



# Unilabs Code of Business Principles



# Foreword by Badhri Srinivasan

**At Unilabs, we want life to be  
lived to the fullest.**

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As an international leader in medical diagnostics, we have the privilege of empowering individuals and communities to better manage their health, and an obligation to protect the physical, mental, and social wellbeing of our people and those we serve, whilst ensuring our planet thrives too.

With our Code of Business Principles ('Code') as our compass, we can uphold the highest ethical standards in all aspects of our work. More than a set of rules, our Code is a reflection of our values and a pledge to treat people fairly, provide a healthy work environment, and act with the highest integrity so that we may maintain our licence to serve.

We believe in what we do and are driven to make a tangible difference in the lives of our people, our patients and our customers, so we 'live the Code' guided by our values.

To fully live our Code, each and every one of us must commit to living our values, day in and day out. This means always putting people at the heart of everything we do; being objective and honest in our decision making; being accurate and protective in all our dealings and priding ourselves on creating a culture that champions respect, reliability and responsibility.

Our success lies in the united actions of our people. By reading and living the terms of this Code, you are doing more than complying with Unilabs' values, principles, and standards; you are helping to create a better global society, one that's committed to truly sustainable growth.

We are Unilabs. We are here for life.

**Badhri Srinivasan, Executive Chair**

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# Living the Code

**'We' are Unilabs. This Code is our commitment to act in accordance with our values and to do right by our patients and customers every day.**



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## **This Code applies to 'our people', which means:**

- all employees of Unilabs Group Holding ApS, including its subsidiaries ('Unilabs'), whether employed full or part time, permanently, as trainee or otherwise
- individuals with statutory directorship roles in Unilabs
- contractors, consultants, and other individuals representing, or acting on behalf of Unilabs

In addition, Unilabs works solely with business partners who adhere to similar principles and share our values (see also 'business partners').

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## **To 'live the Code', is to act with an unwavering commitment to integrity.**

It is understanding why this is crucial; it is acknowledging what we do not know; and it is to raise concerns, so that we can learn from each other. This is why each section of this Code includes:

- the commitments we make to ourselves, to each other, and to our patients and customers – and why they matter
- where to seek further knowledge and guidance
- guidance on how to raise concerns and report potential misconduct

# Acting with integrity

**We conduct business with integrity, and we uphold the law. We expect our people to know and understand the laws, regulations, and standards applicable to them and the work they undertake for Unilabs.**

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Our policies, procedures, and guidelines serve not only to ensure compliance with laws, regulations, and standards, but also to ensure that the work of Unilabs is carried out in the most efficient and consistent manner, ultimately ensuring the best outcome for our patients and customers. Consequently, our people are expected and required to understand and comply with all the policies, procedures, and guidelines applicable to them and their work.

While our values remain constant, our company and the environments in which we operate are ever-changing. So, in the event a situation is not covered by this Code or by our policies, procedures, or guidelines, we trust our people to follow the spirit of the Code, make sound judgement, to reach out when in doubt, and to always adhere to the law.

# Seek guidance

**We always seek guidance.**

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It is crucial that we acknowledge what we do not know and that we are alert and cautious when navigating outside of our domain of expertise. So when in doubt, and in addition to policy-based requirements to obtain internal approvals, we encourage our people to reach out and seek guidance from their Line Manager, their Legal and Human Resources business partner, or other experts, depending on the issue they are facing.





# Raise concerns

**We live the Code together. We rely on the integrity of our people and expect them to raise concerns of actual or potential misconduct or Code breaches.**



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Violations of our Code, policies, procedures, and guidelines can have serious consequences, not just for Unilabs as a business, but also for our people, patients, and customers. It is in the interests of us all that we enforce it fairly and firmly. Living and upholding the Code is a fundamental responsibility for each of us. Those who fail to comply with our Code, policies, procedures, and/or guidelines, or fail to report any instance that could reasonably be regarded as a violation, may face disciplinary measures including termination, and/or legal actions.

We champion transparency, open dialogue and encourage our people to raise their concerns by speaking with their Line Manager first. However, we also recognise that speaking up can be difficult sometimes, so our people can always raise their concerns:

- to their Legal business partner;
- to their Human Resources business partner;
- or anonymously via the [Integrity Line](#).

Regardless of the method chosen for raising concerns, we do not tolerate any form of retaliation or threatening behaviour against those who, in good faith, have made reports of known or suspected wrongdoings.

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**Learn more**  
[Workplace Knowledge Library](#)  
[Whistleblowing Policy](#)







# We are here for the people

## Equity, diversity, and inclusion

Diversity of minds, backgrounds, and experiences delivers different perspectives, which, in turn, lead to better outcomes and smarter solutions. Inclusion ensures that all of our ideas are heard and considered internally, which improves our ability to take the best decisions. We therefore believe that not only is it ethically right to be inclusive and to treat each other with dignity and respect, it is also essential for us to succeed as a business.

### How do we commit?

We listen to diverse opinions and perspectives with an open mind and with respect and are mindful of our potential biases.

We strengthen diversity throughout the employee lifecycle; recruiting, promoting, developing and rewarding people using objective and inclusive criteria.

We create a work environment of mutual **respect, trust, and equal access** to opportunity.

We leverage our unique strengths to excel, to be creative, and to innovate together. **This ensures we deliver the best quality and solutions** for our patients and customers.

### What behaviours are inconsistent with our commitments?

To single out, discriminate, and/or treat colleagues differently on the basis of characteristics such as race, gender, sexual orientation, religious beliefs, or employment status.

To use words, humour, gestures, or other acts or omissions, knowing they are **discriminatory or likely to be perceived as demeaning or belittling**.

Any kind of behaviour that could constitute **discrimination, bullying, or harassment**.

#### Learn more

[Unilabs Knowledge Library on Workplace](#)

**Seek guidance** about equity, diversity, and inclusion with your Line Manager or your Human Resources business partner.

**Raise concerns and report** incidents of discrimination, unfair treatment, and harassment to your Line Manager, your Human Resources business partner, or via the [Integrity Line](#).



## Human rights

Every company has a role to play in upholding human rights and fair labour practices. We consider it of utmost importance that our patients and customers know we are a responsible company that strives to recognise and protect the dignity of our people and those we work with. It is important for us to respect human rights at all times and continue to align our business practices to the UN Guiding Principles.

### How do we commit?

We never pay below minimum wages and strive to uphold **fair wages and proper working conditions**, ensuring that all appointments are made on freely agreed and fair terms and conditions.

**We respect our people's freedom of association** and right to engage in collective bargaining.

We neither use nor condone **any form of modern slavery**, including forced or child labour.

We ensure that **we are transparent** about our commitments with our patients and customers.

**We expect our business partners to commit** to behaviours which are substantially similar to those stated above.

### What behaviours are inconsistent with our commitments?

To require **excessive hours without appropriate compensation** or assessment of wellbeing and safety.

**To directly or indirectly engage in, or support, forced or child labour** within the company or anywhere in our supply chains.

**To refuse providing diagnostic services to any patient or customer** based on race, beliefs, gender, socioeconomic status, or other discriminatory criteria.

#### Learn more

[Unilabs Knowledge Library on Workplace](#)

**Seek guidance** about human rights and fair labour practices with your Line Manager or your Human Resources business partner.

**Raise concerns and report** incidents of suspected violations of human rights and fair labour practices to your Line Manager, your Human Resources business partner, or via the [Integrity Line](#).



## Political and religious neutrality

A company that is committed to delivering healthcare to all those in need cannot take decisions or actions based on political or religious preferences or beliefs, and this holds true for Unilabs as well as all its people. We fully respect our people's individual right to hold personal beliefs and to engage in corresponding activities outside of a professional setting, but it is paramount that this is clearly separated from activities and behaviours in a professional setting. This ensures that Unilabs' neutrality and inclusiveness in interactions with patients and customers is never called into question.

### How do we commit?

**We don't advocate, follow, or discriminate** on the basis of political views, religious beliefs, or association memberships, and remain at all times neutral during the performance of duties.

**We don't offer financial support** to political parties, campaigns, candidates, religious groups, or similar events.

**We remain neutral** at public or semi-public events and gatherings where we could be understood to be speaking or acting in a professional capacity or on behalf of Unilabs.

### What behaviours are inconsistent with our commitments?

**To sponsor or participate in events that are overtly political** in nature or affiliated with a specific political group.

To use the company communications, materials, or events to **promote or endorse a specific religion or belief system**.

To make statements, comments, or posts on behalf of the company **favouring or opposing specific political parties, candidates, or their policies**.

#### Learn more

[Unilabs Knowledge Library on Workplace](#)

**Seek guidance** about our policy of neutrality with Corporate Communications, the Chief Legal Officer or your Human Resources business partner.

**Raise concerns and report** incidents of suspected violations of our neutrality policy to Corporate Communications, the Chief Legal Officer, or via the [Integrity Line](#).



## Health and safety

A responsible company prioritises the safety of its people, because only when we are safe, can we be efficient and reliable. To protect the physical integrity and the mental wellbeing of our people, our customers, and our patients, we make safety at work our top priority at all times. We are committed to ensuring that our people return home safely after each work day.

### How do we commit?

**We remain vigilant at all times and speak up** if and when we detect any behaviour, equipment, process, or activity which could be considered unsafe.

**We intervene and act immediately** when unsafe behaviours, incidents, or near-misses occur, in order to safeguard the physical integrity of our people, our patients, and our customers.

**We analyse unsafe behaviours, incidents, and near misses occurring** during the performance of our duties, to learn from them and mitigate them in the future.

**We guide our patients and customers safely through their patient/customer journey** and inform all 'visitors' on Unilabs' premises of the health and safety procedures applicable to them.

### What behaviours are inconsistent with our commitments?

Not wearing personal protective equipment, using equipment improperly, **or ignoring safety procedures.**

Working **under the influence of alcohol or drugs.**

**Irregular management of hazardous wastes** and products (e.g., formaldehyde), or poor maintenance of equipment.

#### Learn more

[Unilabs Knowledge Library on Workplace Health and Safety Policy](#)

**Seek guidance** about health and safety with your Line Manager or your Health and Safety Officer.

**Raise concerns and report** safety incidents and near incidents to your Line Manager, your Health and Safety Officer, or via the [Integrity Line](#).





# We are objective and honest

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## Competition

Fair competition fosters innovation, improved efficiency, and better quality and service at lower prices. In doing so, it not only serves the best interests of our patients and customers, but ours as well, by driving us to continuously improve our business and offerings. In addition, competition laws are well established and enforced in the countries we operate in; we take pride in ensuring our people understand these well, and understand the risks (fines, reputation) that come with not following the rules scrupulously. We conduct our business with integrity, so we compete fairly.

### How do we commit?

We gain our **competitive advantage** through innovation, efficiency, and delivering the highest quality services to our patients and customers.

We do not seek to **gain any unfair or undue advantage**, and do not engage in anti-competitive practices, such as those listed below.

**We safeguard commercially sensitive information** and always act carefully when interacting with competitors.

### What behaviours are inconsistent with our commitments?

**Sharing commercially sensitive information with competitors**, such as information regarding pricing, strategy, product launches, and market insights.

Entering into **written or oral agreements with competitors, customers, or suppliers** that restrict or distort competition.

Agreeing with other companies to **not hire or solicit each other's personnel**.

#### Learn more

[Unilabs Knowledge Library on Workplace Competition Law Policy](#)  
[Professional Association Procedure](#)

**Seek guidance** about competition law and anti-competitive behaviours with your Legal business partner.

**Raise concerns and report** potential breaches of competition law or instances of anti-competitive behaviour to your Line Manager, your Legal business partner, or via the [Integrity Line](#).

## Conflict of interest

Conflicts of interest pose a direct risk to our patients, customers, and our business. We do not allow our professional judgement to be compromised by conflicting interests and we carefully and transparently manage all potential, actual, or perceived conflicts of interest that arise as a result of personal relationships and interests, financial relationships, or the engagements of our people.

### How do we commit?

We always consider our own **objectivity**, remain loyal, and act in the best interests of Unilabs, our patients, and customers.

We **promptly manage** any potential, actual, or perceived conflict of interest.

We **separate and distance ourselves** from any decision making or business assessments where we might have a conflict of interest.

We **strictly comply** with any remedial measures decided upon to address a conflict of interest.

We **stay alert to, and report**, any potential conflict of interest arising with our people, business partners, suppliers, customers, or healthcare professionals.

### What behaviours are inconsistent with our commitments?

Having an **undisclosed and unmanaged personal or financial interest** in our customers, business partners, or competitors, e.g., through the exchange of work services or investments, or a close personal relationship.

Having **family members or personal friends recruiting one another** or reporting to one another.

**Ignoring or disregarding a 'perceived' conflict of interest** in the eyes of our patients, customers, media, the public or the authorities.

#### Learn more

[Unilabs Knowledge Library on Workplace Conflict of Interest Procedure](#)

**Seek guidance** about conflict of interest matters with your Line Manager, your Human Resources business partner, or your Legal business partner.

**Raise concerns and report** actual, potential, or perceived conflicts of interest to your Line Manager, your Legal business partner, or via the [Integrity Line](#).

## Bribery and corruption

The trust we build with our patients, customers, business partners, and society at large is key to the continued success of our business. Acts of bribery and corruption are not only wrong and against the law, they undermine the trust and the independence of our decision making. We conduct business with integrity, and we do not trade that trust, or our ethical values, to gain improper advantage. Consequently, we have zero tolerance for any form of bribery and corruption.

### How do we commit?

We always act carefully and in accordance with the relevant policies and applicable laws when offering, giving, or accepting anything of value from, customers, business partners, or other third parties, in particular health care professionals (HCPs), health care organisations, and public officials.

We always avoid, step away from, and report interactions or situations which might be, or could give the appearance of, inducing or soliciting a bribe.

We do not make facilitation payments aimed at expediting government processing.

### What behaviours are inconsistent with our commitments?

Accepting or offering anything of value to/from business partners while discussing business opportunities with them (e.g., during a tender process).

Offering a fee above market value or other undue advantage to HCPs in exchange for increasing diagnostic test prescriptions.

Granting a donation to a customer or its owners, associations, foundations, or other related structures without following our internal policies.

Covering an HCPs' congress fee without following the internal policies.

### What is Corruption?

Corruption is the abuse of power or position for personal gain or the benefit of others. It entails various forms of unethical or illegal behaviour including bribery, embezzlement, influence peddling, nepotism and fraud, by individuals in positions of authority.

#### Learn more

[Unilabs Knowledge Library on Workplace Anti-Bribery and Anti-Corruption Policy Gifts and Hospitality Procedure](#)

**Seek guidance** about bribery and corruption with your Line Manager or your Legal business partner.

**Raise concerns and report** suspected incidents of bribery and corruption to your Line Manager, your Legal business partner, or via the [Integrity Line](#).

## Gifts and hospitality

Honest, lasting and balanced relationships cannot be bought. So, we build relationships with customers, business partners, HCPs, and other third parties with integrity and we do not buy favour. Gifts and hospitalities, if left unmanaged, generate a risk of influencing professional actions and decisions, even if unintended. It is therefore crucial that the practice of giving and accepting gifts and hospitalities remains rare, modest and proportionate. It must never be used to influence business decisions or anything that could call into question the objectivity, professionalism, and values of our people and our business partners (see also 'Conflict of interest' and 'Bribery and corruption').

### How do we commit?

We do not directly or indirectly offer or accept gifts and hospitality which could influence, or be perceived to influence, business assessments and decisions or violate any applicable laws.

We are transparent when offering and receiving gifts and hospitalities and always document these properly.

We exercise particular caution when engaging with health care professionals, health care organisations, and public officials who are often subject to stricter regulations and whose independence and reputation must remain untouched in all circumstances.

### What behaviours are inconsistent with our commitments?

Offering cash or cash equivalents (e.g., gift cards) to business partners or HCPs.

Offering lavish or frequent gifts or meals that may influence decisions or create a sense of obligation to reciprocate.

Inviting HCPs to an event with the sole purpose of entertainment.

#### Learn more

[Unilabs Knowledge Library on Workplace Gifts and Hospitality Procedure](#)

**Seek guidance** about gifts and hospitality with your Line Manager or your Legal business partner.

**Raise concerns and report** incidents of suspected breaches of our gifts and hospitality procedure to your Line Manager, your Legal business partner, or via the [Integrity Line](#).



## Fraud

Fraud can lead to substantial losses of money and trust and affects individuals, businesses, and governments alike. Fraud not only poses a significant risk to our reputation, business, and services, but it also carries the risk of civil and criminal liability for our people. Conducting our business honestly and with integrity requires a strong commitment to fight all kinds of fraud to preserve the integrity of our activities and to protect the trust of our patients, customers, business partners, and society at large.

### How do we commit?

We implement robust internal controls and regular audits to detect and prevent fraudulent activities.

We foster a culture of integrity, transparency, of “speaking up” and accountability through our policies and training, and make available a secure and confidential whistleblower system (Integrity Line) to strongly encourage the reporting of suspicious activities without fear of retaliation.

We remain alert to, and report, ‘red flags’ and to potentially fraudulent acts of others, because we understand that to retain the trust of our patients and customers, both Unilabs and our partners must rigorously protect their integrity.

### What behaviours are inconsistent with our commitments?

Intentionally submitting false invoices or overbilling for services or supplies.

Deliberately misrepresenting personal qualifications, accreditations, education, or experience.

Falsification of records, or theft of values or assets belonging to Unilabs.

### What is Fraud?

Fraud can be defined as any intentional act designed to deceive others, resulting in an unfair or unlawful financial or personal gain to oneself, or causing a loss or risk of loss to another. It includes false representations, omissions or manipulations of information to mislead individuals or organisations.

#### Learn more

[Unilabs Knowledge Library on Workplace Anti-Fraud Policy](#)

**Seek guidance** about fraud with your Line Manager or your Legal business partner.

**Raise concerns and report** suspected fraud to your Line Manager, your Legal business partner, or via the [Integrity Line](#).

## Money laundering

Money laundering poses a substantial risk to society by facilitating and perpetuating criminal activities and exacerbating social inequalities. For these reasons, it is imperative we do not unwittingly facilitate, or become associated in any way, with money laundering activities. Furthermore, any failure to prevent or detect money laundering activities also exposes Unilabs to reputational damage, as well as to risks of civil and criminal liability.

### How do we commit?

We implement stringent anti-money laundering (AML) policies and select and monitor our customers, suppliers, and business partners with due care.

We ensure that all **our transactions are recorded accurately** and regularly audited.

We train our people to **recognise and report suspicious activities** and remain alert to 'red flags' and any potentially suspicious activities of our business partners.

We **collaborate with law enforcement** to ensure compliance and integrity in all financial dealings.

### What behaviours are inconsistent with our commitments?

Wilfully ignoring or **accepting unusual payment methods** without due inquiries and verifications.

**Changing the payment recipients** from a customer corporate account to the personal account of the customer manager.

**Structuring transactions to evade reporting requirements**, or otherwise misrepresenting information to regulatory authorities.

### What is Money Laundering?

Money laundering can be **defined as the process of concealing the origins of money obtained illegally**, typically by means of transfers involving foreign banks or legitimate businesses.

#### Learn more

[Unilabs Knowledge Library on Workplace Anti-Money Laundering Policy](#)  
[Third Party Risk Management Policy](#)

**Seek guidance** about our anti-money laundering procedure with your Line Manager or your Legal business partner.

**Raise concerns and report** suspected money laundering activities to your Line Manager, your Legal business partner, or via the [Integrity Line](#).

## Quality

As a provider of medical diagnostic services to our patients and customers, we understand the importance of treatment decisions based on trustworthy, high quality, diagnostics. We therefore hold ourselves to the highest medical, ethical, and scientific standards; foster an environment of continuous scientific and quality improvement throughout our full value chains; and at all times seek to provide the quality diagnostic services we would expect to receive as patients ourselves.

### How do we commit?

We leverage advanced medical technologies and innovations to enhance diagnostic accuracy, treatment speed and effectiveness, and patient outcomes.

We work to implement and continuously improve the Quality Management and Control Systems to enhance patient care and satisfaction.

We regularly measure and analyse our patients' and customers' satisfaction and implement improvements based on their feedback.

### What behaviours are inconsistent with our commitments?

Circumventing or otherwise compromising systems, procedures, or laboratory quality standards for any reason whatsoever.

Failing to report a quality incident as soon as it has been identified.

Allowing personnel to perform duties which are not covered by their job description, qualifications, accreditations, or licenses.

Acting as though quality is the responsibility of the Quality Department, rather than being everyone's responsibility.

#### Learn more

[Unilabs Knowledge Library on Workplace](#)

**Seek guidance** about quality and standards with the Quality business partner.

**Raise concerns and report** potential quality deficiencies or incidents to your Line Manager, your Quality manager, or via the [Integrity Line](#).





# We are accurate and protective

## Books, records, data, and reports

High quality books, records, data, and reports ensure financial transparency and accuracy, thereby contributing to building trust with partners and customers. For this reason, Unilabs is committed to ensuring that it maintains high standards in its bookkeeping and recordkeeping, allowing us to make informed business assessments and decisions. Ensuring robust data and accurate reporting also allows Unilabs to provide high-quality and reliable diagnostic results to our patients and customers. Proper oversight and accountability of Unilabs' assets also helps us meet our financial, legal and regulatory obligations.

### How do we commit?

We implement **rigorous accounting practices** and record and document all transactions and related business rationales in an accurate, transparent, and timely fashion.

We maintain **effective controls over financial reporting** to ensure a complete and accurate record of our financial transactions, ensuring that we remain a trusted partner.

We establish **clear policies and procedures for documentation and recordkeeping**, and regularly conduct audits to ensure compliance therewith. We maintain accurate medical records and secure our data in accordance with internal procedures and applicable laws and regulations.

We uphold a **culture of integrity and accountability**, are transparent, and cooperate openly and honestly with internal and external auditors and authorities.

### What behaviours are inconsistent with our commitments?

Purposefully **deleting data or files, in whole or in part**, with the intention of hiding or obscuring information, or covering up actions or omissions.

**Back-dating documents**, signatures, reports and any other documents, whether internal or not.

**Approving, deciding on, or signing off** on matters that fall under the responsibility or authority of another department or person.

See also 'Quality' and 'Fraud'.

#### Learn more

[Unilabs Knowledge Library on Workplace Accounting Standards Record-keeping Procedure](#)

**Seek guidance** on documentation of medical data and reports with the Medical Department and on accounting standards, finance, and tax, with your Finance business partner.

**Raise concerns and report** potential incidents of omissions, misrepresentation of accounts, tax evasion, or other flaws in our records to your Line Manager, your Legal business partner, your Finance business partner, or via the [Integrity Line](#).



## Confidentiality

Respecting confidentiality in business is crucial to ensuring that personal information, trade secrets, or competitive information does not fall into the wrong hands. At Unilabs, we are responsible for vast amounts of information of varying degrees of sensitivity, and we must avoid the disclosure of any data that could cause harm to our people, patients, customers. Understanding and respecting confidentiality allows us to foster trust and meet our legal and contractual obligations toward our patients and business partners.

### How do we commit?

**We implement stringent security measures**, including encryption and access controls, to safeguard data against unauthorised access.

**We remain alert to the level of confidentiality/classification** of the information we are exposed to and act accordingly.

**We only disclose confidential or sensitive information on a need-to-know basis.** Those with a legitimate need to know the information are subject to obligations of confidentiality and limited use.

**We acknowledge that our patients and customers rely on us** to keep their personal information safe and secure at all times and ensure that any exchange of confidential information with business partners and third parties is covered by appropriate non-disclosure provisions.

### What behaviours are inconsistent with our commitments?

**Disclosing confidential or sensitive information** to colleagues, customers, business partners, or third parties without a legitimate need to know, authorisation, or protection.

**Failing to adhere to security protocols and handling information carelessly**, e.g., keeping unnecessary copies, leaving confidential documents unattended, or discussing confidential matters in public spaces.

**Using confidential information for personal gain**, to benefit third parties, or in any way that goes against the interests of Unilabs.

### What is Confidential information?

**Confidential information is sensitive information** that is intended to be accessed only by certain individuals or organisations. It requires protection by confidentiality as its disclosure could lead to privacy breaches, financial loss, or a competitive disadvantage.

**Learn more**  
[Unilabs Knowledge Library on Workplace](#)

**Seek guidance** about confidentiality with your Line Manager, your Legal business partner, or your IT business partner.

**Raise concerns and report** potential breaches of confidentiality to your Line Manager, your Legal business partner, or via the [Integrity Line](#).

## Data privacy

Safeguarding personal information is not only essential for upholding privacy rights and maintaining trust, but also for preventing identity theft, fraud, or unauthorised system access that could harm individuals and their safety. In the diagnostics area, it is closely linked to our obligation to medical secrecy. Protecting the personal information of our people, patients, and customers is therefore a prerequisite for everything we do. Any breach of privacy risks harming individuals and jeopardising our reputation and business integrity. Therefore, we collect, process, and retain personal information in strict accordance with the law to ensure trust and security in all our operations.

### How do we commit?

We only process personal information when there is a legitimate reason to, and otherwise minimise data exposure.

We guarantee that **any sharing of personal information with third parties includes sufficient and appropriate contractual and structural safeguards.**

We commit to **informing individuals about their data and respecting their rights** in order to maintain trust and ensure that they remain fully aware and in control of their personal information at all times.

### What behaviours are inconsistent with our commitments?

**Collecting and retaining personal data** beyond the intended purpose.

**Using weak or reversible data protection techniques** that can easily compromise the privacy of corresponding individuals.

**Processing personal data without ensuring that the individuals concerned are properly informed** through easily accessible information notices.

### What is Personal Data?

Personal data is any information relating to an identified or identifiable individual, including **direct identifiers such as name, address and social security number**, but also indirect identifiers such as IP addresses or data that, when combined with other information, can reveal a person's identity. It also includes health related information.

#### Learn more

Unilabs Knowledge Library on Workplace  
Data Protection Governance Policy  
Global Data Transfer Procedure  
Global Personal Data Breach Procedure

**Seek guidance** about data privacy with the Data Protection Officer ([dpo@unilabs.com](mailto:dpo@unilabs.com)), your Local Data Privacy and Compliance Officer, your Line Manager or your Legal business partner.

**Raise concerns and report** potential breaches of data privacy through an internal platform ([Link](#)).

**Exercise your rights** related to your personal data through the following Privacy Webform ([OneTrust](#)).

**Any data protection** complaint can be addressed to the Data Protection Officer (DPO) at the following email address: [dpo@unilabs.com](mailto:dpo@unilabs.com).

## Information technology and security

Our computers, devices, and connections are essential for us to carry out our operations and ensure the best quality of care to our patients. Use of assets for private purposes during personal time is tolerated as long as such use conforms to Unilabs policies (e.g., occasional use, no illegal activities, inappropriate content, personal business or freelance work) and does not risk materially impacting Unilabs (e.g., by excessive storage or network usage, downloading unauthorised software). Unilabs reserves the right to inspect, monitor, and delete information stored and processed on Unilabs' computers and other devices, regardless of whether such information is work-related or generated for private use.

### How do we commit?

We use computers, devices, and networks **in an appropriate manner and for appropriate purposes.**

**We use the proper security measures**, such as passwords, PIN locks, and VPNs, and we do not share these with anyone.

**We use our IT material and technologies with due care**, always bearing in mind that we are responsible for securing and protecting our patients' and customers' data.

**We apply the rules set out in our Cybersecurity Charter** when using consumer devices (that is, devices owned by our people and not the company) for business purposes.

### What behaviours are inconsistent with our commitments?

**Excessive use of our computers, devices, and networks to access personal platforms**, such as social networks and personal email accounts.

**Trying to disable or circumvent IT security controls.**

**Using computers, devices, and networks to access or share inappropriate content**, e.g., sexual, discriminatory, or slanderous.

**Allowing an external party to connect removable media**, such as a USB stick, to our devices.

#### Learn more

[Unilabs Knowledge Library on Workplace Acceptable Use Policy – Internet Usage](#)  
[Unilabs Cybersecurity Charter](#)

**Seek guidance** about the proper use of IT, devices, and security measures with your Line Manager or your IT business partner.

**Raise concerns and report** potential breaches of cyber security through our internal platform ([Link](#)). For lost or stolen computers and devices including external storage, please contact your Line Manager or your IT business partner.

## Other assets

All companies have a role to be responsible stewards of their assets. This includes being mindful of sustainable practices and the need to preserve our planet's resources. We also believe that the way we use our assets directly impacts our efficiency and therefore, our success. We value, preserve, and optimise the use of all our assets in order to carry out our services for patients and customers safely and effectively, and to protect our assets from any misuse, loss, damage, or theft.

### How do we commit?

We handle our assets with due care and as if they were our own, considering the nature of the assets and their intended use.

We follow applicable processes to identify, document, and protect all our assets from loss, damage, misuse, theft, fraud, or waste.

We use our assets and, where appropriate, return them at the end of their life to the responsible manager, thereby contributing to a business that is more effective, respectful, and sustainable every day.

### What behaviours are inconsistent with our commitments?

Using assets carelessly without regard for their intended longevity or reliability.

Disregarding maintenance intervals, repair and maintenance requirements, and using non-original equipment manufacturer (OEM) spare parts.

Allowing use of company assets by third parties without a written contract in place and without due consideration of such use by the other party.

### What are Assets?

Our assets can be defined as the company's physical property (properties, facilities, interior, equipment, computers, devices etc.), whether owned or leased, intangible assets (trade secrets, know-how, copyrights, trademarks, goodwill, etc.), and financial property (cash, accounts receivable, inventory, bonds, etc.).

See also 'Health and safety', 'Books, records, data, and reports', 'Confidentiality', 'Data privacy', and 'Information technology and security' for guidance on how to handle our different kind of assets.

#### Learn more

[Unilabs Knowledge Library on Workplace](#)

**Seek guidance** about how to protect our assets with your Line Manager or your Finance business partner.

**Raise concerns and report** any loss, damage, misuse, theft, fraud, or waste of our assets to your Line Manager, the Site Manager, or via the [Integrity Line](#).







# We are reliable and responsible

## Ethical business relations

As a large multinational, we have a responsibility to strive for positive change through all our activities and interactions. As we work to help people live healthier lives, we believe in holding ourselves and our business partners accountable for emulating our company values and ethical standards throughout the value chain.

### How do we commit?

We uphold **ethical standards** in all business interactions, fostering relationships based on integrity, respect, and transparency.

We prioritise **fair and open interactions with all stakeholders**, promoting honest and arms-length relationships.

We leverage our procurement strategy to select **business partners who share our ethical values** and commitment to sustainability and social responsibility.

We seek to **ensure that our business partners share the same expectations** regarding ethical values throughout their own supply chain.

### What behaviours are inconsistent with our commitments?

**Joining industry associations without prior vetting internally**, receiving corresponding internal training, and otherwise following corresponding processes and policies.

Following **business practices that have not been reviewed and approved internally**, even if such practices are known and followed in the industry.

Working with suppliers who we know follow values and **business principles which are in conflict with those of Unilabs**.

#### Learn more

[Unilabs Knowledge Library on Workplace](#)

[Third Party Code of Conduct](#)

[Third Party Risk Management Policy](#)

**Seek guidance** on how to engage with new business partners with your Line Manager, your Legal business partner, or your Procurement business partner.

**Raise concerns and report** potential violations of our values to your Line Manager, your Procurement business partner, your Legal business partner, or via the [Integrity Line](#).

## Sponsorship and charitable donations

In line with our values, we believe it is important for our company to actively contribute to the physical and social wellbeing of people and communities. We therefore engage in charitable activities, such as donations within a selected set of priority areas of engagement. We also enter into sponsorship agreements with selected partners and use these as an opportunity to promote the activities of such partners, as well as the services of Unilabs.

### How do we commit?

We perform due diligence before setting up any donations or sponsorship agreements and seek to sponsor and donate to meaningful causes which align with our values, our ethics, and our purpose.

We ensure that sponsorships or donations are approved in accordance with our internal processes, thereby maintaining accountability and transparency.

We ensure regular audits on our sponsorship and donation activities and strive to ensure our contributions are used responsibly and to create a positive social impact.

### What behaviours are inconsistent with our commitments?

Making contributions or donations based on personal relationships or to derive other benefits, rather than doing so for meaningful causes.

Allowing decisions on sponsorships or donations to be influenced by people in situations of conflict of interest, e.g., making donations to associations or foundations managed by people holding senior positions with customers or business partners.

Failing to disclose the intended use of the funds or failing to check that the contribution has been used in the manner agreed, thereby allowing for potential misallocation of the funds.

#### Learn more

[Unilabs Knowledge Library on Workplace Anti-Bribery Anti-Corruption Policy](#)  
[Delegation of Authority](#)

**Seek guidance** about sponsorships and charitable donations with your Line Manager or your Legal business partner.

**Raise concerns and report** incidents of potential breaches of our policy to your Line Manager, your Legal business partner, or via the [Integrity Line](#).

## Communication and social media

**Not all publicity is good publicity. Managing and protecting our reputation is crucial for maintaining stakeholder trust. A strong reputation attracts top talent, fosters beneficial partnerships, and enhances competitive advantage. Conversely, a damaged reputation can lead to financial loss, legal issues, and diminished stakeholder confidence. Therefore, every action of our people contributes to upholding Unilabs' reputation. This is the case whether our people are present at an external speaking engagement, course, seminar, trade association event, or other physical or online social gathering.**

**When acting in a private capacity on a professional platform, such as a company social media page, it is important that our people do not engage in any behaviour which might reflect poorly on Unilabs.**

### How do we commit?

We seek the **prior written approval from Corporate Communications on any public response, media enquiry or when giving interviews and participating in events.** The appropriate guidance and support will be provided by Corporate Communications and is to be followed at all times.

**We reach out to Corporate Communications when we detect misleading and inaccurate public information in order for them to take the necessary appropriate measures.**

We always demonstrate **integrity and professionalism when communicating externally.**

### What behaviours are inconsistent with our commitments?

Making, posting, or **releasing statements on behalf of Unilabs without prior written authorisation** from Corporate Communications and Legal.

**Posting, sharing, or discussing confidential information**, including commercially sensitive information and personal information (see also 'Confidentiality', 'Competition' and 'Data privacy' sections herein).

**Posting, sharing, or discussing content in any way that might harm Unilabs' reputation** or violate this Code, such as statements which are discriminatory, offensive, or misleading (see also 'Human rights' and 'Equality, diversity, and inclusion').

#### Learn more

[Unilabs Knowledge Library on Workplace External Communications Policy](#)

**Seek guidance** on communication and matters relating to social media with your Line Manager or the Corporate Communications Department.

**Raise concerns and report** incidents of inappropriate and misleading statements to your Line Manager, the Corporate Communications Department, or via the [Integrity Line](#).

## Corporate Citizenship

Corporate Citizenship represents the integration and balance of environmental, social, and governance aspects within business management. At Unilabs, our goal is to ensure that our growth and investment opportunities are balanced with our ambitions to minimise our impact on the planet while generating positive impact to our patients, customers, employees, suppliers and local communities. If we do this well, we know our shareholders and investors will be rewarded too.

### How do we commit?

We integrate sustainability into Unilabs' business strategies by **developing impactful actions associated with the UN Sustainable Development Goals** and seeking alignment with international best practices.

**We improve resource efficiency by reducing, waste, optimising energy and water usage**, and strive to reduce our carbon footprint and implement circular economy practices such as recycling and reusing materials.

**We put care before profit**, because we believe that private healthcare companies can, and must, be a force for good in society.

### What behaviours are inconsistent with our commitments?

**Working with partners who do not adopt sustainable practices** across the supply chain, don't source materials responsibly or promote fair labour conditions.

**Unwittingly promoting excessive prescriptions** or overconsumption of services, thereby potentially generating inefficient use of public funds.

**Establishing schemes which marginalise our workers** and seek to avoid social contributions, taxes, and the like.

#### Learn more

[Unilabs Knowledge Library on Workplace](#)

**Seek guidance** about sustainability with your Line Manager.

**Raise concerns and report** incidents of potential breaches of our policy to your Line Manager, your Legal business partner, or via the [Integrity Line](#).

We, the Unilabs Leadership Team, are committed to upholding these principles in every decision, action, and interaction, ensuring integrity remains the foundation of our business. These values and beliefs are not just words on paper – they define who we are and how we serve our employees, patients, customers, and communities.

**Badhri Srinivasan**  
Executive Chair



**Alessandre Keller**  
Chief Market Officer



**Carsten Højlund**  
Chief Financial Officer



**Catherine Parry**  
Head of Communications



**Johannes Lechnowitsch**  
Chief Legal Officer



**Robin Dargue**  
Chief Data and Information Officer



**Shalinee Basak**  
Chief Human Resources Officer



**Steffen Risager**  
Chief Transformation Officer



**Thomas Lindahl**  
Chief Medical Officer





