

Getinge Global Policy

# **Communication Policy**

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Version v2

Adopted by the Board of Directors 26 April 2023

## 1. Summary

The objective of this Communication Policy is to contribute to a correct and long-term effective exchange of information within Getinge and its employees and between the company and the company's external stakeholders. Communication in accordance with the Communication Policy contributes to increased confidence in management, employees and owners and enhances knowledge of the company's profile, goals and objectives. It further ensures consistent communication with the operating environment in accordance with the company's strategies. Information within Getinge is ultimately intended to support the company's vision, mission and strategies. In addition it should strengthen Getinge's reputation and brand and counteract the risk of a decline in trust.

Getinge's Communication Policy has been established by the Board of Directors in accordance with applicable listing requirements with a view to meet legal requirements and to comply with applicable stock market regulations.

## 2. Scope

This Policy is valid for all Getinge companies, its subsidiaries and joint operations (jointly "Getinge") and applies to all employees, as well as consultants and agency personnel who work at Getinge premises or under the direction of Getinge (all referred to in this policy as "employees").

This Policy provides an overview of Getinge's principles covering both external and internal communication to make sure it is performed in a coordinated, efficient and professional manner. In order to support the organization internally in communication, two supporting directives have been developed as part of this overall Communication Policy. Also, matters of inside information are addressed by Getinge's Insider Policy.

All employees and members of the Board are expected to follow this Policy as well as applicable directives in all communication, internally and externally.



## 3. Principle

The Communication Policy applies to all written statements in annual reports, interim reports, press releases, letters to shareholders or employees, statements from management, information on the Company's digital communication platforms, information in public registers and other content in both external and internal communications.

The policy also covers all verbal statements at group or individual meetings with analysts and investors, telephone conversations with analysts and investors, speeches by company management, interviews with the media and at press conferences, and all other external or internal communications and statements that are to be executed.

In all situations where any form of communication is to take place, regardless of whether it is through written or oral communication and regardless of choice of medium and recipient, it must be considered how the communication affects the company as a whole. All persons must in each situation evaluate the impact and consequences of the communication. When handling inside information, each person has an independent responsibility to ensure that they comply with relevant rules and requirements.

The guiding principles for Getinge's communications are to:

- Communicate in an open, reliable, well-structured and transparent way, both internally and externally;
- Treat all stock market stakeholders equally;
- Disseminate all inside information timely and accurately;
- Fulfil legal requirements and comply with applicable stock market regulations;
- Uphold a high level of ethics;
- Ensure the reliability of information by maintaining specific communication channels and procedures;
- Ensure a consistent and aligned communication to protect and promote our company image and business in a proper and consistent manner.

### **External communication**

External communication relates to communication that is intended to reach one or more target groups outside Getinge, such as the media (which is both a channel and a target group), customers, existing and potential investors, the capital market, authorities and the general public. The mission of Getinge's external communication is to support the business in reaching its overall objectives by developing and maintaining good relations with important stakeholders and by increasing knowledge and awareness of the company and its operations.

All handling of inside information are encompassed by the specific rules set forth in Getinge's Insider Policy. In addition, the External Communication Directive contains certain routines for disclosure of inside information. These routines constitutes a complement to, and are subordinated, the rules on handling of inside information in the Insider Policy.

Only spokespersons appointed in section 4 have a mandate to make official statements on behalf of Getinge and/or its subsidiaries and joint operations within the individually defined areas set forth in the section.



See further: External Communication Directive and Insider Policy

#### **Internal Communication**

The mission of internal communication is to support Getinge in realizing its objectives by providing employees with information about Getinge's objectives, strategy, operations, results as well as how to realize these objectives. The internal communication is limited by the rules of disclosure of inside information described in Getinge's Insider Policy, which means that information constituting inside information cannot be communicated freely internally.

Internal communication is directed primarily to Getinge's employees. This audience can be divided into two subgroups:

- managers and/or other key employees;
- all employees

Considering the limitations stated by the rules of inside information, Getinge's employees must secure a continually open and interactive flow of information at and between each organizational level, supported by adopted procedures and flexible and adequate channels.

See further: Internal Communication Directive

## 4. Roles and Responsibilities

#### **External communication**

The **Board of Directors** is ultimately responsible for Getinge's strategy and organization and shall ultimately monitor the administration of and compliance with the Communication Policy.

The **Chairman of the Board** is the Board's spokesperson and responsible for issuing statements to Getinge's external stakeholders on ownership issues and owner relations. The Chairman of the Board may also issue statements on issues related to the company's business. Other Board members must refer such matters to the Chairman of the Board or the President & CEO.

The **President & CEO** is ultimately responsible for all matters of communication. The President & CEO has ultimate responsibility for contacts with the media and is the primary spokesperson for all issues concerning the company as a whole. The President & CEO may delegate the role of spokesperson as well as strategic and operational implementation of communication activities to other employees. In the first instance such delegation is to the Executive Vice President Brand & Communication, who in turn can further delegate.

The **Executive Vice President Brand & Communication** leads the communications and is responsible for planning and steering of all of Getinge's communication.

**Corporate Communications** is responsible for planning, coordinating, steering and implementing communication in accordance with this Communication Policy.

The **Chief Financial Officer** (CFO) is responsible for all information about and related to the company's financial position and results in press releases, financial reports and other information material. The CFO is responsible for preparation of financial information in interim reports, financial statements and annual reports. The CFO is responsible for remaining continuously up to date with



the legal and stock market requirements applicable to the company's communications. The CFO shall in cooperation with the President & CEO and the Executive Vice President Brand & Communication , ensure that Getinge performs its communications obligations in accordance with the applicable laws and stock market regulations, including the listing requirements and generally accepted stock market practice. In so far as the CFO deems necessary, the CFO shall seek legal advice to ensure such compliance.

None of the company's employees are authorized to speak on behalf of Getinge regarding financial and share-price sensitive matters, unless he or she has been appointed to do so by the President & CEO or the CFO in relation to the financial position.

Other members of the Getinge Executive Team are responsible, in their respective areas, for adapting and following the principles of the Communication Policy, as well as for ensuring that the information used in the communication within their respective area is correct, relevant, clear and not misleading.

#### **Local matters**

The spokesperson for local matters that are deemed to have the potential to become matters of global interest shall make decision on such matters in consultation with the President & CEO, CFO and/or the Executive Vice President Brand & Communication, as relevant.

Changes in local operations, such as divestments, a major order, a minor order that may lead to major commitments and the penetration of new markets are examples of matters of global interest in which the President & CEO, CFO and/or the Executive Vice President Brand & Communication shall be the spokesperson.

For local matters that are only deemed to be of local interest, the local President or appointed spokesperson shall be the company's spokesperson towards the local media.

#### Internal communication

Internal information is an integrated part of **all managers'** overall responsibility. The managers must adapt and communicate Getinge's strategy and objectives. Furthermore, each manager is responsible for informing employees of matters that affect their work and organizational function.

**All employees** are responsible for actively obtaining information about the company and their function via the internal communication channels. Employees also have a responsibility to communicate with their managers and colleagues and thereby keep themselves informed.

## 5. Breaches against the Global Policy - Speak Up

Do not hesitate to raise a concern. Any Getinge employee who suspects violations of this Global Policy is expected to speak up and raise the issue to their line manager, to the Ethics and Compliance Office, or to use the Getinge Speak Up Line. The Getinge Speak Up Line is available on Getinge internal and external webpages. At Getinge we do not accept any form of retaliation against someone who speaks up, expressing concerns or opinions.

See further: Global Speak Up and Non Retaliation Directive



### 6. Framework

This Policy is part of Getinge's Governance Framework, which includes:

- Code of Conduct, strategic framework, Policies approved by the Board of Directors,
  Directives approved by the President & CEO or direct reports to the President & CEO as well as local instructions
- Decisions made by the President & CEO or otherwise under the Delegations of Authority as approved by the President & CEO
- The Ethics and Compliance Office is responsible for ensuring that the latest version of this Policy is published and available to all employees on GetBasics.
- This Policy will be reviewed every other year or as needed.
- The original language of this Policy is English.

### 7. Guidance and assistance

If you have questions on this Global Policy, please contact

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#### **Related Documents**

- Code of Conduct
- Insider Policy
- External Communication Directive
- Internal Communication Directive