

## ÖSSUR SPEAK UP POLICY

### 1. APPROACH

Össur puts Honesty first when doing business and encourages employees and third parties (whether distributor, supplier, agents, former employees) to speak up about possible concerns, wrongdoings or misconduct that have been committed, are suspected or likely to be committed, or actions that don't comply with applicable laws and regulations, the Össur Code of Conduct or internal policies.

Össur provides a platform to report serious and sensitive concerns, and Össur ensures that such concerns are treated appropriately. Whether the report is made anonymously or not, Össur reassures reporters raising such concerns in good faith that they will be protected from any retaliation. Any form of threat, retaliation or discrimination towards a reporter will not be tolerated and will be treated as a disciplinary matter.

By speaking up, you are giving Össur the opportunity to deal with the concern. Remaining silent about possible misconduct may worsen a situation and decrease trust.

### 2. SCOPE

The Speak Up Policy applies to everyone in the Össur Group and complements the global Code of Conduct. The Policy covers the reporting of any actual, suspected, or potential misconduct in relation to Össur's ethical principles, the Össur Code of Conduct, internal policies or applicable laws and regulations.

Össur will adhere to all applicable laws and regulations, and where such laws impose higher standards than the Össur Code of Conduct or supporting policies, the higher standard must be followed.

#### 2.1. SPEAK UP SYSTEM

The Össur Speak Up system is available to employees anywhere in the world to file a report in good faith regarding any concerns, wrongdoings or misconduct and which, due to their nature, cannot be reported through normal reporting channels.

The system is a global Speak Up system available online at all hours and in all local languages and English in all the markets in which Össur operates.

You are encouraged to provide as much information as possible, as this will help the investigation and give Global Compliance & Business Integrity an opportunity to respond in a timely manner. Where necessary, a report can be made anonymously if the reporter feels uncomfortable providing his/her own information. If a report is made anonymously, Össur will not know who the reporter is and therefore solely able to assess and investigate the raised concern based upon the information provided. Össur always encourage employees to

disclose the name and contacts when filing a report in our Speak Up system enabling Össur to obtain additional information and data. Össur reassures reporters that they will be protected whether the report is made anonymously or not.

## 2.2. NATURE OF THE REPORTS

The purpose of Össur's Speak Up system is to protect the integrity of the Össur business. Össur encourages all employees and anyone outside Össur to speak up if they observe wrongdoings or have concerns about a specific practice. Reports made could relate to, among others:

- Unlawful activity;
- Financial fraud (e.g. accounting manipulation, non-compliance with internal controls procedures, misappropriation of assets or fraudulent statements);
- Bribery or corruption (e.g. conflicts of interest, bribery, sponsorships & donations, gifts or facilitation payments);
- Violation of competition laws (e.g. price fixing, exchange of price sensitive information, collusion with competitors);
- Serious endangerment to environment, health and safety;
- Any acts by senior management that cannot be reported using internal channels;
- Activities, which otherwise by law or agreement amount to serious improper conduct (e.g. discriminatory practices, sexual harassment, use of child labour, human rights violations, drug or alcohol consumption at work).

What should not be reported via the Össur Speak Up System?

- Ordinary employment related complaints, e.g. wages, holiday time, employment or union contract matters;
- Practical complaints, e.g. problems with a PC, food quality, heating/cooling in an office;
- Violations of internal policies on routine matters, e.g. dress codes, smoking, vacation, sick leave.

In these cases, the normal communication channels must be used instead, such as the closest manager or local HR.

## 2.3. DATA PROTECTION

As reports made in the Össur Speak Up system will usually contain personal data, Össur has an obligation to protect this data. Össur has chosen an external supplier to manage the Speak Up system who is required to make sure that adequate security measures are in place and in accordance with data protection law.

All data will be processed with a high level of security and deleted when no longer needed to

facilitate investigation or as evidence. This means that data will be deleted immediately, if there is incorrect information or apparently unfounded reports, or as soon as the case has been closed by the relevant authority. If the case leads to disciplinary sanctions or if it is otherwise necessary and objectively reasonable to keep the information, the information will be kept in the employee case file. The information will then be kept up to 5 years after resignation and/or termination or in accordance with applicable data privacy laws.

### **3. RESPONSIBILITIES**

#### **3.1. CONSULT INTERNALLY FIRST**

The purpose of this Speak Up Policy is to ensure that anyone who might experience any misconduct or wrongdoings related to Össur have a channel to make these concerns are heard, and that there is accountability or action taken on unethical and/or illegal conduct. Reporters can therefore raise their concern directly with their manager, local or Global HR, or any other channels they feel comfortable using.

Employees who do not feel comfortable raising the concern directly to their manager or other internal channels, may file a report using the Össur Speak Up system in accordance with this Policy.

#### **3.2. RECEIPT AND RETENTION OF CONCERNS AND INVESTIGATION**

Reports through the Össur Speak Up system can either be made online ([www.össur.com](http://www.össur.com)) or via tablets and/or mobile phones.

When reporting online, you will fill out a form via an independent third-party supplier. The third party will make the first screening of the report and file a notification to Össur's Global Compliance & Business Integrity Director that a report has been made.

Based on the notification and other relevant information from the report, the Global Compliance & Business Integrity Director will determine how to proceed. Based on the type and severity of the claim, next steps can vary from a request for further information, including potential interviews, a report to the police and/or employment consequences.

The conclusions of an investigation may be submitted to Össur's Security and Compliance Committee. Depending on the gravity and magnitude of the violation, it may decide to escalate any investigation report to Össur's Audit Committee.

#### **3.3. REMEDIAL ACTIONS**

While reports can be made anonymously, Össur recommends that the reporter identifies himself/herself, as this will ease further investigations. All reports are handled under conditions of strict confidentiality whether made anonymously or not. There will be no

adverse consequences for anyone making a report in good faith. However, a reporter, who is found responsible for making allegations in bad faith or maliciously may be subject to disciplinary action.

It is a violation of the Code of Conduct to knowingly make a false accusation, lie to investigators, interfere with an investigation, or refuse to cooperate in an investigation. Doing so may lead to disciplinary measures.

The following actions may be taken after investigation depending on the concern:

- Disciplinary action (including potential dismissal) against the wrongdoer depending on the results of the investigation; or
- Disciplinary action (including potential dismissal) against the reporter if the claim is found to be malicious or made in bad faith; or
- No action if the allegation proves unfounded.

The reporter will be kept informed of the progress and outcome of the investigation, within the constraints of maintaining confidentiality or observing legal restrictions. A confidential record of the steps taken will be kept and this will be in accordance with applicable law.

A report can only be followed up on if it contains sufficient information and there is a reasonable possibility of obtaining further information.

### 3.4. COMPLIANCE WITH THIS POLICY

Employees and anyone who reports are responsible for ensuring that they comply with this Speak Up Policy which includes always acting in Össur's best interest by speaking up in case of any misconduct.

Failing to comply will have severe consequences for the parties concerned up to and including dismissal and could be damaging to Össur's activities and reputation.

The current version may be amended from time to time and all must ensure that they are compliant with the latest version of the Speak Up Policy. If in doubt, about anything relating to this Policy, including the applicable version thereof, please consult Global Compliance & Business Integrity.

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