by a GO.
- 3.5. Mölnlycke has four safeguarding principles for ensuring compliance with all relevant Anti-Bribery and Anti-Corruption Laws. If the principles below are not fulfilled, do not proceed:
 - 3.5.1. Principle of legitimacy: Expenses (or anything else of value) related to Mölnlycke business activities must serve a legitimate business purpose. This purpose can include promoting, demonstrating, or explaining our business, or fulfilling contractual obligations. Additionally, expenses for meals, drinks, travel, and lodging may only occur in connection with legitimate occasions for educating, promoting, or discussing Mölnlycke products, and following any internal relevant procedures to ensure compliance.
 - 3.5.2. Principle of separation: Interactions between Personnel and Third Parties may not be misused to exert undue or improper advantages. For example, such interactions should not be contingent upon sales transactions, use or recommendation of Mölnlycke's products.
 - 3.5.3. Principle of transparency: Books, records, and accounts must accurately and transparently document all transactions and dispositions in reasonable detail. Personnel must never authorise expenses that appear to be improper or lack adequate description or supporting documentation. The purpose of any payment, gift, hospitality, or similar item must be clear, appropriate, and transparent. Personnel must not create or conceal any false or artificial entries in any Mölnlycke books or records, nor should they do so for other entities we interact with. Additionally, cash

¹ Anything of value should be read broadly as bribes can be made in the form of both financial and non-financial advantages, such as cash, gift cards, vouchers, gift certificates, discounts, rebates, forgiveness or payment of debt, gifts, entertainment, payment of travel expenses, educational expenses, and employment.

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and cash-equivalents (e.g. shopping coupons, gift vouchers and reward points) shall never be offered.

- 3.5.4. Principle of modesty: All business expenses that Personnel pays for or provides must be reasonable and appropriate in terms of timing and location. Additionally, these expenses should be modest in value and frequency. Payments and reimbursements must be in line with prevailing market rates and industry standards.

4. MAIN AREAS OF CONCERN

Interacting with GOs and HCPs

- 4.1. Our customers often rely on HCPs or GOs for prescription, research, clinical trials, and product development. This dependence can create an environment where undue influence or favouritism may occur, creating a risk for corruption and bribery.
- 4.2. Personnel interact with GOs and HCPs at various levels such as for sales and marketing activities, import and export activities, licenses, permits, audits, and inspections.
- 4.3. Any relationship with GOs must be in strict compliance with the applicable rules or regulations in the country relating to the GO or that have been imposed by the GO's employer. In many countries the HCPs with whom we interact are GOs, and therefore Mölnlycke treats all HCPs as GOs.

Relationship with Third Parties

- 4.4. Mölnlycke and Personnel could be liable for corrupt or improper offers, promises, or payments by Third Parties. Mölnlycke must conduct an adequate risk-based due diligence on Third Parties (through for example the Compliance Screening and Due Diligence Business Procedure), inform them of our policies, have formal and written agreements and contracts, including relevant representations and warranties, and monitor compliance.
- 4.5. Personnel are prohibited from directly or indirectly making any corrupt or improper payments. We also prohibit any Third Party from making corrupt or improper payments on our behalf in connection with our business.

Political and Charitable Contributions

- 4.6. Mölnlycke is committed to the communities in which we do business and permits reasonable donations to bona fide charities. We must ensure that donations are only used for proper charitable purposes, do not cause any conflict of interest or even the appearance of a conflict of interest, and are not otherwise misapplied in violation of this Policy. For this purpose, Mölnlycke does not for example:
- make political donations, including donations to political candidates, political parties, and political party officials; or
 - make donations to charities of a customer's choosing as part of a tender.

Hospitality, Travel and Entertainment

- 4.7. Mölnlycke does not offer to, or accept from, Third Parties (including HCPs and GOs) any hospitality, travel or entertainment that could influence a business decision or affect either Mölnlycke's or the Third Party's impartiality.
- 4.8. However, Mölnlycke and Personnel may offer and accept reasonable and proportionate hospitality, travel and entertainment, whose value is in accordance with relevant Mölnlycke procedures and applicable laws and regulations. However, Mölnlycke does not provide any entertainment to GOs (including HCPs) or offer any hospitality, travel or entertainment to anyone who accompanies a GO to a Mölnlycke business meeting, congress or comparable event.

Agreements and Template Clauses

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- 4.9. Agreements often involve intricate legal language, making it challenging to detect hidden corrupt practices. Therefore, it is important that any agreement with a Third Party is properly reviewed prior to signing.
- 4.10. To ensure that our business partners and customers act in compliance with this Policy, any agreement with a Third Party shall be documented in a written contract with clauses addressing compliance topics that are, or correspond to, the template clauses set out in the *Guidance for Compliance Clauses in Agreements with Third Parties*.

5. RESPONSIBILITIES

- 5.1. All Personnel shall comply with this Policy. Personnel shall promote compliance with this Policy and act in such a way that Mölnlycke's professionalism cannot be questioned.
- 5.2. The Chief Business Ethics & Governance Officer is responsible for
- over-seeing compliance with this Policy; and
 - supporting the Business Areas, EVPs, and Functions in their implementation of this Policy.
- 5.3. The EVPs are ultimately responsible for implementing this Policy in their respective Business Areas. The EVPs are also responsible for establishing the objectives for the implementation and organising adequate/regular follow-ups to ensure compliance with this Policy and relevant due diligence/screening processes. The EVPs shall report results from the follow-ups to the Chief Business Ethics & Governance Officer, who in turn shall report to the ELT and propose changes to the Policy if required.
- 5.4. Personnel having questions about specific conduct or this Policy in general should obtain additional guidance from their manager or Business Ethics & Governance.
- 5.5. If you believe this Policy has been violated, please notify Business Ethics & Governance, or contact the Ethics Hotline. Mölnlycke will not retaliate against Personnel or any other who, in good faith, report an actual or suspected violation of this Policy.
- 5.6. Non-compliance with this Policy can lead to disciplinary and other actions including termination of employment.

6. DEFINITIONS

In this document, the following words and expressions have the following meaning:

"Anti-Bribery and Anti-Corruption Laws"	means laws and regulations of countries where Mölnlycke conducts business activities. Bribery or corruption means offering, giving, or promising (or authorising someone to offer, give, or promise) an improper benefit, directly or indirectly, with the intention of influencing or rewarding the behaviour of someone to obtain or retain a commercial advantage. Bribery can take a variety of forms - offering or giving money or anything else of value. In fact, even common business practices or social activities, such as the provision of gifts, hospitality, or selecting and compensating a third party for a service provision, can constitute bribes in some circumstances.
"Government Official" or "GO"	means a government or public official or employee which 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

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enterprise, or entity-owned or controlled by a government unit.

"Healthcare Professional" or "HCP"	means 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.
"Personnel"	means all individuals working for or on behalf of entities controlled by Mölnlycke AB, including full-time and part-time employees, officers, volunteers, trainees, interns, temporary workers, and contingent workers (e.g. consultants, contractors, and freelancers), as well as board members.
"Third Party"	means any person or entity including but not limited to agents, consultants, vendor, suppliers, or other business partners working for, with or on behalf of Mölnlycke.

7. REFERENCES / RELATED DOCUMENTS

- 7.1. Compliance Screening and Due Diligence Business Procedure
- 7.2. Guidance for Compliance Clauses in Agreements with Third Parties