

What we aim for – and if it does not work



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This brochure comprise information about what Capio aims for in terms of business ethics and the policies adopted to strengthen the work to uphold high standards for openness, honesty and accountability in every day work.

EWC (European Works Council) is a collaborative body within the Capio Group for mutual consultations between employee representatives from all countries of operations and the Capio management – a dialogue with the ultimate objective of exchanging experience in order to improve the quality of the care offered to patients.

Welcome to Capio!

Capio's first priority is our patients. We are here to provide the best possible healthcare for every patient treated by Capio. We also know that quality is the starting point for everything we do when it comes to medical treatment but also in how we work together and relate to patients, employees and to external stakeholders. This culture is rooted in some basic beliefs – our Values – Quality, Compassion and Care which is the foundation for our activities in Capio.

We have set high ambitions for business ethics and the conduct of openness, honesty and accountability in Capio. This is reflected in our Mission, vision and values as well as our Code of conduct. This is what we aim for in Capio, this is what managers and employees are required to adhere to. But what if it goes wrong?

To further strengthen the high standards in both our professional and ethical conduct in Capio, we have adopted a set of new policies for anti-bribery and anti-corruption as well as whistle-blower function routines. The aim of these policies is to further strengthen Capio's high ambitions to conduct sound business ethics and emphasise the importance of openness, honesty and accountability throughout the whole of Capio.

The whistle-blower function, together with our principle for freedom to disclose information constitute a thorough system for Capio employees to air any anomalies in our business with serious risk for damage, that has not been corrected through regular reporting routines.

Of course we aim to do the right things at first hand but if that is not the case we have this "safety valve" not to risk personal- or patient safety, or to avoid any other wrongdoings in Capio. This folder lays out the founding principles for what we aim for and if it does not work. A full disclosure of new policies and instructions how to proceed, is found in this brochure.

We have a mutual responsibility to uphold and develop a sound business culture in Capio thus securing good treatment of our patients.



Thomas Berglund

Thomas Berglund, CEO Capio AB



Kevin Thompson

Kevin Thompson, Employee Chairman Capio EWC

Mission, Vision & Values

Mission

Cure. Relieve. Comfort.

We have a mission: to cure, relieve and comfort anyone seeking medical care from Capio. This is also what is stated in the oath created around 2,400 years ago by Hippocrates, the father of medicine.

Modern medical developments mean that more and more diseases can now be cured, or at least eased. At Capio, we are doing everything in our power to make the most of this development. We use all the knowledge and experience of our staff to ensure that new advances benefit patients as quickly as possible. New, improved methods and procedures are only viable when they are implemented in day-to-day medical care.

There are times when a cure is impossible and relief is merely temporary. In these cases, comfort is an important part of the care offered. We must be able to see the person behind the illness; see their anxiety and sorrow, and do everything in our power to support them. It is important to remember this personal aspect of medical care in the face of the advanced technology used today, not to mention the thousands of sophisticated treatment methods that are part of modern healthcare.

Vision

The best achievable quality of life for every patient

The aim of all healthcare work is to ensure the best achievable quality of life for each and every patient. Many make a full recovery, while others have the chance of a more normal life.

A patient's self-esteem and dignity can also be respected and reinforced even as his or her life draws to a close. Our key motivation is quality, compassion and care.

Values

The foundation of our activities

Quality: Our top priority is medical quality – on which we never compromise. We must remember that what may be routine for healthcare staff is often a unique experience for patients. This is why the highest medical quality on its own is not enough. We must also show compassion and care, which are our other two core values.

Compassion: Today many medical advances are made via technically sophisticated methods. This is important for medical results, although the human aspect of healthcare can never be replaced by medical drugs or machines. Compassion and understanding the fears and vulnerabilities of our patients are therefore just as important to how patients experience medical care.

Care: Our understanding of the patient's situation enables us to show care for both major concerns and minor queries. Caring for patients, of course, but also taking the care to do our everyday work well in relation to both our colleagues and Capio. We know that each and every one of us makes a difference and that each of us is needed for the team to function.

The Capiro model

What do we wish to achieve?

Capiro's mission is to cure, relieve and comfort patients that seek care from our medical care facilities.

Our vision is to ensure the best achievable quality of life for every patient.

How we do it

Capiro's culture is based on our core values: Quality, Compassion and Care.

We seek to achieve medical care of good quality via four cornerstones, or methods: Modern medicine, Good information, Kind treatment, and a Nice environment and adequate equipment.

To enhance and reinforce the four cornerstones, employees with the right skills are required, as well as a culture that promotes continuous, systematic improvements. We create these conditions with the help of our tried and tested organisation model, which consists of four important, interrelated elements.

The result – good healthcare for more people

Our methodical approach to our work means that we are constantly developing. Quality increases, with better treatment results and less care-related injuries. Quality in turn drives higher productivity. This increases the benefit to patients and to society, as the money can be spent on good healthcare for a larger number of patients.

The method

Quality based on four cornerstones



The practice

People make the difference



The basis

The values



Capio's Code of Conduct

Our values guide our everyday work

Capio's Code of Conduct comprises the principles that the Group, its Board of Directors and employees are required to adhere to in relation to our patients, staff, clients, business partners, shareholders and other stakeholders. The basic philosophy is that we must treat others as we would like to be treated ourselves, and conduct ourselves in a way that we can always be proud of.

Honesty and integrity – two cornerstones

Our values, which are based on high ethical and moral standards, must be part of the day-to-day activities throughout the organisation. Ethically sound conduct contributes to ensuring sound business results in the long term.

In a successful company, the entire organisation, and every employee, must act with honesty and integrity. For Capio, there are no compromises, and the high moral standard also entails that employees are expected to openly express their opinions and report any improprieties that are identified. In this way we can continue to make the investments needed to develop our company and meet the requirements and challenges within the the European healthcare sector.

Good business ethics and sound relations

For Capio, operating a business as a responsible member of society requires us to adhere to current laws and regulations in the countries in which we operate. We require honesty and integrity of all employees, and expect the same of our business partners. Capio is politically neutral. We do not give financial support to political parties or policies, nor do we engage in political activities.

All business transactions must be reported in the company's financial statements in accordance with good accounting practices. The Capio Group's information must be reliable, relevant and current and provide a balanced view of its operations.

Respecting human rights

The Capio Group respects the ILO's basic conventions on human rights. Capio treats all of its employees as equals and with respect. We respect the right of all employees to form and join a trade union of their own choice and to participate in collective bargaining. Capio does not tolerate forced labour or child labour and is committed to doing its utmost to create a safe and healthy working environment.

Protecting the environment

Capio seeks to make efficient use of energy and natural resources, favours systems for recycling and reuse of materials, and works to prevent and minimise pollution. We must fulfil or exceed the environmental requirements set out in laws, regulations and international agreements that affect our markets.

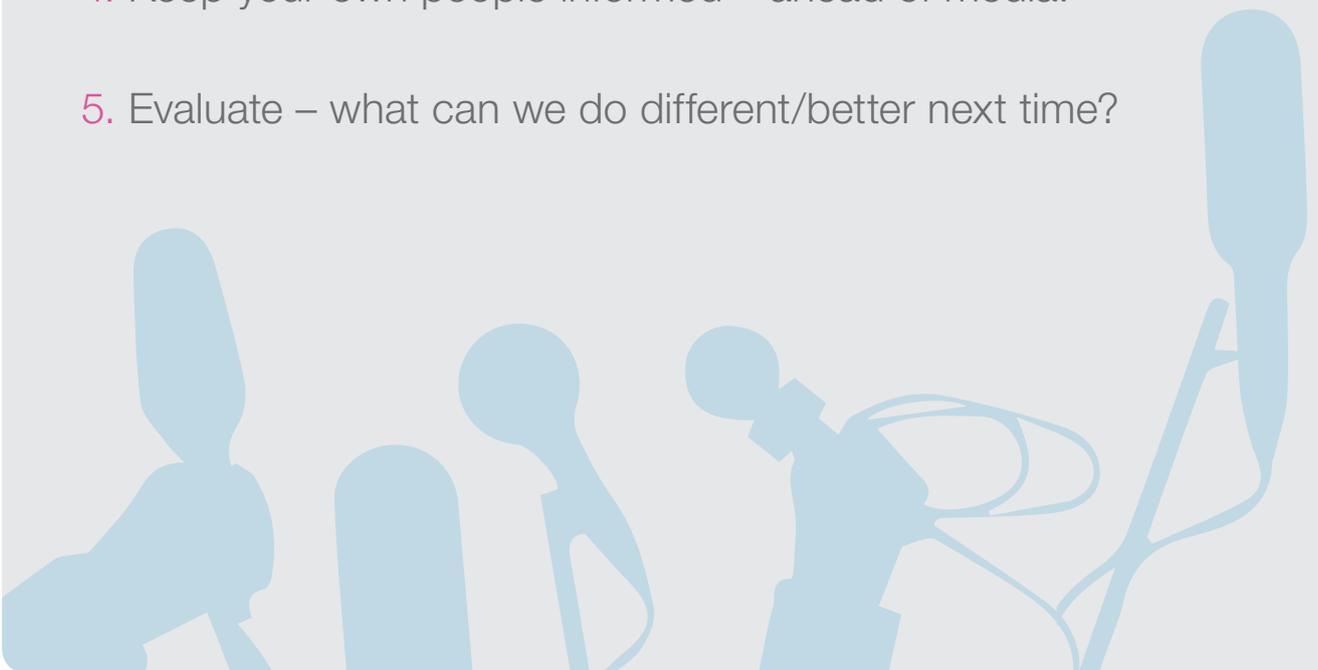
Responsibility and follow-up on our conduct

Our employees must adhere to the Code of Conduct, and each manager is responsible for ensuring that employees and business partners are informed of its content. Employees are required to report any deviations from the Code of Conduct to their managers for investigation and possible corrective action. Compliance is monitored continuously as an integral element of corporate governance. Each manager is responsible for local follow-up and reporting of any relevant issues. Repeated, serious deviations lead to corrective measures. If a business partner is repeatedly in serious breach of the Code of Conduct the cooperation will be terminated.

Openness and Transparency

Capio aims for good treatment and superior quality. We have high ambitions and good intentions. Despite this, sometimes things does not turn out as planned. In such case we are obliged to understand and deploy corrective actions as fast as possible. And more important to learn and reduce the risk for repeated failures. Capio has adopted five principles. The first principal refers to how we relate to our mission. The following four principles apply when our activities are scrutinized and questions are asked.

1. We shall consciously not do anything we cannot defend on the tabloid's frontpage.
2. Give a correct picture – we have nothing to hide.
3. When in doubt – stick to the truth.
4. Keep your own people informed – ahead of media.
5. Evaluate – what can we do different/better next time?



Policies

– if it does not work

General anti-bribery and anti-corruption guidelines of the Capio Group

It is a fundamental principle within the Capio Group (“Capio”) that we apply the highest standards in both our professional and ethical conduct. This principle should be reflected in how we act in every situation. The Capio Code of Conduct contains our vision, mission and core values and in order to further clarify and highlight our position on non-acceptance of bribery, Capio has adopted these “General anti- bribery and anti-corruption guidelines of the Capio Group”.

These general guidelines form the basis for Capio’s work to prevent, deter and detect bribery and corruption and set forth the minimum standards for Capio’s internal rules and policies on anti-bribery and anti-corruption. The guidelines are complemented by specific anti- bribery and corruption policies for each of the respective countries in which Capio is active (respective policy sets forth in greater detail what is considered allowed and accepted and what is not in each jurisdiction). Please refer to the respective policies adopted in France, Germany, Great Britain, Norway and Sweden.

Bribery and corruption harm the societies in which these acts are committed. They prevent economic growth and development and restrict fair competition. Capio’s commitment to the prevention of bribery is an integral part of our business and is fundamental to our investors. Capio is committed to the highest standards of business integrity and to operating transparently, honestly and fairly in all of our business dealings. The

same commitment is expected from all Capio’s employees, board members and business partners. Capio will not and no employee of Capio must:

- offer, promise, give, request, agree to receive or accept a bribe;
- encourage, require or condone another person offering, promising, giving, requesting, agreeing to receive or accepting a bribe on its behalf; or
- engage in any form of corrupt practice, i.e. the misuse of public office or power for private gain through means that are illegitimate, immoral or incompatible with ethical standards.

Capio will actively investigate any suspected breach of applicable anti-bribery legislation or internal anti-bribery policies and, where appropriate, invoke disciplinary measures against any director, officer or employee found to be involved in bribery or corrupt practices. Capio will enforce all appropriate legal and contractual sanctions against any party acting on its behalf who is found to have committed bribery or corruption-related offences.

All Capio employees are encouraged to report any incident or suspected breach of applicable anti-bribery legislation or policies and will under no conditions suffer demotion, penalty or other adverse consequences for refusing to pay bribes, refusing to participate in other corrupt practices or reporting any incidence or suspicion of bribery, even if this may result in Capio losing business.

Whistle blower policy of Capio AB

Capio AB, its subsidiaries and affiliates (“Capio”) are committed to the highest possible standards of openness, honesty and accountability. In line with this commitment, we encourage our employees and others that we deal with who have serious concerns about any aspect of Capio’s work to come forward and voice those concerns. For the purpose thereof, Capio has implemented a so-called Ethic hotline. In case of questions regarding this Policy or the Ethic hotline, please contact Henrik Brehmer (Senior Vice President Corporate Communications & Public Affairs).

What is whistle blowing?

Employees are usually the first to know when something is going seriously wrong. A culture of turning a “blind eye” to such problems means that the alarm is not sounded and those in charge do not get the chance to take action before real damage is done. Whistle blowing can therefore be described as a complement to, not a replacement of, regular internal information and reporting channels, attracting management’s attention to information about serious wrongdoings (see examples below).

What is serious wrongdoing?

Serious wrongdoing involves any illegal behaviour as well as serious irregularities concerning the vital interests of Capio or the life and health of individuals and may, for example, include the following:

- An unlawful act, whether civil or criminal.
- Breach of, or failure to implement or comply with, any Capio policy.
- Unprofessional conduct, not complying with established standards of practice.
- Questionable accounting or auditing practices.
- Practices likely to cause physical harm or damage to a person or to property.
- Abuse of power or authority for any unauthorised or ulterior purpose.
- Unfair discrimination in the course of the employment or provision of services.
- Conflicts of interest.

What can be reported through the Ethic hotline?

Reporting by individuals using the Ethic hotline should concern serious wrongdoing alleged or suspected to have been conducted by management or key employees in

companies within Capio. Irregularities concerning other individuals within Capio should be reported using the regular internal reporting system (i.e. through the responsible manager or the Human Resources Department).

Who should you contact?

Capio’s Ethic hotline is operated by Mannheimer Swartling Advokatbyrå AB, whom safely will receive and channel reported information to a dedicated appropriate senior executive at Capio for further investigative measures.

In order to report via the Ethic hotline, use one of the following alternatives:

E-mail to: hpe@msa.se

Letter to: Hans Petersson, Mannheimer Swartling Advokatbyrå AB, Box 4291, SE-203 14 Malmö, SWEDEN

A report may be made anonymously, but contact details to the reporting person are appreciated and could in some cases be of importance for the conduct of any investigation. A report may also be made in each respective local language in the countries where Capio conducts business. Mannheimer Swartling Advokatbyrå AB and Capio will treat all reports strictly confidential.

In case of questions regarding this Policy or the Ethic hotline, please contact Henrik Brehmer, Senior Vice President Corporate Communications & Public Affairs.
E-mail: henrik.brehmer@capio.com, tel. +46 8-737 87 82

Recommended structure of a whistle blower report

To assist Capio in the response to, or investigation of, a report, the report should be factual rather than speculative and the following questions could be contemplated in the drafting of the report:

- What has happened? Where has this happened?
Please be as detailed as possible.
- When has this happened?
- Who was involved?
- Is this expected to happen again and, if so, when and where?
- Which other persons may have knowledge of the above mentioned or may have access to relevant information?
- Is there any documentation or other supporting records available that may serve as evidence?
If so, please include this information.
- Is there any other information that may be relevant or useful for the investigation or otherwise?

Whistle blower policy of Capio AB cont.

How will Capio respond

Capio is proud of its reputation and is striving to continue to meet the highest standards of honesty. It will therefore ensure that sufficient resources are put into investigating any report, which it receives. Please note that Capio will be able to assess the merits of a raised concern only after having conducted an initial inquiry and, if necessary, after duly investigating the matter in question.

Where appropriate, the matters raised may:

- be investigated by management and/or the Board of Directors (together with external advisors, where necessary);
- be referred to the Police or other law enforcement authorities; and/or
- be referred to Capio's auditor

In order to protect the individuals involved and those suspected of the alleged wrongdoing, an initial enquiry will be made to decide whether an investigation is appropriate and, if so, what form it should take. If urgent action is required, such action may be taken before any investigation is conducted.

The overriding principle, which Capio will have in mind, is the interest of Capio and its shareholders.

No reprisals

Any individual making a report in good faith under this Policy will be entitled to protection from any disciplinary action, discrimination or other reprisals for the making of such report.

Processing of personal data

For the purposes set out in this Policy, Capio will process personal data in respect of employees. Such processing will include collecting, storing and other actions taken, including, but not limited to, the transfer of such data to third parties, necessary for the reporting procedure and the administration of the Ethic hotline. The personal data processed will include any information obtained through the whistle blower function, including the name, contact details of individuals who report irregularities (unless the report is anonymous) and individuals who are reported within the function. The data processed may include personal data concerning legal offences.

The personal data processed for the purposes set out herein may be kept for a period necessary having regard to the purpose of the processing. This means that personal data processed in the course of a report, which does not lead to any further investigation or is unfounded, will be deleted promptly. Reports resulting in an investigation will be deleted once the investigation is completed, or, if the investigation is resulting in remedial or other actions, when the information is no longer needed for such purpose.

Capio is the data controller of the processing of personal data in connection with the Ethic hotline. An employee who would like to request that certain personal data is rectified, blocked or erased or who would like to request information about Capio's processing of his/her personal data can contact Henrik Brehmer.

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