

# Code of Conduct



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## Introduction

As a company operating in the health sector, sustainability is at the core of Oriola's business. We work to improve people's health and wellbeing, in line with our purpose 'Health for life'. Our important role in society comes with a great responsibility, and we are committed to promoting sustainable business practices. We strive to be a responsible partner complying with high ethical standards.

This Code of Conduct is a guideline explaining the key principles that Oriola applies in all its businesses within the Group. Combined with our values, the Code of Conduct lays the foundation for everything we do. All employees at Oriola are expected to commit to the principles and practices of the Group.

## Oriola Values

### Openness

We believe that openness builds trust, transparency and a culture where everyone feels heard, valued and included. We are open to new ideas, feedback and honest dialogue, and we respect others' viewpoints.

### Responsibility

For us, responsibility means taking ownership and working together as a team for Oriola's success. We care about society and about the people we work with.

### Together

Collaboration makes us stronger and helps us reach common goals. We are committed to growing together, as individuals and as a company, and to supporting each other along the way.

### Initiative

Being proactive and curious helps us grow and exceed our customers' expectations in an ever-changing world. We encourage a culture where people feel inspired to explore and to try new ideas.

## Compliance

### We comply with the law

At Oriola Group we consistently comply with all applicable laws and regulations in all our activities. We also follow Oriola Group's internal policies, guidelines and procedures. We do not accept any breach of law, and we never incite or advise anyone to breach the law.

As a listed company, Oriola Group is also bound by and observes securities market regulations and guidelines for good corporate governance.

### We avoid conflicts of interest and do not engage in bribery

An Oriola Group employee may not be employed by or associated by any means with competitors of Oriola Group. Employees must avoid situations where their personal interests may conflict, or may appear to conflict, with those of Oriola Group.

It is the responsibility of an employee to disclose to the company all outside activities, financial interests or relationships that may present a conflict or the appearance of a conflict of interests.

Oriola Group employees must not pay, offer to pay or accept bribes or kickbacks to or from the government, public officials, candidates, business partners or other third parties in order to obtain or retain business. Unauthorized donations to third parties are prohibited.

Oriola Group employees are not allowed to accept or give gifts or entertainment from or to a stakeholder, with the exception of gifts or entertainment of a minor value that can be regarded as reasonable hospitality. Gifts or entertainment may further be given or received on an occasional basis and should never create a conflict of interest between an Oriola Group employee and a stakeholder.

If there is any suspicion of conflict of interest, the employee should contact the supervisor or local legal department for guidance.

## Integrity

### We are committed to fair competition

Oriola Group believes in tough but fair competition. Violation of competition laws, such as participation in cartels, abuse of a dominant position in the market place, or the exchange of price or other commercial information between competitors, is prohibited.

Competition laws aim to protect consumers and businesses against unfair business practices. Each Oriola Group employee shall comply with competition laws.

### We protect Oriola Group material and intellectual property

All Oriola Group employees are responsible for the safety of company property under their control, including business documents, records and intellectual property (i.e. patents, trademarks, trade secrets, etc.).

We respect the valid intellectual property rights of others, and unauthorized use of others' intellectual property is prohibited.

Oriola Group's officers and employees use company property only for legitimate business purposes.

Oriola Group does not tolerate fraud, theft or embezzlement, or misuse of company property.

### We do not disclose confidential information and we comply with insider regulations

All Oriola Group employees must keep any trade secrets, documents and internal information confidential. Information available to the employee may not be disclosed to any third persons, including colleagues that are not related to the information, relatives or friends. Confidential information may not be used for any other purpose than performing the work tasks at hand.

Oriola Group employees may not use non-public / inside information for their financial or other personal benefit (i.e. buying or selling shares) or unlawfully disclose inside information to anyone.

We follow applicable laws, regulations and guidelines governing insider trading.

### We provide reliable financial records

Oriola Group's management and financial records must be accurate and reliable in all material respects. Unrecorded funds are prohibited. Records may not contain any false, misleading or artificial entries.

Oriola Group officers and employees are responsible for providing reliable and accurate financial and non-financial information related to the business activities they perform, in a timely manner.

### We promote openness and transparency

Oriola Group promotes openness, transparency and continuous dialogue with its stakeholders, including customers and other business partners, shareholders, personnel, authorities, local communities and the media.

Oriola Group ensures that all market participants have simultaneous and timely access to relevant and sufficient information on the company to determine the value of Oriola Corporation's shares. Stock exchange rules and competition considerations may, in some cases, restrict such openness and transparency.

## Sustainability

### We promote non-discrimination and fair employment

We hire, employ and promote employees based solely on the competence and skills required to handle the tasks. Oriola Group promotes freedom from discrimination based on ethnic or national origin, gender, family status, sexual orientation, creed, disability, age or political beliefs, or other characteristics protected by law. Oriola Group fosters equal opportunity, and employees are recruited and treated on the basis of their skills, abilities and merits.

Oriola Group does not accept any form of abuse, discrimination, harassment or bullying.

We respect individual privacy and the confidentiality of private information.

We respect our employees' freedom of association.

### We promote health and safety

Oriola Group endeavours to create hazard-free workplaces for its employees working in various locations by applying high standards of occupational health and safety.

Each employee is responsible for complying with the safety instructions, for using personal protection equipment when required, and for reporting on any shortcomings regarding safety instructions or protection measures.

### We minimize environmental impacts

We strive to reduce the environmental impacts of our operations as part of our sustainable business. We actively work to find new development areas to reduce our total environmental impact and report our development as part of our sustainability reporting.

### We do not support political activities

Oriola Group does not support, whether directly or indirectly, political parties or organisations. Neither do we participate in financing individual candidates' election campaigns.

### We maintain continuous dialogue with authorities

Oriola Group maintains constructive co-operation and dialogue with authorities and regulatory bodies, at both local and international levels. Oriola Group seeks to play a role in serving the needs of the local communities whenever possible.

## Reporting & Guidance

### Reporting non-compliance, nonretaliation and whistleblowing

If you detect behaviour that violates this Code of Conduct, please contact your supervisor and local legal department for guidance. Oriola Group also has a whistleblowing tool, where employees can anonymously report any activity that violates Oriola Group's Code of Conduct, ethical principles or laws and regulations.

Each report is investigated in detail. As long as the employee raising a concern acts in good faith, honesty and with integrity, he/she will not suffer any negative consequences in the event that he or she has mistakenly raised a concern. Oriola Group treats each report of a violation confidentially and ensures that the employee raising the concern is not placed in a disadvantageous position. Employee identity and information will be kept confidential and shared only on a "need-to-know" basis with those responsible for investigating the concern.

If an employee is involved in violating the Code of Conduct, the timely raising of a concern and assistance in providing full clarification and limiting the damage may lessen the legal consequences. Any type of retaliation towards employees who have raised concerns is treated as a serious breach of the Code of Conduct.

If you detect behaviour that violates this Code of Conduct, please contact your supervisor and local legal department for guidance.

For help and guidance, please see [www.oriola.com/sustainability](http://www.oriola.com/sustainability)

You can confidentially report violation here: <https://report.whistleb.com/oriola>

Please note that this channel is only intended for reporting violations of this Code of Conduct and suspected violations of securities markets regulations.