

# Code of ethics and business conduct

December 2025



## Foreword

### Jonny Mason, CEO

**Pioneering trusted medical solutions to improve the lives we touch - our vision - ten words that capture why we're in business. At the heart of that vision is a promise to be **forever caring**, which defines how we go about our work for patients, customers and healthcare professionals.**

Behaving ethically and transparently is one of the four pillars of our approach to responsible business, which we describe as *Convatec Cares*, and has our vision and promise firmly at its core. In addition to our vision and forever caring promise, we have five values that we live by: **Do what's right** is one of those five.

These are all important foundations that we build trust upon, and it's why our **Code of Ethics and Business Conduct** ('the Code') matters. The Code translates these foundations into both collective and individual responsible business practices and standards for behaviour, which underpin how we work together and ensure we can all play our part in protecting and enhancing Convatec's reputation.

The Code applies to everyone, regardless of role or location. It's regularly reviewed as our industry continues to evolve.

At Convatec, we are determined to operate to the highest levels of ethical conduct and all of our colleagues strive to deliver that.

However, if you have a concern about business conduct, please speak up. You can contact the compliance helpline ([convatec.ethicspoint.com](http://convatec.ethicspoint.com)) or your local compliance officer if you have any further queries.

Many thanks for all you do on behalf of everyone relying on our trusted medical solutions.



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# Code of Ethics and Business Conduct

## Introduction

Convatec Group plc and its subsidiaries ('Convatec' or 'company') have always taken pride in pioneering trusted medical solutions to improve the lives we touch. This Code of Ethics and Business Conduct (the 'Code') explains Convatec's basic expectations for professional and personal behaviour from each employee around the world. You are expected to understand and comply with this Code.

**If you have questions, you should consult with your supervisor, Human Resources, Legal or the Office of Ethics and Compliance (OEC).**

## Scope

This Code is applicable to Convatec and applicable third parties acting on behalf of Convatec. Respecting and following the principles of this Code is a condition of employment. Any employee who fails to comply with or meet the standards in this Code, or any manager or supervisor who attempts to punish a subordinate for raising questions or for trying to follow this Code, may be subject to disciplinary action, up to and including termination of employment.

## Personal responsibility

This Code embodies Convatec's philosophy to conduct business in a lawful and ethical manner. Convatec conducts its business in a highly regulated environment and it is the responsibility of every employee and applicable third-parties to understand and comply with the basic legal and regulatory requirements that pertain to their job and job responsibilities.

No employee or applicable third-party should commit an illegal or unethical act or instruct another employee or third-party (e.g., Channel Partner<sup>1</sup> or Third-Party Intermediary<sup>2</sup>) to do so for any reason.

## Seeking guidance & reporting a concern

Every employee must promptly report all concerns about potentially illegal or unethical business practices or individual misconduct to at least one of the following:

1. Supervisor;
2. Human Resources Department;
3. Legal Department; or
4. Local Compliance Officer

Convatec employees may contact Convatec's Compliance Helpline at [convatec.ethicspoint.com](http://convatec.ethicspoint.com) to ask questions or report any potential ethics and compliance related matters or concerns by name or in an anonymous manner (if permissible under local law) and without fear of retaliation. Please know that all reports received are treated with discretion and sensitivity. A Compliance professional will promptly respond to your report. This does not prevent employees from reporting issues or concerns outside of the company.

Convatec prohibits retaliation against any employee that reports a truthful concern and will keep such reports confidential to the extent possible, consistent with Convatec's legal responsibilities and obligations to fully investigate potential misconduct and to protect public health and safety.

## Corporate education and training

Convatec Employees and applicable third parties are obligated through employment or contract, to complete all required education and training issued by Convatec. Employees may also be responsible for completing external education and training, in accordance with credentialing or other institutional obligations. Education and training provide learners with information about rules, procedures, restrictions, and best practices. In addition, education and training provides learners with unique perspectives on how to do their current jobs, evolve professionally and support Convatec's Mission and Values in an ethical and compliant manner.

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<sup>1</sup>'Channel Partner' includes any third-party person or company that sells and, subject to limits set forth in their contract, markets and promotes Convatec product (e.g., dealers, distributors and/or agents).

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## A living document

This Code will be updated periodically to stay current with changing legal and regulatory requirements. It is your responsibility to review the most current version of this document, posted on Convatec's designated policy management system and other approved locations (e.g., SharePoint), annually or more frequently as necessary to ensure you understand its contents. If you have questions about the Code or your obligations under the Code or where to locate the Code, please notify anyone referenced in SEEKING GUIDANCE & REPORTING A CONCERN.

## Business practices

Convatec expects its employees, at all times, to conduct themselves in a courteous, professional, and ethical manner when dealing with other Convatec colleagues and third parties (e.g., Channel Partners and Third Party Intermediaries) that include but are not limited to customers, patients, distributors, retailers, competitors, Healthcare Professionals ('HCPs'),<sup>3</sup> and, Government Officials<sup>4</sup>. Laws, regulations, industry codes, and other industry guidance regarding business practices vary around the globe. For example, in Europe, the company has adopted the MedTech Europe Code of Ethical Business Practice (the 'MedTech Code') and expects employees to abide by its tenets. In the United States (US), the company abides by the AdvaMed Code of Ethics on Interactions with Health Care Professionals (the 'AdvaMed Code'). Other industry codes may apply in other jurisdictions.

## Anti-Bribery and anti-corruption

Convatec is committed to complying with the anti-bribery and anti-corruption laws in all countries in which it operates. In most countries, including in the United States, Europe, and other countries, it is illegal to offer, promise, give, receive, or request a kickback or bribe. A kickback or bribe is offering, promising, giving, receiving, or requesting 'anything of value,' not only money, to obtain or reward favorable treatment in a business transaction. 'Anything of value' includes, but is not limited to, fees, commissions, credits, gifts, gratuities, rebates, employment, or a service contract. **Convatec's policy on kickbacks, bribes and all improper payments is clear—Convatec will not offer, promise, give, receive, or request them, nor tolerate those that do.** This prohibition is not limited to improper payments paid to - or received from - Government Officials or HCPs—it applies to all persons and entities that Convatec employees may encounter while acting on behalf of the company. For this reason, all arrangements with Government Officials or HCPs, including healthcare providers, distributors, and retailers of Convatec products, will be in writing and approved by the company.

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<sup>2</sup> 'Third-party intermediary' includes a non-Convatec individual or entity or an Employee of such entity who provides services for Convatec that may involve interactions with HCPs or Government Officials. These generally include, without limitation: custom agents, meeting planners, third-party vendors assisting Convatec with public tenders or other bidding processes, or travel agents supporting HCP training, tender agents, regulatory agents and/or other government intermediaries.

<sup>3</sup> 'HCPs' include any individual or entity involved in the provision of healthcare services and/or items to patients, and/or are in a position to purchase, lease, recommend, use, arrange for, or influence the purchase or lease of, or prescribe Convatec products or services. This definition includes, but is not limited to: a licensed physician, medical resident or fellow; non-physician healthcare practitioner, such as a nurse; medical student; and/or an institutional educational or healthcare facility, entity, or organisation, including an academic medical center, as well as agents and employees for each of the above individuals or entities. An HCP is affiliated with an entity if the HCP is employed by, has staff privileges at, or otherwise has a position of influence with the entity.

<sup>4</sup> 'Government Officials' include:

- 1) Any officer or employee of a government, its armed forces, or any department, agency, or instrumentality of a government, such as a state-owned or -controlled company.
- 2) Any person acting in an official capacity for or on behalf of that government or department, agency, or instrumentality.
- 3) Any official, employee, or person acting on behalf of a public international organisation, such as the European Union, the Red Cross, or the World Health Organisation.
- 4) Any officer or employee who is remunerated either directly or indirectly by a government, or any department, agency, or instrumentality of a government, including without limitation a Healthcare Professional.
- 5) Any Healthcare Professional working in, on behalf of, or otherwise affiliated with a government healthcare facility, institution, university or hospital.
- 6) A candidate for a political office; and
- 7) Any relative of the persons listed above.

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Many anti-bribery and anti-corruption laws will hold Convatec responsible for the acts of third parties acting on its behalf. Thus, Convatec cannot make prohibited payments through third parties or anyone acting on the company's behalf. Similarly, Convatec must be vigilant when engaging and managing third parties to help ensure that those parties do not put the company at risk.

For additional guidance on these issues, please see Convatec's Anti-Bribery and Anti-Corruption Policy.

## Tax evasion

Convatec is subject to the Corporate Criminal Offence ('CCO') rules in the United Kingdom. Convatec takes a no tolerance approach to any criminal activity, in any location, including tax evasion committed by our employees or third parties working on behalf of Convatec.

Convatec could be criminally liable under the CCO for failure to prevent an employee or a third-party performing services for, or on behalf of Convatec from criminally facilitating tax evasion, which brings the risk of unlimited fines, reputational damage and consequences for its directors. Tax evasion is any fraudulent activity that intends to divert funds from the public revenue. A facilitation offence will be committed where an individual or entity deliberately and dishonestly facilitates tax evasion.

The prevention, detection and reporting of tax evasion concerns is the responsibility of all Convatec employees and those working for or providing services on behalf of Convatec. If a member of staff has a concern about tax evasion or the facilitation of tax evasion, they should speak with their immediate superior, or someone from the Legal, Compliance, Tax or Human Resource departments.

For more guidance, please refer to the [Facilitation of Tax Evasion Policy](#).

## Advertising, promotion, and communications with Healthcare Professionals

It is Convatec's policy to promote and market its products in a lawful and truthful manner. While it is natural to want to present each product in the best light, employees must be careful to only offer an accurate representation of product capabilities and benefits. All promotional presentations, including product claims and comparisons, should be accurate, balanced, fair, objective, unambiguous, and based on supported and approved clinical evidence.

In addition to the laws outlined below in the antitrust section (e.g., prohibition on unfair competition, advertising, promotion, deceptive claims, or packaging), Convatec products are also subject to premarket and post-market regulation. For example, in the United States, companies may not promote medical device products or product indications not cleared by the U.S. Food and Drug Administration, except under very limited circumstances. Collectively, these regulations apply to sales and marketing personnel (including distributors), who are required to represent Convatec products in a manner consistent with the applicable labeling and market approvals. All information provided to customers must be, truthful, accurate and complete. Any discussion or descriptions of Convatec products must be 'on label,' meaning in conformity with government approved labeling or health department registration documentation. Questions concerning new or existing promotional materials, for internal or external use (e.g., HCPs and patients), should be directed to medical, regulatory, and legal personnel, as well as your local compliance officer when applicable.

## Business meals, and travel / accommodation

Convatec employees may provide business meals and travel to HCPs, Government Officials, patients, and distributors. However, these transfers of value must strictly comply with applicable Convatec policies, procedures, local laws, regulations, and industry codes (e.g., the AdvaMed Code and the MedTech Code).

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**Business meals and refreshments may be provided to appropriate third parties that are:**

- for a bona fide and legitimate business purpose
- within Convatec meal limits
- modest, infrequent, and incidental to a product, medical, clinical, or substantive business discussion
- at a venue that is subordinate to the focus of the meeting
- paid by a single meal host

**Business meals and refreshments are restricted if:**

- provided to obtain or maintain a business relationship with Convatec or induce the use or referral of Convatec products and services
- provided without an appropriate business discussion (e.g., 'dine and dash')
- alcohol is provided without a sit-down meal and consumption is greater than 2 drinks per person
- meeting or event participation by spouses or guests of HCP, Government Official or other third-party that are not qualified to participate and do not have a legitimate interest in the discussion
- bill splitting (i.e., to conceal transfers of value, meal limits, non-essential attendees)
- conducted at entertainment or luxury venues (e.g., tourist attraction and related establishments, sports or adult bars, country clubs, resorts, five-star properties)

**Travel accommodation may be provided to appropriate third parties that are:**

- for a bona fide and legitimate business purpose
- airfare class appropriate (i.e., economy class unless greater than six hours of in airtime)
- at an appropriate lodging location

**Travel Accommodations are restricted for:**

- first class air or train travel, contrary to Convatec policies, procedures, and travel approvals
- lodging at lavish, 5-star, spa, or casino properties
- extended stay, unless there are extraordinary circumstances (e.g., flight delays, national emergencies)
- spouse or guest accommodations
- entertainment, food, beverage, lodging property recreation or other services (i.e., massages)

## Gifts and entertainment

Convatec shall not provide HCPs or Government Officials or their family members or their staff with unapproved gifts or entertainment of any kind. Convatec employees and third parties working on behalf of Convatec shall not provide directly or indirectly gifts or other transfers of value that would ordinarily be purchased by the HCP or Government Official in order to perform their job responsibilities, job function, or involvement or support with patrons, customers or patients.

For example: Convatec employees or third parties acting on behalf of Convatec should not provide business supplies or other similar items to HCPs or Government Officials. The provision of these items would constitute a prohibited gift under this Code.

## Restricted gift examples:

- holiday or thank you gifts, gifts for significant life events (e.g., childbirth, birthday, wedding, anniversary, graduation, new job, professional recognition). However, in the case of death and for distribution of company-branded items of nominal value, please contact your local compliance officer for guidance on applicable local laws, regulations, and industry codes.
- candy, gift baskets, gift cards, cash or cash equivalents, electronics, entertainment or sporting event tickets, cakes, alcohol, meals, or meal vouchers.

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Educational items (e.g., medical textbooks or anatomical models) do not fall under the gift restrictions outlined in this section.

## Restricted entertainment examples:

- entertainment or recreational event or activity for HCPs, or Government Officials such as: theater, sporting events, museums, golfing, skiing, massages, dinner cruises, hunting, leisure or vacation trips, and city tours.

Convatec employees must exercise caution when receiving gifts from third parties to ensure that the gift does not affect business decisions or otherwise create the appearance of undue influence or impropriety in connection with business activities. Convatec employees may accept gifts under certain circumstances and must always notify OEC of any gifts received over \$25 U.S. dollars or country equivalent.

For more detailed guidance on providing gifts and entertainment, please consult with your local compliance officer and see the [Global Policy on Interactions with HCPs and patients](#).

## Educational items

Educational items may be provided to HCPs or Government Officials for the benefit of patients or serve a genuine educational function for HCPs. Compliance should be notified of all proposed educational item offerings in advance of distribution.

### Educational Items must:

- be given infrequently
- be fair market value - per local laws, regulations, and industry codes (e.g., U.S. AdvaMed Code USD \$100)
- not be provided through a medium for personal use (e.g., iPad, unlocked USB drive)
- not be provided in the form of cash or cash equivalents (e.g., gift cards)
- not be provided to influence HCP treatment decision making (e.g., use, prescribe, refer)
- not be provided solely to specific HCPs (e.g., targeting specific HCPs or accounts)

However, for distribution of company-branded educational items of nominal value please contact your local compliance officer for guidance on applicable local laws, regulations, and industry codes.

**Product samples are not considered educational items**, even though they may be used to educate HCPs and patients on safe and effective product use.

## Educational grants and charitable donations

Disseminating scientific and educational information through materials, conferences and other programs is a worthy undertaking that the company supports. Likewise, Convatec may make financial or in-kind support (i.e., products, assets, or services) donations to bona fide charitable organisations to further their charitable purposes. However, the decision to support an educational program or to make a charitable donation may not be linked to, or contingent upon, a customer prescribing, purchasing or recommending any Convatec product. More specifically, the company's support must be unrestricted and may not be allocated as an inducement or reward for business. Accordingly, return on investment ('ROI') analyses or other tracking metrics for business generation may not be conducted in connection with educational grants or charitable donations.

For more detailed guidance on providing educational grants and charitable donations, please see the [Global Policies on Educational Grants, Charitable Donations and Promotional Sponsorships](#).

## Financial arrangements with Healthcare Professionals including speaker and consultant fees

Convatec may engage and compensate a reasonable number of HCPs, based on relevant qualifications and expertise needed to support legitimate and approved commercial, clinical research, product development and medical objectives (e.g., advisory boards, education and training, speaking and ad hoc consulting activities).

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Financial arrangements with HCPs must never be for the purpose of rewarding HCPs for past, present or future use, prescription, purchase, or referral of Convatec's products or services.

## Financial arrangement requirements:

- Due diligence screening (e.g., exclusion lists, licensure, investigations)
- Conflicts of interest screening (e.g., Institution and Immediate Relatives<sup>5</sup>)
- Terms and conditions (e.g., scope of services to be performed, term of service, and fair market value payment structure)
- Executed agreement, prior to conducting services
- Actual performance of services; sham or ghost consulting arrangements are prohibited
- Cross-border utilisation, in compliance with local policies, procedures, laws, regulations and industry codes.

For more detailed guidance on these arrangements, please see the [Global Policy on Interactions with HCPs and patients](#).

## Promotional sponsorships

Convatec may purchase a Promotional Sponsorship at Third-Party Organised Events in order to exhibit products, services and provide presentations on subjects that are consistent with the overall content of the Third-Party Organised Event, and approved Convatec strategic business objectives and apply to the approved labeling of Convatec products.

Support must be for promotional activities only. Requests that involve both promotional and Continuing Medical Education (CME) support must be provided to your local compliance officer for review and approval.

Convatec must ensure that any payments made to third-party event organisers, in connection with the promotional sponsorship, are fair market value and not intended to improperly influence event participants (e.g., HCPs).

For more detailed guidance on these activities, please see the [Global Policy on Promotional Sponsorships](#).

## Trade compliance

### Exports

Convatec's global business strategy involves the distribution and sale of products to countries and jurisdictions where its products are formally approved by applicable government and registered bodies. In addition, Convatec will not engage with any person, entity, or governmental agency, in any business, dealing, agreement or transaction prohibited by country specific Export Control Laws (e.g., U.S. Office of Foreign Assets Control and the U.K. Export Control Act).

### Convatec will not engage, directly or indirectly, in any transaction with:

- Persons or entities located in embargoed countries
- Governments of embargoed countries
- Blocked or excluded persons or entities
- Sanction targets or evaders
- Other restricted parties (e.g., terrorist organisations) identified on government watch lists

## Tenders

Convatec participates in tenders held by governmental entities and medical institutions (e.g. hospitals and universities). A tender refers to the formal solicitation by a governmental entity or medical institution (a 'procurement authority') for bids or proposals to sell specified Convatec products and services.

<sup>5</sup> 'Immediate Relative' includes an individual's husband, wife, birth or adoptive parent, child or sibling, stepparent, stepchild, stepsibling, father-in-law, mother-in-law, son-in-law, daughter-in-law, brother-in-law, sister-in-law, grandparent, grandchild, spouses of grandparent or grandchild, aunt, uncle, cousin, domestic partner and fiancée.

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Convatec prohibits offering, promising, or giving anything of value to improperly influence procurement authority bids. At times, Convatec may provide certain types of Value-adds to procurement authorities in connection with tenders. Value-adds must be in writing, part of the tender and may include anything of value, such as: funding (e.g., educational and research grants), free of charge product (e.g., evaluation and demonstration) or discounted product (e.g., volume purchase). Company sponsored education and training is not considered a Value-add.

All tender submissions must comply with all applicable local law, regulation, industry code and Convatec policies and procedures.

**For more detailed guidance on complying with the Export Control Laws and Tender requests, please contact Legal and Regulatory.**

## Third party engagements

Convatec may engage third parties such as suppliers, distributors, brokers, consultants, agents, and vendors (collectively described as Channel Partners and Third-Party Intermediaries) to provide services or support designated Convatec business activities, events, and initiatives. Convatec employees and those third parties acting on Convatec's behalf are required to comply with anti-corruption laws. Convatec must not ask or allow a third-party to perform a task or provide a transfer of value to an HCP or Government Official that would ordinarily be prohibited by Convatec, local law, regulation, or applicable industry code.

**Convatec employees that are responsible for the engagement and management of third parties must ensure the following:**

- Due Diligence is conducted for all Channel Partners and Third-Party Intermediaries prior to engaging such third parties
- Data Privacy assessment is conducted for all Third-Parties that are contracted to manage or share personal or protected health information with or on behalf of Convatec
- Convatec Legal approved executed contract is in place before services are provided
- Confirmation that Third-Party has been trained on all applicable Convatec policies and procedures and other content necessary to perform services on Convatec's behalf

For more information about how and when to engage the Data Privacy team regarding Third-Party engagements and data privacy assessments, email [dataprivacy@convatec.com](mailto:dataprivacy@convatec.com).

For more detailed guidance on engaging and managing third parties, please see the Global Policy on Anti-Bribery and Anti-Corruption and the Convatec Global Third-Party Compliance Manual.

## Company-conducted product education and training

Convatec's interactions with HCPs, Government Officials, patients and other related third parties may include education and training on therapeutic areas, as well as Convatec products, technologies, and services.

Discussions about Convatec product features and uses must be consistent with approved product indications and labeling, and must be approved in accordance with Convatec's Medical, Regulatory, Legal (MRL) review process. As part of the education and training interaction (e.g., meeting, activity, or event), Convatec may provide product for evaluation or demonstration purposes in accordance with applicable local laws, regulations, and industry codes.

Convatec must ensure that these interactions are done ethically, compliantly, approved for legitimate business purposes, and coordinated in a manner that focuses on the education and training content without the existence of any recreational or entertainment components.

Education and training interactions must not take place to reward HCP speakers or attendees for past, present or future use, prescription, purchase, or referral of Convatec products.

**For more detailed guidance on interactions with HCPs, please see Convatec's Global Interactions with HCP policy.**

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## Product sampling

Convatec may provide a limited quantity of no-charge products to HCPs and patients for live patient evaluation, demonstration, or education purposes. Convatec may also authorise Channel Partners and Third-Party Intermediaries to distribute no-charge products to HCPs and patients. As a condition of Convatec providing product samples, HCPs and other third-party recipients are prohibited from re-selling or seeking reimbursement for the sample product.

Providing sample, evaluation and demonstration products furthers patient care, facilitates the safe and effective use of Convatec products and increases awareness of Convatec product and service offerings.

Product sample distribution must be provided and tracked in accordance with Convatec policies, procedures, local laws, regulations, and industry codes.

Convatec products must never be given as a way to inappropriately gain or obtain a business advantage or improperly arrange or influence the purchase, lease, recommendation, use, or prescription of Convatec products and services, and may not be provided as a form of payment for services rendered.

**Furthermore, Convatec prohibits the distribution of samples for the following:**

- HCP personal use, pricing concessions, expired exchanges, competitive swap-outs, replacement or consignment, tenders, research, charitable donations, indigent care and for externally sponsored education and training events.

Product donations for third-party initiatives (i.e., charitable, and educational) are covered in other Convatec policies.

For more detailed guidance on providing product samples, please see Convatec's [Global Product Sampling to Healthcare Professionals and Patients policy](#).

## Antitrust and fair competition

Antitrust and competition laws are designed to preserve and foster fair and honest competition. These laws are designed to prohibit unfair business practices that attempt to fix or control prices, limit or restrict the sale of products or allocate or boycott geographical regions, customers, or suppliers. Convatec employees must never collude with competitors to gain an inappropriate business advantage with customers or suppliers of Convatec products.

It is Convatec's policy to comply fully with antitrust and competition laws that regulate Convatec's business. Since these laws and regulations vary around the world, it is the responsibility of the business unit manager of each country or region to confirm whether a certain business practice is permitted under local antitrust or competition laws and regulations. If it is unclear, the matter should be referred to Convatec's Legal Department for guidance.

## Competitive interactions

Convatec employees should always conduct themselves in a professional and ethical manner when interacting with competitors, as well as discussions involving competitor products and services with third parties (e.g., HCPs or patients). These discussions, which may occur at HCP practices, medical institutions, trade shows, or conferences, must never include product comparisons (unless substantiated by approved clinical evidence) or other defamatory comments about the competitor.

Any documents comparing Convatec products with competitors' products should be fair, balanced and approved by the appropriate MRL review process.

While it is important and acceptable to remain informed regarding competitors' business practices, no illegal, deceptive or dishonest methods should be used to obtain this information. Representatives of the company should never exchange anything of value, trespass, or steal to obtain competitor information. Former employees of competitors should not be hired with the purpose of gaining access to their proprietary knowledge. If confidential information is offered by a competitor to a Convatec representative, it should not be accepted without prior approval by Legal.

**For more information please contact the Legal Department on guidelines for gathering business intelligence.**

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## Accounting or auditing matters

Convatec requires that all its books and records accurately and fairly reflect the transactions made by its employees and comply with internal accounting controls. Each employee should ensure that all transaction documentation that they submit or have responsibility over accurately reflects, in appropriate detail, the purpose and subject matter of the transaction.

All Convatec employees are responsible for reporting any questionable transactions, as well as any accounting or auditing irregularities to their immediate supervisor, management, Legal, Human Resources, OEC or by using the Compliance Helpline at <https://convatec.ethicspoint.com>

## Data privacy, data protection and confidentiality

Convatec requires that all employees who, in the course of their job responsibilities, may access, receive or share personally identifiable information (PII), health related or confidential information involving other employees, HCPs, patients, customers, vendors, suppliers, other third parties (e.g., shareholders, bondholders), must adhere at all times to Convatec's data protection policies, guidance and employee notice at a minimum.

**Examples of personal and confidential information include, but are not limited to:**

- Name, address, phone or email address or photograph of the data subject
- Social Security or national identification numbers
- Health information
- Financial information
- Company or third-party proprietary information

**Generally, when handling personal or confidential information, consider the following:**

- Does the proposed handling adhere to Convatec's External and Internal data privacy and protection policies?
- What is the lawful basis of the proposed handling or processing? Is consent required? Or is there a legitimate business interest?
- Are there legal or regulatory use requirements or limitations?
- How will the information be stored?
- Are approvals necessary for access or sharing the information?
- Have I consulted with the data privacy team at [dataprivacy@convatec.com](mailto:dataprivacy@convatec.com) or contacted my local privacy specialist regarding the proposed use of information?

Convatec employees are obligated to secure and protect personal and confidential information (e.g., HIPAA, GDPR and CCPA) and must report any unauthorised access, misuse, theft or breach to Privacy, Legal, OEC or Human Resources. **Data breaches must also be reported to [dataprivacy@convatec.com](mailto:dataprivacy@convatec.com)**

## Insider trading

As an employee of a publicly traded entity, from time to time, you may become aware of confidential information that is not available to the public. Convatec employees and third parties working on Convatec's behalf are prohibited from telling anyone (including family, friends, and business acquaintances) any confidential information about Convatec.

**In addition, information about Convatec is characterised as 'inside information' (as defined below) which cannot be used to:**

- deal in any securities of Convatec or any instruments linked to them.
- recommend, encourage, or induce somebody else to do the same; and/or
- disclose the inside information except where you are required to do so as a part of your employment or duties (you will know if this is the case).

Insider trading or insider dealing is prohibited even if you will not profit from the deal or transaction.

If anyone receives an inquiry relating to the public listing of Convatec or matters concerning the share price, they should not engage in any discussion but refer the requestor to Investor Relations immediately.

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'Inside information' is information about Convatec which:

- is not publicly available;
- would be likely to have a significant effect on Convatec's share price if made public;
- relates, directly or indirectly, to Convatec or its shares; and
- is 'precise'. For these purposes, information is 'precise' if it concerns existing circumstances or events or circumstances or events which may occur (rumor or speculation is not enough).

'Dealing' covers a very wide range of transactions in a company's securities, for example, buying or selling securities of Convatec. It also includes exercising options under any of our share schemes, using Convatec's shares as security for a loan and entering into any derivative contract which relates to Convatec's securities.

'Securities' covers any publicly traded securities including, for example, shares, bonds, notes and depositary receipts and any financial instruments linked to them, such as derivatives.

Failure to adhere to the foregoing principles may violate relevant securities laws and amount to a criminal offence for both Convatec and the individual. Please refer to the Group Securities Dealing Policy for further information on restrictions on share dealing when in possession of inside information.

Please contact the Company Secretary or a member of the Legal Department if you have any questions regarding the purchase or sale of Convatec securities.

## CONFLICTS OF INTEREST

Convatec expects its employees to make sound business decisions based on Convatec's best interests, using care to avoid even the appearance of a conflict of interest. Convatec employees should avoid situations where they are in a position to derive personal benefit from actions or decisions made in their capacity acting on Convatec's behalf or through a relationship with an Immediate Relative.

In certain situations, avoiding a conflict of interest may not always be possible. Be aware that facilitating or supporting a conflict of interest will likely violate Convatec policies and procedures and may trigger some form of corrective action by Convatec or other legal authorities. Therefore, transparency, in the form of disclosure, is critical to help protect the integrity and reputation of Convatec and its employees.

**The following are some common situations where conflicts of interest may arise:**

1. If an employee or Immediate Relative has a financial or other substantial interest (e.g., ownership interest of greater than 5%) in a supplier, competitor, or customer of Convatec.
2. Personal relationships (e.g., romantic relationships) within Convatec or between a Convatec employee and a third-party (e.g., HCP, customer, supplier, competitor, government employee).
3. An Immediate Relative, who is being considered for employment, or is seeking or currently doing business with Convatec.
  - a. For example, a candidate who is an Immediate Relative of a Convatec employee should not directly or indirectly report to that Convatec employee.
4. If a commercial employee (i.e., sales representative) calls on an Immediate Relative who is a Healthcare professional or healthcare institution administrator to approve, use, purchase, or refer company products and services.

Participating in professional services or activities, such as service on corporate boards of directors, advisory boards, panels, consulting, speaking at conferences.

Convatec employees must disclose outside service arrangements to Human Resources, Legal or OEC to ensure compliance with Convatec's policies and procedures.

Convatec employees must be careful to avoid any actual or perceived undue influence, therefore, Convatec prohibits employees to solicit or accept, or permit any Immediate Relative to solicit or accept any gifts, gratuities or other favors from any customer, supplier, payer, competitor or other person who does or seeks to do business with Convatec unless what is offered is of nominal value (e.g., less than 25 USD or country equivalent) and consistent with applicable local laws, regulations and industry codes.

# Code of ethics and business conduct

Convatec employees involved in outside organisations, private, public or charitable, should be reminded that, depending on their jurisdiction, they may have signed an agreement requiring non-disclosure of Convatec's business secrets or a duty not to compete for a certain period of time. Furthermore, employees' outside activities must not adversely impact Convatec's corporate image and/or disrupt business operations.

If a situation arises or if a Convatec employee is uncertain whether a conflict of interest exists, they should discuss the matter with their supervisor and Human Resources or OEC.

**For more detailed guidance on conflicts of interest, please see Convatec's Global Conflicts of Interest Policy.**

## RESPONDING TO GOVERNMENT INQUIRIES

Convatec may deal with Government Officials as customers or regulators, such as the ministries of health, customs officials, and others. Convatec is also subject to inspections and audits by government regulators in various areas, such as safety, quality, and regulatory compliance.

If a Convatec employee or applicable third-party receives a notification of a pending on-site inspection or audit, they should immediately contact Convatec Legal and Regulatory.

When dealing with regulators, Convatec employees and applicable third parties should always be courteous and answer all questions truthfully. If questions arise from Government Officials, Convatec employees and applicable third parties should consult with Convatec Legal or Regulatory for guidance.

It is the policy of the Company to comply with all applicable anti-corruption laws, including the UK Bribery Act 2010, the Foreign Corrupt Practices Act and the relevant local laws in every country where we do business, as well as any applicable industry codes of ethics, such as AdvaMed, Medtech Canada, MedTech Europe, or APACMed.

Convatec employees are prohibited from offering, promising, giving, receiving, or requesting 'anything of value,' not only money, to influence an official act or inappropriately gain a business advantage. Convatec prohibits all forms of bribery that involves Government Officials paid directly or indirectly by a Convatec employee or through a third-party.

## Lobbying activities

Convatec may engage in legal lobbying activity to support its business efforts or to advocate for patient groups, both directly or through industry associations. It is the Company's policy to comply with all applicable laws and regulations related to lobbying or attempting to influence and ethical interactions with Government Officials.

## Political activity

Convatec encourages its employees and third parties to participate in the political process; however, in doing so, Convatec employees and third parties may not create the impression that you or they are speaking or acting on Convatec's behalf. Convatec employees and related third parties are expected to obey all laws relating to political contributions and donations must follow Convatec's policies. Convatec cannot contribute money, time, services, or property to a political candidate or party unless it is permitted by local law and approved by Legal or OEC.

## WORKPLACE STANDARDS

We are responsible for maintaining a safe, healthy, and diverse workplace, respecting the environment, and conserving natural resources.

## Human rights and labour standards

Convatec supports and complies with the United Nations' Universal Declaration of Human Rights and the UK Modern Slavery Act and seeks to protect the human rights and well-being of all employees within Convatec. More specifically, the Company respects and adheres to the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work and has in place a framework of policies and procedures designed to ensure fairness in the recruitment, development, and retention of all employees.

# Code of ethics and business conduct

Convatec also requires its third parties to operate in a manner consistent with these principles and has developed a Third-Party Compliance Manual to assist third parties in understanding and complying with Convatec's expectations regarding human rights, prohibition of child labor, compulsory labor or trafficked labor and the general health and safety of third-party employees.

In each of these areas, Convatec is committed to ensuring the continuous improvement of working conditions and management of labor risks in its global operations and each Convatec employee is encouraged to report any actual or potential violation of the relevant code, policy or procedure.

For more detailed guidance on Convatec's expectations regarding human rights and labor standards, please see the [Human Rights & Labor Standards Policy](#) and the [Convatec Third-Party Compliance Manual](#).

## Discrimination

Convatec strives to ensure equal employment opportunity without discrimination or bias in the workplace on the basis of any characteristics protected by law, such as gender, race, color, religion, national origin, age, disability, citizenship, marital status, sexual orientation or any other characteristics protected by law. Any reported formal complaint of discrimination will be investigated promptly. If you have any questions or concerns about your job or work environment, please consult your Convatec Human Resources representatives.

## Harassment

Convatec prohibits any form of harassment of Company employees on the basis of any characteristics protected by law, such as gender, race, color, religion, national origin, age, disability, citizenship, marital status, or sexual orientation. Harassment can include verbal, nonverbal, or unwanted physical contact.

This policy applies to Convatec employees and third parties. Therefore, inappropriate workplace behaviour and discriminatory harassment based on a protected characteristic, including but not limited to, sexual harassment, by either employees or third parties (such as customers, suppliers, vendors, and contractors), will not be tolerated by Convatec. This policy applies to harassment whether it occurs on our premises or in some other location where Company activities occur, such as on business trips, third-party meetings, events or at Convatec social activities or events. This policy covers all Convatec employees and third parties working on its behalf.

Any employee who believes that they have been subjected to harassment, or has seen someone else harassed, should report it immediately to their supervisor, Human Resources, Legal, OEC or the Convatec Compliance Helpline [convatec.ethicspoint.com](http://convatec.ethicspoint.com).

Convatec prohibits retaliation against any individual who truthfully reports harassment or participates in an investigation of such reports. Retaliation, like harassment or discrimination itself, will be subject to disciplinary action up to and including termination of employment or disqualification from representing Convatec.

For more detailed information, please see the [Equal Employment Opportunity Policy / Anti-Harassment Policy](#).

## Workplace violence

Convatec strives to maintain a workplace free from violence, threats of violence, harassment, intimidation, or other disruptive behaviour. Such behaviour includes, but is not limited to, oral, written, photographic or video statements, gestures or expressions that communicate any threat of harm. Individuals who commit such acts may be immediately removed from Company premises and may be subject to disciplinary action up to and including termination of employment. Any employee that experiences or witness's workplace violence, whether or not from a Convatec employee, should immediately report it to their supervisor, Human Resources, Legal or OEC.

## Alcohol and drug-free workplace

Convatec strictly prohibits the manufacture, distribution, or sale, of alcohol, prescription, and illegal drugs in the workplace. Reporting to work under the influence of alcohol or drugs is also strictly prohibited. Employees will be tested when there is reasonable suspicion they are under the influence of alcohol or drugs at work.

# Code of ethics and business conduct

Alcohol may be consumed on company premises during company-sponsored employee picnics, outings, athletic events and other social activities when the use of alcohol is controlled, discreet and approved in advance by Management and where such use of alcohol is not prohibited by local law or regulation. The choice of whether to drink alcohol at Company-sponsored events is voluntary and requires responsible consumption and consideration for fellow employees and others.

## Use of company property

Convatec permits reasonable and incidental personal use of company property to do such things as send email, make phone calls, make limited internet transactions, and receive small package deliveries, according to local practice. Personal use of company property, equipment, services, or facilities is prohibited beyond these limited circumstances. If in doubt, check with your supervisor, management, or the relevant Company department (e.g., Information Management, Legal, OEC).

## Computer use guidelines

Convatec computing resources are for business use only. However, limited personal use of Convatec computing resources is allowed provided that it does not interfere with productivity, job requirements or any business activity.

Electronic storage of data, use of email and Internet access are subject to Management review. Any communications using Convatec systems or resources are not necessarily private and may be subject to review by the Company. Abuse of these systems and resources can result in loss of Company proprietary information, could compromise the security and integrity of the Company's systems, networks, and business endeavors, thus is strictly prohibited.

## Company information

Convatec employees or third parties working on its behalf may not disclose, disseminate or otherwise make available to any third-party, outside of legitimate business purposes, any confidential or proprietary information of the Company that is learned in the course of their employment or contractual relationship with Convatec, or that of Convatec customers, patients, suppliers, shareholders, fellow employees, or third parties who disclose information to Convatec in confidence.

This includes any confidential or proprietary information pertaining to the Company's or third-party's research and development, products, customers or patients, employees, financial data, sales figures (including forecasts, budgets or projections, or other similar reports), marketing and sales programs, business opportunities and potential contracts or ventures, business practices, pricing, discounts, individual compensation/bonus schedules, voicemail or email lists, education and training manuals, newsletters, audio or video tapes, territory information and other materials used in sales education and training. It also includes internal correspondence, regulatory reports and computer passwords or software.

Materials that contain confidential information, such as memos, notebooks, and computer files (e.g., disks, jump drives, other electronic devices such as computers, laptops, mobile devices or electronic storage devices) should be stored securely and shared only by authorised and approved Convatec employees and third parties with individuals that have a legitimate business need to know.

## Social media

Convatec Associates are responsible for individual social media activities, and Convatec-sponsored social media activities and must avoid unlawful activities, such as defamatory, libelous, obscene, discriminatory statements, posting of material that violates intellectual property laws or that discloses confidential or proprietary information of Convatec or any other party.

For additional guidance please refer to Convatec's Global Social Media Policy.