

VINGMED

Vingmed CODE OF RESPONSIBLE BUSINESS CONDUCT

*The
Vingmed
way of
doing
business*



Vingmed Holding AS



Vingmed AS



Vingmed AB



Vingmed A/S



Vingmed OY

Why do we have a Code of Responsible Business Conduct?

Our code of Responsible Business Conduct outlines a framework of principles and standards, and helps us create the Vingmed way of doing business.

The code of responsible business conduct defines our ethical compass, setting clear standards and expectations on how to act in a responsible manner.



The code of responsible business conduct outlines principles and standards that all employees and third parties acting on behalf of the company must follow.

Our commitment to Responsible Business Conduct?

Vingmed expects its customers, partners, and suppliers to maintain good business conduct in line with the Vingmed Code of Responsible Business conduct, inspired by OECD Guidelines for Responsible Business Conduct, the UN Guiding Principles on Business and Human Rights, the principles of the UN Global Compact, the ILO conventions, The UN sustainable development goals, the UN Global Compact's ten principles for human rights, labor conditions, the environment and anti-corruption.

The responsible way of doing business

The Vingmed Group consists of 4 direct sales organizations: Vingmed AS (Norway), Vingmed AB (Sweden), Vingmed A/S (Denmark) And Vingmed Oy (Finland). The group is one of the largest companies in the Nordic countries for distribution and services of high quality medical technical products.



Vingmed believes in socially responsible business. Promoting decent working and environmental conditions in our supply chains is part of the company's strategy and efforts to act responsibly. In pursuit of this goal, we want to work closely with our suppliers and business partners.

Vingmed has adopted the attached Code of Conduct to clarify what we expect and demand from ourselves and our partners. Our ethical guidelines are based on internationally recognized UN and ILO conventions, and lay down basic expectations and rules relating to human rights, labor rights and the environment as mentioned in international conventions and national legislation. Vingmed expects its suppliers and business partners to work systematically and purposefully to ensure compliance. We will support our suppliers and partners in this regard.

Focusing on working conditions and the environment has economic benefits and strengthens competitiveness. Various studies have shown that by improving health and safety, as well as regulating working hours and paying decent wages, productivity and quality increase while the number of occupational injuries decreases.

We seek to form long-term cooperation with business partners who share our values and focus on promoting decent working and environmental conditions in the supply chain.

Vingmed core values:

Respect and trust.

Competence

Loyalty

Delivery ability.

Long term relationship

Asker 15.03.2023

Jan Erik Kirkeby

CEO Vingmed Holding

Human Rights and working environment

At Vingmed we are committed to respecting internationally recognized human rights standards throughout the entire value chain. Vingmed will actively work to identify, prevent, mitigate, and account for potential adverse impacts in our own operations, our supply chain and other business relationships.

Decent wages and working hours

Contribute to ensuring fair wages for workers throughout the value chain.

Wages shall be paid directly to the employee on time and in full. Lowest acceptable salary level is the minimum wage according to national legislation.

Weekly working hours must not exceed the national legal limit and payment for overtime shall follow national legislation.



Child labor

The minimum age for workers shall not be less than 15 years and in line with: national minimum age for employment, or; minimum age for compulsory schooling, with the highest age applicable. If the local minimum age is set at 14 in line with the exception in ILO Convention 138, this can be accepted.



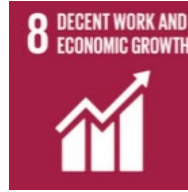
New recruitment of child workers in violation of the above-mentioned minimum age shall not take place.

Children under the age of 18 must not perform work that is harmful to their health, safety or morals, including night work.

Action plans must be established for the rapid phasing out of child labor that is in breach of ILO Conventions 138 and 182. The action plans must be documented and communicated to relevant staff and other stakeholders. Arrangements must be made for support schemes where children are given the opportunity for education until the child is no longer of compulsory school age.

Forced labor

There shall not be any form of forced labor, slave labor or involuntary labor.



Workers shall not have to deliver a deposit or identity papers to the employer and shall be able to freely terminate the employment relationship with reasonable notice.

Discrimination

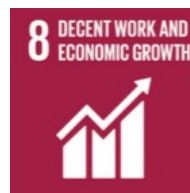
There shall be no discrimination in employment, remuneration, training, promotion, dismissal, or retirement based on ethnicity, caste, religion, age, disability, gender, civil status, sexual orientation, trade union work or political affiliation.



Protection must be established against sexually intrusive, threatening, insulting or exploitative behavior, and against discrimination or dismissal on unfair grounds, e.g., marriage, pregnancy, parenthood, or status as HIV-infected.

Freedom of association and collective bargaining

Workers shall, without exception, have the right to join or establish trade unions of their own accord, and to bargain collectively. The employer must not interfere with, prevent, or oppose trade union organization or collective bargaining.



Trade union representatives must not be discriminated against or prevented from carrying out their trade union work.

If the right to free organization and/or collective bargaining is limited by law, the employer must facilitate, and not prevent, alternative mechanisms for free and independent organization and negotiation.

Health and safety

Efforts must be made to ensure workers a safe and healthy working environment. Hazardous chemicals and other substances must be handled properly. Necessary measures must be taken to prevent and minimize accidents and health damage as a result of, or related to, conditions at the workplace.



Workers must have regular and documented training in health and safety. Health and safety training must be repeated for newly employed and redeployed workers.

Workers must have access to clean sanitary facilities and clean drinking water. If relevant, the employer must also provide access to facilities for the safe storage of food.

If the employer offers accommodation, this must be clean, safe, adequately ventilated and with access to clean sanitary facilities and clean drinking water.

Environment

Negative environmental impact must be reduced throughout the value chain.

In line with the precautionary principle, measures must be implemented to

continuously minimize emissions of greenhouse gases and local pollution, the use of harmful chemicals, pesticides and to ensure sustainable resource extraction and management of water, sea, forest and land, and conservation of biological diversity.



National and international environmental legislation and regulations must be complied with, and relevant emission permits must be obtained.

Impact on the climate

Vingmed will focus on environmental measures that contribute to reducing the footprint in the environment. We will work to reduce the environmental burden, and increase the positive environmental effects by:

- Reduce or eliminate sources of pollution.
- Contribute to our customers meeting their environmental targets through the selection of suppliers with environmental focus.
- Search and choose eco-labelled products and consumables
- Continuous focus on the environment among our employees
- Focus on energy-efficient and environmentally friendly transport solutions

- Packaging and waste management

Take an active role in reducing the climate footprint

All employees shall take a role to actively contribute to reducing the environmental footprint in the environment, by continuous focus on environmentally friendly solutions and efficient use of resources.

Vingmed is committed to having an effective environmental management system, to comply with all applicable environmental, health, and safety laws, regulations, and other requirements. Vingmed will adhere to the principles set out in the environmental policy, and actively work to continually improve our environmental performance. Vingmed will maintain the environmental management system with objectives and targets to minimize adverse environmental impacts.

Anti-corruption

All forms of bribery are unacceptable, such as the use of alternative channels to secure illegitimate private or work-related benefits to customers, agents, contractors, suppliers or their employees and public officials.



Vingmed has developed an anti-corruption policy, that is applicable to all staff. Its purpose is to ensure, and support behavior and work ethics characterized by the highest standards of personal and organizational integrity, both internally and externally with our different partners.

This Anti-Corruption Policy provides guidance to staff on their required conduct when confronted with corruption, corrupt practices, or corrupt propositions, and when working to prevent corruption.

***Corruption is** "requesting, offering, giving or accepting, directly or indirectly, a bribe or any other **undue advantage** or prospect thereof, **which distorts the proper performance of any duty** or behavior **required of the recipient** of the bribe, the undue advantage or the prospect thereof."¹*

Corruption is best known in the form of bribery, fraud, embezzlement, or extortion. However, corruption does not exclusively involve money changing hands; it may also include providing services to gain advantages, such as favorable treatment, special protection, extra services, or quicker case processing.

Consumer Interests and quality management

In Vingmed we demonstrate good business, marketing and advertising practice and take reasonable measures to ensure that the goods and services we supply are of good quality and are reliable.



Through a good quality system, Vingmed works actively with ongoing improvements and customer satisfaction. The quality system is part of providing information about the organization's vision and strategy, challenges in relevant areas and how to measure and monitor to achieve the organization's goals.

Vingmed comply with all relevant regulations related to the products distributed, in addition to relevant ISO certification.

At Vingmed we work closely with our supplier and business partners to ensure sustainable development throughout the business chain.

Reporting concerns

Any violations of this code of responsible business conduct, or governing rules and regulations - or suspicion thereto - shall be reported to the CEO of Vingmed Holding, general managers or quality managers in each country. Anyone reporting a violation shall have the possibility to remain anonymous, to the extent legally possible.

All reported concerns shall be investigated confidentially. A report documenting the investigation and the conclusion will be compiled, securing confidentiality for the reporter. The reporter will be informed about the outcome of the investigation and the conclusion. Information will be reported to management.

Our employees and business partners can report any concerns or suspected violation to our code of responsible business conduct anonymous by using the QR-code.

