

## **Code of Conduct Unilabs Group**

### **Unilabs Code of Conduct – our definition**

The principles, values standards and rules of behaviour that guide the decisions, procedures and systems in the Unilabs Group should contribute to the welfare of its key stakeholders and respect the rights of all constituents affected by our operations

### **Unilabs Code of Conduct – our statement**

Our purpose is to provide and develop laboratory medicine and radiology services for private and public customers. We do this for the individual, both as a patient and as a taxpayer, as well as for society at large. We do this because we want to take an active part in the renewal of European Healthcare.

Unilabs is an ethically, socially and ecologically responsible organisation. We take responsibility for the impact of our activities on customers, employees, communities and the environment - in all aspects of our operations. To us this goes beyond the obligation to comply with legislation. Our Code of Conduct is based upon our values.

This results in stringent requirements in terms of responsible enterprises and employees who accept responsibility.

In this Code of Conduct we describe the requirements we have established for the actions and behaviours of our Board Members, management and employees and which we also assume are respected by all of our business partners.

This Code of Conduct governs the interpretation of any other policies, guidelines or rules adapted by the Unilabs Group

### **Unilabs Values - The foundation for our conduct**

- Patient and customer focus

Above all, we never forget the people we are here to serve

- Confidence

We are committed to gaining the confidence of our customers by demonstrating our intentions and our competence

- Respect and Empathy

Our work is always characterised by sympathy, participation and respect for individual integrity

- Initiative

We take initiatives and responsibility for improvements in our operations

- Benefit society

We endeavour to forge enduring and developing relationships with our clients in order to increase the benefits to society arising from our work

## **Unilabs Business Principles**

All employees are expected to follow national law and adhere to high ethical standards. They should demonstrate social and environmental responsibility, professionalism and use good business practices in performing their jobs.

They shall also use good judgement and common sense in all situations when the requirements of the law or of good practices appear unclear. Employees should seek advice and direction from their supervisor in such situations.

Employees having inside information about Unilabs or any other company which Unilabs is considering for acquisition or strategic alliance, disinvestment or merger, may not trade in any way stocks, derivatives or other securities in Unilabs or that other company, or disclose such information to another person.

Unilabs' customers and stakeholders must view us as a reliable and honest company group that always lives up to its commitments. We strive to achieve long-term business relations as a basis for generating customer value, shareholder value and secure workplaces conducive to development. Our Code of Conduct must always be communicated as a natural feature of cooperation with partners.

### **Laws, regulations and international conventions**

A basic requirement is that we act within the framework of laws and international conventions. We respect and comply with competition rules, environmental legislation, labour market laws, agreements and safety requirements, or other provisions that set the parameters for our operations

### **Agreements**

Unilabs displays openness and honesty in its dealings with business partners. We live up to the commitments we have made. Established agreements apply. Our business partners must feel that they are an important prerequisite for ensuring that joint business ventures are as successful as possible

### **Competition issues and conflicts of interest**

Unilabs does not permit any form of pricing collaboration or cartel building and supports in all phases of its operations correct and unrestricted competition in regard to bids, tenders, procurement and purchasing.

Unilabs employees are not permitted to engage in activities that could lead to a conflict of interest, or to exploit relations with business partners for personal gain. This includes providing or accepting personal gifts or services of a value exceeding country specific common practice, or participating in expenses-paid activities beyond normal business requirements. It also includes requesting or providing any form of promise connected to the acceptance of gifts.

## **Human Rights and Working Principles**

Unilabs supports and respects international conventions concerning human rights. We promote diversity and equality. Each employee is entitled to fair, courteous and respectful treatment by his or her supervisors, subordinates and peers. Unilabs do not tolerate

harassment or discrimination based on race, religion, national origin, gender, sexual orientation, disability, age or any other relevant category.

Unilabs does not accept any form of mental or physical punishment, threat of punishment, discrimination in employment opportunities or work, sexual or other harassment, forced labour or other types of involuntary work.

The operations and the projects in which Unilabs is involved shall be characterized by a safe and healthy work environment.

Obligations toward employees pursuant to national laws and agreements on social security must be respected and followed. Salary and other benefits shall at least fulfil national laws, applicable agreements and the generally accepted standard for the laboratory and radiology market.

Employees' rights to organise themselves in optional employee organisations and to negotiate collectively must be respected. Employee representatives must not be discriminated against.

We work actively to ensure acceptable labour standards and promote workforce diversity not only in our operations but up and down our supply chain as well.

## **Compliance and follow up**

### **Responsibility**

Compliance with the Code of Conduct is a matter for Board Members, Group Management – and for managers at all levels of the Group down to the individual employee.

Every manager has an obligation, within his or her area of responsibility, to ensure that employees and business partners are informed of the content of Unilabs' Code of Conduct and the need for compliance with it. Managers at all levels within Unilabs must always set a good example.

### **Follow-up**

Compliance with the content of the Code of conduct is followed up continuously as an integrated part of how we govern the different parts of our operations.

Repeated and serious breaches will result in corrective action.

If any business partner repeatedly and seriously violates the Code of Conduct, cooperation will be discontinued.

We have a Code of Conduct champion at management level, who is well equipped to assist the management team in ensuring that our Code of Conduct is implemented and that actions are taken to fulfill our obligations and objectives