

1. Purpose

Coloplast is committed to our mission of making life easier for people with intimate healthcare needs.

Coloplast is known for being a highly ethical company and we have earned that reputation through our commitment to conduct business with respect, uncompromising integrity and in accordance with the highest ethical standards.

This policy reflects the Coloplast Group's commitment to conduct business ethically and with the highest integrity in all its operations across the world.

2. Objective

The objective of this policy is to set out your responsibilities in ensuring that Coloplast's business practices are compliant with anti-bribery, anti-corruption, and anti-money laundering laws as well as Coloplast policies, and to provide you with guidance on how to identify and combat anti-bribery, anti-corruption, and anti-money laundering risks.

3. Scope

This policy applies to all directors, officers, managers, employees, and contract workers employed within the Coloplast Group as well as third parties acting on behalf of Coloplast whether directly or indirectly.

Where Coloplast holds minority investments, Coloplast will use commercially reasonable efforts to ensure that the principles in this policy also apply to any company that Coloplast invests in.

4. Principles

4.1. Prohibited and Restricted Payments

Giving, promising, offering, or authorising payment of anything of value to Government Officials, including Healthcare Professionals, to secure improper advantages, obtain or retain business, or attempt to influence decisions in an improper manner, is never allowed (**Government Bribery and Kickbacks**).

Giving, promising, offering, authorising payment of, or receiving anything of value from persons or entities in the private sector to secure improper advantages, obtain or retain Coloplast business, or attempt to influence a decision in an improper manner, is never allowed (**Commercial Bribery and Kickbacks**).

The prohibition against Bribery covers all improper payments no matter the size or purpose, including "facilitating" and "expediting" payments (**Facilitation Payments**).

These prohibitions apply to cash payments (or cash equivalents such as gift cards, vouchers, etc.), benefits, business opportunities and favours and may in certain instances also cover otherwise legitimate business expenses such as gifts, entertainment, travel, donations, sponsorships, or training.

The above mentioned payments are strictly prohibited regardless of whether they are made directly or indirectly through third party intermediaries to an individual or, at their request, to friends, family or other third parties and it does not matter if the payment is actually accepted by the intended recipient or not.

4.2. Permissible Payments

It is permitted to provide modest gifts, hospitality, and certain other things of value to Government Officials and Private Individuals who legally promote or educate on Coloplast products and services (**Government Officials and Private Individuals**).

It is permitted to provide reasonable hospitality during company and third party events, but never gifts or other things of value, to Healthcare Professionals who legally promote or educate on Coloplast products and services (**Healthcare Professionals**).

When determining if a gift or hospitality is appropriate, the recipient's realm of influence, timing, and context as well as national laws must be considered to assess if the gift or hospitality could be viewed as Bribery in which case it is not allowed.

Payments are allowed if an employee's physical health and safety is at risk, risk of property damage, significant harm to reputation, or due to any unfavourable government actions with a material impact on Coloplast in which case written notification must be sent to the Group Chief Compliance Officer without undue delay (**Extortion Payments**).

4.3. Travel, Education and Related Expenses Involving Government Officials and Healthcare Professionals

Coloplast may accept requests to host Government Officials or Healthcare Professionals for training or other business-related purposes or events either at Coloplast's facilities or at training events sponsored by third party vendors.

Payment for travel expenses to Government Officials or Healthcare Professionals (both inside and outside their home country) must meet the requirements set out in the Global Standards of Conduct for Interactions with Healthcare Professionals and Government Officials Policy.

4.4. Charitable Donations and Grants

Coloplast may make contributions to its local communities, reasonable donations to charities, and offer grants.

Reasonable and adequate steps must be taken to verify that a contribution, donation, or grant does not constitute (or can be perceived to constitute) an illegal payment in violation of this policy.

All contributions, donations, and grants must meet the requirements set out in the Global Grants and Donations Policy.

4.5. Third Parties

Coloplast can be held liable for the actions of third parties, especially when the third parties perform services or otherwise conduct business dealings on behalf of Coloplast. This includes giving and accepting Bribes.

Coloplast can be held accountable for not taking proper and sufficient steps to prevent third parties from bribing or engaging in similar related conduct – even if Coloplast was not aware of the improper conduct.

Third parties acting on behalf of Coloplast must act with the highest level of professional and legal integrity. Coloplast may never engage a third party to interact with Government Officials on behalf of Coloplast without first making proper inquiries into the third party's background, qualifications, and reputation.

Any employee seeking to establish a relationship between a third party and Coloplast must follow the due diligence process set out in the Global Third Party Management Policy.

Third parties must never be asked to engage in or condone any conduct that Coloplast employees are not allowed to engage in themselves and due care must be exercised to ensure money provided to third parties are not used to support corruption.

Employees must never ignore suspected violations of this policy by third parties acting (directly or indirectly) on behalf of Coloplast or disregard otherwise suspect circumstances.

4.6. Books, Records, Accounting, and Payment Practices

To prevent the possibility of Bribes and Kickbacks being paid or accepted, all business and financial records must fairly and accurately reflect each transaction involving Coloplast.

Secret, unrecorded, or unreported transactions are prohibited.

All expenses must be accurately accounted for, include the appropriate supporting documentation, and be entered into company records before such expenses are reimbursed. This includes accurate identification of all payments to third parties acting on behalf of Coloplast.

Written proof of service documentation must be maintained when third parties perform services on behalf of Coloplast to document that the services have been performed.

Cash payments are commonly used to launder money as there is no audit trail. To prevent Money Laundering, Coloplast does not accept cash as payment form. If no other payment option is available, employees are required to take all necessary steps to verify that the payment is lawful, including seeking approval from Group Finance and Group Business Ethics & Compliance. Special care must be taken when payments appear to be designed to evade legal reporting requirements (e.g., multiple smaller payments or payments from multiple sources).

Payments to third parties located in tax havens are not allowed and payments must always be made to the country where the contracting third party is based (as stated in the contract).

Payments to or from countries subject to global trade sanctions such as Iran, Syria, Russia, and Cuba are subject to additional restrictions and the Global Trade Sanctions and Export Controls Policy. Employees must consult with Group Finance and Group Business Ethics & Compliance before making or receiving any such payments.

Any suspicious payments or payment requests must be reported to the Group Chief Compliance Officer immediately.

5. Management Obligations

Management must demonstrate role model behaviour that supports ethical business practices and ensure that their teams follow Coloplast policies and procedures.

Management must address any bad practice that they become aware of in a timely manner, and when needed make sure proper training is given to their teams to prevent or address any issues or concerns.

6. Governance

Where local laws and regulations, industry codes, or local Coloplast requirements are stricter than this policy, such stricter requirements prevail.

In the event of any discrepancies between the English version of this policy and a translated version, the English version shall prevail.

7. Raising Concerns

Any employee or third party who becomes aware of or suspects a violation of this policy must immediately contact Group Business Ethics & Compliance or use the Ethics Hotline. If you have doubt as to whether a payment is permitted or not, Group Business Ethics & Compliance must be consulted prior to making/receiving such payment. Coloplast does not tolerate Retaliation of any kind against any Individual who, in Good Faith, reports a suspected violation or wrongdoing or participates in an investigation.

8. Violations

Failure to follow this policy and related policies, including failing to report behaviours or actions of others inconsistent with this and related policies, may lead to disciplinary action up to and including termination of employment in accordance with applicable local labour laws and regulations as well as company policies, and may be reported to the relevant authorities.

Third parties acting on behalf of Coloplast who violate this policy may be terminated and Coloplast reserves all rights to pursue any legal action and/or remedy available to Coloplast under applicable law, including reporting the incident to the relevant authorities.

9. References

- Coloplast BEST Code of Conduct
- Global Standards of Conduct for Interactions with Healthcare Professionals and Government Officials Policy
- Global Third Party Management Policy
- Global Grants and Donations Policy
- Global Trade Sanctions and Export Controls Policy

10. Policy Revision

This policy must be reviewed on an annual basis and may be amended at any time.

This policy, including revisions to the policy, must be approved by the Executive Leadership Team.

Definitions and Abbreviations

Bribery: means offering, promising, or giving a direct and/or indirect payment or something of value (money, gift, or service) to influence a decision.

Coloplast Group ("Coloplast"): means Coloplast A/S, including its direct and indirect subsidiaries and affiliates.

Extortion Payments: means direct and/or indirect payments or something of value provided due to actual or threat of violence, property damage, significant harm to reputation, or unfavourable government action which has a material impact on Coloplast's business operations.

Facilitation Payments: means small payments to Government Officials to carry out or expedite routine matters such as issuing business licences, processing visas, custom clearance, etc.

Government Official ("GO"): means any official or employee of a government agency or other governmental unit, political party, party official or candidate, or public international organisation as well as officers and employees of government-owned companies, or companies substantially controlled by such governments.

Healthcare Professional ("HCP"): means any person or entity:

- a. authorised or licensed to provide healthcare services or items to patients, or
- b. who is involved in the decision to purchase, prescribe, order, or recommend a medical technology.

This term includes individual clinicians (e.g., physicians, nurses, and pharmacists), provider entities (e.g., hospitals and ambulatory surgical centres), administrative personnel at provider entities (e.g., hospital purchasing agents), and durable medical equipment (DME) retailers and dealers. This term does not include Healthcare Professionals who are bona fide employees of Coloplast while acting in that capacity.

Healthcare Organisation ("HCO"): means any organisation (irrespective of its legal or organisational form) that is a healthcare, medical, or scientific association or any other organisation which may have a direct or indirect influence on the prescription, recommendation, purchase, order, supply, utilisation, sale, or lease of medical technologies or related services such as a hospital or group purchasing organisation, clinic, laboratory, pharmacy, research institution, foundation, university or other teaching institution or learned or professional society (except for patient and user organisations), or through which one or more Healthcare Professionals provide services.

Kickback: means the exchange (or offer to exchange), anything of value in an effort to induce (or reward) the referral of business. A form of Bribery.

Money Laundering: means the deliberate attempt to hide or disguise the profits of a crime by moving them into legal and legitimate financial activity.

Private Individuals: means an individual acting only for themselves and not representing any group, company, or organisation (i.e., not an HCP, HCO, or Government Official).