# Table of Contents

**Introduction** ................................................................. 5  
  Our Core Values ............................................................ 5  
  Special Responsibilities for Leaders and Managers ................. 6  
  Responsibilities of our Business Partners .......................... 6  
  Reporting a Concern ......................................................... 6  
  Duty to Follow Policies and Procedures ............................... 7  
  Ethical Decision Making ................................................... 7  
  Retaliation ........................................................................ 9  
  Acknowledgment .................................................................. 9  

**Commitment to Each Other** ............................................. 10  
  Diversity and Equal Employment ........................................ 10  
  Free From Harassment ....................................................... 10  
  Company Environmental, Health, and Safety ....................... 11  
  Free From Workplace Violence .......................................... 12  
  Drug Free Workplace ........................................................ 12  

**Commitment to Customers** .............................................. 14  
  Quality and Product Safety ............................................... 14  
  Fraud, Waste, and Abuse ................................................... 14  
  Anti-Bribery .................................................................... 15  
  Interactions with Healthcare Providers ............................... 16  
  Gifts ............................................................................... 17  
  Data Privacy .................................................................... 18  
  Anti-Trust and Global Competition ................................... 19  
  Regulatory ....................................................................... 19  
  Advertising and Promotion ............................................... 20  
  Clinical Research and Medical Affairs ............................... 21  
  Working with the Government .......................................... 21  
  Supplier Relationships ....................................................... 22  
  Trade ............................................................................. 23  

**Commitment to Shareholders** ......................................... 24  
  Conflict of Interest .......................................................... 24  
  Proprietary and Confidential Information ......................... 24  
  Insider Trading .................................................................. 25  
  Media and Careful Communication ................................... 26  
  Company Resources .......................................................... 27  
  Record-Keeping ............................................................... 28  

**Commitment to Community** ........................................... 29  
  Political Activity and Charity ........................................... 29  
  Corporate Social Responsibility ....................................... 29  
  Important Contact Information ......................................... 31
VISION
“Restoring people’s lives”

MISSION
“Together we change the practice of medicine with solutions that speed healing, reduce complications, create economic value and improve patients’ lives.”

VALUES
.Customer First: We provide the best solutions for customers & patients
.Integrity: We are accountable for our actions & do what is right
.A Will to Win: We love to compete & enjoy being the best at what we do
.One Acelity: We are one team executing with a global mindset
Introduction

The Acelity Code of Conduct is the ethical foundation of our business and supports our values.

Our values are the beliefs we all share, that drive our company personality, culture, and priorities. They provide a framework for making decisions and define how Acelity employees are expected to conduct themselves in a professional and responsible manner.

Our values serve as our compass in how we achieve our vision of restoring people’s lives. They are also the reason our stakeholders, including customers, employees, business partners, and shareholders, place their trust in us. We place the customer first by providing the best solutions for healthcare providers and patients. We operate with integrity, being accountable for our actions and doing what is right everywhere and every day. We demonstrate a strong will to win as we compete fairly and enjoy being the best at what we do. Ultimately, we are one Acelity, one team, executing with a unified global focus.

As a member of the Acelity team, the actions you take day-in and day-out bring our values to life and are essential to both your individual and our collective success. The Acelity Code of Conduct contains important information and resources to guide you in conducting business legally, ethically, and responsibly in accordance with our core values.

Following the introduction, the Code is organized in four major categories, representing our commitment to our key stakeholders:

1. Commitment to Each Other
2. Commitment to Customers
3. Commitment to Shareholders
4. Commitment to Community

Our Core Values

Customer First: We provide the best solutions for customers & patients
Integrity: We are accountable for our actions & do what is right
A Will to Win: We love to compete & enjoy being the best at what we do
One Acelity: We are one team executing with a global mindset
Special Responsibilities for Leaders and Managers

While all employees are required to act with integrity, show respect and build trust, leaders and managers have special responsibilities under our Code. If you lead or supervise others, Acelity requires you to demonstrate ethical leadership and set the right tone by:

1. Fostering a positive work environment in which only legal, ethical, responsible, and appropriate behaviors are acceptable.
2. Modeling behaviors that are consistent with our Code and Core Values.
3. Regularly communicating the importance of ethically sound business practices and discussing the ethical and legal implications of business decisions.
4. Identifying and mitigating ethical, compliance and legal risks, as well as other business risks.
5. Responding appropriately and in a timely way to colleagues who seek advice or raise concerns, helping them feel secure and at ease in doing so.

Responsibilities of our Business Partners

We believe in doing business with business partners such as suppliers, contractors, joint venture partners, agents, sales representatives, distributors, and consultants, who share our values and approach to doing business. We expect our business partners to adhere to all applicable laws and regulations, and review, understand, and act consistently with the principles set out in this Code.

Reporting Concerns

Expectation to Report

You may at some time come across a situation that appears to violate this Code, the law, or another Acelity policy or procedure. At Acelity we expect everyone to promptly report any suspected violation. While you may initially be reluctant to "get involved," it is important to know that failure to report potential or suspected violations can have significant consequences and you may be subject to disciplinary action, including termination, for not speaking up. As with all disciplinary matters, principles of fairness and equity are applied.

Reporting a Concern

When in doubt, ask for guidance. In general, you should first seek to address your questions or concerns with your manager. If you believe that is not appropriate or you feel your concerns are not being addressed, and because the manner in which violations may be reported may vary from country to country, Acelity has alternative channels for you to report, including, for example, Human Resources, Compliance, Legal and the Acelity Alertline.
You are encouraged to share your identity when you report because this permits Acelity to conduct a more thorough investigation. If however you are uncomfortable identifying yourself, then you may report anonymously, if local laws permit. Once your call is received, your concern will be referred to the appropriate Acelity representative and will be handled with discretion and confidentiality. Information relating to a reported violation will be communicated on a need-to-know basis only.

**What Happens When a Concern is Raised**

All concerns about compliance with Acelity policy will be investigated.

The Acelity investigation process includes the following steps:

1. **ASSIGN AN INVESTIGATOR/INVESTIGATION TEAM**
   Assign expert(s) with the right knowledge and objectivity to investigate the concern.

2. **CONDUCT AN INVESTIGATION**
   Investigate facts through interviews and/or review of documents.

3. **TAKE APPROPRIATE CORRECTIVE/DISCIPLINARY ACTION**
   If necessary, appropriate corrective/disciplinary actions are identified, enforced, and implemented in accordance with Company policies and procedures.

4. **PROVIDE FEEDBACK**
   The person raising the concern receives feedback that the concern was investigated and handled appropriately.

**Duty to Follow Policies and Procedures**

It is important that you have a basic understanding of the policy statements summarized in this Code and learn the details of policies and procedures relevant to your job.

Check the Acelity intranet for up-to-date policies and ask your manager, Human Resources, Compliance, or Legal about any questions you may have.

**Ethical Decision Making**

Some ethical issues are easy to identify, and the right course of action is simple to determine. Some ethical situations, however, are more complex and the right course of action is not easy to determine. This section contains tools designed to help you navigate difficult situations. As a guide in deciding on a course of action, follow these steps and ask yourself these questions:
CAN I DO IT
1. Is it legal?
   NO. Then don’t do it.
2. Is it ethical – the right thing to do?
   NO. Then don’t do it.
3. Is it in compliance with Acelity policy?
   NO. Then don’t do it.

SHOULD I DO IT
1. Is it consistent with Acelity values and this Code?
   NO. Then don’t do it.
2. Is it consistent with professional standards?
   NO. Then don’t do it.

HOW DO I DO IT
1. Test the decision before acting.
   • Does it feel right?
     NO. Then don’t do it or get further advice from Human Resources, Compliance or Legal.
   • Do I feel it may be wrong, but feel pressure to do it anyway?
     YES. Then don’t do it and get further advice from Human Resources, Compliance or Legal.
   • Will it reflect negatively on you or Acelity?
     YES. Then don’t do it.
   • Who else could be affected by this (e.g., others in Acelity, customers, you, etc.)?
   • Is there an alternative action that does not pose an ethical conflict?
     YES. Then choose the alternative action.
   • How would this look on the front page of a newspaper or on the 5 o’clock news?
2. If unsure, consult with others – refer to the “Reporting a Concern” section in this Code.

Staying on the right course also includes reflecting back on your decision and asking yourself, “Did I do the right thing?”

• Not sure. Talk to your manager, Human Resources, Compliance, or Legal to determine if there is something you could do better the next time.
• No. You may need to report this in accordance with the “Reporting a Concern” section in this Code.
• Yes. Congratulations, you are supporting the Acelity commitment to compliance!
Retaliation is strictly prohibited

We support honest and open communication and encourage our employees to ask questions and report concerns. We will not tolerate retaliation against any employee who discloses any suspected violations of Acelity policies, applicable laws, rules or regulations, or participates in a Company investigation. If you believe you have experienced retaliation as a result of raising a concern, participating in an investigation, or other protected activity, you should contact Human Resources, Compliance or Legal, or the Acelity AlertLine.

Complaints of retaliation will be investigated promptly and corrective action, if appropriate, will be taken.

Acknowledgment

Periodically, Acelity requires employees to read and certify their acknowledgment and understanding of our Code by completing online Code of Conduct training. Failure to complete the certification process can be a Code violation and may subject you to disciplinary action and/or affect your performance reviews at the discretion of Acelity, where permitted by law. In no circumstance does failure to read our Code, sign and acknowledge understanding, exempt you from your obligation to comply with our Code.

“We are unwavering in our commitment to compliance and integrity. We do more than just comply with the law. Everywhere and every day we do the right thing.”
Commitment to Each Other

Diversity and Equal Employment

WHAT IS RIGHT
We strive to promote and maintain a culture in which employees of all backgrounds, capabilities, and opinions are treated with fairness, respect, dignity, and courtesy. At Acelity we are committed to equal employment opportunity and diversity.

WHY IT’S RIGHT
Acelity recognizes that a mix of backgrounds, opinions, and talents in our global workforce enriches our company and helps us achieve success. “Diversity” may include: personalities, lifestyles, thought processes, work experiences, ethnicity, race, color, religion, gender, gender identity, sexual orientation, marital status, age, national origin, disability, veteran status, or other uniquely identifying characteristics. We will better understand the needs of our customers and foster innovation if each of us embraces diversity and inclusion in all aspects of our business.

HOW TO DO WHAT’S RIGHT
In our daily work activities, we should treat each other with respect. All employment decisions that involve recruiting, hiring, training, promoting, compensating employees, or any other terms or conditions of employment should be based on job-related qualifications and made without regard to any legally protected status in each of the countries in which we operate. We recognize people for their contributions and provide timely, open, and honest performance feedback.

Free From Harassment

WHAT IS RIGHT
We promote a work environment free from harassment, which includes unwelcome verbal, visual, physical, or other conduct of any kind that creates an intimidating, offensive, or hostile work environment.

WHY IT’S RIGHT
Employees have the right to work in an environment free from discrimination, intimidation, ridicule, and insult. Not only could harassment violate the law and/or Acelity policy, it also distracts employees from their work.

To achieve a positive and thriving work environment, we must take steps to ensure it is free from harassment. Conduct could be considered harassment regardless of whether it is done physically or verbally, in person or by other means (such as harassing notes or emails), and sexual in nature or otherwise inappropriate.
HOW TO DO WHAT’S RIGHT
You are expected to act in a non-harassing manner with your co-workers, business partners, and customers, and treat everyone with respect and conduct business in a way that does not cause anyone to feel uncomfortable. It is important to remember that harassment, sexual or otherwise, is determined by your actions and how they affect others, regardless of your intentions. Potentially offensive behavior includes unwelcome sexual advances or remarks. It may also include slurs, inappropriate jokes, or disparaging comments about subjects such as race, religion, age, sexual orientation, disability, or ethnicity.

Improper conduct will not be tolerated and should be reported as directed in the “Reporting a Concern” section of this Code.

Company Environmental, Health, and Safety

WHAT IS RIGHT
Together we work to promote a safe and healthy work environment that complies with all applicable laws, regulations, and industry codes. It is the intention of Acelity to maintain fair and effective enforcement of a safe work environment to prevent injury and illness.

We also strive to operate in a manner that preserves natural resources and reduces the environmental impact of our processes and our products. We are committed to partnering with our employees, suppliers, and the communities in which we operate to be good environmental stewards. Our environmental, health, and safety policies and procedures are designed to help you work safely and in a manner that is environmentally responsible, whether at our facilities, or out in the community with our customers.

WHY IT’S RIGHT
Good environmental, health, and safety standards and practices go hand-in-hand with excellent business results. High standards are essential to adequately protect employees, the public, and any other people affected by your work. Moreover, good practices contribute to business performance by protecting and developing human and physical resources and by reducing costs.

HOW TO DO WHAT’S RIGHT
We each have a responsibility to meet this commitment by following all Acelity environmental, health, and safety procedures, as well as applicable laws and regulations. In so doing, we avoid risk to ourselves and those around us. You are expected to develop a proactive, cooperative attitude toward the environment, health, and safety. You are also expected to comply with local operating procedures and safe working practices, report injuries and ill health arising from your work, take steps to prevent accidents, and, in general, be attentive to safety. If you are aware of unsafe working conditions, report the situation to your manager immediately.
Free From Workplace Violence

**WHAT IS RIGHT**
We are committed to a safe and secure work environment that is free of threats, intimidation, and physical harm. As part of our commitment, we must never engage in or tolerate any form of violence.

**WHY IT’S RIGHT**
Everyone has a right to work in a safe environment and shares the responsibility of ensuring the safety and security of others. We have no tolerance for workplace violence. We will investigate any threats to a safe workplace and take appropriate action, up to and including termination.

**HOW TO DO WHAT’S RIGHT**
We prohibit violent behavior in the workplace or while conducting Acelity business. Such behavior includes physical assaults, fighting, threatening comments, intimidation, threats through electronic communications including social media, and the intentional or reckless destruction of company, employee, or customer property. We also prohibit employees from bringing unauthorized materials, firearms, other weapons, and other dangerous or hazardous devices or substances inside Acelity facilities, unless such possession cannot be prohibited by applicable law.

Employees that are aware of violent or threatening conduct, have a responsibility to immediately report the situation in accordance with the “Reporting a Concern” section of this Code.

Drug Free Workplace

**WHAT IS RIGHT**
We are firmly committed to providing and maintaining a “Drug Free Workplace” that is safe, healthy, and productive and free from the effects of alcohol or illegal drugs for employees, others doing business with Acelity and the general public. “Illegal drugs” means all drugs, the use or possession of which is illegal under federal, state, or local law as well as prescription medication which is used in a manner that is inconsistent with the prescription or for which the individual does not have a valid prescription.

**WHY IT’S RIGHT**
Drug and/or alcohol abuse adversely affect productivity, work quality and dependability, as well as pose a significant threat to the safety, security, and welfare of Acelity, its employees, customers, vendors, and the general public. Such abuse can also affect an employee’s opportunity for advancement and successful employment. Maintaining a Drug Free Workplace is right because it ensures that our mutual success is not compromised by substance abusers.
HOW TO DO WHAT’S RIGHT
Acelity Drug Free Workplace expectations and standards are set forth in more detail in a separate policy. Please refer to the Acelity intranet for up-to-date policies and ask your manager, Human Resources, Legal, or Compliance about any questions you may have regarding your employment and substance abuse and drug/alcohol testing.

If you have a drug or alcohol problem, you are encouraged to seek assistance. Contact the confidential Employee Assistance Program (EAP) or Human Resources to learn of applicable assistance programs in your region.
Commitment to Customers

Quality and Product Safety

WHAT IS RIGHT
As a manufacturer and distributor of healthcare products, Acelity is responsible for maintaining the highest quality standards. Every employee is accountable to uphold the Quality Policy and to follow associated procedures and processes to be compliant with regulatory requirements.

WHY IT’S RIGHT
The quality and integrity of Acelity products and services are critical to our success and essential in helping deliver safe and effective products to our customers. With strict global regulatory requirements governing our business, we cannot afford to violate holding the highest standards of meeting our quality commitments.

HOW TO DO WHAT’S RIGHT
We work in a highly regulated industry and we are subject to requirements set by regulatory agencies around the world, including the U.S. Food and Drug Administration (FDA), the EU Medical Device requirements and the International Organization for Standardization (ISO), to name a few.

Our Quality Management System ensures we meet these requirements and that we comply with applicable regulations.

Each of us is responsible for asking questions and voicing concerns related to perceived compromised quality and product safety. We also have a responsibility to report any product quality issues for the purpose of tracking product performance and taking appropriate corrective and preventive actions. If you learn of a complaint associated with an Acelity product, you have a responsibility to promptly report it to Complaint Handling.

Fraud, Waste, and Abuse

WHAT IS RIGHT
Acelity takes very seriously its responsibility to comply with the U.S. federal and state False Claims Acts and similar local laws. We take necessary steps to prevent fraud, waste, and abuse affecting healthcare program reimbursement.

WHY IT’S RIGHT
The detection, correction, and prevention of fraud, waste, and abuse is essential to maintaining a health care system that is affordable for everyone. To that end, law enforcement agencies are increasingly focused on investigating federal and state false claims acts, which prohibit knowingly submitting to federal or state government false or fraudulent claims for payment. Often, these laws also allow individuals to file suit on behalf of the government against people or businesses alleged to have committed fraud and protect people who report violations to national, state, and local enforcement authorities.
HOW TO DO WHAT’S RIGHT
What can you do to prevent fraud, waste, and abuse?

- Make sure you are up-to-date with training associated with applicable laws, regulations, departmental policies and procedures (including work instructions).
- Ensure data and documentation used for claim/billing purposes are both accurate and timely.
- Verify information provided to you by external sources when possible.
- Be on the lookout for suspicious activity.

You are expected to immediately report suspected fraud, waste, and abuse. In general, you should first seek to address your questions or concerns with your manager. If you believe that is not appropriate or you feel your concerns are not being addressed, refer to the “Reporting a Concern” section of this Code for guidance. Acelity will never retaliate against employees who exercise their rights under the U.S. federal and state False Claims Act, Deficit Reduction Act — or any other applicable law.

Anti-Bribery

WHAT IS RIGHT
Almost every country in the world has laws banning corruption, bribery, kickbacks, and illicit payments. We support these laws because they are designed to protect companies like ours which seek to compete fairly based upon the quality of our goods and services, rather than on favors granted in exchange for bribes. These laws also apply to third parties promoting, representing, selling, and distributing Acelity products, such as distributors, agents, and consultants.

WHY IT’S RIGHT
Bribery and corruption damages our business, conflicts with our core values and contradicts our day-to-day business practices. It is impossible to overstate the importance of Anti-bribery. Acelity is committed to ethical business practices everywhere it conducts business globally and expects the same ethical commitment from its global business partners.

HOW TO DO WHAT’S RIGHT
Wherever we do business, we must be aware of and comply with applicable corruption and bribery laws and Acelity policies. Being a U.S.-based company, the U.S. Foreign Corrupt Practices Act applies, as well as other laws including the U.K. Bribery Act, which also forbids private bribery. You may not offer or give money or anything else of value either as an inducement to make, or as a reward for making, any decision favorable to Acelity. This includes providing benefits to government officials, private parties, and other healthcare professionals and organizations, such as patients, suppliers, charities, and patient groups. Even small gifts and entertainment may amount to illegal inducements in some circumstances. Acelity also does not permit any agent, contractor, advisor or other third party working on our behalf to engage in this type of conduct. You must understand and adhere to all applicable Acelity policies and procedures on anti-bribery.
Interactions with Healthcare Providers

**WHAT IS RIGHT**

Acelity acts with integrity in all our business dealings and is committed to complying with all laws, regulations, and the industry codes to which we subscribe; including rules specifically governing our interactions with Healthcare Providers (HCPs). HCPs include any individual, institution, or entity that has the ability to prescribe, acquire, or influence the prescription or acquisition of Acelity products. This is a broad definition and includes administrators, physicians, nurses, technicians, clinical researchers, governmental employees, hospitals, clinics, and group purchasing bodies. Employees and Acelity representatives must not engage in any conduct that unlawfully induces (or appears to unlawfully induce) anyone to purchase, lease, recommend, use, or arrange for the purchase, lease or use of, Acelity products.

Acelity has adopted various industry codes that govern interactions with HCPs, including “The AdvaMed Code of Ethics on Interactions with Health Care Professionals” in the U.S. and “The Eucomed Code of Ethical Business Practice” in the E.U. These Codes provide a general framework for common types of interactions with HCPs.

**WHY IT’S RIGHT**

Because we make products for and provide services to the healthcare industry, it is essential that we develop and maintain close working relationships with healthcare professionals to ensure the safe and appropriate application of our products. The rules that govern interactions with healthcare professionals, including the payment or provision of anything of value such as gifts, meals, entertainment, honoraria, travel, or grants are complex and differ from country to country. The consequences for failing to comply with these rules can result in significant monetary and sometimes criminal penalties. It is important that we comply.

Sales and service representatives have a special responsibility to understand the laws, regulations, and industry codes when dealing with HCPs and must be particularly vigilant to any situation that could appear to be, or result in, an illegal inducement. Some situations (such as giving doctors cash in return for their business) are clearly illegal. Other situations (such as extravagant meals, resort level venues, and unnecessary travel or accommodations) are less obvious but may nevertheless be construed as an illegal inducement. National law and, in some cases, local law equivalents provide that an inducement may be direct or indirect, in cash, or in kind. Transfers of value involving HCPs may be unlawful if even one of the reasons of an otherwise legitimate transfer of value is to induce the HCP to use or prescribe an Acelity product.
HOW TO DO WHAT’S RIGHT
Acelity has established both a regional and country guidance structure that governs our interactions with healthcare professionals throughout the world. It is based on the laws or regulations governing a specific country or region and therefore guidance may slightly differ based on the location of the interaction and the HCPs country of origin. Although there is some variation, there are four core guiding principles for all interactions with HCPs. Employees and Acelity representatives are responsible for following these principles in their dealings with HCPs:

• **Separation** - Healthcare interactions with HCPs must not be misused to improperly influence purchasing decisions.
• **Transparency** - Relationships must comply with local regulations and meet all notification and reporting obligations.
• **Equivalence/Proportionality** - Any transfer of value or consideration given to an HCP in exchange for a service or other performance should not exceed “fair market value”.
• **Documentation** - All interactions require adequate support documentation (such as sign-in sheets, invoices, and contracts when necessary, etc.).

Gifts

WHAT IS RIGHT
Acelity values its reputation of operating with integrity in the marketplace and values business obtained through proper use of business courtesies. In our interactions with our customers and business partners, we do not give or receive inappropriate gifts, favors, or entertainment.

WHY IT’S RIGHT
Giving or accepting a gift can create the appearance of a conflict of interest. It could be suggested or inferred that the gift-giver might receive favorable or preferential treatment. Always avoid gifts, favors or entertainment that could appear to be bribes, raise questions about conflicts of interest for you or Acelity, or damage our reputation if they became known publicly.

Gifts present unique challenges for a company like Acelity. Modest gifts can be appropriate in certain circumstances, but even modest gifts can violate laws, rules, and regulations. Acelity policies and procedures address the specific rules and many circumstances providing employees the appropriate guidance.

HOW TO DO WHAT’S RIGHT
Acelity does not generally allow for the giving and accepting of business or non-business gifts and entertainment. Our policy on gift-giving and receiving extends to suppliers and customers, as well as entities or individuals doing or seeking to do business with an Acelity entity. For details about our policies on gift-giving regarding our commercial and governmental customers, HCPs and business partners, please refer to the policies on Conflict of
Interest, Anti-bribery, Doing Business with the Government, and Interactions with Healthcare Professionals. You should obtain advice from Legal or Compliance when questions arise around offering or giving any gift, favors, or entertainment.

Data Privacy

What Is Right

Acelity is committed to the protection of confidential information to which we are entrusted. Confidential information comes to us in many forms. Examples include business information, proprietary intellectual property, patient information, and personal data. We all have a role in safeguarding confidential information. We may not disclose confidential information we obtain to third parties unless the disclosure is in compliance with the privacy policies of Acelity, a valid business need exists, and the transfer is not prohibited by a confidentiality or other agreement, or law.

We also respect the confidential information of others, such as competitors and other third-party organizations. In the course of your work, you may not use any confidential information about another organization or person obtained from a source outside Acelity if there is any reason to believe that the information might have been obtained improperly.

Why It’s Right

A growing number of countries stringently regulate the collection and use of consumers’ “personal data” (e.g. names, home and office contact information, other customer, and supplier data).

Many countries regulate personal data of Acelity representatives in business-to-business transactions and the privacy of information relating to corporations.

In the course of conducting our business, we have access to various types of personal information about our patients. Similar to employee data privacy and security, patients and their healthcare providers expect us to access, use, transmit, store, and dispose of patient personal information in a safe and secure way, in accordance with applicable laws and regulations.

How To Do What’s Right

- Learn and comply with the applicable laws and regulations of jurisdictions from which personal data is collected and in which it is processed or used; the privacy policies of Acelity and any contractual obligations that apply.
- Collect, process, and use personal data for legitimate business purposes only.
- Use “anonymous” data, where appropriate, (names removed and not identifiable) or “aggregated” data (summarized so as not to be identifiable to an individual) rather than personal data.
- Limit access to personal data to individuals who need it only for a legitimate, business purpose.
• USE CARE to prevent unauthorized access when processing personal data and to prevent accidental loss or destruction of personal data.
• IF YOU LEARN THAT PERSONAL DATA HAS BEEN USED IN VIOLATION of this Code or Acelity policy, or if you learn that the security of any system or device containing personal data has been compromised, immediately notify appropriate personnel as directed in the “Reporting a Concern” section of this Code.

Anti-Trust and Global Competition

اكتشف ما هو الصحيح

أكليتي تتبناها الفكرة أن التفاعل الصحيح في الاقتصاد يعتمد على تعامل الناخبين بالكالوس في مساحة مفتوحة. نسعى لتفوق المنافسين بطريقة شريفة، وصحيحة، واحترافية.

اكتشف لماذا هو الصحيح

قوانين簸ية والتنافسية حول العالم موجودة للولايات المتحدة في تقديم القدرة على مشاركته باستقلالية، وفجاءة. جرائم تلك القياسات يمكن أن تؤدي إلى المسؤولية التنافسية والعقاب الجنائي، وقد تؤثر على عملنا وشهرتنا مع العملاء.

اكتشف كيف أفعل ما هو الصحيح

نمنع من الممارسات التي قد تنتهك أو تنجم عن الاحتمالية أن تنتهك هذه القواعد. تتوقع منك أن تكون حريصًا على عناصر تنفيذ أي قانون مشابه لتعاملاتك التي تتعلق بالأعمال، وأن تعرف المسؤولية المطلوبة. بعض الأمثلة على الممارسات المحظورة تشمل:

• متعمية تصميم المنتجات أو التمييز بأسعار
• تبادل الأسعار أو المعلومات sensible مع المنافسين
• موافقن ملازمة أو التقليل،fix بيع أو تمويل، أو نثأ عن العملاء أو بعد العملاء
• التدخل في علاقات العملاء بين المنافسين

نستثمر تنافسنا الفعال فقط باستخدام الأساليب القانونية والأخلاقية، ولا يمكننا أن نفعل من الطرق قد تهدر السوق. طالع مناقشة من مناقش يسمح أو دماعة. الرد بالمقابل على الأسئلة.

اللواء

اكتشف ما هو الصحيح

هناك رعاية لدينا عند أكليتي لضمان أن مستخدمي المنتجات والموارد الآمنة، والوظائف، والتفصيل من منتجاتنا، و، حسب الاقتضاء، المتطلبات والخصائص من منتجاتنا. نعمل كما هو من خلال مجموعة واسعة من أدوات الاتصال. كل المعلومات التي نقدمها أو ندعمها يجب أن تكون متوافقة مع البحث العلمي والعلمي.
WHY IT’S RIGHT
The distribution of our products is heavily regulated by governmental agencies, health ministries, and other governing bodies around the world.

We are bound by law to secure the appropriate approvals for our products through regulatory agencies and bodies worldwide. Since approvals are unique to each country, we will follow the specific requirements for the marketing, sale, and promotion of our products. We are all responsible for compliance with these global product regulation requirements. The laws and regulations that apply are complex. You must be aware of the ones which affect your job. If you are unsure, ask a Regulatory Affairs representative.

HOW TO DO WHAT’S RIGHT
Only products receiving appropriate local registrations and/or approvals can be imported into a specific country and sold in that country. If you are unsure about the indications for use or registration/approval status of a specific product, seek guidance from a Regulatory Affairs representative.

Advertising and Promotion

WHAT IS RIGHT
Our customers can be assured of the credibility of Acelity because we are committed to honestly and accurately describing our products and services. All promotional materials, including advertising, literature, and public statements about products and services must be fair and balanced to accurately disclose risks and benefits. The materials must be supported by appropriate supporting documentation and must not contain false or misleading information.

WHY IT’S RIGHT
Respecting the patient-physician relationship includes promoting our products using approved labeling and promoting and selling our products through accurate and truthful communications about their efficacy, quality, safety, and price.

Fair and accurate advertising is essential, not only to comply with applicable laws, but also to preserve the goodwill, integrity, and reputation of Acelity.

HOW TO DO WHAT’S RIGHT
Various laws and regulations require that we represent all Acelity products in a manner consistent with applicable labeling and market approvals. All information provided or available to customers, whether in print or via the Internet, must be accurate, complete, legal, and approved by the appropriate internal departments through our copy review processes. The creation or use of “homemade” or otherwise unapproved promotional materials is strictly prohibited. Always seek guidance from a Regulatory Affairs representative and/or marketing communications regarding the registration and approved indications of a specific product.
Clinical Research and Medical Affairs

WHAT IS RIGHT
As a globally diversified medical device company, Acelity is responsible for design and distribution of medical products whose safety and effectiveness are documented by published research results. Acelity must manage the clinical research process in compliance with the laws and regulations that relate to the safety of devices throughout their lifecycle. This includes: conducting appropriate, ethical, and safe research whether it involves clinical subjects, healthy humans or animals; ethical and unbiased publication of the research and other data. We are also responsible for the appropriate dissemination of medical literature, including, unsolicited communication of off-label topics; offering education to users and customers; providing grants to fulfill legitimate educational and research initiatives and engaging healthcare professionals for research, speaking, and consulting on the topics listed above. The laws and regulations that apply are complex. You must be aware of the ones which affect your job. If you are unsure seek guidance from a Clinical Research/Medical Affairs representative.

WHY IT’S RIGHT
Our products and services affect patients’ lives. Therefore we are required to ensure their safety and effectiveness and to help the users know how to use them appropriately to achieve best results.

HOW TO DO WHAT’S RIGHT
Special regulatory and legal considerations are involved in conducting scientific and clinical research, communicating, and publishing data, educating users, and ensuring the safety of our products and their application worldwide. If you are involved in any of these activities, you are responsible for ensuring that they are conducted effectively and legally. Always seek guidance and input from a Medical and/or Clinical representative on any such activities.

Working with the Government

WHAT IS RIGHT
Acelity conducts business with national governments, governmental agencies and other government-owned enterprises. In the course of your work, you may interact with representatives of such agencies and enterprises. In every instance, you are expected to apply the highest ethical standards and comply with all applicable laws and regulations, including certain special requirements associated with governmental transactions.
**WHY IT’S RIGHT**
Failure to observe those laws and regulations can result not only in loss of contract work and damage to the Acelity reputation, but also in civil and criminal penalties for you and the Company.

**HOW TO DO WHAT’S RIGHT**
The sale of goods and services to governmental organizations is heavily regulated. Acelity employees involved in sales to governmental customers must take the necessary steps to ensure that all government-related transactions and relationships comply with applicable laws and regulations, including the provision of gifts. You must be cautious when interacting with any governmental official or representative. The legal and regulatory requirements that arise in the context of selling products to a governmental body can be different than those of private commercial transactions. Take time to make yourself aware of the rules. If you have any questions or concerns, always seek guidance from a Compliance or Legal representative.

**Supplier Relationships**

**WHAT IS RIGHT**
We deal with many suppliers. It is the policy of Acelity to treat suppliers fairly and select suppliers on the basis of quality, service, and value creation. Our relationships with suppliers are based on lawful, efficient, and fair practices, including observation of human rights and eradication of human trafficking and slavery. We expect our suppliers to obey applicable laws, including laws that require them to treat workers fairly and free from coerced or forced labor, unlawful harassment or offensive conduct, provide a safe and healthy work environment, protect environmental quality, and provide products and services according to design and contract requirements, and applicable quality standards.

**WHY IT’S RIGHT**
Doing business solely on the merits of our suppliers will help us maintain the quality of our relationships and our products.

All interactions with our suppliers must meet our high ethical standards. We expect our suppliers to adhere to the same standards of integrity to which we hold ourselves, including the values and standards described in this Code.

Any unethical or illegal act of a supplier may hurt our reputation as a world-class company and may cause a loss of goodwill in the communities we serve.

**HOW TO DO WHAT’S RIGHT**
This means that you should:

- Avoid actual or perceived conflicts of interest in selecting or dealing with suppliers.
- Reject side agreements (such as an agreement to keep business away from another supplier).
- Never accept a bribe or a kickback.
• Never use suppliers as intermediaries to make payments prohibited by this Code or applicable laws.
• Ensure that suppliers have been appropriately approved before engaging them.
• Always abide by this Code and follow the applicable Acelity policies.
• Properly protect both Acelity and the supplier’s confidential information.
• Inform Acelity suppliers of our expectations.

Trade

What is Right
As a global company, Acelity is committed to complying with applicable laws that govern international trade.

Why It’s Right
We comply with all applicable international trade laws and rules, including those governing the import and export of goods, software, technology, technical data, and services across national borders, those regulating boycotts and economic sanctions, and those governing country of origin. International trade controls may apply to any import or export activity, even transmission of electronic data. Various government sanctions restrict us from directly or indirectly engaging in trade with certain countries, entities, vessels, and persons.

How to Do What’s Right
As a global company, we are required to uphold the appropriate boycotts and sanctions, and we must ensure our business partners do the same. International laws are complex and require strict adherence. If you are involved in the sourcing, sale, marketing, distribution or transportation of products, or the transfer of technology across international borders, you must:

• Be familiar with and comply with all applicable laws and the Acelity Trade Compliance Policy.
• Notify Trade Compliance if you receive any requests from customers, suppliers, or others to participate in a boycott against individuals, companies or countries.
• Seek guidance from a Trade Compliance representative if you have a concern about a trade-related issue.
Conflict of Interest

WHAT IS RIGHT
As a member of the Acelity team, you are expected to conduct yourself, both at work and in your free time, in accordance with good judgment, and in such a manner that does not create a conflict of interest or appearance of such conflict.

WHY IT’S RIGHT
It is important to make business decisions based on sound judgment and in the best interest of Acelity – and not based on personal interests or relationships. You are expected to devote your full professional efforts to the performance of your job. No activity at work or outside of work should hurt the reputation or good name of Acelity. It is important to consider how your actions might appear and to avoid, even the perception of, a conflict of interest.

HOW TO DO WHAT’S RIGHT
We make decisions and act in the best interests of Acelity rather than for personal gain by:

• Avoiding putting ourselves in a position where our judgment and decision-making could be improperly influenced by close personal relationships;
• Giving our best effort, every day, at Acelity;
• Not allowing outside jobs or other activities to hinder your contributions to Acelity;
• Not taking advantage of Acelity opportunities or information which you discovered through your employment;
• Following all applicable policies and procedures on giving or receiving gifts, favors, and entertainment; and
• Promptly disclosing as appropriate – Refer to the “Reporting a Concern” section of this Code - if you are in a situation where there may be a real or perceived conflict of interest.

Proprietary and Confidential Information

WHAT IS RIGHT
We must safeguard Acelity proprietary and confidential business information against unauthorized disclosure and misuse. In addition, information provided to Acelity in good faith, or to you, in your role at the Company, by our customers and suppliers, including protected health information, must be treated with the same degree of confidentiality.

WHY IT’S RIGHT
Proprietary information of Acelity is a valuable asset, especially when it is confidential business information. Our Company’s confidential and proprietary information is vitally important in helping us develop new products and markets, attract new customers, and maintain a competitive advantage.
HOW TO DO WHAT’S RIGHT
We must all help protect Acelity confidential information by:

- Securing and limiting access to confidential information to those people who need to know such information to perform their jobs;
- Avoiding the disclosure of confidential information when talking or working in public areas, such as airports, elevators, and restaurants, whether in person or on mobile phones;
- Never using confidential information for your own personal gain or to benefit anyone outside of Acelity; and
- Remembering that your obligation to protect Acelity confidential information continues after your individual employment ends.

Examples of proprietary and confidential information:
[Refer also to the Data Privacy section in this document]

- Intellectual property – such as trademarks, trade secrets, patents, and copyrights.
- Acelity financial information, including actual results and budget or forecast projections.
- Written and oral agreements between Acelity and agents, strategic partners, and/or other third parties.
- Information about new product development.
- Marketing and business strategic plans.
- Customer names and information.
- Protected health information—such as patient names, addresses, and health conditions.
- Sensitive personal information, including: customer and third party payment accounts, data collected for work visas, I-9 verification, and benefit and workers compensation information.

Insider Trading

WHAT IS RIGHT
We never use or improperly disclose material, non-public information about Acelity or another company for the purpose of buying or selling securities; nor do we attempt to manipulate the price of publicly traded securities.

WHY IT’S RIGHT
Insider trading and financial market abuse not only distort financial markets, they are illegal. Enforcement is rigorous and penalties are severe. In the course of your work, you may learn material information about Acelity, or one of its business partners, before it is made public. Using
this information for your financial or other personal benefit or conveying this information to others constitutes a violation of this Code and may violate the law.

**HOW TO DO WHAT’S RIGHT**

Buying or selling the securities of any company about which you have material, non-public information and giving this “inside information" to others who might trade on the information you’ve shared is prohibited.

You should take precautions to be aware of, and avoid, the risks of insider trading. If you have any doubt, please contact a Legal representative for advice. For further information, refer to applicable Acelity policies and procedures.

**Media and Careful Communication**

**WHAT IS RIGHT**

We value our relationships with the news media, investors, and other key stakeholders, and it is our policy to communicate openly and actively with one voice to all of them. All such communications on behalf of Acelity must be made only by those people who are authorized to do so. Acelity is committed to ensuring that the use of social media in any form or context, serves the needs of our business by maintaining our identity, integrity, and reputation in a manner consistent with our values and policies.

**WHY IT’S RIGHT**

Our customers, employees, and investors deserve accurate, clear, complete, and consistent communications about Acelity. What we say, write, or post, in any format or medium can reach millions of people in seconds. Comments and opinions spoken or placed on social media sites or blogs can affect how millions of people view our company and our products, for better or worse. In addition, employees’ communications and use of social media can pose risks to Acelity confidential and proprietary business information and can jeopardize our compliance with business rules and laws.

**HOW TO DO WHAT’S RIGHT**

Unless you are expressly authorized to speak on behalf of Acelity, you must direct all inquiries from the media to a Corporate Communications representative and all inquiries from the financial community to an Investor Relations representative. If you are contacted by a representative of a governmental agency seeking company information or making a non-routine request for company documents or access, you should immediately contact a Legal representative so that appropriate arrangements can be made to fully comply with our legal obligations.

As with other forms of external communications, you must be expressly authorized to participate in any social media on behalf of the company. You should engage with social media responsibly, use your best judgment, and understand that your actions can result in unintended consequences.

Refer to the Employee Handbook for more guidance on responsible participation in social media.
Company Resources

☒ WHAT IS RIGHT
We owe Acelity a duty of working together to ensure the best use of company property, money, and other resources (company assets). As employees, we are entrusted with company assets and resources and we are expected to make use of them efficiently and appropriately. We all share the responsibility to be good stewards, taking care to avoid loss, damage, waste, and improper use.

☒ WHY IT’S RIGHT
Our integrity demands that Acelity property, money, and other resources are used only for the proper advancement of our business and not for personal gain, or fraudulent purpose. We safeguard our reputation and other assets so that we can better serve our customers and preserve value for our investors and other stakeholders. Theft, carelessness, and waste have a direct impact on our business operations.

☒ HOW TO DO WHAT’S RIGHT
We are good stewards of Acelity assets by:

• Taking reasonable care to prevent loss, damage, destruction, theft, unauthorized, or improper use or waste of Acelity assets;
• Using or authorizing the use of Acelity assets only for business purposes, regardless of condition or value. Incidental and occasional personal use of physical assets such as telephones, computers, Internet access, and email is permitted so long as such use is reasonable, does not interfere with your job responsibilities and responsiveness and in accordance with Acelity policies and procedures;
• Never taking, selling, lending, borrowing, giving away, or disposing of Acelity assets without proper authorization; and
• Reporting any concerns about the use, abuse, or endangerment of Acelity assets in accordance with the “Reporting a Concern” section of this Code.
• The following is a non-exhaustive list of Company assets we are all entrusted with protecting:
  - Information assets are any data relating to Acelity business, irrespective of how it is created, distributed, used, or stored;
  - Financial assets are the company’s money, financial instruments, and anything that can be converted to money;
  - Physical assets are anything of a tangible nature provided by Acelity to employees for use in conducting our business (e.g., computers, mobile phones, materials, tools, machinery, Company vehicles, office equipment, and supplies); and
  - Intangible assets are things such as our reputation, ideas, inventions, improvements, educational/promotional material, intellectual property, registered and unregistered copyrights, trademarks, patents, and service marks or trade secrets conceived, developed, or practiced.
Record-Keeping

 WHAT IS RIGHT
Acelity is committed to maintaining accurate financial information and business records to report information in a timely and appropriate manner and communicate with integrity. Each of us is responsible for doing our part.

 WHY IT’S RIGHT
Every action we take, regardless of our position within Acelity can result in an entry into the Company’s financial information and business records. For example, every time you report hours worked, process an invoice or claim, file or approve an expense report, sign a contract, make a sale, have a business meal, engage in a healthcare professional interaction, receive raw materials, or engage in any other business activity, you have an impact on our financial statements.

Accurate business and financial records are essential to our business operations and to compliance with laws. It is the information by which we are measured. We rely on the integrity and accuracy of records, both for internal decision making and for the benefit of investors, governmental agencies, regulators, and others to whom we report. Accurate and transparent record-keeping protects our reputation, promotes organizational efficiency, and helps us meet our legal and regulatory obligations.

 HOW TO DO WHAT’S RIGHT
Acelity has well established record-keeping, document management and reporting control systems to ensure proper recording, maintenance and reporting of information in order to make responsible business decisions and adhere to various laws and regulations. Any activity which circumvents our systems of controls is prohibited. As Acelity employees, we must protect, secure, retain, and destroy Acelity information in accordance with corporate and local Company requirements.

There could be significant adverse consequences to both individuals and Acelity if we fail to fully comply with record-keeping and reporting requirements. You are expected to be familiar with all applicable Acelity policies and procedures concerning appropriate and accurate record-keeping. Check the Acelity intranet for applicable policies and procedures.

Research shows that companies with a strong culture of integrity and ethics are more successful in the marketplace.
Commitment to Community

Political Activity and Charity

✔ WHAT IS RIGHT
Everyone is free to be informed and become involved in the political process as long as participation is voluntary and made during personal time. As a company, we will constructively engage with all governments in whose jurisdictions we operate.

✔ WHY IT’S RIGHT
We believe that an active, inclusive, and fair political process promotes open government and healthy, productive societies.

✔ HOW TO DO WHAT’S RIGHT
It is up to you to be aware of and obey all laws relating to your personal political contributions and activities.

Each of us has the right to participate in the political process and engage in political activities. It is important to keep in mind the following:

- Make it clear that your political views and actions are your own, and not those of Acelity.
- Be careful not to create the impression that you are acting or speaking on behalf of Acelity in political matters, unless you are expressly authorized to do so.
- You may not contribute Acelity money, time, services, or property to any political official, candidate, or political action committee without prior written approval from the Legal Department.
- Inform a Compliance or Legal representative if you are considering running for political office and following your appointment or election, as this will help to identify and avoid any potential conflicts of interest.
- In all instances, public representation on behalf of Acelity must be coordinated with a Compliance or Legal representative.

Corporate Social Responsibility

✔ WHAT IS RIGHT
As a company we take our responsibility to preserve natural resources and support the local communities in which we live and work very seriously. This is why, wherever possible, we give every full time Acelity employee 16 hours a year to volunteer in their local community.

✔ WHY IT’S RIGHT
Acelity recognizes that responsible, sustainable corporate performance is essential to the long term success of our business and is desirable to all our stakeholders.
HOW TO DO WHAT’S RIGHT
Below are a few examples of the Acelity commitment to practice responsible corporate behavior:

• We maintain the highest standards of integrity, leadership, and behavior in all that we do.

• We act in a socially responsible manner, within the laws, customs, and traditions of the countries in which we operate.

• We treat our employees fairly and ethically and require our business partners to support ethical labor practices, including the eradication of coerced or forced labor, human trafficking, and slavery in our supply chain.

• We act in a manner that minimizes the environmental impact of our business operations. We have a global Environment, Health, and Safety program and are committed to continuously improve our performance.

• We actively encourage the support of charitable, educational, and community service activities.

• We support international and local efforts to eliminate corruption and financial crime.

• We commit to delivering outstanding corporate performance, value to our customers, returns to our shareholders, and prosperity to our employees.
<table>
<thead>
<tr>
<th>Inquiry</th>
<th>Contact Information</th>
</tr>
</thead>
<tbody>
<tr>
<td>Alertline</td>
<td><strong>Germany</strong> – 0800-187-3586</td>
</tr>
<tr>
<td></td>
<td><strong>Hungary</strong> – 06-800-20-124</td>
</tr>
<tr>
<td></td>
<td><strong>Ireland</strong> – 1-800-558-549</td>
</tr>
<tr>
<td></td>
<td><strong>United Kingdom</strong> – 0808-234-7051</td>
</tr>
<tr>
<td></td>
<td><strong>United States/Canada</strong> – 1-800-279-3239</td>
</tr>
<tr>
<td></td>
<td>For a complete listing of individual country phone numbers and web links see:</td>
</tr>
<tr>
<td></td>
<td>“Compliance Program” on the Acelity Intranet site; or “Corporate Compliance” at acelity.com</td>
</tr>
<tr>
<td>Complaint Handling</td>
<td><a href="mailto:ComplaintHandling@acelity.com">ComplaintHandling@acelity.com</a></td>
</tr>
<tr>
<td>Corporate Communications</td>
<td><a href="mailto:corpcomm@acelity.com">corpcomm@acelity.com</a></td>
</tr>
<tr>
<td>Corporate Compliance</td>
<td>See “Compliance Program” page on the Acelity Intranet</td>
</tr>
<tr>
<td>Department Contacts</td>
<td></td>
</tr>
<tr>
<td>Corporate Headquarters</td>
<td>12930 W. Interstate 10</td>
</tr>
<tr>
<td></td>
<td>San Antonio, TX 78249 USA</td>
</tr>
<tr>
<td>Employee Assistance</td>
<td>To speak with a United Health Care24 counselor call: 1-888-229-9280 or 1-888-887-4114</td>
</tr>
<tr>
<td>Program</td>
<td></td>
</tr>
<tr>
<td>General Compliance</td>
<td><a href="mailto:Compliance@acelity.com">Compliance@acelity.com</a></td>
</tr>
<tr>
<td>Healthcare Compliance</td>
<td><a href="mailto:ComplianceDepartment@acelity.com">ComplianceDepartment@acelity.com</a></td>
</tr>
<tr>
<td>Human Resources</td>
<td><a href="mailto:HRCompliance@acelity.com">HRCompliance@acelity.com</a></td>
</tr>
<tr>
<td>Investor Relations</td>
<td><a href="mailto:IR@acelity.com">IR@acelity.com</a></td>
</tr>
<tr>
<td>Legal</td>
<td><a href="mailto:legal@acelity.com">legal@acelity.com</a></td>
</tr>
<tr>
<td>Medical Affairs</td>
<td><a href="mailto:GlobalMedicalAffairs-US@acelity.com">GlobalMedicalAffairs-US@acelity.com</a></td>
</tr>
<tr>
<td></td>
<td><a href="mailto:GlobalMedicalAffairs-EMEA@acelity.com">GlobalMedicalAffairs-EMEA@acelity.com</a></td>
</tr>
<tr>
<td>Privacy Compliance</td>
<td><a href="mailto:Privacy.Office@acelity.com">Privacy.Office@acelity.com</a></td>
</tr>
<tr>
<td>Policies</td>
<td>See “Policy Central” on the Acelity Intranet</td>
</tr>
</tbody>
</table>
Our Code
Everywhere, Every day
Acelity Code of Conduct

acelity.com