

Data Ethics Policy

1. Introduction

This Data Ethics Policy (the "Policy") sets out Coloplast A/S' ("Coloplast" or "Company") position on data ethics. The Policy, including how the Company works with data ethics, is further described in the Company's management report in accordance with Section 99d of the Danish Financial Statements Act.

The Policy comprises all types of data, including but not limited to personal data, and outlines how Coloplast works to ensure ethical use of data.

The Policy applies to the entire Coloplast Group and supplements the Company's other policies on information and data.

2. General principles for processing data

Coloplast's mission is to *"make life easier for people with intimate healthcare needs"*. To do this, the Company relies on data to provide its services and improve its product offerings.

Coloplast acknowledges that data is a valuable asset and should be treated with sensitivity and respect. Ensuring that appropriate measures are in place to safeguard ethical data processing within the Coloplast Group is a natural part of doing business in Coloplast.

Coloplast has therefore defined seven data ethical principles:

1. **Transparency:** Individuals must be able to understand how their personal data is used.
2. **Data quality:** Decisions must be made based on correct and sufficient data.
3. **Fairness and non-discrimination** Bias must be avoided, as it can have severe negative implications. Data collection and processing must therefore be unbiased, impartial, and shall correspond to individual needs.
4. **Autonomy:** Respect individuals' privacy, protect their rights, and honour confidentiality.
5. **Ethics by design:** Controls must be built into the architecture to prevent harm and risks to individuals.
6. **Responsible data sharing:** Data must be shared on a need-to-know basis only, and processes for sharing data must actively and consistently consider and protect individual's rights.
7. **Accountability:** Clear governance, effective policies and processes, and continuous training and monitoring are a must.

It is important to Coloplast that not only Coloplast but also the companies that Coloplast does business with maintain a high level of data ethics.

3. Use of data in Coloplast

The Coloplast Group uses and processes data in various functions such as R&D, sales, marketing, finance, People & Culture etc. Having solid data helps make better decisions which ultimately benefit society and the end-users.

Further, Coloplast conducts evidence-based scientific research and analyses which are used for product development, enhancement of product safety and quality, and market surveillance and statistics. These include, among other, user interviews, end-user surveys, and clinical trials.

3.1 Data governance

Coloplast's principles on data ethics are approved by the Board of Directors. The Executive Leadership Team is responsible for establishing policies, processes and procedures to ensure compliance with this Policy, and reporting structures are put in place to verify compliance.

3.2 Impact on society

Misuse of data can have a negative impact on society. Coloplast therefore adheres to a high standard of data ethics and solely uses and processes data for legitimate purposes that serve shared benefits for all interested parties.

Data processing within the Coloplast Group must never lead to any form of discrimination, or biased decisions, decision-making or results.

3.3 Data sharing

Coloplast uses a variety of sources for data collection ranging from data collected internally from users and corporate IT systems (such as order intake systems, complaint systems, etc.) and externally from third parties. To the extent Coloplast purchases data, Coloplast only purchases generic market data from legal sources. Regardless of how data is collected, Coloplast always respects data privacy laws and regulations.

Coloplast retains full ownership of data shared with third parties, and Coloplast only shares data for legitimate business processes and in compliance with applicable laws and regulations. When sharing data with third parties, Coloplast maintains responsibility for secure and safe data processing and Coloplast imposes high standards on its third parties to ensure appropriate data security, including protection against unauthorized or unlawful processing, and accidental loss, destruction, or damage.

Coloplast never sells data.

3.4 IT & cyber security

Working responsibly with information and data requires a solid foundation within IT and cyber security. Coloplast will always seek to implement appropriate IT and cyber security measures both in design and by default, including appropriate management of user rights and access restrictions.

Coloplast has implemented extensive security measures and continuously trains its employees in data ethics to ensure a satisfactory level of knowledge, awareness and understanding. Coloplast follows the ISO 270001 to constantly drive improvement and validate performance of the Information Security Management System through audits and risk management. All sites within the ISO 27001 certification scope are internally audited annually in addition to external audits as required under the certification.

3.5 Retention

Coloplast will not retain personal data beyond what is necessary to fulfil the purposes for which it was collected, or to comply with applicable laws or regulations.

Retention of personal data ceases by effective deletion or by aggregation and full anonymization.

3.6 Use of artificial intelligence and machine learning

Coloplast's use of AI and machine learning, including algorithms, is still at an early stage. It is Coloplast's ambition to retain all rights related to such software to verify compliance with data privacy laws and maintain control of all data collected through such software.

In early 2023, Coloplast published internal guidelines for employee's use of ChatGPT and similar language model tools.

4. Review, approval and publication

The Board of Directors, with the support of the Audit Committee, is responsible for compliance with this Policy and for completing an annual review of this Policy.

This Policy has been approved by the Board of Directors on 7 December 2023 and is available at Coloplast's website, www.coloplast.com.

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