

# Code of Conduct for procurement in Coloplast



# Introduction

In Coloplast, we act responsibly and with high integrity in all we do.

We aim to conduct our procurement practices in a fair and transparent manner. We have committed ourselves to work against corruption and bribery in any form.

***In this pamphlet, you will find guidelines on how you, as involved in Procurement, can ensure living up to corporate standard.***

The pamphlet provides guidance on how to respect confidentiality issues and avoiding conflict of interests when engaging with suppliers.

The guidelines are relevant to all Coloplast employees associated with procurement and contract activities.

It is every employee's responsibility to comply with these guidelines.

It is every manager's responsibility to communicate the guidelines and ensure compliance.

If in doubt notify your manager.

# The code consist of the following principles

- We commit ourselves to a high standard of integrity and work against corruption and bribery in any form
- We always respect confidentiality when engaging in relationships with suppliers
- We avoid any conflict of interests
- A minimum of two employees must always be present at large contract negotiations
- We refuse to accept anything other than token gifts.

# Bribery and corruption

***We commit ourselves to a high standard of integrity and work against corruption and bribery in any form.***

In Coloplast, we perceive corruption and bribery as a threat against our business.

Therefore, we have developed a corporate code of conduct against corruption and bribery.

We do not under any circumstances accept bribery as part of business transactions.

As involved in Procurement, you should pay particular attention to this during procurement and sourcing processes.

If a supplier attempt to bribe you, you are obliged to report this to your manager.

You will not – under any circumstances - be penalized for making a disclosure of bribery. Nor will you be sanctioned for refusing to pay or accept bribes.

***To anonymously discuss situations or issues related to corruption and bribery, contact Corporate Procurement or Corporate Ethics.***



# Confidentiality

***We always respect confidentiality when engaging in relationships with suppliers.***

Confidential or otherwise sensitive information concerning Coloplast, our suppliers, or competitors should never be disclosed or used without prior authorization from proper party/management.

Typically, confidentiality covers:

- Technical information (often about products under development, launch, specifications or intellectual property rights)
- Financial data
- Commercial strategies
- Supplier related information
- Information provided by tendering companies.

Conditions negotiated with one supplier should never be disclosed to another competing supplier, without the former suppliers consent.

If you are directly or indirectly involved in a sourcing or tender process, you should always take care not to disclose any privileged information concerning the process or its parties.

# Conflict of interest

***We avoid any conflict of interests.***

A conflict of interest arises when employees are involved in activities causing disagreement between personal interests and the interests of Coloplast.

Conflict of interest can affect the employee's business actions and decisions in a disadvantageous manner.

Situations that often poses risk of conflict of interests are:

- When giving or receiving gifts
- When having a personal interest in a company doing business with Coloplast
- When investing in or using company resources.

As involved in Procurement, you should always be especially alert to these situations.

It is your responsibility to avoid conflicts of interests at all times.



# Negotiations

***A minimum of two employees must always be present at large contract negotiations.***

To avoid conflicts of interest, it is always required that a minimum of two Coloplast employees are present during larger contract negotiations.

Managers should always avoid placing subordinates in situations making it difficult to comply with this guideline.

Being two at larger contract negotiations will support an image of Coloplast as a professional, fair and transparent business partner.

It will also help avoid that external parties are tempted to bribe or otherwise make offers posing a risk of conflict of interest.



# Gifts and personal benefits

***We refuse to accept anything other than token gifts.***

To avoid conflict of interests, no employees must gain personal profit or benefit from procurement of goods or services on behalf of Coloplast.

As involved in Procurement, you must refuse to accept any gifts above 'token value'.

***This means that you cannot receive gifts representing a value above EUR 100.***

Gifts representing a value above EUR 100 must be returned to the presenter with referral to Coloplast's ethical guidelines.

If in doubt about the value of any gift, you should decline the gift or refer to your manager.

As manager, you must ensure that explicit guidelines exist on how employees should deal with local cultural practices and customs, which may cause conflicts with this guideline.

# Contact

If in doubt notify your manager.

Contact Corporate Procurement or Corporate Ethics.

**[corporateprocurement@coloplast.com](mailto:corporateprocurement@coloplast.com)**

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