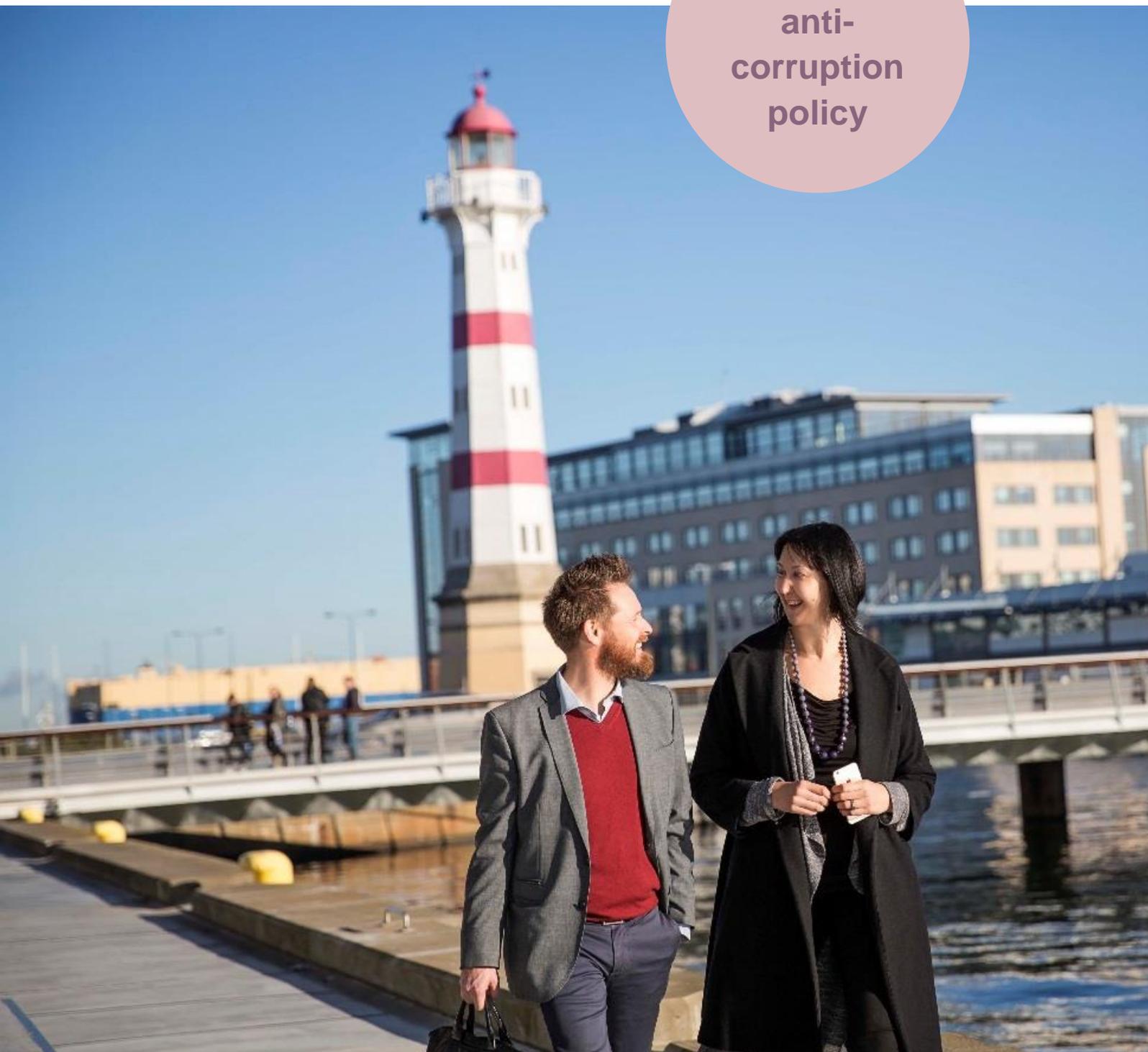


Global
anti-
corruption
policy



1. Introduction

- **Our policy is to comply with all applicable laws, regulations and industry codes of the countries where we do business, and to demand the highest standard of business ethics and integrity from all Arjo Employees.**
- **We participate only in business activities where we can compete honestly and fairly based on the quality and price of our offering, and not by offering **improper** benefits or engaging in any other unethical behavior.**

As a world-leading provider of caregiver equipment, Arjo supports the daily tasks of aiding, lifting and transferring hospital patients. We promote early mobility, facilitate patient hygiene and help prevent pressure ulcers and deep vein thrombosis. As expressed in the Arjo Code of Conduct – we want to conduct business in a sustainable way where anti-bribery is one of our focus areas.

This Policy has been adopted to further clarify and highlight our position on non-acceptance of bribery under the Arjo Code of Conduct.

2. Key principles

Arjo Employees are not permitted to:

- **directly or indirectly offer, promise, grant or authorize; the giving of money or anything of value to someone in order to unduly influence the performance of the recipient's (or someone else's) professional duties or to obtain or retain an undue business advantage; or**
- **accept, accept a promise of, or request an improper benefit for the performance of professional duties.**

Regardless of whether a payment or a benefit may actually be permissible under local laws, every Arjo Employee shall always comply with this Policy.

Bribery can generally be defined as the offering, promising, granting or authorizing the giving of benefits to someone in order to unduly influence the performance of the recipient's (or someone else's) professional duties or to obtain or retain an undue business advantage. Also the acceptance, acceptance of a promise of, or request of an improper benefit for the performance of professional duties may constitute bribery.

- A bribe does not have to be cash, but can be in the form of gifts, entertainment, travel and accommodation, use of property or equipment, job offers or work placements, charitable or political donations; or services, favors or benefits for family or friends.
- The scope of anti-bribery legislation in many countries extends beyond their own territories to also include acts performed outside the country's borders, for example, the US Foreign Corrupt Practices Act (FCPA) and the UK Bribery Act. Such extraterritorial legislation is applicable to Arjo and to Arjo Employees since the company conducts business globally.

Arjo is determined to compete based on fair and conscientious practices. Our success must be the result of the quality of our products and our work.

3. The Policy

3.1 Scope

This Global Anti-Corruption Policy (referred to below as “the Policy”) applies to Arjo AB (publ) and all of its worldwide subsidiaries, divisions and affiliated companies (collectively “Arjo” or “the Company”).

The Policy must be observed and complied with by all Arjo Employees, meaning all of Arjo’s employees, contract employees and members of its Board of Directors. Compliance with this Policy is **mandatory for all Arjo Employees**.

This Policy must also be observed and complied with by all Arjo Business Representatives, meaning agents, distributors, consultants, service partners, suppliers or other contractors or intermediaries who represent the goods or services of Arjo. Arjo reserves the right to terminate its business relationship with any Arjo Business Representative who does not follow this Policy.

This Policy will also be communicated to other business partners of Arjo as far as reasonably possible

4. Enforcement

Arjo will actively investigate any suspected breach of this Policy and, where appropriate, take disciplinary measures against any Arjo Employee found to be involved in bribery or corrupt practices.

Arjo will also enforce appropriate legal and contractual sanctions against any Arjo Business Representative or other business partner who is found to have committed bribery or corruption-related offences.

Arjo is committed to ensuring that all Arjo Employees receive appropriate compliance and ethics training.

Arjo Employees are encouraged to consult with a superior or the Compliance Officer if they are uncertain about applicable laws, regulations or guidelines, or if they are ever in doubt about whether a specific payment, benefit or activity is permitted under this Policy. No Arjo Employee will suffer demotion or other disciplinary action for complying with this Policy, even if it results in lost business.

4. Conduct within identified risk areas

4.1 Specific prohibited benefits

Certain benefits are prohibited (black listed). These include:

- Cash (or cash equivalent) gifts.
- Non-merchantable monetary loans.
- Provisions of **credit guarantees** and remissions of debt.
- Giving of goods and services intended for private purposes (other than promotional items of minimal value).
- Trips for leisure.
- Hidden non-transparent discounts, commissions, bonuses or kickbacks.
- “Plus-one invitations,” meaning invitations where the participant is allowed to bring his/her spouse or an extra guest.

It is prohibited to both offer and accept benefits included on this black list.

An exception may be justified in certain circumstances. Such an exception must be preapproved in writing, on a case-by-case basis, by the Compliance Officer.

4.2 Gifts and hospitality

- All Arjo Employees are prohibited from receiving, offering or providing gifts or hospitality whenever these can be perceived to affect the outcome of a business transaction or potentially expose business to undue influence (taking advantage of a position of power over another).
- All gifts, hospitality and similar must be given openly, and not secretly.
- All Arjo Employees are responsible for following local monetary limits and approval levels for gifts and hospitality, and other local restrictions.

Exchanges of reasonable and courtesy gifts and hospitality are part of our business practices. They are permitted if they comply with this Policy and if they are:

- related to company promotions and offered in connection with a company event or a company visit;
- given in good faith and openly;
- occasional, appropriate, transparent, proportionate, justifiable and reasonable;
- a normal business courtesy;
- not extravagant in the context provided;
- not given or received with the intent or prospect of improperly influencing the recipient's decision making or other conduct; and
- not part of a mutual exchange arrangement.

As a general rule, benefits given to those working within the public sector (not only government agencies and other public authorities but also publicly owned or publicly funded companies or activities) are more at risk of being deemed as improper. As a result, particular care must be taken when interacting with representatives from the public sector.

All Arjo Employees are responsible for complying with local monetary limits and approval levels for gifts and hospitality.

4.3 Hospitality

In relation to the private sector, hospitality in the form of lunch or dinner is allowed provided that the expenditure is reasonable. Wine and beer are allowed as table drink, but in moderation. Spirits are never allowed.

In relation to the public sector and the healthcare sector in general, hospitality in the form of lunch or dinner is not permitted if it coincides with an ongoing matter, such as business negotiations, legal proceedings or a public procurement. Luxury restaurants are not allowed. Wine and beer are allowed as table drink, but in moderation. Spirits are never allowed.

In relation to the healthcare sector, it shall be noted that hospitality in the form of lunch or dinner is permitted only if offered in connection with product information, a scientific meeting or the like arranged by Arjo or by Arjo in collaboration with a third party. Please refer to section 4.5 for further information about the specific rules applicable to healthcare professionals.

4.4 Gifts

In relation to the private as well as the public sector reasonable business expenditure related to company promotions are allowed, such as promotional items of minimal value. In addition, occasional gifts of a modest value may be given in connection with celebrations, when giving such gifts is customary, or if the gift benefits patients or serves a genuine educational function. All Arjo Employees are responsible for complying with local monetary limits and approval levels for gifts and hospitality.

In relation to healthcare professionals it shall be noted that items of minimal value are acceptable as gifts only if the item is of relevance for the healthcare professional's area of practice.

4.5 Acceptance of gifts and hospitality and disclosure requirements

Arjo Employees or members of their families are not permitted to accept gifts of more than a modest value, loans or substantial favors from any third party that is an Arjo Business Partner or is otherwise conducting or seeking to conduct business with Arjo, or is a competitor to Arjo.

An Arjo Employee who receives a gift or offer of corporate hospitality of any kind from an existing or a potential business contact must disclose the gift or hospitality, its nature and the identity of the provider to his/her line manager. This does not apply to promotional gifts, lunch or dinner entertainment of a modest value.

4.6 Sales and promotional meetings

- **Travel and accommodation must always be in connection with a business meeting where the business content is predominant. Invitations for sales and promotional meetings may not be offered overly frequently.**
- **Travel and accommodation or benefits at sales or promotional meetings must never be perceived as excessive or luxurious and must never leave the recipient in a position of obligation (or perception of obligation) to provide anything in return.**
- **Travel and accommodation cannot be offered or arranged for healthcare professionals attending sales or promotional meetings.**

As part of the sales process, customers are invited to reference sites for product demonstrations. The sales contract may also include customer training activities at specific training sites.

Arjo may pay for reasonable travel and modest accommodation costs incurred by customers participating in visits to reference sites, training or conferences, if they are in accordance with this Policy and comply with local monetary limits and approval levels for gifts and hospitality.

In relation to healthcare professionals Arjo cannot pay for travel and accommodation costs incurred by healthcare professionals participating in visits to reference sites, training or conferences. Please refer to section 4.5 for further information about the specific rules applicable to healthcare professionals.

For meetings in which Arjo and customers discuss product features, sales terms, contract negotiations and training for Arjo products or services, Arjo may, in addition to the main purpose of the meeting (and not as a main focus of the event), provide occasional modest meals, receptions, and hospitality for customer attendees (but not for customers' guests), if such hospitality facilitates the exchange of information and is compliant with this Policy.

Hospitality, travel, accommodation and other expenses are not to be paid for persons who do not have a genuine professional interest in the information being shared at the meeting.

Meetings shall be held at locations appropriate to the purpose of the meeting. A resort location or luxury venue is never appropriate. In relation to healthcare professionals it is preferable to arrange the meeting at the participants workplace.

Benefits offered at these meetings must be transparent to the principal, either by agreement or written consent.

There must be no obligation on the attendee to purchase or cause to purchase any goods or services from Arjo in exchange for the training received.

4.7 Customer events

- **All customer events organized by Arjo and all of its worldwide subsidiaries, divisions and affiliated companies must be preapproved in writing by the local company Head of Finance.**
- **All customer events attended by Arjo Employees must be preapproved in writing by the immediate superior of the Arjo Employee who is to attend the event.**

Customer events, such as seminars and courses organized or attended by anyone acting on behalf of Arjo, must always have a legitimate business purpose where the professional program is the dominant element.

An invitation to an event organized by Arjo or its Business Representatives must always be arranged in such a way that the relevant business purpose is clear. Recipients and their managers must be able to understand the content and value of the event from the invitation.

In relation to the public sector and the health care sector in general, an invitation to an event may never coincide with an ongoing matter such as business negotiations, legal proceedings or public procurement. The element of entertainment must be kept to a minimum. Written consent by the participant's principal must always be obtained.

In relation to healthcare professionals it must be noted that the invitation must be sent to the recipients' managers. Arjo may only invite healthcare professionals to events which are of professional relevance for the healthcare professional. Arjo cannot pay for travel and accommodation costs incurred by healthcare professionals participating in customer events.

4.8 Interaction with healthcare professionals and healthcare organizations

- **All Arjo Employees must observe applicable laws, regulations and industry codes or guidelines that address interaction between the industry and healthcare professionals and organizations.**

Arjo conducts a wide variety of activities in the healthcare market, including research, development, medical and other forms of training, marketing and sales. Each of these activities is subject to numerous legal, ethical and industry standards such as the Eucomed Guidelines on Interactions with Healthcare Professionals issued by Eucomed, which is the European industry association for the medical device industry.

Arjo is committed to complying with all applicable laws, regulations and industry standards in its interaction with healthcare professionals such as physicians, dentists, pharmacists, nurses etc. and healthcare organizations so as to ensure high standards of integrity of behavior that will generate patient and healthcare professionals confidence in dealings with Arjo and its products.

In particular, the following restrictions are important to be aware of:

- interactions between Arjo and healthcare professionals/organizations must be transparent and well documented in written agreements,
- any remuneration paid to healthcare professionals or organizations must represent fair market value and be proportional to the services provided,
- Arjo cannot pay for healthcare professionals travel and accommodation when organising or sponsoring events, and
- invitations to events must always be sent to the healthcare professionals' principal.

4.9 Consultancy and research arrangements

- **All consultancy and research arrangements must be documented in a contract, describing all services to be provided and compensation to be paid.**
- **If a healthcare professional is engaged as a consultant, the healthcare professional's principal must be party to the agreement.**
- **The compensation paid must be consistent with the fair market value of the services.**
- **Healthcare professionals may only be engaged as consultants provided that such an assignment takes place only after a legitimate need and purpose for the services have been identified in advance, and where the promotion of a medical technology is not one of the aims of the assignment.**

Many healthcare professionals serve as consultants to Arjo, and provide valuable consulting services, including research, product development, participation on advisory boards, training, presentations, product collaboration and other services.

- Consultancy and research arrangements must be entered into only where a legitimate need for service has been identified in advance and documented in a contract that describes all of the services to be provided and the compensation to be paid.
- When healthcare professionals are engaged for consultancy services, the principal of the healthcare professional must be party to the agreement. Thus, all consultancy agreements involving healthcare professionals must be three-party agreements entered into between Arjo, the healthcare professional and the principal.
- Consultant for consultancy or research assignments must be selected based on the consultant's qualifications and expertise in meeting the defined needs. The promotion of medical technology is not to be one of the aims of the assignment.
- Compensation paid must be consistent with the fair market value of the services provided and in proportion to the level of work involved.
- For research arrangements, a written protocol must also be included in the agreement describing the genuine research purpose. The research shall be legitimate scientific work with well-defined and detailed documented milestones and deliverables.

4.10 Sponsorships for third-party educational conferences

- **Sponsorships for third-party educational conferences are to be paid only to the conference sponsor or organizer directly, never to an individual participant.**

A third-party educational conference is a conference sponsored or conducted by or on behalf of a professional association for the purpose of promoting scientific knowledge, medical advancement or delivering effective healthcare. Sponsorship entails financial or other support that includes a market-based return such as exhibit space or the opportunity to demonstrate a product.

Arjo may only offer sponsorship to conferences that are of relevance for Arjo's business area and where the scientific and professional program is the dominant element and purpose of the conference. Arjo's sponsorship can be used only for costs which are necessary in order to carry out the professional parts of the meeting including expenses for speakers, venues, training materials and moderate meals.

Prior to offering a sponsorship it must be ensured that:

- Arjo obtains a budget for the conference that clearly demonstrates how the sponsorship will be used,
- Arjo does not pay for travel, accommodation or participation fees for individual participants who are healthcare professionals,
- there are no direct payments to individuals that might be regarded as an incentive to make a recommendation, and
- that it does not coincide with an ongoing matter such as business negotiations, legal proceedings or public procurement.

4.11 Donations

- **Arjo is not permitted to make any political donations.**
- **Grants, including research grants and educational grants, and donations may not be offered or made without the preapproval of the Compliance Officer.**
- **No grants or donations may be made to customers and no grants may be made directly to a healthcare professional.**

Arjo is not permitted to make any form of political donations or contributions, neither monetary nor in-kind contributions. This includes donations for political purposes to any politician, political party or related organization, official of political party or candidate for political office under any circumstances, either directly or through third parties.

Grants, including research grants and educational grants, may not be offered or made without the preapproval of a the Compliance Officer. Donations or grants to healthcare are allowed only if they are made to support research and development. All donations and grants must be transparent and well documented. No donations or grants may be offered or made to a customer, a healthcare professional or to a practitioner in training.

Donations or grants to healthcare cannot be linked to past, present or potential future use, recommendation, sale or prescription of Arjo's products or services.

Donations may not be offered or made without the preapproval of the Compliance Officer. Donations may be made to charitable organizations for a charitable purpose, such as independent research, [poverty](#) care, patient education and public education, and sponsorship of events where the proceeds are charitable. Requests for charitable donations should be evaluated separately from the commercial activities, and it is inappropriate to make charitable donations linked to past, present or future business transactions.

4.12 Facilitation payments

- **Arjo prohibits facilitation payments.**

Facilitation payments or “grease payments” are typically small, unofficial payments made to secure or speed up routine actions, often performed by public officials, such as issuing permits, licenses or consents, immigration controls, scheduling inspections, providing services or releasing goods held in customs.

If the payment is requested by a foreign public official, it may still constitute a bribe, even if it involves only a small amount.

5. Arjo Business Representatives

- **Prior to the appointment of a Business Representative, a compliance assessment of the Business Representative must be performed using the *Arjo Approval Form for Authorized Business Representatives*.**
- **All contracts appointing a Business Representative must include a provision where the Business Representative undertakes to comply with this Policy.**
- **Compensation or commission paid to business partners and relevant consultants must be in line with the fair market value of the services rendered, and must be documented in a written contract including a provision that forbids influencing decisions makers or anyone else directly or indirectly associated with the end customer.**

Arjo engages in business activities with a number of business representatives, such as distributors, agents, consultants, suppliers, service partners and other intermediaries, who represent the goods and/or services of Arjo in different parts of the world (“Arjo Business Representatives”).

Those responsible within Arjo for appointing and hiring Arjo Business Representatives are also responsible for evaluating such third parties in relation to anti-bribery compliance, and for monitoring the compliance behavior of the Arjo Business Representative. Such an evaluation is to be performed prior to entering into, during and/or on renewal of a relationship with a Arjo Business Representative.

As a representative of the products and services of Arjo, a Arjo Business Representative is responsible for conducting business in accordance with this Policy in the same manner as Arjo Employees.

- Prior to appointment, a Business Representative must be assessed using the Arjo Approval Form for Authorized Business Representatives. The general principle is to carry out research and interviews to ensure that Business Representatives will conduct themselves in a manner consistent with this Policy. The Business Representative shall also complete and sign the Arjo Approval Form for Authorized Business Representatives.
- All Arjo Business Representatives must sign a written contract or letter of authorization in order to be recruited.
- All contracts appointing a Arjo Business Representative must include a provision where the Business Representative undertakes to comply with this Policy and which reserves the right for Arjo to terminate its contractual relationship with Business Representatives who do not adhere to this Policy or do not cooperate with any Arjo or government investigation regarding compliance with this Policy or ethical concerns. If the appointing contract does not include such provisions, amendments shall be made.

- Compensation paid to a Arjo Business Representative must be appropriate, reasonable and justifiable in return for legitimate services according to the applicable agreement, and may never be used or allowed to be used to influence decision makers or anyone else directly or indirectly associated with the end customer.
- Compensation paid to a Arjo Business Representative must only be made to the Business Representative and not a nominated third party, and must only be made to a bank account in the country where the Business Representative carries out its business and not to a nominated third country.

6. Financial anti-corruption controls

- **All contracting, payments and other financial procedures must be made and conducted in accordance with the applicable country and specific regional instruction.**
- **Price discounts, rebates, commissions, special payment terms and deviation from customary terms must be justified and consistent with this Policy.**

Country and region specific instructions ensure that company operations are conducted in a manner that avoids employee collusion (secret or illegal cooperation) that may lead to fraud or other illegal transactions. It is the duty of each Arjo Employee to adhere to these policies and procedures.

7. Your responsibilities

It is the responsibility of each Arjo Employee to:

- read, understand and comply with this Policy and any additional internal instructions on the subject matter of this Policy, including any revisions, and confirm acknowledgement by signing the form provided for this purpose;
- undergo compliance training on local legislation and any local industry codes and on how to implement and adhere to this Policy;
- communicate this Policy to all Arjo Business Representatives when a business relationship is initiated, and as subsequently appropriate, in accordance with this Policy;
- consult with a superior or the Compliance Officer if ever in doubt about whether a specific payment, benefit or activity is consistent with this Policy;
- notify a superior or the Compliance Officer as soon as possible, if you believe or suspect that a conflict with this Policy has occurred or may occur, and
- cooperate with any internal or government investigation regarding compliance or ethical concerns, as requested by the Compliance Officer.

Any Arjo Employee who does not adhere to this Policy may face disciplinary action, which may result in termination of employment with possible immediate dismissal.

8. How to raise a concern

8.1 What concerns shall be raised

Each and every Arjo Employee is encouraged to bring forward any concerns or complaints related to this Policy and about any suspected wrongdoing at the earliest possible stage.

Use peer influence, if appropriate. If you see or suspect business conduct violations, do not ignore the situation. Your influence could help prevent a colleague from making a mistake.

8.2 Procedure

If peer influence is not appropriate or the situation does not improve, you shall raise your concern with your immediate manager, local HR or other appropriate superior. In case normal procedures cannot be used, you shall raise concerns through Arjo's whistleblowing system. Arjo's Whistleblowing Policy details the types of matters that can be reported through the whistleblowing system.

8.3 Investigations

Arjo is committed to investigating any instances of alleged or suspected bribery or suspected wrongdoings under this Policy. If you believe that you have not received a satisfactory response to your information, you shall inform the Compliance Officer.

Arjo may also report any matter to the relevant authorities and assist relevant authorities in investigations and any subsequent prosecutions.

8.4 Employee protection

No Arjo Employee will suffer demotion (reduction in rank), disciplinary action or other adverse consequences for refusing to pay bribes, for complying with this Policy or for reporting or raising good faith concerns under this Policy. If you believe that you have suffered any such treatment, you shall inform local HR.

An act of retaliation or victimization against a *good faith* whistle-blower will result in disciplinary action against the responsible person, which may include termination of employment with possible immediate dismissal.

The *bad faith* use of whistle-blowing may result in disciplinary action against the person responsible, which may include termination of employment with possible immediate dismissal.

9. Non-compliance

9.1 Criminal and civil liability

A Arjo Employee who does not comply with applicable anti-bribery laws and regulations is exposed to both criminal and civil liability. Such non-compliance will also expose Arjo and other representatives of the Arjo to criminal and/or civil liability. Penalties for violations of anti-bribery laws can include fines and imprisonment, and settlements with authorities can range into the hundreds of millions of euros or dollars. In addition, non-compliance may significantly harm the company's reputation. Arjo may also be subject to exclusion from publicly procured projects.

9.2 Disciplinary action

Arjo will enforce this Policy and, where appropriate, take action against a Arjo Employee found to be involved in bribery or corrupt practices. Such measures may include verbal or written reprimands, suspension, termination of employment with possible immediate dismissal. Such action may also be taken when a Arjo Employee fails to report or withholds relevant information

concerning violations of this Policy, or fails to cooperate with a related investigation, or where there has been inadequate supervision or lack of due care by a manager in connection with a violation.

10. Training and communication

All Arjo Employees will receive relevant and regular training on local legislation and any local industry codes and on how to implement and adhere to this Policy.

All Arjo Employees and Arjo Business Partners are encouraged to comment on this Policy and suggest ways in which it might be improved. Such comments or suggestions can be addressed to the Compliance Officer.

11. Who is responsible for this Policy?

11.1 Overall responsibility – Board of Directors and CEO

The Board of Directors and CEO of Arjo AB and the Board of Directors and Presidents of each local Arjo subsidiary have the overall and ultimate responsibility for ensuring that this Policy is implemented locally and that all Arjo Employees and Arjo Business Representatives, within their areas of responsibility, receive appropriate training as stated and comply with the Policy.

11.2 Day-to-day responsibility – Compliance Officer and EVP HR and CSR

The Compliance Officer and the EVP HR and CSR have been delegated the day-to-day responsibility for implementing this Policy and for monitoring its use and effectiveness, and dealing with any queries on its interpretation.

12. Supplemental documentation

Where relevant, Local Addendums to this Policy may be adopted. Such Local Addendums are to form an integral part of this Policy. Local addendums must be translated into English and a copy shall be sent to the Compliance Officer for reference.

In addition, this Policy is supplemented by the following documents.

- Arjo Approval Form for Authorized Business Representatives
 - Request Form (Corporate Events, Charitable Donations and Sponsoring)
-