

Code of Ethics

The Employer

- The rights of every employee will be respected as incorporated within the Vygon (UK) Ltd Equal Opportunities and Diversity Statement:
 - At Vygon (UK) Ltd everyone, regardless of circumstance, will be treated with dignity and consideration
 - Vygon (UK) Ltd works hard to create an environment that will foster mutual trust, openness and respect
 - Vygon (UK) Ltd employees are recruited, promoted and rewarded on the basis of merit alone
- Vygon (UK) Ltd is an equal opportunity employer. All Vygon (UK) Ltd employees will be treated fairly and without discrimination regardless of race, gender and transgender, disability, age, sexual orientation and religion or belief
- Vygon (UK) Ltd recognises that people with different backgrounds, talents, skills, attitudes and experiences bring fresh, independent knowledge and experience
- Vygon (UK) Ltd is committed to encouraging, nurturing and promoting appropriate talents, skills, attitudes and experiences
- Vygon (UK) Ltd respects the right of employees to join associations of their own choice
- Employees should report any violations of this code

The Company

- Vygon (UK) Ltd is committed to the promotion of the Code of Ethics to those with whom we do business
- Vygon (UK) Ltd insists upon the highest standards of personal and professional ethics. We will:
 - Practice our business with integrity, honesty and openness

- Respect the different cultures and the dignity and rights of individuals
- Vygon (UK) Ltd will promote honest and ethical conduct, including the ethical handling of conflicts of interest
- Vygon (UK) Ltd will promote full, fair, accurate, timely and understandable disclosure in company reports
- Vygon (UK) Ltd will promote compliance with applicable laws and governmental rules and regulations
- Vygon (UK) Ltd will promote prompt internal reporting of violations of this code

The Customer

- Vygon (UK) Ltd is committed to offering products and services designed to improve the health and quality of life of patients or to compensate for handicaps and declining functions
- Vygon (UK) Ltd undertakes to:
 - Continuously foster innovation with this aim in mind
 - To abide by the regulations related to quality and safety that have been set-up and which we have established for the patient's benefit
- Vygon (UK) Ltd recognises the increased, informed input of the patient, whether directly or through the intermediary of representative associations

The Healthcare Professional

- Vygon (UK) Ltd undertakes to continue in the development of research into improving products and initiating innovative products to the healthcare market
- Vygon (UK) Ltd undertakes to place top quality products on the market which meet the national, European or international regulatory requirements applicable to the field concerned

- Vygon (UK) Ltd undertakes to monitor the products placed on the market and to guarantee the traceability of the products concerned and to take measures laid down by the laws, in particular with respect to information should an incident occur
- Vygon (UK) Ltd undertakes to comply with current regulations regarding promotion and advertising, whether these come under the Public Health Code, commercial law or self-imposed standards
- When operating trading practices Vygon (UK) Ltd undertakes to abide strictly by:
 - The Consumer Protection from Unfair Trading Regulations 2008 (UK)
 - Guidelines, procedures and recommendations drawn up, where appropriate, by SNITEM

The Healthcare Market

- Vygon (UK) Ltd will accept, manage and overcome the inevitable pressures of competition that are likely to appear between companies at commercial level and in the field
- Vygon (UK) Ltd undertakes to observe conduct that excludes any disparagement, any incorrect information and any unfair action, with respect to their competitors
- Vygon (UK) Ltd agrees to any individual and collective duties without prejudice in the observance of the competition law and any other relevant National legislation
- Vygon (UK) Ltd undertakes to uphold and promote the image of the healthcare profession and to contribute to enhancing the influence of the Medical Technology Industry



Health and Safety

- Vygon (UK) Ltd is committed to the application and enforcement of legislation under the Health and Safety at Work etc. Act 1974, which is incorporated within the Vygon (UK) Ltd Health and Safety Policy

Community

- Vygon (UK) Ltd employees will act in ways that are beneficial to the quality of life in the communities where our employees live and work

Environment

- Vygon (UK) Ltd will display and promote a responsible approach to environmental sustainability, which is incorporated within the Vygon (UK) Ltd Environmental Policy
- Vygon (UK) Ltd will employ, where practical, technologies and promote practices that minimise our environmental impact

UN Global Compact

- Vygon (UK) Ltd are a formal signatory to the United Nations Global Compact, and its ten principles are incorporated within the Vygon (UK) Ltd Code of Conduct
- Vygon (UK) Ltd will endeavour to ensure all ten principles are employed throughout the supply chain in which we are involved

Signed



Les Davies
 Managing Director
 Vygon (UK) Ltd