

## Code of Conduct

### Our Vision

The Unilabs vision is to be the leading provider of diagnostic services in Europe.

Our mission is to provide and develop laboratory medicine and radiology services for private and public clients. We want to do this for the individual, both as patient and as a taxpayer, as well as for society because we want to actively participate in the renewal of European health care.

Our main contributions to a sustainable society include

- Providing high-quality diagnostic services
- Driving development and innovation in our industry
- Being the first choice for business partners and employees
- Being the best at combining a profitable diagnostics company with social and environmental responsibility
- Being the most profitable diagnostics company in the short and long term through sustainable business

### Why a Code of Conduct?

Unilabs is dependent on the outside world having confidence in us. It is only through a high level of trust that Unilabs can continue to be a successful company. The Unilabs Code of Conduct clarifies how we should behave as business partner, employer, employee, and community stakeholder, and how our relationships with each other, with customers, suppliers, contractors, and other stakeholders must be characterised by transparency, simplicity, innovation, and customer focus.

Our Code of Conduct is a tool to help all employees, including Management and board members and Unilabs consultants, to make well-adjusted and ethical decisions that meet Unilabs expectations. It must also be made known to our customers, suppliers, and business partners in order to better explain our standards.

The basis of our Code of Conduct is derived from our mantra “CARE BIG” and the four “CULTURE BUILDING BEHAVIOURS” (CBBs) that together help us create and maintain guidelines for how we want to work together.

- **“CARE BIG”** To “CARE BIG” is to do what is right rather than what is easy
- **“Walk in your customer’s shoes”** In order to “CARE BIG”, we need to understand the needs and perspectives of our customers, patients, and other stakeholders as well as we possibly can.
- **“Bring out the best in each other”** “CARE BIG” is about how we approach our outside world.  
But in order to succeed, we must also take care of and challenge each other.

- **“Try new stuff”** In order to “CARE BIG”, we must also dare to be innovative and try doing things in new ways.
- **“Make a Difference”** To “CARE BIG” is to really have the chance to make a difference.

### **To whom does the Code of Conduct apply?**

The Code of Conduct applies to all employees and Unilabs AB partners. It is everyone’s responsibility to set a good example. Anyone concluding agreements with customers, suppliers, contractors, and consultants must also ensure and monitor their compliance with the Code of Conduct.

The Code must always be reviewed in connection with employment, performance reviews, procurements, business monitoring, etc. When signing business and partnership agreements, the Code of Conduct must be attached to the agreement.

### **Guidance**

Our Code of Conduct does not replace existing policy decisions, nor does it exclude the application of other conduct or ethical rules related to specific functions, operations, or professional groups.

It is not exhaustive, nor can it predict every situation or provide definite answers to all questions that may arise. Consequently, these guidelines are intended to make us all aware of ethical risk areas, provide guidelines in identifying and managing ethical issues, establish systems for reporting unethical conduct, and help promote Unilabs AB's values and business principles.

### **Our joint responsibility within Unilabs AB**

Unilabs shall conduct profitable business operations with good ethics. Unilabs AB shall set an example in sustainable business, which includes the environment, business ethics, anti-corruption, gender equality, diversity, working conditions, and human rights.

Unilabs shall provide a good workplace for everyone, regardless of gender, transgender identity or expression, ethnicity, religion or other belief, disability, sexual orientation, or age, and everyone shall have the same rights, opportunities, and obligations.

Unilabs fully supports its actions

- Global Compact, which includes ten principles on human rights, labour law issues, environmental protection, and anti-corruption, as well as
- the UN Universal Declaration of Human Rights
- ILO's eight fundamental conventions No. 29, 87, 98, 100, 105, 111, 138, and 182
- the UN Convention on the Rights of the Child, Article 32
- the occupational safety and work environment legislation applicable in the country of manufacture
- the labour law, including minimum wage legislation, and the social insurance protection applicable in the country of manufacture
- the environmental legislation applicable in the country of manufacture.
- the United Nations Convention against Corruption

### **Work environment**

All employees have the right to a safe and stimulating work environment, characterised by respect and trust. All Unilabs employees contribute with their commitment, competence, and loyalty to the vision and objectives of Unilabs. Managers and employees are obligated to actively counteract any form of discrimination and other negative treatment.

### **Ethics**

Unilabs only engages in business activities that comply with laws and agreements and that are consistent with our Code of Conduct. We do not engage in activities that we cannot openly stand for or account for, and we do not make business decisions based on personal interests or relationships. Bribery, hidden commissions, or other illegal activities or unethical benefits are not allowed.

Unilabs employees must not cooperate in any form or otherwise act in a manner that can be construed as restricting competition. We want to form trusting relationships with customers, suppliers, and contractors. We shall not engage suppliers or contractors if we know that they have breached their obligations to business partners or employees, have violated laws, rules or agreements, have abused bankruptcy institutions, or have unclear ownership.

### **Supplier relations**

Unilabs has committed to cooperate with suppliers in a transparent and reciprocal manner. We should thus choose our suppliers on the basis of a transparent, competitive tendering procedure based on objective criteria for assessing performance and service quality. We should also apply transparency in the tendering procedure and give refused tenderers sincere reasons for refusal. In addition, the confidential information of suppliers must be protected. Unilabs expects its suppliers to meet the highest possible environmental and ethical standards in their operations, particularly with regard to:

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- the UN Universal Declaration of Human Rights
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### **Political activities, contributions, and sponsorship**

As a serious member of the community, Unilabs adheres to strict political, religious, and philosophical neutrality. It is therefore Unilabs' policy not to make any financial contributions to political candidates, elected representatives, or political parties.

Unilabs respects the personal civic commitments of employees who participate in political or public activities. However, such commitments must not affect the business or image of Unilabs, nor the company's neutrality. Political contributions from the company are prohibited. Sponsorship of and

contributions to public or private organisations are allowed when they are in compliance with all applicable laws and regulations.

## **Environment**

We respect the environment. Each of us is responsible for preventing or minimising the environmental impact of our business by reviewing our actions. For example, we can avoid unnecessary travel, save water and energy (lights, turn off computers, etc.), limit our use of printed material, and avoid generating waste. Such small gestures can make a collective difference in the long run.

For such waste as is unavoidable, we must ensure that it is recycled or sorted in the best way possible and in accordance with national laws or with the guidelines applicable for your unit.

Please see our Environmental Policy for more information.

## **Compliance and monitoring**

It is the responsibility of each unit within the group to apply these ethical rules considering the restrictions and special terms set by its operations and geographic location.

Our managers have a special responsibility for the application of the rules. They should create an atmosphere of trust and transparency that encourages employees to discuss even uncomfortable matters in a sincere way. They should act exemplary and quickly respond to any violations of the rules. Each individual employee must comply with and apply these ethical rules.

## **Reporting violations**

When faced with an ethical issue in connection with a decision, we want you to ask yourself the following questions:

- Is it legal?
- Does it comply with the Unilabs Code of Conduct?
- What consequences would my actions have for other stakeholders, and what would their reaction be?
- If I'm not sure, have I asked for help?
- If you are unsure of the best approach, you are encouraged to address the issue and openly discuss it. Usually, an issue is best addressed via your immediate supervisor. You can also consult your HR Manager. If you feel uncomfortable using the regular channels or with the answers you are given, the SpeakUp Line can, in exceptional cases, offer a supplemental process for submitting your query by phone or online.

## **SpeakUp Line**

In the event of a violation or suspicion of a violation of the Code of Conduct, a report must be submitted. The SpeakUp Line is reserved for serious irregularities and wrongdoings. The SpeakUp Line is an alternative to the regular reporting routes. The report goes to an external company and you can be anonymous. The SpeakUp Line is not intended for reporting minor wrongdoings or general dissatisfaction and complaints. Those with concerns about the business should first contact their immediate supervisor or the manager in charge of the operations where the irregularity is occurring. In case this is not appropriate, you may contact your HR Manager and Communications Director.

### **Regular review of the rules**

*The company will follow up compliance of these rules on a regular basis by communicating with the Board, Management, and personnel, particularly in terms of problem areas arising from the rules, as well as ideas or suggestions for improvements.*

*General suggestions for improvements or changes to the rules can be submitted at any time, in writing, to the Unilabs Group HR Department.*

*These rules are available online on our intranet as well as on our websites.*

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Johan Höglund  
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