



## OUR CODE OF CONDUCT

Guiding Principles

Protection is at the heart of everything we do. Ansell means more than just safety; our products and services inspire confidence in people everywhere and enable businesses and workers to perform better.



# OUR VISION & MISSION

Lead the world to a safer future by staying two steps ahead of workplace risk. Everywhere.



# OUR VALUES



# LETTER FROM YOUR MANAGEMENT

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Dear Colleagues,

Ever since our founding in 1893, Ansell has been leading the safety industry by providing advanced protection solutions for millions of people around the world.

We are all proud of our track record and committed to deliver on our mission to provide innovative and effective solutions for safety, well-being and peace of mind to customers and employees.

Around the world Ansell stands for safety, but also for integrity.

In order to maintain our vision, we must continue to adhere to our core values on which Ansell has been built. In today's fast-evolving world, we need to stay grounded in our values. It is an anchoring point for our culture and something that endures.

This Code of Conduct provides guiding principles to assist you in resolving potentially troublesome issues. Although our Code applies universally to everyone at Ansell regardless of job function or seniority, it does not address every potential circumstance or anticipate every conceivable problem. Accordingly, we are always expected to operate in the "spirit" of our Code and consistent with our values.

You are always encouraged (and often required) to seek help whenever you have questions or report concerns whenever you witness possible wrongdoing or have questions about whether a particular course of action might violate our Code.

At Ansell, we demand excellence and expect performance, but not at all costs. No business gain or success, no matter the size, will ever be acceptable or worthwhile if it comes at the expense of our values.


Please read the Ansell Code of Conduct carefully and thoroughly. The Code is available in the languages spoken at all key Ansell locations, and Ansell will periodically provide training to ensure that you understand it and the legal and ethical obligations and standards we expect you to follow.

You will be asked regularly to formally acknowledge that you have read the Code, understand it and agree to abide by it.

Staying true to our core principles will help make our vision become a reality and make both Ansell and the communities in which we operate inspiring places to be a part of.

Sincerely,

**The Ansell Executive Leadership Team**



**Neil Salmon**  
Managing Director and  
Chief Executive Officer



**Brian Montgomery**  
Chief Financial Officer



**Charlotte Doll**  
Chief Human Resources  
Officer



**Philippe Rommel**  
Chief Legal Officer



**John Marsden**  
Chief Operations  
& Supply Chain Officer



**Deanna Johnston**  
Chief Information Officer



**Sean P. Sweeney**  
Chief Commercial Officer,  
Americas



**Augusto M. Accorsi**  
Chief Commercial Officer,  
EMEA/APAC



**Rob Hughes**  
Chief Product &  
Marketing Officer



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# INTRODUCTION TO OUR GUIDING PRINCIPLES

## Purpose of Our Code

Welcome to Ansell's Global Code of Conduct: Our Guiding Principles, also known as our "Code." Our Code serves as the platform for all of Ansell's activities. It shows us how to act with the utmost integrity when dealing with our various stakeholders—including fellow employees, customers, suppliers, distributors, other business partners, consultants, shareholders, government agencies, healthcare professionals, hospitals, product users and local communities. By following our Code when interacting with these stakeholders, we help ensure our Company's success and limit its business risks.

Our Code also serves as a guide to ethical principles and business conduct at Ansell. It sets forth the behaviors expected of us, reflects our values, helps us to make ethical decisions and shows us how to identify potential misconduct. In addition, it tells us where we need to go when we have questions or would like to make a report.

## Scope of Our Code

Our Code and our values apply to all of us—including employees, officers and directors—in all our work activities, regardless of where we are located. In addition, we expect that our consultants, suppliers, distributors and other business partners will adhere to these principles and our values when working on Ansell's behalf or on Ansell's premises.

This Code is intended to be consistent with and refer to Ansell company policies, which can be found on our intranet site. These policies may provide greater detail than is provided by our Code.





## Compliance with Local Laws

Due to Ansell's global reach, it is important that we know and follow all applicable local legal and regulatory requirements. We must also uphold the standards set forth in our Code and Company policies. In some situations, this may even require that we act according to a higher standard than is legally required in the location where we are doing business.

Laws and regulations are complex and subject to change, and often vary greatly from one location to the next. If you have any doubts about whether a business decision or action is lawful or appropriate, you should seek guidance by following the steps set out in "Seeking Advice and Reporting Concerns."

## Additional Obligations of People Managers and Supervisors

Ansell people managers and supervisors have additional responsibilities that go above and beyond those we all share. If you manage others, you are expected to lead by example and serve as an ethical role model. This means you must be familiar with our Code so that you can effectively communicate its guidelines to those who report to you. In addition, you have an obligation to create a positive work environment in which employees feel comfortable coming to you with questions or concerns.

You must never ignore unethical behavior or misconduct, even if it occurs outside of your areas of responsibility or expertise. If someone comes to you with a concern, you have a duty to resolve the issue appropriately, which may require you to contact HR, the Compliance Officer, members of the Law Department, or other appropriate resources within the company (see: Seeking Advice & Reporting Concerns). You must never retaliate (or permit someone else to retaliate) against anyone who reports in good faith a concern about actual or suspected misconduct. Managers and supervisors who do so or allow such retaliation to occur will be subject to disciplinary action, consistent with local law.

As a manager, you must also ensure that those who report to you complete any required training on our Code and applicable Ansell policies.





# SEEKING ADVICE AND REPORTING CONCERNS



At times, you may find yourself involved in an ethical dilemma where you are uncertain about the right course of action. If you have questions or doubts as to whether an action is consistent with our Code or Ansell policies, you should seek advice.

You also have a duty to Ansell and your fellow employees to report any known or suspected violations of our Code, Ansell policy, or applicable laws or regulations. By making such a report, you safeguard the reputation and integrity of Ansell and all those who work for it.

Whether you need to seek advice or report a concern, you are encouraged to first contact your manager for assistance. If you are uncomfortable doing so, you are also encouraged to contact the:

- Human Resources Department
  - Compliance Officer (by email at [complianceofficer@ansell.com](mailto:complianceofficer@ansell.com))
  - Law Department, or
  - Compliance Hotline
- Telephone: country-specific phone numbers can be found on the Ansell Compliance Hotline poster at your location, or online at <http://www.ansell.com/hotline>
  - Online: <http://ansell.ethicspoint.com/>
  - Our Compliance Hotline is operated by an independent service that will forward a report of your call to the Compliance Officer at Ansell. **The reporting system is designed so that the subject of a report is never the person who receives it.** The Hotline is available 24 hours a day, seven days a week. Although you may make reports to our Compliance Hotline anonymously where allowed by local law, you are encouraged to provide your identity, as doing so will assist us in fully investigating your concern. See the Compliance Hotline poster at your location for more information.

## No Retaliation at Ansell



Ansell will protect you from retaliation for reporting a concern in good faith or participating in an investigation of a report. Making a report in “good faith” means you provide all the information you have and you report honestly, regardless of whether the report turns out to be true.

Any employee who attempts to retaliate against a colleague (or is aware of such retaliation and does not appropriately report it) will be subject to disciplinary action, up to and including termination consistent with local law. If you suspect that you have experienced or witnessed an act of retaliation, you should report your concern promptly.





## Investigations of Reports



All reports will be promptly and thoroughly investigated under the supervision of the Compliance Officer. Ansell will treat any information you provide as confidential to the maximum extent possible while allowing for adequate resolution of the issue and consistent with local law. When required by local law, anyone accused of wrongdoing will have the right to access the information reported about them, as well as a right of correction.

When asked, you are expected to cooperate in the investigation of a reported violation.

## Consequences of Code Violations



Violations of our Code, Ansell policies, regulations and the law are taken very seriously as they may have consequences not only for the individual(s) in question, but also for Ansell. On an individual level, this may lead to disciplinary action, up to and including termination consistent with local law. Violations by an individual may also subject Ansell and/or its officers to civil and/or criminal liability.





# OUR RESPONSIBILITIES TO EACH OTHER



## Respect in Our Workplace



A great deal of our business success stems from the value we place on inclusiveness and creating a sense of belonging for all. We believe that maintaining a workforce that promotes inclusivity, openness and tolerance fosters a workplace where everyone's different talents and strengths are welcomed, utilized and respected. In order to maintain our dynamic workplace, we must make sure it is free from unlawful acts of discrimination. This means that we make all employment decisions based on merit and in full compliance with applicable laws. We ensure that factors such as race, gender, class, age, religion, sexual orientation, or any other characteristics unrelated to job performance do not influence our decisions.

We must also work to ensure that our workplace is free from harassment or bullying. "Harassment"

generally includes any form of unwelcome conduct towards another person that has the purpose or effect of creating an intimidating, hostile or offensive work environment for that person. Sexual harassment includes unwelcome sexual advances, unwanted touching, suggestive or lewd remarks, requests for sexual favors, and display of indecent content. Ansell will never tolerate any form of harassing or bullying behavior.

You are required to report any harassment, bullying or discrimination concerns promptly. Ansell will investigate all such reports and will take corrective action as appropriate. You will not face retaliation for making a report in good faith.

## Safety and Health in Our Workplace



### Workplace Safety and Health

As a world leader in workplace safety, it is critically important that we work together to ensure our own workplaces are safe and healthy. Ansell is guided by our 5-Point Safety Charter and an EHS framework that includes mandatory global standards for High-Risk Tasks (HRTs) and Core Operating Procedures, covering all employees, contractors and visitors. These policies and procedures enable us to protect each other and provide safe, quality solutions to our customers. As part of our responsibility to conduct our work in the safest possible manner, we comply with all health and safety laws and regulations relevant to our jobs. We also report violations both internally (to local EHS management) and to the competent local authorities when required. If you know of or suspect any unsafe situations or conditions, alert your manager immediately. If you believe an environmental, health or safety incident has not been properly reported, please contact the Compliance Officer.

### Drugs and Alcohol

To ensure the safety of our workplace, we must all be free from the influence of alcohol, drugs and improperly used prescription medicine when conducting business. Subject to local legal and policy requirements, the possession, use, sale, offering or distribution of illegal drugs or other controlled substances on Ansell premises or while conducting Ansell business is forbidden. You may consume alcohol in moderation at business dinners or authorized Ansell events in accordance with applicable company policies. Violations of this policy can pose safety hazards and will be regarded as serious misconduct.

### Violence and Weapons

Our commitment to workplace safety also means that there is no place at Ansell for acts or threats of violence. We may not possess weapons on Ansell property. In extraordinary circumstances, where legally permitted, and with the approval of the site manager and Ansell's CEO, armed guards employed by reputable and licensed security firms may be permitted onsite in the interest of employee and public safety. If you experience, witness or are otherwise aware of a violent or potentially violent situation, you should immediately report the situation to your manager, human resources or the local authorities.

## Fair Employment Practices



Ansell is committed to treating its employees with dignity and respect. This means, in part, that we must treat one another fairly and comply with all applicable laws concerning employment and workplace conditions. Ansell will never tolerate child, forced or involuntary labor of any kind, under any circumstances.

We expect our material suppliers and outsourced manufacturers to uphold similar employment practices. See also the section of our Code labeled "Our Responsibilities as a Good Corporate Citizen, Social Accountability" for more details.

## Employee Privacy



We must all respect each other's privacy by safeguarding the personal information of our fellow employees. Those of us with access to this information must ensure that it is collected, kept and used in a manner that complies with the laws in place in the locations where we are doing business. If your job responsibilities involve the collection, storage, modification, transfer, blockage, erasure or use of employee personal information, you have a duty to know and comply with the privacy and data protection laws that apply to your work and the Ansell organization as a whole.





# OUR RESPONSIBILITIES TO OUR CUSTOMERS AND BUSINESS PARTNERS



## Product Safety



One of Ansell's principal goals is to ensure that the products we develop, make and sell are safe, reliable and effective. To further this goal, we must follow all applicable requirements and standards that relate to the development, manufacture, sale and distribution of Ansell products. If you need further information on the requirements and standards that apply to your work, you should seek advice from the Quality and/or Regulatory teams or the Law Department. We also expect our suppliers to assure the safety and performance of the products and services they provide to us.

If you receive or are personally informed of a product complaint or defect, you must promptly respond to it in accordance with Ansell procedures. You should raise any issue that might adversely affect or compromise the integrity, performance or effectiveness of any Ansell product as soon as you become aware of it. Ansell takes all product complaints and recall notifications seriously and will respond to them quickly and thoroughly.

If you have any questions or concerns relating to product safety, you should consult your manager or our Quality and/or Regulatory teams or the Law Department.



## Fair Dealing



Our competitive advantage must be based strictly on the quality of our products, the strength of our brands, and our value-added services. It should never be the result of unfair dealing practices. In addition, we must always act with honesty and integrity when doing business on behalf of Ansell.

### Fair Dealing with Customers

We must be careful to never misrepresent the quality, features or availability of our products. We also may never seek or retain improper or impermissible rebates, discounts or other payments made in connection with products reimbursed by government programs. See the Company's Healthcare Interactions: Global Handbook and Reference Guide, for specific policies and requirements applicable to our Healthcare businesses. Finally, we may not make untrue statements about our competitors' products.

### Fair Dealing with Suppliers

We only use legitimate, business-related criteria to choose suppliers, in accordance with Ansell procurement policies. Ansell will select only those suppliers believed to have demonstrated integrity. In addition, we never take unfair advantage of our suppliers through abuse of confidential information, misrepresentation of material facts, or any other unfair dealing practice.

We allow suppliers to compete fairly on the quality of their products and services. We will not be influenced by gifts or favors of any kind from our suppliers or potential suppliers. (See *Conflicts of Interest* below).

If you have questions regarding fair dealing or need guidance on particular commercial activities, you should consult the Law Department.

### Commercial Bribery

We must never seek to gain unfair competitive advantages through bribery. Ansell will not tolerate any form of "commercial bribery." This form of bribery occurs when one company (or its representative) provides a bribe, kickback or improper payment to another company (or its representative) in order to obtain or retain business, or secure other special concessions. For additional information, see the "Bribery, Kickbacks and Improper Payments" section of our Code.

### Competitor Information

Through our work, we may be asked to gather information regarding our competitors. Although this is a legitimate business activity, we must gather this information in a fair, ethical and legal manner. Make sure to exercise caution if you encounter what appears to be non-public competitor information. Report such information to the Law Department before using or circulating it. In addition, you may never misrepresent your identity or intentions in order to receive access to competitor information.





## Competition Laws



Competition, or antitrust laws aim to prevent any business activity that unreasonably restrains free trade and limits competition. Although these laws vary from one country to another, they generally seek to ensure that businesses compete in a manner that promotes quality, innovative products and services at competitive prices. To compete ethically and legally, we must know and strictly comply with all applicable competition laws in the locations where we do business.

While competition laws are complex, they generally forbid entering into formal or informal agreements with competitors that may restrict trade, such as:

- Setting prices or any other economic terms of sale.
- Allocating or limiting customers, geographic territories, products or services.
- Refusing to do business with (or “boycotting”) a customer or supplier.
- Limiting production volume or research and development.

- Refraining from certain types of selling or marketing of goods or services.
- Limiting or standardizing the features of products or services.

Competition laws may also prohibit entering into formal or informal agreements with suppliers, distributors or customers that may restrict competition. Such agreements include tying products, fixing resale prices or refusing to sell to particular customers or buy from particular suppliers.

Ansell must avoid even the appearance of an understanding or agreement that could violate competition laws. Exercise particular caution when attending trade shows, trade association or standards-setting organization meetings, or any other meetings at which competitor representatives may be present. If a competitor attempts to discuss any of these topics with you, stop the conversation immediately. You should then report the incident to the Compliance Officer or the Law Department promptly.

Please note that violating these laws may subject both the individual employees involved and Ansell to severe consequences. If you have any additional questions, you should seek advice from the Law Department.



## Government Contracts



When working with government customers, it is critical that Ansell abides by the laws, regulations and procedures that apply to government contract work. These rules are often much stricter and more complex than those that govern the work we do with commercial customers.

Please see the section labeled “Public Tenders” for specific requirements that may be applicable to Ansell’s participation in a public bid.

Many laws restrict us from hiring government employees (current or former) even as consultants and may limit our ability to discuss future employment arrangements

with these parties. You therefore must obtain written permission from the Law Department before discussing these opportunities with a current government employee and before hiring or retaining anyone who left employment with the government in the past two years.

If you are working on a project or sales opportunity involving a government body or agency, it is your responsibility to know and follow the rules that apply to you. Talk to your manager, your supervisor or the Law Department if you have any questions or concerns in this area.



# OUR RESPONSIBILITIES TO OUR SHAREHOLDERS



## Conflicts of Interest



We must each make unbiased and loyal business decisions on behalf of Ansell. In order to do so, we must properly handle all actual or potential conflicts of interest. A “conflict of interest” is a situation where our personal interests interfere or appear to interfere with the interests of Ansell as a whole. We must actively avoid situations where our personal interests make it difficult to perform our work objectively on behalf of Ansell.

If you know or suspect that you are involved in a possible conflict of interest situation, you should immediately disclose the situation to your supervisor and the Human Resources Department. Simply being involved in a conflict of interest situation does not constitute a violation of our Code. However, failing to disclose it or delaying disclosure is a violation.

Conflicts of interest can arise in a variety of different ways. The following describe some common conflict of interest situations:

### Giving and Receiving Gifts and Entertainment

Exchanging business courtesies is often a customary aspect of developing good working relationships with our customers, suppliers and other business partners.

However, we must exercise caution when engaging in such activities. Giving and receiving gifts and entertainment can easily lead to conflict of interest situations. In addition, these activities can lead to accusations of bribery if not handled correctly. If you ever have doubts about whether you should offer or accept a gift or entertainment, you should consult your supervisor or the Law Department. To avoid the appearance of improper business courtesies, abide by the following guidelines:

- You may offer or accept gifts of nominal value but should consult your supervisor or the Law Department before doing so.
- Do not offer or accept gifts in the form of cash, a cash equivalent (e.g. a gift card) or securities, or any gift that is valued over U.S. \$100 (or the local equivalent).
- Offering or accepting routine business entertainment is acceptable, so long as it is related to a business occasion and includes legitimate business discussions. You should report any offer of entertainment (in advance, if possible) to your manager to ensure it is reasonable in nature.
- Do not solicit any gift or entertainment.





- Many countries completely ban gifts and entertainment for healthcare professionals or limit them more strictly than the guidelines above. Before offering any gifts, entertainment or business courtesies to a healthcare provider, consult Ansell's Healthcare Professional Interactions: Global Handbook and Reference Guide.

If you are offered a business courtesy that does not meet these guidelines, you should politely refuse it and cite our Company's policy. If you are unsure whether a business courtesy complies with this Code you must report the courtesy to your manager and the Compliance Officer.

### **Corporate Opportunities**

Through your position at Ansell, you may learn about a business opportunity in which you are personally interested. You may not act upon such an opportunity for personal gain (or another person's gain) until you are certain that Ansell has had a chance to act on it and has declined to do so. You should never engage directly or indirectly in any activity that competes with Ansell.

### **Outside Employment**

To ensure you are acting in Ansell's best interests, you should not hold any form of outside employment that hinders your ability to do your work for Ansell, is for an organization that competes with Ansell, or would imply our sponsorship or support. You should also be careful not to engage in any form of outside employment that could affect Ansell's reputation. All outside job activities require the prior written approval of your manager.

Be sure never to use company property or time for outside work.

### **Financial Interests**

You must report to your manager or the Compliance Officer any direct or indirect financial interest that you and your family members may have in an Ansell customer, supplier, other business partner or competitor. If possible, this interest should be reported in advance. A "family member" includes your spouse, domestic partner or any other member of your immediate family. The only exception is investments in publicly-traded stock that do not exceed one percent of the company's total outstanding stock.

### **Workplace Relationships**

A romantic or sexual relationship with a co-worker can often result in conflicts of interest, as can the employment of two or more members of the same family. Although Ansell does not prohibit such workplace relationships, we generally require, consistent with local law, that they be disclosed to Human Resources, and do not permit such relationships between managers and subordinates or in other situations where one party to the relationship could exert significant management influence over the other party. If you have a family or romantic relationship with a co-worker, please consult with Human Resources to ensure any resulting conflict of interest is properly managed.





## Company Property



Our assets have been acquired through the hard work and dedication of many Ansell employees over many years. We owe it to our company, our stakeholders and each other to protect this property as diligently as we would our assets.

We are accountable to use Ansell's property carefully and protect it from theft, damage and loss (including through proper expense reimbursement procedures). This includes Ansell facilities, equipment, vehicles, funds, intellectual property, and network and computer systems. Any personal use of company assets must be in compliance with Ansell policies.

## Intellectual Property and Confidential Information



Intellectual Property ("IP") is one of Ansell's most valuable business assets. IP matters to Ansell because it: (1) builds brand awareness and loyalty among customers, (2) establishes protectable legal interests in the products and services we sell and in the technology and know-how used to produce them, (3) gives Ansell a competitive edge, (4) drives innovation, (5) builds Ansell's reputation as a technology leader, and (6) enables Ansell to enter new markets and grow market share. Without the protection that IP rights provide, Ansell's competitors would soon be able to copy our successful products.

Ansell uses many forms of IP protection, including copyrights, patents, trademarks, product and package designs, brand names and logos, research and development, and trade secrets. Subject to applicable law and any agreement you make with the Company, you assign to Ansell all of your rights in such IP no matter where or when you create it, whether at work or after hours. You must disclose such IP to Ansell in accordance with Ansell policies and procedures.

At all times, employees should take precautions and follow applicable policies to protect Ansell IP and confidential business information. Examples of confidential information include unreleased financial results, pricing, development activities, and potential acquisitions or divestitures. Confidential information should be stored in a secure manner, consistent with Ansell's policies, to prevent unauthorized access. Employees should avoid talking about or sharing confidential information in public places, and should raise any concerns of misuse or theft by others. Before disclosing confidential information to third parties or sharing company assets, employees should seek proper authorization and ensure that appropriate contract terms are in place. To safeguard Ansell brands and trademarks, employees should follow guidance from the Law Department on proper usage.

In addition to protecting Ansell IP and confidential information, it is critical that we respect the IP and confidential information of others with the same degree of care we give our own, and according to the terms of any applicable agreement. Theft, misuse or misappropriation of a third party's IP can expose you and potentially Ansell to civil lawsuits and damages, as well as criminal liability. If you have any questions about the use of Ansell or third-party IP and confidential information, you should consult the Law Department.



## Data Privacy



Ansell respects and protects the personal data of our employees, customers and other third parties with whom we do business and are committed to the responsible collection, storage, use, transfer and disposal of that personal data.

We must make sure to:

- only collect personal data for legitimate business or legal reasons, safeguard the personal data that is entrusted to us and use it for the purpose of its collection;
- limit access to personal data to only those who are authorized.
- take appropriate measures to protect personal data from unauthorized disclosure and take immediate action to remedy any breach of data privacy.

If you are not sure whether your use of personal data is in accordance with company policies, contact the Law Department.

## Social Media



Employees must comply with all Ansell policies in their use of social media. Our policies apply to communications related to job responsibilities and to personal communications that may impact the Company. In personal activities on social media, employees should be respectful and recognize that their activity may impact the way others perceive Ansell. Remember that the internet is a public place.

Employees should include a proper disclosure statement when speaking about Ansell or our products. Permissions must be secured, and releases obtained, when images or video of others are to be featured (See Intellectual Property and Confidential Information, above).

Our Company's full policy regarding social media is available on the company intranet.

## Proper Use of Company Computer Systems



We each have a responsibility to use our Company's computer systems for ethical business purposes. While occasional personal use of these systems is permitted, we should know that Ansell reserves the right to monitor our use of anything we create, store, send or receive on Ansell computer systems, consistent with local law and Ansell policies. This includes all data and communications transmitted by, received by or contained in Ansell email accounts, as well as all electronic documents maintained on company computers, laptops, mobile devices, and networks.

We may never use Ansell's computer systems for unauthorized, unprofessional, illegal or unethical purposes. This means, in part, that we may not:

- Download or transmit materials that are illegal or abusive, or that are offensive, profane, sexually suggestive or explicit (unless required for an authorized and legitimate business purpose).
- Use Ansell's computer systems to solicit for outside purposes, such as religious causes, political campaigns and outside organizations.
- Send or download copyrighted materials, trade secrets, proprietary financial information or similar materials without proper authorization.

Employees are expected to take appropriate measures, in accordance with the IT Department's guidance and policies, to protect the security, confidentiality, and integrity of Ansell electronic data and information. For example:

- Protect User IDs and passwords for Ansell resources and ensure their proper use. User IDs and passwords are confidential information.
- Lock workstations when left unattended.
- Take all assigned cybersecurity training.
- When using Ansell devices in public places, protect confidential information, for example, by using a privacy screen and being aware of surroundings.

Additional policies and information concerning the use of Ansell computers systems can be found on the Information Technology page of the company intranet.



## Books and Records



Our books and records form the basis for our earning statements, financial reports and other public disclosures. In addition, they guide our business decision-making and strategic planning. Each of us is therefore responsible for making sure that the information we submit in all company records is complete, accurate and understandable. This includes information we provide in timecards, travel and expense reports, measurement and performance records, customer and supplier records, inventory records, and design and engineering records. We may never make a false representation or otherwise mischaracterize such information.

Those of us with finance and accounting responsibilities have a special responsibility to ensure Ansell's financial statements are true and fair. Because Ansell is an Australian public company, we must submit various financial reporting and other filings to Australian regulatory authorities that are accurate and timely. This requires that we know and follow the legal and regulatory requirements and internal controls that govern these reports. Remember, inaccurate, incomplete or untimely records or reporting may not only damage our Company, but also result in legal liability for those involved.

You should report any suspected accounting or auditing irregularities or fraud immediately. Ansell will not tolerate retaliation against you for disclosing in good faith questionable or improper accounting or auditing matters.

## Continuous Disclosure and Public Communications

As an Australian public company, Ansell is required to immediately disclose any information that would have a material effect on the price of Ansell's securities. In addition, Ansell is required to promptly correct any material mistake or misinformation in the market. Only authorized persons may make these disclosures. For more information about the obligations we must uphold in this area, see our *Continuous Disclosure Policy*, which is available online at [Ansell.com](http://Ansell.com). We must each be aware of our obligations and follow them at all times.



### **Document Retention**

We have a responsibility to know and follow the rules governing how long we should retain Company documents, as well as how and when to discard them. We therefore must know and follow the guidelines set forth in Ansell's *record retention policy* before archiving or destroying any company documents. If you are unsure whether you should maintain or destroy a particular document, you should consult the Law Department.

You may be notified that documents in your control may be required in connection with a lawsuit or government investigation. If you receive such notice, you must preserve (and never alter, conceal or destroy) documents that could possibly be relevant. If you are unsure whether a document is relevant, contact the Law Department.

### **Responding to Auditors and Government Inquiries**

We have a responsibility to cooperate with and be courteous to external and internal auditors who are reviewing Ansell's products, activities or financial reporting. We must also cooperate with government investigators conducting an inspection of Ansell. Never interfere with or seek to improperly influence these persons. Be sure to provide them the information to which they are entitled. No documents, emails, or other records should be destroyed until further notice. Hefty fines are imposed for delaying an investigation, destroying or deleting content and data, interrupting IT systems, withholding information and restricting or refusing access to hard drives or email. In some countries authorities can even impose fines on individuals in addition to the company. If you have any questions about what information a given auditor or investigator is entitled to, consult the Law Department.







## Insider Trading



Through our work, we may come to know information about Ansell or another company with which we do business that is considered inside information. Information is “inside” if it is not public and, if it were public, would be considered important by a reasonable investor in determining whether to buy, hold or sell the stock of the company to which the information relates. Common examples of inside information include:

- Non-public information about Ansell financial results.
- Unannounced acquisitions or divestitures.
- Advance notice of changes in senior management.
- Pending or threatened litigation
- Development of a significant new product.

When we have inside information about a company, we may not trade the securities of that company. This activity is called “insider trading” and is illegal under securities laws in many countries where we do business.

Never communicate inside information to anyone who does not have a business need to know it. It is a violation of securities laws to communicate inside information to another person if we know or should know that that person might engage in insider trading based on the information. Be advised that, in this situation, we could be held liable for breaking the law without personally engaging in trading activity. See our *Securities Trading Policy* for more information which is available online at [ansell.com](http://ansell.com).

Any employee likely to come in contact with inside information must follow the *Securities Trading Policy*, including Ansell guidelines on “trading windows” that limit when you may deal in Ansell shares. In addition, those with a grade of Senior Director or above must secure approval from the CEO before transacting in Ansell shares even during trading windows. Review Ansell’s *Securities Trading Policy* for further details.

Violations of insider trading laws may subject the individuals involved to severe consequences, including both civil and criminal prosecution. If you have a question about insider trading, consult the Company Secretary or Law Department.





## Inquiries from the Media and Analysts



In order to ensure that information about Ansell is disclosed to the public appropriately, only designated representatives of our Company may comment on or respond to requests for information. Remember, any inappropriate or inaccurate response could result in negative publicity and could seriously affect our Company's market and legal position.

If you receive an inquiry from the media or a member of the investment community:

- Refer requests for information about Ansell and its business units to External Communications.
- Refer requests relating to statutory reporting or investor queries to the Vice President, Finance, Treasurer & Investor Relations.

Refer requests for information from regulatory agencies (such as the Australian Stock Exchange) to the Law Department or Company Secretary.

Any responses to media or analyst inquiries must be in accordance with our *Continuous Disclosure Policy*.

# OUR RESPONSIBILITIES AS A GOOD CORPORATE CITIZEN



## Social Accountability



At Ansell, we believe that good, responsible corporate citizenship is critical to our continued business success. An essential element of good corporate citizenship is our expectation that the suppliers of our products will treat all of their employees with dignity and respect. We expect that suppliers will comply with all applicable laws and regulations in the manufacture and distribution of our products, and in providing us their services.

We require that all suppliers of Ansell products comply with our *Supplier Code of Conduct*. These suppliers must demonstrate their compliance with this policy at Ansell's request, and may be subject to audits and self-assessments.

Many of our customers are subject to domestic and international laws and guidelines that restrict the use of minerals and metals that finance armed groups in conflict-prone regions. These customers demand, and Ansell policy requires, that Ansell refrain from sourcing certain raw materials, particularly tantalum, tin, gold or tungsten, without first verifying their origin. If you are required to purchase any raw materials containing these metals, please contact Global Sourcing or the Law Department to ensure that we properly vet the suppliers.

## Environmental Protection



As good corporate citizens of our global community, we strive to act in an environmentally responsible manner and to promote sustainable practices. This means we must meet or exceed any applicable environmental, health and safety laws, regulations and policies that govern our work. It is your responsibility to know and follow applicable standards. If you have any concerns regarding the impact our practices have on our environment, you should report the situation promptly.

## Political and Charitable Contributions



We are encouraged to actively support the communities where we live and work. However, we may not take part in community, volunteer or charitable activities while using Ansell's property, facilities, physical resources or name without prior written approval from our Company. If you wish to make a contribution on behalf of Ansell, consult the Human Resources Department.

In addition, Ansell supports our freedom to participate in personal political activities. However, strict laws govern corporate political activities. We must receive prior approval from the Compliance Officer or Law Department before undertaking any political activity that might appear to be done on Ansell's behalf, and no Ansell funds may be used for political donations. This includes using funds or assets to directly or indirectly make a political contribution to any political party or candidate. Ansell will not reimburse you for any personal political contributions.







## Bribery, Kickbacks and Corruption



Ansell takes a firm stance against bribery. To be responsible members of our business communities, we must never pay, accept, loan or offer a bribe, kickback or improper payment to anyone while conducting business on Ansell's behalf. A "bribe" includes anything of value, including money, gifts, loans or other favors, that may influence or appear to influence the recipient's business decisions or compromise independent judgment. A "kickback" is the return of a sum already paid or due to be paid as a reward for making or fostering business arrangements. We must also make sure to never make or offer bribes, kickbacks or other improper payments to government officials or employees to obtain favorable decisions.

It is also important to note that we may not hire a third party to do something we cannot ethically or legally do ourselves. Engaging a third party to make an improper payment on Ansell's behalf, or to otherwise facilitate a corrupt practice, violates our Code and anti-corruption laws. We must carefully screen all third parties, using our due diligence procedures, before retaining them. In addition, we must continually monitor them for any suspicious activities or payments.

## Anti-Corruption Laws

We must abide by all anti-corruption laws, treaties and regulations. These restrictions generally forbid bribery of government officials. "Government officials" may include employees of governments and political parties, party officials and candidates for public office. In many countries, they may also include employees of state owned enterprises. We must be sure to follow these laws wherever we do business, regardless of local law or custom. Anti-corruption laws are complex, and the consequences for violating these laws are severe. For this reason, you should avoid any activity that could be viewed as bribery.



### Facilitating Payments are Bribes

In some locations, it may be common practice to make small, payments (known as “facilitating payments”) to speed up routine governmental actions such as the issuance of permits or visas. However, because these payments raise many legal and business concerns, they are always prohibited at Ansell. Ansell will not distinguish between “facilitating payments” and any other bribe.

### Public Tenders

Ansell regularly sells products to government customers and may submit bids or proposals as part of a public tender. If you participate in public or government tenders, you must be familiar with and obey all applicable laws and regulations concerning the public tender process. These rules may, for example, forbid you from communicating with government officials involved in the tender process through unofficial means.

If you have any questions or concerns in this area, you should contact the Law Department.

### Trade Controls



As a global company, we deliver our products all over the world. It is critical that we carefully comply with all applicable rules and regulations that regulate our international trading activity, including exports, re-exports or imports.

### Exports and Imports

An export occurs when a product, service, technology or piece of information is shipped to a person in another country. An export can also occur when technology, technical information or software is provided in any way (including verbally, in the case of information) to a citizen of another country. Before engaging in export activity, you must verify the eligibility of both the location of delivery and the recipient. You also must obtain all required licenses and permits and pay all proper duties.

Import activity or bringing the goods and services we purchase from a foreign or external source into







another country, is also subject to various laws and regulations. Specifically, this activity may require the payment of duties and taxes, as well as the submission of certain filings.

Consequences for violating trade control laws and regulations are severe for both Ansell as a company and the individuals involved. If you have any questions about this or other trade control policies, please consult the Law Department.

### **Sanctions and Boycotts**

Regardless of where we are doing business, we must follow the economic sanctions and trade embargoes that apply to our activities. These sanctions are often used by countries to further foreign policy and national security objectives. If you are unsure whether a transaction complies with applicable sanction and trade embargo programs, you should consult the Law Department.

In addition, many countries have enacted laws that prohibit companies from participating in or cooperating with an unsanctioned international boycott. It is Ansell's policy to comply with all relevant anti-boycott laws.

If you believe you have received a request or other form of communication regarding boycotts or trade embargoes, you should immediately report the situation to the Law Department.

# WAIVERS OF OUR CODE

Our Code will be periodically reviewed and may be revised, changed or amended at any time by the Board of Directors of Ansell Limited. In addition, the Board is responsible for the final interpretation of the information contained herein. Any waivers of or exceptions to this Code for directors and executive officers may be made only by the Chairman of the Ansell Limited Board of Directors, in writing. Any other waivers or exceptions will be made jointly by the Chief Executive Officer and the General Counsel. All waivers and exceptions will be promptly disclosed when required by regulation or law.





