

Atos Medical  
Your voice

**Atos**

# Giving Voice to Our Values

Atos Medical  
Code of Conduct

At Atos Medical, we are committed to giving a voice to people who breathe through a stoma, with design solutions and technologies built on decades of experience and a deep understanding of our users.

[www.atosmedical.com](http://www.atosmedical.com)

# Give Voice to Our Values and Do the Right Thing

At Atos Medical, we are committed to giving a voice to people who breathe through a stoma, with design solutions and technologies built on decades of experience and a deep understanding of our users. We always live our values: **we listen – we focus – we engage – we inspire.**

Every one of us connects with stakeholders, involve them in our activities and strive to support and empower our users and each other every day. No matter whom we interact with – our users, our colleagues, health care professionals, or business partners – respect and integrity are at the core of everything we do.

Our Code of Conduct is the common baseline for all of us when discussing compliance and ethical behavior, and will be our day-to-day guidance.

## Do the right thing

I expect that you comply with our Code of Conduct as well as with current laws and regulations, and that you do the right thing when making decisions. I expect all employees to receive regular compliance training, and I expect our managers to keep an open dialogue with their people on ethics and compliance and how high ethics and compliance standards are secured locally.

## Speak up

If you have a concern about breaches of the Code of Conduct you must speak up. Go to your manager, or go to the Compliance Officer. Remember that we all share the responsibility for maintaining our good reputation and our high ethical standards.

We are proud of our history and our accomplishments, and want to make sure that we continue to be the world leader in Laryngectomy Care. I rely on your help to make sure that our words and actions always reflect our values and will lead us on the road towards better serving all of our key stakeholders.



**Claus Bjerre**  
CEO



A landscape photograph showing a field of dry, golden-brown grass in the foreground. In the background, a single tree stands on a small hill under a clear, light blue sky. The text is overlaid on the image in a large, white, sans-serif font.

We listen  
We focus  
We engage  
We inspire



# The Atos Code of Conduct: How We Give Voice to Our Values

## Who must follow our Code of Conduct?

At Atos Medical, all employees must adhere to all laws and regulations of the countries where they do business and follow our Code of Conduct. It is your responsibility to know the Code and to know the laws that govern your activities at Atos Medical.

Laws and regulations differ from country to country. In case of conflicts between the principles in the Code of Conduct and local laws and regulations, you must adhere to the stricter regulations.

If you have a management role, you have additional responsibilities to serve as a positive role model. It is your obligation to help your employees understand and use the Code of Conduct and to guide them in ethical questions.

Individuals and companies conducting business on our behalf must also follow our Code of Conduct, in addition to other relevant Atos policies. When dealing with outside business partners, you must see to it that the relevant rules of our Code of Conduct are included in their contracts with us.

## What if you breach the Code of Conduct?

Unethical or illegal behavior may cause severe harm to Atos. If you violate the Code of Conduct you may personally risk civil damages, criminal prosecution, and/or disciplinary actions up to and including termination of employment.

Similarly, any business partner working for us or on our behalf, who fails to comply with the principles in our Code of Conduct risks termination of contract and claims for damages.

## How do you raise a concern?

If you have concerns about a possible breach of the Code of Conduct, talk to your manager. If you are not comfortable raising the issue with your manager, contact the Compliance Officer or go through our Speak Up Hotline on our external website.

Concerns about employment or health and safety matters should be addressed to corporate or local Human Resources.

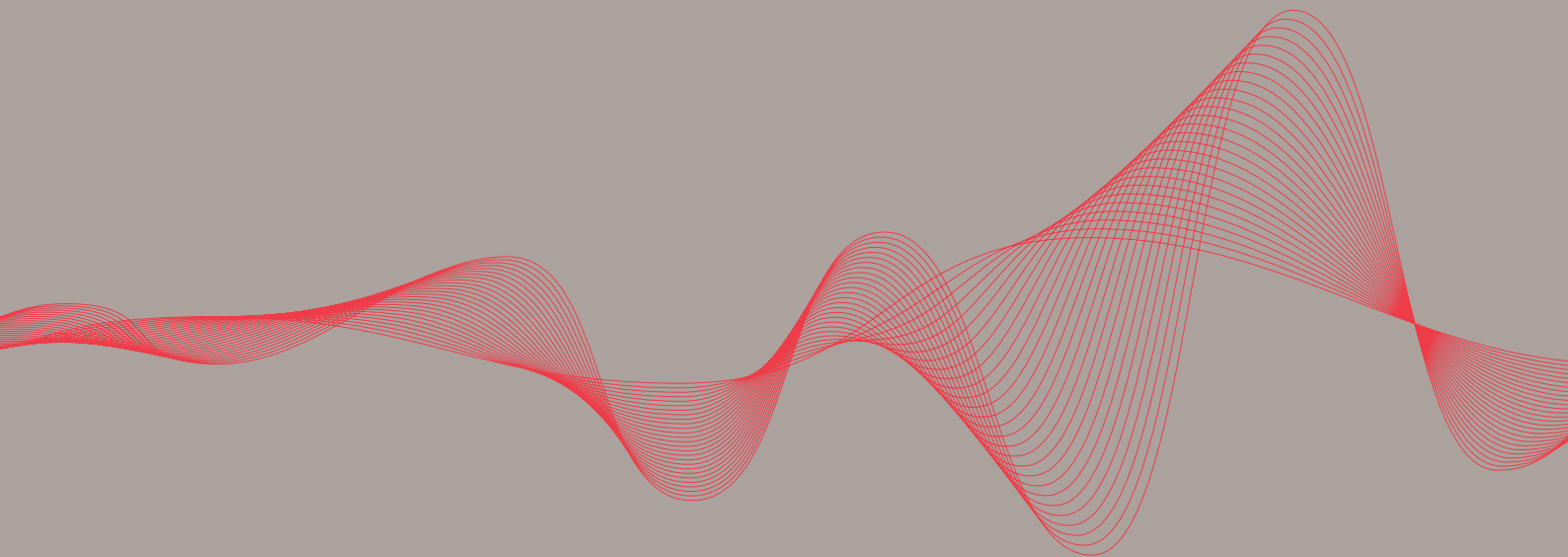
Concerns about product safety or product conformity must always be addressed to corporate or local Quality Assurance (QA).

Remember: you must speak up! It is always better to report a concern or ask for advice than to put your own and Atos' reputation at risk. Failure to speak up can be a breach of this Code of Conduct on its own. Atos will not accept retaliation against anyone that raises a concern in good faith.

At Atos, we acknowledge that mistakes may happen, and that it may not always be easy to speak up in an open dialogue. This is why we have the Speak Up Hotline where concerns can be reported.

You can find an updated list of global contacts on our international website [www.atosmedical.com/compliance/](http://www.atosmedical.com/compliance/).

# Our Users are Always in Focus



# User Safety and Product Quality

The Atos brand is associated with improving the lives of patients – our end-users – through innovative, high quality products and a high standard of care. We share the responsibility to maintain our strong quality and safety record.

### User Safety and Product Quality

Atos always prioritizes product safety and quality from the early stages of designing a new product, through production, and until the end of its life cycle.

We maintain a certified Quality Management System abased on ISO 13485 in compliance with regulatory requirements everywhere we operate.

We analyze, evaluate, and control the product risks related to our products, and maintain a post-market surveillance process. All product safety and quality concerns are registered to ensure timely reporting to authorities and give important input for improvement of the product quality.

### Innovation, development, and trials

Atos always wants to understand our users’ needs, and respond to them through innovative solutions.

We conduct our clinical trials in accordance with regulatory requirements and internationally recognized standards.

We collect and promptly report required data to relevant regulatory authorities, and retain clinical data in accordance with applicable law.

When developing new products, we comply with regulatory approval, registration, and marking requirements.

You must always	You can never
<ul style="list-style-type: none"><li>• Immediately report any product complaints or safety concerns to the local complaint manager or directly to <a href="mailto:quality.se@atosmedical.com">quality.se@atosmedical.com</a></li><li>• Participate in relevant training and observe the quality procedures that apply to your job</li><li>• Advise patients that experience adverse effects that may relate to our products to also contact their health care professional</li></ul>	<ul style="list-style-type: none"><li>• Neglect user concerns or complaints about product quality or safety</li><li>• Disregard quality procedures to meet targets or save cost</li><li>• Ask users to use or test a product that is not yet released, unless part of a formal clinical trial</li></ul>

# Interactions with End-users

At Atos Medical, we seek a deep understanding of our end-users in order to improve their lives. We connect with them and involve users and their relatives to provide them with the highest standard of care. Respect and integrity is at the core of all our interactions with our users.

We are committed to Direct-to-Consumer (DtC) activities, because we need to be in contact with our end-users and their relatives in order to best serve them, and help improve their lives. All our communications with patients and their relatives should be straightforward, honest, fully informative, transparent, and non-deceptive.

We respect regulations on marketing and telemarketing, and we respect the integrity and data privacy of every end-user.

We adhere to local regulations on samples and on gifts and entertainment, and we never use improper means to induce our current or future end-users or their relatives to purchase our products.

You must always	You can never
<ul style="list-style-type: none"><li>• Know the laws and regulations that apply to your job and adhere to them</li><li>• If you need training – speak up</li><li>• Protect your customers’ data privacy and data security</li><li>• Find out if your customer is covered by public healthcare or insurance and follow the rules that apply</li><li>• Inform your customer of her or his freedom to choose supplier (if it applies)</li></ul>	<ul style="list-style-type: none"><li>• Contact a customer without a valid, express consent (unless a legal exception applies)</li><li>• Use patient data for any other purpose than it was given for</li><li>• Process patient data unless strictly necessary</li><li>• Abuse a patient’s or relative’s fears for health or safety</li><li>• Knowingly misrepresent the coverage or payment of our products with our user’s insurance company or public healthcare program</li></ul>

# Communicating About Our Products

When we communicate about our products through promotion or in instruction, support, and training activities, we play an important role in informing our stakeholders about the safe and effective use of our products.

At Atos Medical we are committed to good practices for product promotion and we always comply with laws and regulations that apply to our communications wherever we operate.

Our managers must see to it that every employee involved in promoting our products, or informing users and caregivers on products and product use, is trained in all local laws and regulations as well as in our own standards.

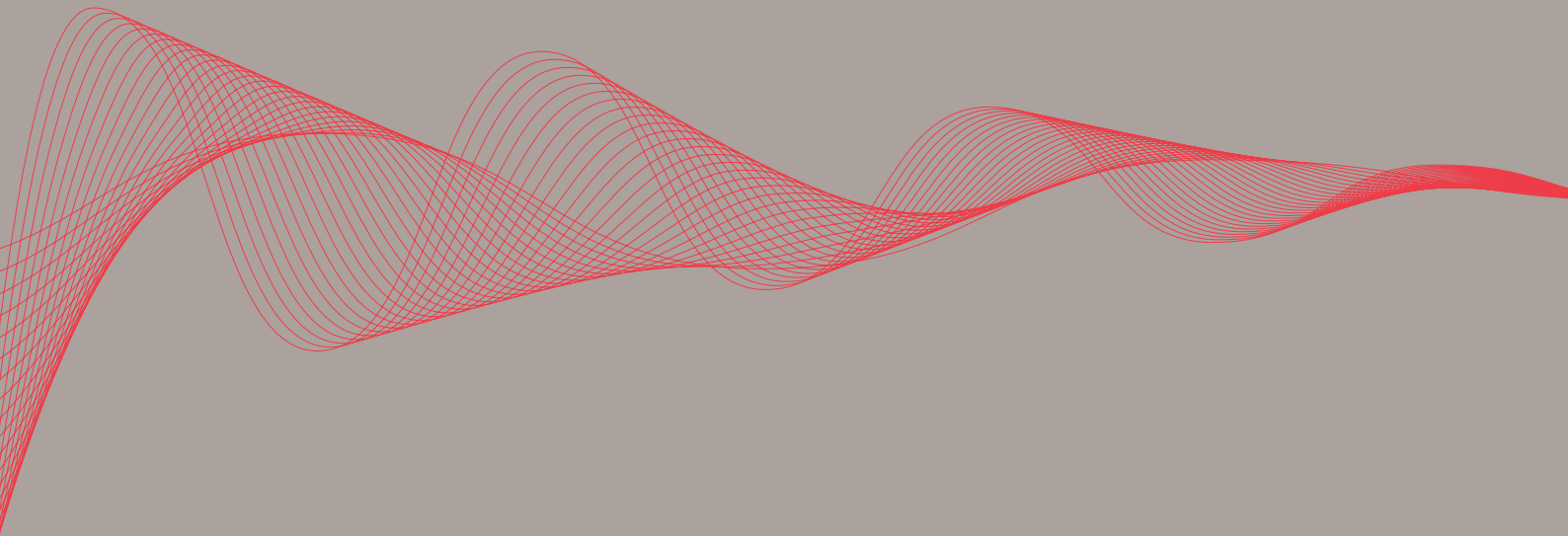
All our product promotion must be based on valid scientific evidence and provide accurate, objective, and complete information about the product. You must only use promotional materials that are current and have been approved according to Atos Medical procedures.

All our communications are based on honesty. Whenever we compare products we base it on fair evidence and we never demean our competitors or denigrate their products.

You must always	You can never
<ul style="list-style-type: none"><li>• Know the laws and regulations that apply to your job and adhere to them</li><li>• If you're not properly trained: speak up</li><li>• Provide fair, current, accurate, and compliant information about Atos products</li><li>• When communicating to end-users: use only marketing materials that are reviewed and approved for use</li><li>• Only make product claims that are fully substantiated</li></ul>	<ul style="list-style-type: none"><li>• Lie about, exaggerate, or embellish product information</li><li>• Use information made for HCPs, information for internal use only, or outdated materials directly to patients</li><li>• Promote products directly to end-users if the products are banned from promotion directly to patients</li><li>• Promote products that have not been filed, approved, or marked (as applicable)</li><li>• Promote our products for any other use than what it has been filed, approved, or marked for (as applicable)</li><li>• Make absolute claims about product safety or product efficacy</li><li>• Denigrate or belittle competitor products</li></ul>



# Our People First



# Diversity, Health and Safety

At Atos Medical, we want our employees to be focused, open-minded, and engaged. We want our culture to be based on high performance and strong ethics, and we are committed to provide our people with a safe and healthy workplace.

## Non-discrimination and non-harassment

Atos Medical provides equal opportunities for employment, and we base our employment decisions on merit, considering qualifications, skills and achievements. We do not tolerate any form of discrimination or harassment. We look at discrimination and harassment as unwelcome and offensive conduct that impairs a person's ability to perform his or her work.

You must always	You can never
<ul style="list-style-type: none"><li>• Show respect for the integrity and dignity of others</li><li>• Show respect for different ideas, opinions and cultures of others</li><li>• Base employment decisions on merit, qualifications, and abilities.</li><li>• Inform your manager or HR manager if you or one of our colleagues are subject to discrimination or harassment</li></ul>	<ul style="list-style-type: none"><li>• Discriminate against anyone in the workplace on the grounds of race, color, age, gender, nationality, social or ethnic origin, religion, disability, sexual orientation, marital status, medical condition, genetic information, or any other category mentioned in any applicable regulations</li><li>• Harass or encourage the harassment of anyone</li><li>• Accept, condone or turn a blind eye to harassment of others</li></ul>

## Occupational Health and Safety

Atos Medical strives for a safe and healthy working environment for our employees and others working within, or visiting, our facilities and premises. We comply with local health and safety regulations, and ensure that our people have all the tools, safety equipment and education needed in their jobs. Drug and alcohol use is forbidden in the work place and during working hours. If alcohol is consumed while entertaining and representing the company it should only be offered and consumed moderately and responsibly.

You must always	You can never
<ul style="list-style-type: none"><li>• Understand and follow Atos Medical's health and safety requirements in order to manage the potential risks and dangers of your job</li><li>• Report accidents, injuries, and unsafe working conditions</li><li>• Help improve our work environment by addressing unsafe situations and behaviors</li></ul>	<ul style="list-style-type: none"><li>• Disregard any instructions on health, safety, and the use of safety equipment</li><li>• Fail to report incidents – even if your own health is not at risk</li><li>• Hesitate to ask questions if you are in doubt about any instructions on health and safety</li></ul>

## Human and Labor Rights

At Atos Medical, we support and respect the protection of internationally proclaimed Human Rights and Labor Rights

We make sure that we, or anyone working on our behalf, are not complicit in human rights abuses.

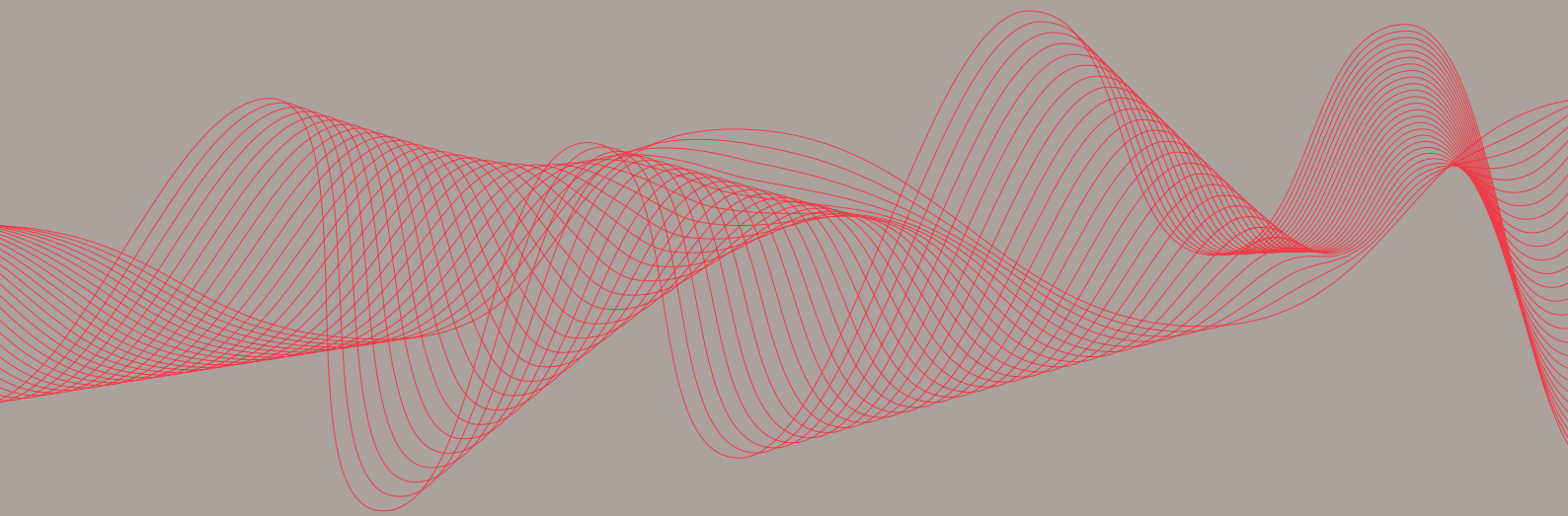
We respect the freedom of association and recognize of the right to collective bargaining.

### Our expectations

- We expect that our managers, relevant employees as well as our business partners work to avoid that our activities have any negative impact on human rights.
- We expect our people and business partners to report any breach of this expectation or any doubts that our expectations will be met.



# Respect, Integrity and Transparency



# Anti-corruption

Our relationships are based on honesty, trust, and the aim for the common good. Corruption damages our relationships, so Atos Medical works against corruption – in all its forms.

## Bribery and Extortion

Bribery is illegal worldwide, and may lead to severe criminal sanctions such as fines for the company, but also fines and imprisonment for anybody involved, whether at the giving or the receiving end of a corrupt relationship. Bribery does not need to involve money, it can be money, services, or anything else of value offered or accepted to gain an undue advantage.

Our officers and employees and anybody working on our behalf will not give, offer, obtain or accept an advantage (money/service/etc.) through means that are illegitimate, immoral and/or inconsistent with your duty or the rights of others. Facilitation payments are also banned in Atos Medical; we do not accept facilitation or “grease” payments (small payments, in cash or in kind, to low-level government officials to perform a routine duty).

We also work against extortion. This means that we will never use illegal force or threats to reach our targets.

You must always	You can never
<ul style="list-style-type: none"><li>• If you are asked to give a bribe, always refuse</li><li>• If you are asked to accept a bribe always refuse</li><li>• Refer to our Code of Conduct and tell them that bribery is illegal and violates our policies</li><li>• Immediately report any bribery offers or demands to the Compliance Officer</li><li>• Extortion is completely banned: You will not obtain money, services or goods or anything else of value through the illegal use of force or threats</li></ul>	<ul style="list-style-type: none"><li>• Give or receive anything of value if it could give the impression of having an inappropriate influence or if it could imply that there is an obligation to return the favor</li><li>• Stay quiet about attempts at bribery or extortion – you must always speak up and report this to the Compliance Officer</li><li>• Give small payments, in cash or in kind, to low-level government officials to perform a routine duty</li></ul>

# Gifts, Hospitality and Entertainment

Atos Medical wants successful working relationships and goodwill with our business partners. However, we are very careful that gifts, hospitality and other advantages do not jeopardize the integrity of our business dealings.

**Gifts, hospitality and other advantages to outside parties**

We never use gifts and hospitality or other advantages to outside parties (government officials, customers, suppliers, partners, users, etc.) to improperly influence others or gain an undue advantage. Stricter rules apply for gifts, hospitality, and other things of value to government officials and we acknowledge that breaching those rules amount to corruption. Stricter rules also apply to Health Care Professionals.

We make sure that gifts, hospitality, and other advantages are appropriate, legal, fully documented, and that they are compliant not only with our own policies, but also with the policies of the recipient’s organization.

You must always	You can never
<ul style="list-style-type: none"><li>• Only offer reasonable – not lavish – gifts, hospitality and other advantages, and only if legal and appropriate</li><li>• Offer gifts, hospitality and other advantages openly and ensure accurate documentation</li><li>• If you have doubts whether gifts, hospitality or other advantages comply with our policies go to your manager or to the Compliance Officer</li></ul>	<ul style="list-style-type: none"><li>• Offer gifts, hospitality or other advantages beyond acceptable courtesy</li><li>• Offer gifts, hospitality and other advantages that are against the recipient’s policies and local law</li><li>• Offer gifts, hospitality or other advantages to gain an undue advantage</li></ul>



### Receiving gifts, hospitality, and other advantages from outside parties

We accept that our people receive appropriate hospitality and token gifts from business partners as this is an ordinary way of building business relations in many markets. However, we make sure that gifts, hospitality, and entertainment can never be perceived as inappropriately influencing our business decision.

We do not accept gifts that exceed token value. Hospitality and entertainment is acceptable only when incidental to a business activity, and we do not tolerate lavish hospitality and entertainment.

You must always	You can never
<ul style="list-style-type: none"><li>• Accept gifts only in compliance with local laws, regulations, and business practices</li><li>• If you have doubts whether gifts, hospitality or other advantages are in compliance with the law or with our policies, go to your manager or to the Compliance Officer</li></ul>	<ul style="list-style-type: none"><li>• Accept gifts of money, cash, or cash equivalents</li><li>• Accept gifts, hospitality or other advantages beyond common courtesy and above token value</li><li>• Encourage or solicit personal advantages from any business relation of Atos Medical</li><li>• Accept gifts, hospitality or other advantages, if it may compromise your or Atos Medical's integrity</li></ul>

# Conflicts of Interest

Conflicts of Interest are a threat to the integrity of our employees, and are detrimental to our decision process. That is why you must always ensure full transparency about any Conflict of Interest that might occur.

Anyone of us may face a conflict of interest from time to time, if our private or personal interests compete or conflict (or even appear to compete or conflict) with the interests of Atos Medical. Private and personal interests include, but are not limited to, your family, your relatives and other relations, your friends, the clubs and societies to which you belong, your private business interests, your investments and shareholdings, or any person to whom you owe a favor or are obligated to in any way.

## **Family members and other close relationships**

Relationships with family members and close personal friends can influence our decisions. In Atos Medical, we are careful about Company business decisions that involve close personal relationships. We do not accept that our managers hire, supervise, or promote family members, close relatives, or close personal relations.

If a conflict of interest arises within an Atos unit or department, the manager must assess the situation, and consult with her or his own manager on how to resolve the situation. In these cases one of the employees may be transferred to another available position where there is no conflict.

## **Other personal interests outside Atos Medical**

Conflicts of interest may also occur if you have other personal interests that could be seen as conflicting with our Company interests – e.g. if you have investments or shareholdings in competitors, suppliers, or distributors, or you have family, friends or relatives that work at competitors, suppliers or other business partners.

To make sure that Conflicts of Interest will never compromise your integrity or cast doubt on your business decisions, you must always declare any Conflict of Interest to your manager, and remove yourself from the decision process.

You must always	You can never
<ul style="list-style-type: none"><li>• Be conscious about family and other relations, and any personal interests that might conflict with the interests of Atos Medical</li><li>• Inform your manager about any possible conflicts of interest</li><li>• Try to avoid putting yourself in an actual or perceived conflict of interest</li><li>• If a conflict of interest occurs, immediately declare the conflict of interest in writing to your manager, and step away from the decision-making process and follow your manager's instructions</li></ul>	<ul style="list-style-type: none"><li>• Supervise or take part in the hiring or promoting of a family member</li><li>• Hold a position with access to or influence over performance appraisals, salary information or other confidential information related to a family member or relative</li><li>• Try to handle a Conflict of Interest by thinking that you're able to base your decisions on professional judgment only: Remember, it will still look wrong</li><li>• Stay quiet about possible Conflicts of Interest</li></ul>

# Sponsorships, Grants and Donations

Atos Medical supports initiatives that promote innovation, educate users and Health Care Professionals, and help provide our users improve their quality of life. This is why we from time to time provide sponsorships, donations, and grants to Health Care Organizations as well as to patient organizations.

When providing sponsorships, grants, or donations, we follow applicable regulations on transparency, publication, and reporting, and we never use sponsorships, grants, or donations as a hidden inducement to generate sales, use, prescription, or recommendation of our products, and we make sure that decisions on sponsorships, grants, and donations are made outside our sales and marketing processes.

You must always	You can never
<ul style="list-style-type: none"><li>• Know the applicable local regulations before planning a grant, donation, or sponsorship</li><li>• Follow our policy on grants, donations, and sponsorships</li><li>• Involve the Compliance Officer and the SVP Innovation and Marketing in all matters relating grants, donations, and sponsorships</li></ul>	<ul style="list-style-type: none"><li>• Make a sponsorship, grant, or donation conditional on the purchase, use, prescription or recommendation of our products</li></ul>



# Interactions with Health Care Professionals

Atos Medical regularly interacts with health care professionals to improve their knowledge of our products, and secure the optimal use of our products for our users. Health care professionals work with us to develop and improve products, raise awareness about our products, and to give us vital feed-back and scientific information.

When working with health care professionals (HCPs), we follow the applicable laws and regulations – both our country and in the HCP’s country. We only interact with health care professionals, if we have a legitimate, professional purpose, and keep our relations transparent, and live up to applicable regulations on publication and reporting.

We only offer gifts, hospitality, and other advantages to health care professionals if it is legal. Our gifts are moderate and must have a professional or educational purpose or benefit our users. We only provide hospitality within the context of a legitimate event or meeting, see to it that hospitality is moderate and incidental, and we make sure that the venues we choose are appropriate with suitable settings for the event or the meeting.

When we have a legitimate need for expert advice or professional services from a Health-care Professional, we enter into a legitimate contract and keep the relation transparent.

We promote our products in accordance with applicable laws and regulations. Our product promotion must be based on valid scientific evidence and provide accurate, objective, and complete information about the product. We maintain a process for approval of promotional materials.

You must always	You can never
<ul style="list-style-type: none"> <li>• Know the laws and regulations that apply in your country and the HCP’s country</li> <li>• Provide only moderate hospitality to HCPs, and only when allowed and appropriate under applicable laws and regulations</li> <li>• Only provide gifts and other advantages to a healthcare professional when allowed and appropriate – if gifts are permissible, they must be of moderate value only and have a professional or educational purpose or benefit our users</li> <li>• Report any considerations of value to a HCP per your local expense or reimbursement process</li> <li>• If you have any questions whether gifts, hospitality or other interactions with HCPs are compliant, go to your manager or the Compliance Officer</li> </ul>	<ul style="list-style-type: none"> <li>• Offer gifts, hospitality or other advantages to HCPs that could be seen to inappropriately influence her or him</li> <li>• Offer gifts, hospitality, and other advantages linked to any obligations or expectations to buy, prescribe or recommend our products</li> <li>• Give gifts in the form of cash or cash equivalents</li> <li>• Pay fees exceeding fair market value</li> <li>• Pay for spouses or relatives of an HCP</li> </ul>

# Competition Law Compliance

Fair competition makes great companies like Atos Medical flourish. We encourage and support fair competition, and we don't accept illegal behavior. Breaches may lead to severe criminal sanctions for the company as well as for anybody involved.

## **Abuse of a Dominant Position**

Competition Law prohibits companies from engaging in abusive behavior such as e.g. dumping prices, illegal obstructions, or unfair discrimination.

Our strong market position is built on fairness, and relies on high quality products, fair prices, high standards of service, and a deep understanding of user needs. At Atos Medical we only compete on fair terms, and will never abuse our strength to illegally eliminate competition.

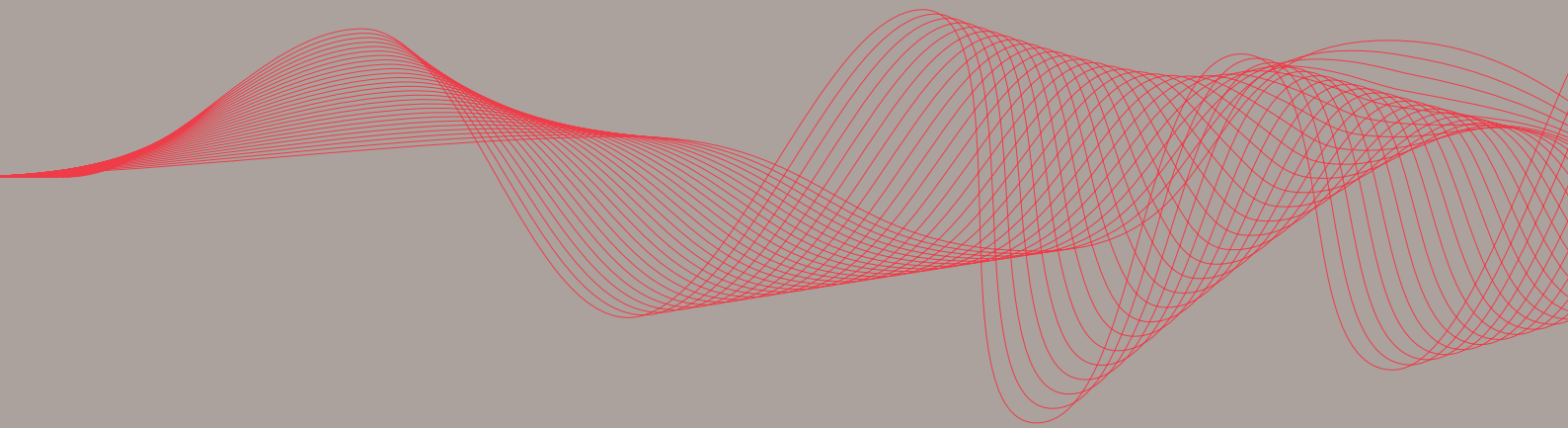
## **Cartels**

Competition Law also bans illegal cartels, collusion, and other anti-competitive practices, whether they are horizontal (among competitors) or vertical (through different links of the supply chain), and include e.g. price fixing, bid rigging, market sharing, group boycott or discrimination.

Atos Medical will never be a part of any agreement or "meeting of the minds", whether just a handshake, a tacit coordination of practices, a "gentlemen's agreement" or a formal contract that has as its objective or effect to restrict or distort fair competition.

You must always	You can never
<ul style="list-style-type: none"><li>• Be aware of red flags: Could your actions limit free and open competition? Are your actions fair?</li><li>• Report potential issues that may obstruct, limit, or distort competition</li><li>• Contact Legal Affairs to get advice whenever a red flag appears</li></ul>	<ul style="list-style-type: none"><li>• Discuss markets, prices, strategies, etc., with competitors</li><li>• Engage in any activity that will obstruct, limit, or distort competition</li></ul>

# Protecting Assets and Information



# Personal Data Protection

At Atos Medical we respect people's privacy and integrity, and know how important it is to protect personal data. We always handle personal data ethically and responsibly in order to retain the trust of our users, employees, and business partners.

Atos Medical needs to collect, use, and transfer personal data about our employees, our users and other people (business partners, health care professionals, etc.) to be able to deliver our products and services, and to live up to our legal obligations.

When processing personal data, we adhere to applicable data protection and privacy laws and regulations. We know that the abuse of personal data may harm the individual, and may be a criminal offence. This may have a serious negative impact on Atos Medical and lead to criminal sanctions for the company as well as for any individuals involved.

We adhere to a strict privacy policy, and make sure that we have the necessary security measures in place when handling personal data.

You must always	You can never
<ul style="list-style-type: none"><li>• If you work with personal data, know the regulations that apply to your work</li><li>• Participate in relevant training and observe the data protection and security restrictions that apply in your job</li><li>• Retrieve, use, transfer, disclose, or otherwise handle personal data only for a specific, legitimate, and necessary purpose</li><li>• Only handle sensitive personal data (e.g. health, gender, race, religion) if you have a valid consent or a legal exception applies, and necessary notifications, permits, and security measures are in place</li></ul>	<ul style="list-style-type: none"><li>• Keep personal data for longer than absolutely necessary</li><li>• Compromise on the security of personal data</li><li>• Transfer personal data outside of Atos Medical without a consent, and/or a valid contract with the recipient protecting personal data</li></ul>



# Protecting Assets and Information

Every one of us is responsible for protecting our assets, and for respecting the property of others. This means that we take good care of equipment, as well as intangible assets, and that we work against fraud.

## Fraud and misappropriation of assets

Fraud is unacceptable and illegal – it's that simple. Fraud is a deception deliberately practiced to secure an unfair or unlawful gain. At Atos Medical we don't accept fraud, whether committed against us or against our customers, suppliers, partners or other stakeholders.

You will not use Atos Medical property, facilities, equipment, information or any other assets for private purposes. You will always report any concern about potential fraud against Atos Medical or against our customers, suppliers, or partners.

You must always	You can never
<ul style="list-style-type: none"><li>Report any concern about fraud against Atos Medical or against our customers, suppliers, or partners</li></ul>	<ul style="list-style-type: none"><li>Use Atos Medical property, facilities, equipment, information or any other assets for private purposes unless expressly permitted</li></ul>

## Protecting Intellectual Property and Confidential Information

Atos Medical is an innovative company and being innovative keeps us ahead of the competition. We protect our intellectual property rights – our patents, designs, technology, our methods, our copyrights, our knowhow etc. – to ensure that we stay competitive and able deliver the best products and services to our users.

When we store, process and exchange confidential and sensitive information such as information about our markets, prices, methods, suppliers, partners, etc. we prevent unauthorized access to all Atos Medical information, and always keep our IT systems secure.

When we get legitimate access to confidential or sensitive information from business partners, suppliers, customers or others, we protect this information as if it were our own information.

You must always	You can never
<ul style="list-style-type: none"><li>Ensure that any exchange of confidential information is covered by a non-disclosure agreement</li><li>Respect third parties' confidential information and use it only for legitimate purposes</li><li>Think carefully about how you discuss and handle confidential information in public spaces</li><li>Report any concern about unintended disclosure of confidential information</li></ul>	<ul style="list-style-type: none"><li>Disclose or share confidential information unless you are expressly authorized to do so</li><li>Share confidential information with a person who has no legitimate need to receive the information</li><li>Copy, take, or retain any Atos Medical confidential information or intellectual property for personal use or advantage</li><li>Obtain confidential information from other parties by improper means</li></ul>

# IT and Computer Systems

IT and computer systems, emails, and other electronic communication systems, and Internet access are important tools for fast and effective operations at Atos Medical. However, the use of IT also raises security concerns.

When using IT at Atos Medical we take precautions to assure the integrity, confidentiality, and safety of our technology and information. We have policies in place for IT access, IT security, and appropriate use of IT and you must follow the policies applicable to you. Remember, when using our systems, you are always representing Atos Medical.

You may use our IT equipment for incidental personal matters, but you will not be guaranteed personal privacy. All the documents and information on our IT systems are the company’s property, and we will review them on a regular basis. As permitted by law, we retain the right to access and monitor information and communication systems, including employee email and other electronic documents, for any legitimate purpose.

You must always	You can never
<ul style="list-style-type: none"><li>• Memorize your passwords rather than writing them down</li><li>• Lock your computer every time you leave it</li><li>• Shut down your computer when not in use</li></ul>	<ul style="list-style-type: none"><li>• Share your password with other people</li><li>• Send company business information or data from company IT systems to your personal computer</li><li>• Use your personal IT or communications equipment for Atos business purposes</li><li>• Visit offensive or inappropriate internet sites or use the internet for illegal, inappropriate or offensive purposes</li><li>• Illegally download or use copyrighted material from the Internet</li></ul>

# Financial Integrity, Accounting, Books and Records

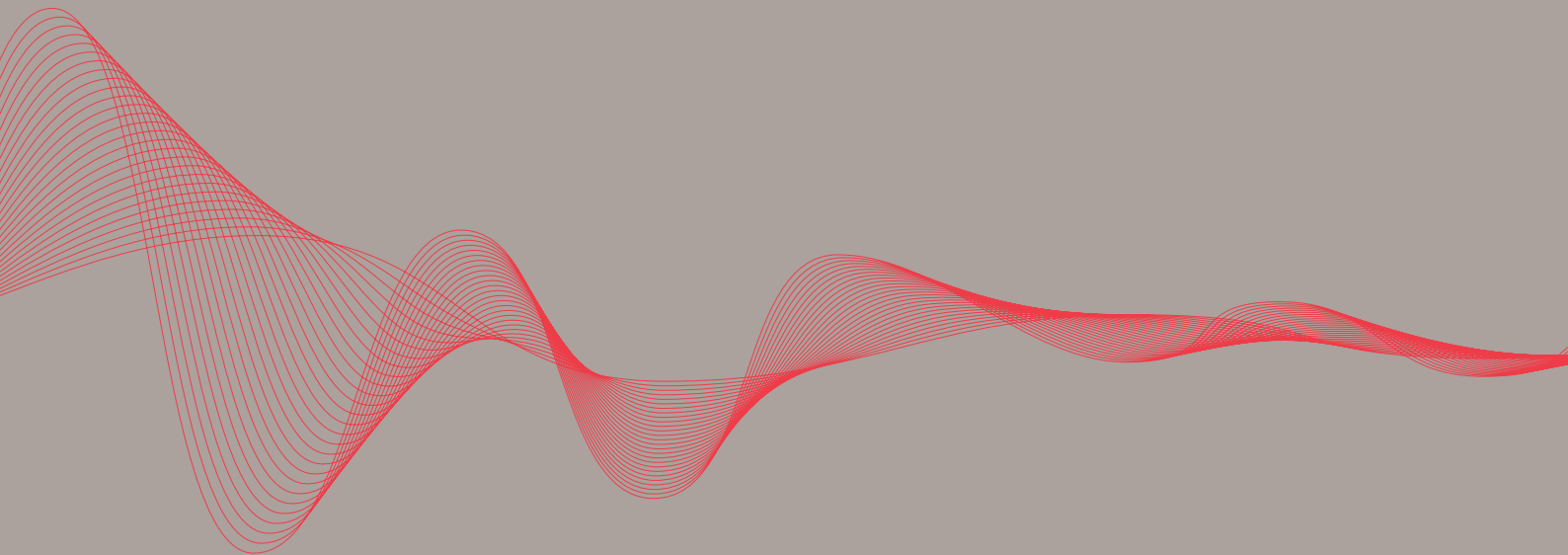
In order to have an accurate, complete and transparent view of our business operations and performance it is essential that our accounts, books, and records are fully updated and correct.

At Atos Medical we follow accounting and reporting laws and regulations, and we keep our company books and records for as long as they are needed for business purposes, or longer if required by law.

We maintain solid procedures for approvals, financial reporting, accounting, recordkeeping and internal controls. Our managers must ensure that adequate internal controls are in place. We comply with laws and regulations as well as with the procedures and guidelines issued by Group Finance.

You must always	You can never
<ul style="list-style-type: none"><li>• Know and adhere to the spending and approval limits that apply to your job</li><li>• Accurately and thoroughly record and retain information required for your job role</li></ul>	<ul style="list-style-type: none"><li>• Falsify books or records</li><li>• Deliberately or negligently record inaccurate or misleading information</li><li>• Destroy company records unless they are no longer needed for business purposes, or you have an obligation to do so, and you are not required to retain them by law</li></ul>

# Protecting the Environment



# Protecting the Environment

At Atos Medical we work to reduce our impact on the environment, and base our work on the laws and regulations that govern our activities.

In collaboration with customers, suppliers, and partners we strive to minimize our consumption of energy and raw materials and reduce emissions. We live up to all requirements for environmental permits, and report and track all environmental incidents.

We train our people and communicate internally about our impact on the environment to make our people conscious about, knowledgeable of, and engaged in environmental issues.

We maintain an environmental policy as the basis for our work. We map and assess our environmental impact, and we set targets for our environmental work.

## Our expectations

- You must know the environmental regulations that apply to your job role
- You must always report any concerns about incidents that may negatively impact the environment to your manager
- You must be aware of any environment targets that have been set for you or your department or area
- You must always take an active part in protecting the environment by reducing waste and minimizing our consumption of energy and other resources







# Atos

Atos Medical **Your voice**

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