

INVESTIGATION MANUAL

Össur Global Compliance

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Global Össur Investigation Manual

Global Compliance is overall responsible for Össur Speak Up Line and the investigations related to ethical, reputational, financial, fraud or other cases whether received through the Össur Speak Up Line or outside the system. All cases received in Össur Speak Up Line will be assessed by Global Compliance and based on this assessment, investigations will be initiated either by Global Compliance or an assigned investigator.

1.1. Purpose of the manual

The purpose of this manual is to formulate the requirements of investigations conducted following reports received through the Össur Speak Up Line, as well as other sources. The manual describes the requirements of the investigation itself, evaluations, conclusions, any potential actions and confidentiality, as well as defining roles and responsibilities.

The manual applies to all Össur employees assigned to or involved in an investigation.

1.2. Össur Speak Up Line principles

When conducting an investigation, the following principles should be applied at all times:

Protection from retaliation

Those who report potential misconduct and those who cooperate in an investigation must be protected from retaliation. Employees must be able to feel comfortable speaking up and addressing potential issues. It's in our best interest to resolve issues as soon as possible and build trust. Everyone involved in an investigation must be aware of and report signs of retaliation.

Objectivity

All information must be reviewed and analyzed using uniform and objective standards where the findings in an investigation are based on facts.

Confidentiality

Maintaining confidentiality is critical to the integrity of an investigation; all information related to the investigation must be kept and treated strictly confidential subject to section 4.1. There can be serious consequences for failing to maintain full confidentiality. These consequences include among others:

- Damage to someone's reputation and integrity if others learn that the allegations were made.
- The efficiency of the investigation can be undermined if others know of the investigation.

2. Use of Össur Speak Up Line

2.1. Communication

All communication related to a case shall be managed within the Össur Speak Up Line. Communication related to the content and progress of the investigation must be in writing to ensure documentation of decisions. Only persons with a legitimate need for the information must be included in the communication via the Össur Speak Up Line. The Investigator is responsible for keeping the number of persons knowledgeable of the investigation to an absolute minimum.

E-mails via Outlook and other written communication must be avoided, opting for the use of the Össur Speak Up Line instead. If emails are used, do not include personal data.

2.2. Documentation and retention

Documentation supporting conclusions and observations made during the investigation must be kept in a format that allows an independent third party to review the documentation and reach the same conclusion. Facts, in the form of documents, statements, transactions, etc. supporting the conclusion of the investigation must be kept in copy and archived upon the completion of the investigation in the case file in the Össur Speak Up Line. Documentation should be in English or in case of local language come with an English translated summary.

Documents relating to scoping, documentation of issues, minutes and reports must be archived in the Össur Speak Up Line for up to 5 years.

2.3. Access

Access requests

Individuals (internally or externally) can submit access requests via the system or by contacting Global Compliance. Global Compliance will notify the DPO and follow Össur guidelines on subject access requests.

Access rights

Access rights are reviewed and adjusted when needed, e.g. change of employment.

3. Roles and responsibilities

3.1. Global Compliance

Global Compliance is responsible for initiating investigations and must approve the scope, evaluation and conclusions of all investigations. It can delegate cases received in Össur

Speak Up Line and those received from other sources if needed. An investigation may not be closed or finally concluded before approval from Global Compliance. Global Compliance is also responsible for overseeing that all relevant documents are archived.

3.2. Investigator

The Investigator is the person assigned to the case. The investigation should be carried out in accordance with this manual and in due time (see section 4.3.2). The Investigator is responsible for clarifying any changes to the agreed scope of investigation with Global Compliance (in case Global Compliance delegates the investigation to a stakeholder).

The Investigator has the responsibility to:

- plan and conduct the investigation in an efficient manner, with due respect to the employees involved and affected by the investigation;
- ensure that all relevant documents are archived;
- take necessary precautions to ensure the confidentiality and integrity of the investigation;
- document minutes from the interview and review all the documentation objectively.

3.2.1. External assistance

The character of the investigation may justify the use of external assistance e.g. from lawyers, auditors or other experts. Global Compliance may choose to use external assistance when it is considered beneficial for the investigation due to time and/or knowledge constraints.

3.3. Local management/relevant stakeholders

Local management/relevant stakeholders must support the Investigator by providing documentation and information upon request. Furthermore, local management/relevant stakeholders are required to respect the integrity and confidentiality of the investigation and should not share information or interfere with the investigation. Local management and HR business partners carries out the sanctions in alignment with Global Compliance.

3.4. Conflict matrix

If a report concerns the Global Compliance & Business Integrity Director, the reports will instead be received by the General Counsel and if the reports concerns the General Counsel, both the CEO and the Global Compliance & Business Integrity Director will be notified.

4. Planning an objective investigation

4.1. Assessing severity

Upon receiving cases in Össur Speak Up Line, Global Compliance assigns a priority rating (risk assessment) on the case. The rating is indicative of and based on the information available at the time of receiving the case. A rating may increase or decrease in severity during the investigation.

PRIORITY	EXPLANATION
<p><i>Escalation to the Compliance & Security Committee</i></p> <p>A+</p>	<p>A concern that requires immediate attention since it involves a significant risk including reputational or financial effects to Össur, a person, property, and/or environment. Risk of reputational damage affecting the Össur Group and its owners.</p> <p>Össur CEO and relevant EVP's may be informed about the report before the investigation is initiated, unless the case related to the Össur CEO or EVP's in which case the Össur CFO will be informed.</p> <p>Global Compliance & Business Integrity will conduct investigation with involvement from relevant stakeholders.</p>
<p><i>Össur Speak Up Line risk</i></p> <p>A</p>	<p>A concern that involves potentially serious or time-sensitive issues, or those with serious legal ramifications or having potential economic consequences related to fraud, involvement of local management and unethical behavior.</p> <p>Global Compliance & Business Integrity will investigate or assign an Investigator, who will coordinate investigation with Global Compliance & Business Integrity. In case the investigation is conducted by an assigned Investigator, Global Compliance & Business Integrity will monitor the progress and quality of the investigation.</p>
<p><i>Dismissed case</i></p> <p>A-</p>	<p>If the case received is considered irrelevant or to have no merit, (not falling within the scope of Össur Speak Up Line) Global Compliance & Business Integrity will close the case immediately and inform the reporter via the Össur Speak Up Line.</p>

4.2. Assigning an investigator

Global Compliance is responsible for either assigning an investigator to the case received or conduct the investigation. The priority, content and geography are taken into consideration when deciding upon the investigator.

In case Global Compliance assigns an Investigator to the case, information about the case is made available to the Investigator immediately after the Investigator is made aware of the assignment.

4.3. Scope

The Investigator is responsible for scoping the investigation so that all allegations are covered. The scope of the investigation is subject to approval by Global Compliance. The agreed scoping method must be documented in writing to allow follow-up and subsequent re-evaluation.

When scoping the investigation, the Investigator should consider whether: the concern is on-going; it can lead to other wrongdoings or unlawful acts; it can result in financial damage to Össur; there is potential environmental damage, reputational damage or any other damage to Össur.

4.3.1. Methodology

The Investigator is responsible for choosing the method of investigation of the case. The methodology may include analysis/review of financial and legal documents, Legal hold of e-mail accounts, interviews with employees and managers, analysis/review of booked transactions and records, physical inspection of assets and equipment.

The methodology chosen must ensure that all elements of the case are investigated and that it supports the agreed scope of investigation.

4.3.2. Time

The investigation must be conducted within the shortest possible timeframe to limit the risk of breaching the confidentiality of the investigation and to ensure the necessary legal, financial and/or HR-related actions.

5. Conducting an investigation

5.1. Obtaining information

The Investigator is responsible for identifying and obtaining information relevant to the investigation. The Investigator must consider which channel to use that is the most appropriate and discrete with regards to the information in order to respect the confidentiality and integrity of the reporter.

Consider the following examples of methods for obtaining information: following up with the reporter; interviewing witnesses from the list of names supplied by the Reporter; reviewing personnel records of the parties involved; checking org. charts; travel expenses etc.

5.2. Interviews

Interviews should take place in a discreet location. Before starting the interview, the subject in question should be informed that the interview is strictly confidential and no information about the interview may be shared. The interviewer should ask open-ended questions to allow the subject in question the opportunity to elaborate on their answer. During the interview, the subject's behavior, body language and gestures should be observed to detect possible signs of dishonesty.

Please see below an exhaustive list of questions the Investigator can ask the Reporter:

Questions for the Reporter

- Use "Who, What, When, Where and Why" to set the scene and timeline
- How did the events affect you personally?
- How would you like to see the situation resolved?
- Did the conduct occur at other times that you are aware of?
- Do you have any other relevant information?

Questions for the Subject in question

- What is your response to the allegations?
- What is your version of the events?
- You have stated that the allegations are untrue. Is there a reason you can think of as to why the reporter would make them?

Question for the Witness

- Can you describe what you heard?
- Are there others who witnessed the same events?
- Are you aware of any other relevant information?

Follow up:

After all parties have been interviewed, it may be necessary to verify evidence to determine the credibility of the witnesses and their statements. It is a good idea to inform all parties that they may need to be interviewed again at a future date, e.g. conflicting answers, cases of sexual harassment.

5.3. Review of documentation

Regardless of the form, the documentation must be reviewed to substantiate facts that support the allegation.

Documentation must be reviewed objectively, and no bias should affect the conclusions drawn from the investigation. Indications such as peculiar behavior, irregularities and/or missing documentation (referred to as circumstantial evidence) may be taken into consideration during the investigation. However, the Investigator must base conclusions on objective facts. It will be up to the Investigator to decide which documents to review for the investigation.

All relevant documentation must be archived upon the completion of the investigation (see. Section 2.3).

6. Closing investigation

6.1. Conclusions

Employee(s) that have violated the Össur Code of Conduct, policies and/or procedures may be subject to sanctions. Sanctions can be expanded to also cover the direct manager of the person who committed wrongdoing if the manager has neglected his/her management responsibilities.

The Investigator and Global Compliance are responsible for determining the applicable sanctions together with relevant bodies and escalate any critical cases to the Össur Security and Compliance Committee in a separate forum or to the Audit Committee.

At the end of the investigation the case will be rated according to whether it is substantiated or non-substantiated.

6.1.1. Disciplinary sanctions options

There are several different sanctions:

VIOLATION	SANCTION	EXPLANATION
INSIGNIFICANT	Instructions	Employee in question receives instruction/guidance from direct manager or other relevant party on compliance.
MINOR	(Re-)Training	Employee is trained/re-trained in relevant policies and procedures. Direct manager monitors compliance going forward.
MORE SEVERE OR REPEATED MINOR	Warning (verbal)	Employee receives a verbal warning from the direct manager. Local HR and 'grandfather' are notified.
MORE SEVERE OR DELIBERATE DISREGARD OF POLICIES AND PROCEDURES	Warning (written)	Employee receives a written warning and is notified that repeating the violation will lead to termination. Local HR and 'grandfather' is notified.
SEVERE	Dismissal	Employee is dismissed. Depending on responsibilities and role of the employee, the dismissal may be with immediate effect.
SEVERE AND WITH DIRECT NEGATIVE EFFECT ON ÖSSUR IMAGE, EARNINGS OR ASSETS	Immediate dismissal and/or criminal charge	Employee is dismissed with immediate effect, PC, phone, etc. are confiscated. Case documents etc. are handed over to legal counsel and/or police.

6.2. Reporting and conclusion

The Investigator should prepare a final report for Össur Speak Up Line cases in Össur Speak Up Line immediately after closing an investigation. The final report is done in accordance with applicable Data Protection Laws.

Items in the report should consist of the following:

- Summary of the report
- Issues that were investigated

- List of witnesses
- Summary of information from any interviews
- Findings for each individual allegation
- Remedial actions taken during the investigation
- Conclusions and recommendations

The final report is subject to approval by Global Compliance before sanctions are decided by relevant bodies. Actions and recommendations requiring follow-up will be communicated to relevant bodies on a need to know basis.

Global Compliance reports to the Audit Committee each quarter regarding Össur Speak Up Line, including trends, number and types of cases received. If required Global Compliance will report ad hoc cases to the Audit Committee if they are significant.

Version number/final	1.0
Effective date	1 December 2020
Scope	Everyone in the Össur Group
Approved by	Compliance & Security Committee, Date XX

Annex

Overall criteria for assessment

When deciding on a sanction, the Investigator and Global Compliance must evaluate both the actual violation and any potential mitigating or aggravating factors. Furthermore, established practices must also be considered to ensure a consistent and fair treatment of any violations.

The following is a non-exhaustive list of such factors:

Mitigating factors

Lack of intent

The employee in question may have committed the violation with a lack of intent in which case any sanction may be lowered or disregarded. The latter only for minor violations.

Limited effect

The consequence of/impact on Össur following the violation can have limited or no effect in which case any sanction may be lowered or disregarded. The latter only for minor violations.

Isolated episode

Clear evidence exists that the violation was an isolated episode and/or where there were circumstances beyond the control of the employee in question affecting the action/decisions leading to the violation. Depending on the nature and severity of the violation this may lead to a less strict sanction being imposed.

Self-reported

The employee in question has reported the violation him/herself. Depending on the nature of the violation and whether the violation would have been detected regardless of the self-reporting, the employee in question may face a less strict sanction if self-reported.

Aggravating factors

Intent

The employee in question committed the violation with full intent, knowledgeable that the action was a violation of Össur policies and procedures. Intent may lead to a stricter sanction.

Repeating incident

The employee in question commits a violation for which the employee in question has previously received a sanction or in any other way been informed that the behavior is unacceptable.

Effect

The employee in question has committed a violation for personal gain or a violation that in other manners leads to a loss for Össur.

Magnitude

The employee in question has committed a violation where the violation itself or its immediate consequences have a significant impact on Össur. Either in direct financial losses, indirect financial losses, legal, quality or related damages.

Frequency

The violation represents a series of violations committed by the employee in question.