

Global provider of medical devices,
plastics solutions and pharmaceutical systems



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SP Medical develops, manufactures and provides plastics and surface solutions to the global medical devices and pharmaceutical industries. Our core capabilities are injection molding, surface treatment and processing of plastic products. At our state-of-the-art facilities in Denmark and Poland, we manufacture components, medical devices, single-use devices and we apply function-enhancing Coatings to a number of products.

SP Medical is a company in SP Group A/S, an international plastics group headquartered in Denmark. SP Group is listed on NASDAQ OMX Nordic.

www.sp-medical.com

Code of Conduct

Introduction

SP Medicals' Code of Conduct is a code of practice for ethical behavior. It sets standards for various areas with which our companies and staff must comply in order to uphold SP Medicals' reputation as a group with high integrity and trustworthiness.

In accordance with our values, we acknowledge our responsibility for contributing to sustainable development, and are not opposed to behaving responsibly, while simultaneously seeking to increase the group's income and growth. On the contrary!

The point of departure for SP Medicals' position is the UN's Global Compact - the ten principles of human rights, labor, the environment and anti-corruption, whereby the UN has laid down guidelines for companies' work towards a more sustainable economy.

SP Medical follows the principles in the International Labor Organization's conventions and the UN' Declaration on Human Rights (UNDHR). In other words, the group does not tolerate child- or forced labor, does not employ minors, and all forms of discrimination in labor/employee relationships are forbidden.

We take the view that we will be judged based on the methods we use to achieve results; therefore, we behave properly, professionally and responsibly.



Code of Conduct – Internal issues

Internal issues

Human rights

SP Medical complies with the principles of the Internal Labor Organization's conventions and the UN' Declaration on Human Rights (UNDHR).

In other words, we do not tolerate child- or forced labor, do not employ minors, and accept no forms of discrimination in labor/employee relationships, including prejudice based on gender, religion, age, sexual orientation, nationality, political orientation and social or ethnic origin. SP Medical recruits, employs and promotes staff exclusively based on their qualifications and experience.

We recognize that all people are free and have equal rights in the workplace, and also respect each individual employee's individuality, including their private life.

Employees' rights

Our staff are free to join a union, to express themselves and to participate in- or choose members for collective organization. All our organizations have established systems whereby staff elect representatives/spokesperson(s) for negotiation with management.

As an employer we comply as a minimum with national legislation, legal codes, regulations and agreements in respect of wages and working conditions. SP Medical also works to provide staff with extra benefits.

Trust and respect

As an international organization we respect differences in cultures and traditions.

Our internal relationships are characterized by mutual trust and respect. Consequently we do not tolerate any form of harassment, be that direct or indirect; physical or psychological; verbal or non-verbal.



Safety

SP Medical ensures that staff have a satisfactory working environment, and one in which the greatest consideration is taken for safety and environmental effects. We are committed to ensuring that our companies - as a minimum - act in accordance with applicable legislation relating to safety and the environment.

Safety organizations are established within all our companies. Consequently, SP Medical ensures -in a structured manner and in cooperation with our staff - that the technical and organizational conditions are present to ensure a good and safe working environment.



Code of Conduct – External issues

External issues

Competition

SP Medical operates legal, decent and competitive business. We respect and comply with rules of competition, and respect customers' independence.

We avoid anti-competitive practice that inhibits a free economy - including price-fixing, market sharing with competitors or misuse of dominance.

Openness and confidentiality

SP Medical endeavors to be as transparent as possible in our activities and will openly enter into dialogue with anyone who has a healthy interest in our business and activities.

Our staff are committed to protecting both the company's own confidential business information and respecting others' immaterial rights and confidential information.

Anti-corruption measures and conflicts of interest

Our business partners and other interested parties should be aware that our staff's behavior is based on the company's interests and not the staff's own private interests. Consequently, SP Medical endeavors to avoid the slightest suggestion of conflict of interest.

In all external relationships we maintain a high degree of integrity and responsibility. We do not offer customers, potential customers, suppliers, the authorities or other community representatives, payment, gifts or benefits that conflict with applicable legislation, or what could be considered reasonable and accepted business- and marketing practice.

Our staff receive no gifts, benefits or payments that might influence - or be considered to influence their, or the organization's business decisions.

Environment

In accordance with the UN's Global Compact, SP Medical takes initiatives to promote greater environmental responsibility and to reduce the group's impact on the internal and external environment, in the same way as we endeavor to promote use of more environmentally-friendly technologies and materials.

The strategy is that all our companies will implement systems which ensure:

- that environmentally-friendly products are used in manufacturing and development processes
- that the quantity of waste and spillage as well as use of resources are minimized
- that our activities - as a minimum - are based on relevant environmental legislation

The most significant effects on the environment occur by our businesses using energy (in particular electrical energy) and raw materials in production, and associated spillage material.

We measure ongoing figures for consumption of energy, heating, water and raw materials. The results are used to implement widespread measures which reduce energy consumption and spillage.

Our organizations' direct CO₂ emissions are modest, but indirect effects on the environment from CO₂ result from electricity produced by power stations. SP Medical has no direct influence on the production derived from electrical power stations, but we endeavor to purchase a significant proportion of electricity from power companies who produce energy from renewable sources, e.g. windmills.



We take the view that we will be judged based on the methods we use to achieve results; therefore, we behave properly, professionally and responsibly.

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