

AVANOS

# CODE OF CONDUCT

Your North Star

## TABLE OF CONTENTS

<b>WHY WE HAVE A CODE OF CONDUCT .....</b>	<b>3</b>
The Code Applies to All of Us .....	3
Share Your Concerns Without Fear .....	4
Non-Retaliation Policy.....	4
Reporting Honestly.....	4
Resources for Asking Questions or Reporting Concerns .....	5
Violations of Accounting Practices and Internal Controls .....	5
Compliance and Ethics Helpline and Online Reporting .....	6
Obligations of Team Leaders and Others Receiving Reports of Potential Code Violations .....	6
Violations of the Code.....	6
<b>CONDUCT WITH OUR TEAMS .....</b>	<b>7</b>
Freedom of Association.....	7
Diversity and Inclusion and Non-Discrimination .....	7
Global Human Rights.....	8
Workplace Safety .....	9
Respectful Workplace .....	10
Workplace Violence .....	10
Drugs and Alcohol .....	10
<b>CONDUCT WITH OTHERS .....</b>	<b>11</b>
Customers and Suppliers.....	11
Social Media .....	12
Competition.....	12
Safety of our Products.....	13
Employee and Patient Data Privacy .....	13
Competitive Information.....	14
Environment.....	14
Government .....	15
Gifts, Entertainment and Other Favors .....	15
Doing Business Internationally .....	18
<b>CONDUCT WITH OUR COMPANY .....</b>	<b>19</b>
Conflicts of Interest.....	19
Confidential Information.....	21
Use of Company Resources.....	22
Record Retention .....	23
Financial Reporting.....	24
Fraud Prevention.....	25
<b>DOING WHAT’S RIGHT IS THE AVANOS WAY.....</b>	<b>26</b>

## DEAR AVANOS EMPLOYEES AND CONTRACTORS,

CEO

At Avanos, our focus is on helping patients return to what matters most. Acting ethically and compliantly every day is crucial as we serve patients, providers, and caregivers. Our customers trust us to provide solutions that truly impact patients' lives.

By upholding high standards of professional behavior, we encourage customers to embrace our technologies and collaborate with us in advancing healthcare. The Avanos Code of Conduct isn't just words; it's a pledge to uphold ethical business practices worldwide. Our actions safeguard Avanos' reputation, driving growth through innovation and prioritizing patient well-being. If you have any questions, feel free to reach out to your manager, a senior leader, or me.

Remember, when faced with a decision, always choose to do the right thing.

Sincerely,



Dave Pacitti  
Chief Executive Officer



CECO

All Avanos employees have shared goals in supporting our patients. In a shifting world, uncertainty can cloud our path. That's why the Avanos Code of Conduct serves as our professional GPS, guiding us through challenges and ethical dilemmas. It sets shared standards, offers direction in moral quandaries, and connects us to essential policies and resources for confident decisions in all interactions.

Every team member is encouraged to delve into the Code, understanding its relevance to their role. Links to global policies provide further insights. Remember, you're not alone in navigating this journey. Support is readily available from managers, other leaders, or the Ethics & Compliance team.

Thank you for upholding integrity, accountability, and a collective commitment to doing what's right. Together, we move forward with clarity and purpose.

Sincerely,



Jonathan Turner  
Vice President & Chief Compliance Officer



## WHY WE HAVE A CODE OF CONDUCT

At Avanos\*, it is our mission to deliver clinically superior breakthrough medical device solutions to improve patients' quality of life. Ethical decision-making and compliance ~~is~~ are at the core of how we operate as a company and is integral to our success as a pure play medical device company.

The Code cannot describe all laws, regulations or Avanos policies that apply to us or to a specific situation. Instead, *the Code is an important reference guide, an ethical framework, to us as we strive to conduct our businesses in an ethical and appropriate manner. The standards it establishes are often higher than the minimum legal obligations.*

A company needs to take smart risks to Innovate. This requires a solid ethical and compliance foundation so every person, no matter the level, can make the best decisions on the risks to take and the risks to avoid.

### THE CODE APPLIES TO ALL OF US

Each of us has the obligation to read and understand the Code of Conduct. The Code of Conduct applies to every Avanos employee and contractor around the world. The Code of Conduct also applies to members of the Board of Directors of Avanos. If a local custom, culture, or law sets a different standard than the Code, you should ask the Ethics & Compliance Department or Legal Department for guidance. We are each responsible for our own compliance with the Code, to report suspected violations, and to cooperate in the Company's investigation of potential violations.

### SHARE YOUR CONCERNS WITHOUT FEAR

If you become aware of a Code of Conduct issue, there are many reasons that you might not want to tell anyone. You might not be sure what happened or if it was wrong. You might be afraid to "cause trouble" or that you will be punished for saying something. You might think it is someone else's responsibility.

It is hard to speak up, especially if you are afraid.

"Courage is one of the most important of all the virtues because without courage you can't practice any of the other virtues consistently." --Maya Angelou

Avanos needs your courage:

- \*Courage to ask the question no one is asking
- \*Courage to raise the concern you have
- \*Courage to suggest a new idea
- \*Courage to identify an issue

And Avanos requires you to report any unethical or illegal activity. If you do not feel comfortable using your name, you can share your concern anonymously (subject to local laws).

## NON-RETALIATION POLICY

To encourage you to ask questions and raise concerns, our Company is committed to protecting the rights of those individuals who report Code of Conduct issues in good faith. Our Company will not retaliate against a person who:

- Reports what he or she believes is a violation of our Code, our policies, or the law.
- Raises a compliance question or seeks advice about a particular business practice, decision, or action.
- Cooperates in an internal or government investigation of a potential violation.

You cannot lose your job or your benefits, or be demoted, suspended, threatened, harassed, or discriminated against, for raising a Code of Conduct concern honestly or for truthfully participating in a Company investigation. The employees engaged as investigators of any violation are also protected by this non-retaliation policy.

## REPORTING HONESTLY

Reporting honestly means that you have a good faith belief that the Code of Conduct has been violated even if an actual violation cannot be verified. Filing a report to retaliate against another individual, gain an advantage in a personal conflict, or to harass or intimidate does not constitute reporting honestly.

Dishonest reporting under the Code of Conduct is in itself a violation of the Code of Conduct. If you believe someone is retaliating against you, please report it as you would a violation of the Code.

**Q.** Different countries have different culture and laws. **Does the Code apply to everyone globally?**

**A. Yes.** The conduct established in the Code applies to all employees and contractors worldwide regardless of the location. If a local custom, culture, or law sets a different standard than the Code, you should ask the Ethics & Compliance or Legal Departments for guidance.

**Q.** I saw my team leader doing something that seemed unethical, but I'm afraid to report the suspected violation. **Will I get in trouble or hurt their reputation by making a report?**

**A. No.** You cannot get in trouble or hurt your team leader's reputation simply by making a report. You will not be held responsible for reports made honestly, even if they turn out to be unfounded. Investigations are conducted in an objective, fair and confidential way to ensure that the reputations of everyone involved are protected. All concerns about the Code and reports of retaliation will be fully investigated.

## RESOURCES FOR ASKING QUESTIONS OR REPORTING CONCERNS

Reporting suspected violations of the Code of Conduct is critical so that the Company can properly determine if a problem exists that needs to be fixed. For that reason, we all have an obligation to report suspected violations of the Code of Conduct. If you have questions about the Code or you are aware of suspected violations, there are several resources available to you.

- **Your team leader**

You may take your questions and concerns to your team leader. If you do not want to tell your team leader about your concern, or if you do not believe your team leader has taken appropriate action, you can also go to:

- **Another team leader**

- **Any member of the Global Security team**

Email: [global.security@avanos.com](mailto:global.security@avanos.com)

Phone: 470-448-5000

Mail: Avanos Medical, Inc.  
5405 Windward Parkway  
Alpharetta, GA 30004 USA  
Attention: Global Security Department

- **Any member of the Legal or the Ethics & Compliance Departments**

You may contact any member of the Legal or Ethics & Compliance Departments with whom you have worked.

You may also contact the Avanos General Counsel's office at:

Email: [ComplianceSupport@Avanos.com](mailto:ComplianceSupport@Avanos.com)

Phone: 470-448-5000

Mail: Avanos Medical, Inc.  
5405 Windward Parkway  
Alpharetta, GA 30004 U.S.A.  
Attention: Ethics & Compliance Department or Legal Department

- **Any member of the Human Resources Department.**

You may contact the Human Resource representative for your business unit or country.

## Compliance and Ethics Helpline.

<https://app.convercent.com/en-us/LandingPage/c6d2b4bb-4bbb-e811-80e6-000d3ab6ebad>

Note, in accordance with applicable laws, the Compliance and Ethics Helpline may not be available in certain countries.

## VIOLATIONS OF ACCOUNTING PRACTICES AND INTERNAL CONTROLS

The failure to comply with the Company's accounting practices, internal accounting controls, or auditing practices could have severe consequences for Avanos and its shareholders. If you have concerns with respect to these matters, you should report your concerns to:

- **General Counsel**

Phone: 470-448-5000

Mail: Avanos Medical, Inc.  
5405 Windward Parkway  
Alpharetta, GA 30004 U.S.A.  
Attention: General Counsel

OR

- **Chairman of the Audit Committee**

Mail: Avanos Medical, Inc.  
5405 Windward Parkway  
Alpharetta, GA 30004 U.S.A.  
Attention: Corporate Secretary

OR

- **Compliance and Ethics Helpline**

**Q.** I have a concern, but it is not covered by the Code of Conduct. **Does that mean there is no problem?**

**A.** **The Code of Conduct cannot possibly answer every question or ethical situation.** If something does not seem right to you, ask your team leader or one of the other people listed in this Resources section.

## COMPLIANCE AND ETHICS HELPLINE AND ONLINE REPORTING

To ensure that anyone has the ability to report Code of Conduct concern on an anonymous basis, Helpline Numbers and an Online System are available. Your information will be taken by an independent company staffed by professionals trained to handle Code of Conduct reports for many companies across the globe.

- Available 24 hours a day, 365 days a year.
- Report in any language.
- Report anonymously.

### Online Reporting:

<https://app.convercent.com>

## VIOLATIONS OF THE CODE

Violations of the Code of Conduct are serious offenses. Violating the Code, our policies or the law may result in disciplinary action all the way up to termination. It depends on the type of violation and how severe it is. Where a violation of the Code is also a violation of the law, you may be subject to fines, penalties, criminal prosecution or other legal remedies imposed by a governmental agency or a court.

## OBLIGATIONS OF TEAM LEADERS AND OTHERS RECEIVING REPORTS OF POTENTIAL CODE VIOLATIONS

Team leaders and others who receive reports of potential Code violations play a very important role in upholding the Code of Conduct. Avanos encourages team members to talk to their team leaders about their concerns. Team leaders and others who receive reports of potential Code violations need to be prepared and know how to handle any Code of Conduct concerns or reports.

Team leaders should:

- Make sure that you know and understand the Code and model your behavior consistent with the Code.
- Act to stop violations of the Code or the law by team members.
- Let team members know that you are available to discuss their concerns.
- Take team members' questions and concerns

Once a potential Code of Conduct violation is reported to you:

- Feel free to seek guidance before responding.
- Raise all concerns to the appropriate level and function. Please reach out to Human Resources or the Ethics & Compliance Department for guidance.
- Support team members who raise concerns honestly and treat them with respect.
- Never let team members feel that their concerns are being ignored.
- Ensure that no retaliation occurs against someone for reporting a suspected violation of the Code.

## CONDUCT WITH OUR TEAMS

Avanos believes that our success depends on trust and respect for each other. Teamwork is a value that guides us in all we do.



## FREEDOM OF ASSOCIATION

We are committed to respecting our employees' right to freedom of association, including;

- The right to organize in accordance with national laws and practices.
- The right to collective bargaining through representatives of their own choosing.
- The right of their chosen representatives to have reasonable access to our employees in order to represent them.
- The right to engage in other protected activities.
- The right to refrain from such activities.
- We expect that our suppliers and business partners will adhere to the same principles. See our [Supplier Social Compliance Standards](#) for more information.

## DIVERSITY AND INCLUSION AND NON-DISCRIMINATION

We are committed to having a globally diverse workforce through equal employment opportunities. We will:

- Recruit, promote and support the professional development of a globally diverse workforce.
- Hire, train, promote, and compensate based on the ability, achievement, experience, and conduct of the employee without regard to race, ethnicity, color, gender, sexual orientation, age, religion, creed, national origin, gender identity, disability, legally protected leave or veteran status or other categories protected by applicable law.
- Recognize and utilize the diversity of each other's talents, abilities, and experiences.
- Be open to all perspectives and help others feel comfortable expressing those perspectives.

## GLOBAL HUMAN RIGHTS

Avanos is committed to recognizing human rights on a global basis. We have established certain standards designed to protect human rights and also expect our suppliers and business partners to follow these standards:

- Allow freedom of association and collective bargaining.
- Protect against child labor.
- Protect against forced labor and abuse of labor.
- Prohibit discrimination.
- Comply with work hour, wage, and benefit laws.
- Provide a safe and healthy workplace.
- Protect the environment.
- Prohibit corruption and bribery.

See our [Supplier Social Compliance Standards](#) for more information.

**Q.** I overheard my team leader tell my co-worker a joke involving religion that made my co-worker uncomfortable. I don't want to get in the middle of anything. **What should I do?**

**A. Report It.** All employees are entitled to a workplace where their co-workers and team leaders treat them with dignity and respect. You should report the matter to your Human Resource representative or by using the Compliance and Ethics Helpline, even though doing so may make you uncomfortable. See: [Resources for Asking Questions or Reporting Concerns](#).

**Q.** I feel as though I was not given a promotion because of my gender. **What should I do?**

**A. Report It.** Avanos policy requires that employment decisions be made without regard to the gender of the candidate. If you feel you were treated unfairly, you should report your concern. See: [Resources for Asking Questions or Reporting Concerns](#).

## CONDUCT TIP

If you see or become aware of a supplier or vendor violating any of these human rights standards, Tell Us.

## WORKPLACE SAFETY

At Avanos, we believe that occupational injuries and illnesses are preventable and can be eliminated. No production goal, cost saving, time-saving or competitive advantage is worth an injury of any kind. We are committed to:

- Ensuring that safety is always our number one priority.
- Integrating our belief that all workplace injuries and illnesses are preventable into our research and engineering, product development, manufacturing, delivery, and sales activities.
- Providing a workplace that meets or exceeds applicable occupational safety and hygiene laws and regulations.
- Establishing occupational safety and hygiene standards and technical guidance based on best practices.
- Striving to continually improve our occupational safety and hygiene performance.
- Expecting all Avanos personnel to contribute to safety improvements.



**Q.** My team leader suggested using an unsafe practice to speed up the production line. I know our goals are very important, but I don't feel that the new process is safe. What should I do?

**A. Report it.** Never compromise safety. No production goal, cost saving, time saving, or competitive advantage is worth an injury of any kind. Every employee has the right to refuse to do work reasonably perceived to be dangerous to personal health or safety. See: Resources for Asking Questions or Reporting Concerns.

## CONDUCT TIP

Remember these three safety obligations in your daily activities:

**1. "Look after yourself"**

I will act in ways that I consider safe and for which I am properly trained to do and have the proper tools to do.

**2. "Look after your coworkers"**

I will immediately speak up to anyone performing or about to perform an act or task that is unsafe, and I will do what I can to keep a person from performing a task which they are not properly trained to do.

**3. "Listen to your coworkers"**

I will immediately stop what I am doing if someone speaks up to me about a task I am doing. I will resolve the concern with respect and goodwill, requesting assistance from another, if necessary, before continuing.

## RESPECTFUL WORKPLACE

We are committed to providing our employees with a work environment free from harassment, intimidation and other inappropriate behavior.

### Examples of harassment can include:

- Unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature.
- Offensive talk, jokes, pictures, and comments that involve race, color, sex, sexual orientation, gender identity, age, religion, creed, national origin, disability, veteran status or other protected categories.

### Examples of inappropriate behavior can include:

- Shouting or screaming in anger.
- Calling names.
- Profanity directed at another person.
- Threats and intimidation.
- Public teasing/ridicule.
- Intentionally excluding a person from a group.

**Q.** I am a team leader. One of my team members and I had dinner with a vendor rep. My team member made several flirtatious remarks to the vendor rep. I thought this was a personal issue and didn't say anything. **Am I right?**

**A. No.** If you tolerate your team member's inappropriate behavior, you are giving the message that it is acceptable. Your team should behave the same way at a business dinner that they would behave in the office. You should counsel the team member on appropriate behavior.

**Q.** I overheard a co-worker threaten another employee, who is afraid to report the incident. **What should I do?**

**A. Report the incident immediately.** Avanos will not tolerate acts or threats of violence and will investigate all reports. You have a responsibility to act when you know of a threat or risk to any of our people. See: [Resources for Asking Questions or Reporting Concerns](#).

See our [Human Resources Insite page](#) for more information.

## WORKPLACE VIOLENCE

It is Avanos' policy to conduct business, provide services and protect its employees and the public from harm by providing a safe, secure and healthy environment that has no tolerance for aggressive behavior, violence, threats (direct, indirect or veiled), harassment, intimidation and/or weapons. As such, it is important that protecting employees, customers, property, information and Avanos' image is a shared goal for which all employees at Avanos are responsible.

Anyone who believes that he or she is a victim of threatening, harassing, violent or potentially violent conduct in the workplace, or who observes such behavior or believes a threat of such behavior exists (even if originally meant as a joke), should immediately report the conduct to their supervisor, Human Resources, Compliance, Legal and/or Global Security.

## DRUGS AND ALCOHOL

### *We are committed to a drug-free workplace.*

- Do not sell, use, or be under the influence of alcohol, non-prescribed drugs, narcotics, or any other "controlled substance" as defined by criminal statutes while at work, except for the serving of alcoholic beverages in connection with an authorized event.
- Participate in Avanos awareness programs to educate yourself about the hazards of substance abuse and addiction.
- Contact the local Avanos confidential Employee Assistance Program, if drug or alcohol abuse may be affecting your job performance or the performance of others.
- All employees are subject to testing, if allowed by local law, if the employee appears to be under the influence of drugs or alcohol at work, or when the Company has reason to believe an employee has violated this policy. All applicants must pass a post-offer, pre-employment drug screening.

See [Policy on Alcohol, Drugs, and Other Controlled Substances](#) for more information.

## CONDUCT WITH OTHERS

### OUR BUSINESS

Fair dealing has been a fundamental value of Avanos since the Company was founded.

We believe that honesty and trustworthiness build long-lasting relationships. There are many ways we stay true to this value in today's environment.

In addition, as a medical device company, we are subject to a number of global laws and regulations that directly impact how we can do business. In order to execute our visions and our mission, we must comply with these requirements at all times.



## CUSTOMERS AND SUPPLIERS

We are committed to fair dealing with our customers and suppliers.

- Do not mislead, misrepresent, deceive or take unfair advantage of customers or suppliers.
- If you know of a mistake, whether it is in Avanos' favor or not, correct it.
- Follow Avanos sourcing processes before appointing suppliers.
- Buy from suppliers and sell to customers based on appropriate business considerations such as quality, price, service, reliability and a commitment to human rights.
- When buying goods or services on behalf of the Company, treat all potential suppliers fairly and honestly.
- Never indicate to any supplier that our relationship with them may be affected by personal favors, gifts, or donations to charity. See our [Policy on Conflicts of Interest](#) for more information.
- Do not offer gifts, entertainment, or favors to win or keep business. See our [Policy on Interactions with Healthcare Professionals](#) and our [Policy on Anti-Corruption](#) for more information.
- Suppliers to Avanos are required to comply with all applicable local and national laws, rules, regulations and requirements in the manufacturing and distribution of our products and supplies and in the provision of services. All Avanos contracts and purchase orders must require suppliers to adhere to the [Supplier Social Compliance Standards](#) ("SSCS").

## SOCIAL MEDIA

Social media outlets are an important method of personal and business communications. We must, however, use care and consideration in posting or sharing anything online.

- Any social media posts related to our products or their clinical attributes or benefits must comply with Company policies.
- There should be no expectation of privacy if you participate in social media while at work or while using Avanos equipment.
- Only authorized employees may use social media on behalf of Avanos. If you are not so authorized, you should identify when making posts that you are an employee of Avanos and make it clear that any opinions expressed are your own and not those of Avanos.
- Be careful never to disclose Avanos' confidential or proprietary information, including trade secrets, intellectual property and copyrighted or trademarked information, when using social media (or otherwise).
- Be courteous, respectful and use good judgment in what you say online. Never post anything that is defamatory, discriminatory, harassing, or retaliatory.
- Please reference our [Social Media Guidelines](#) for more information.

If you have any questions about posting anything online, you can contact your team leader, the Human Resources, Ethics & Compliance Department, or Legal Department for assistance.

## COMPETITION

We are committed to fair competition in compliance with anti-trust laws (also called competition laws) in every country, state, and locality where we do business. We compete vigorously and ethically by making *independent* decisions on how to compete that do not treat customers unfairly or undermine free competition in the marketplace.

Penalties for violations of anti-trust laws can be severe and include damage to reputation, high fines, and jail. More and more, countries share information to enforce these types of laws – so an investigation in one country can quickly expand to many countries.

In general:

- Never discuss topics with competitors that could affect pricing or marketing decisions such as prices, sales terms, business plans, margins, costs, bids, production capacity, inventory levels, trade promotions, or discounts.
- Never agree with competitors to fix prices, limit production or sales, or divide territories, customers, or suppliers.
- In those instances where we have significant market power we must not abuse that power by monopolizing, tying (selling a product only if the buyer buys a second product), improperly price discriminating between competing reseller customers, pricing below our cost, or refusal to supply.
- Do not require our customers to sell our products at the prices we set. We can suggest a resale price, but we cannot coerce any customer to use it.
- Do not agree with other companies to boycott suppliers or customers.
- Contact the Legal or Ethics & Compliance Departments for specific guidance about the laws in your country and to report all inappropriate conversations with competitors.
- For more information, please reference our [Compliance policies on Insite](#).

**Q.** While talking to a friend who used to work at Avanos, I learned she now works for a competitor. She asked me about upcoming product introductions and promotional pricing and offered to share her company's marketing and pricing plan with me. **Is it okay for me to have this conversation with her?**

**A.** No, you should end the conversation and contact the Ethics & Compliance and Legal Departments immediately. You should always exercise caution if you find yourself in a meeting with a competitor because it can give the appearance of impropriety. If you do find yourself in such a meeting you should never talk about business topics like those you mention as that conversation may lead to an improper agreement, or the appearance of an improper agreement, on pricing. If pricing is raised leave the room immediately and contact the Ethics & Compliance and Legal Departments immediately.

## SAFETY OF OUR PRODUCTS

You should never compromise product quality or safety.

- Avanos' reputation for product safety and quality is one of our most valuable assets. We are committed to providing products that are safe and please our customers and patients.
- The health, safety and well-being of healthcare professionals and patients are our primary concern. We will meet or exceed legal and regulatory requirements and industry standards for product safety and quality. We work every day to earn the trust of our healthcare professionals and patients through all our actions and decisions.
- We are committed to producing safe, high-quality products across all of our brands. We maintain the trust of our customers and patients by designing and manufacturing superior products, starting with the purchase of our raw ingredients and continuing until the finished product is used by the customer or patient.
- Each one of us plays a role in providing our healthcare professionals and patients with the safe, high-quality products they expect. Know the quality standards, policies, and procedures that apply to the products and activities at your location.

**Q.** We received a raw material on our production line. The material just did not look like the material I am used to working with; I think it might be contaminated. My team leader said that we are in a rush to make this order and that I should not be concerned and just use it. **What should I do?**

**A. Stop and Report it.** Never do anything that you believe could compromise the quality or safety of our products. No production goal or time saving measure is worth compromising the trust our customers and patients place in us. Stop what you are doing and contact your facility quality leader to determine whether the material is safe and meets our quality specifications. See: [Resources for Asking Questions or Reporting Concerns](#).

- Never do anything that could undermine the trust that our customers and patients place in us or could compromise the quality or safety of our products.
- If you see something that could negatively affect the quality or safety of an Avanos product, speak up and report it immediately to your team leader or your facility, business unit or corporate quality/product safety department.

For more information, please reference our [Quality Policy](#).

## EMPLOYEE AND PATIENT DATA PRIVACY

As part of our everyday work, many of us have access to personally identifiable information of our employees and our customers. Laws around the world impose responsibilities on the Corporation and our employees to protect and lawfully use that personally identifiable information. **Failure to meet our responsibilities could result in government actions, damage to our reputation, potential lawsuits, fines and penalties.** This information must be maintained, kept confidential, and used in accordance with the terms of our [Policy on Data Privacy](#).

Further, we have an obligation under patient privacy laws globally to never receive, request or share, internally or externally, any personally identifiable health information of patients, except as permitted by our [HIPAA Privacy Policy](#).

One way we meet these obligations is by protecting our hardware and data from cyberattacks. When we are not careful about protecting our computers and other devices, we expose all of our data to hacking, including employee and patient data. **You must do your part** in preventing a cyber incident by not clicking on links that you don't trust and by not sending sensitive data in email. Take a pause — if you get a request in email, text, or even voicemail, reach out to the person requesting the information and confirm they want it. Follow the Acceptable Use Policy to send anything. Violating this requirement, even if it is unintentional, can result in disciplinary action. The risks are too great to the company and others to not follow this requirement.

## COMPETITIVE INFORMATION

In the ordinary course of business, information is routinely acquired about other companies, including customers, suppliers and competitors. Being exposed to this type of competitive information is an ordinary part of a competitive business environment. However, there are legal and ethical limits on acquiring competitive information:

- We should not seek to acquire information through improper means, such as through bribery or covert surveillance on our competitors.
- We should not hire an employee of a competitor to get confidential information or encourage employees of competitors to disclose confidential information about their employer.
- If offered information about a competitor that you believe may be confidential, you should ask if it is confidential and how it was obtained. If you are uncertain about whether the information was obtained properly, contact the Ethics & Compliance Department or Legal Department.
- If the material that is offered is written material and carries a classification such as “secret,” “confidential,” or “proprietary” or if you otherwise determine that it is confidential, you should refuse to accept it, immediately make a note of what occurred and then contact the Ethics & Compliance Department or Legal Department.

For more information, please reference the following policies:

[Policy on Antitrust and Competition](#) [Policy on Anti-Corruption](#)

## ENVIRONMENT

Avanos is committed to operate its business in a way that protects the environment and promotes the sustainable use of natural resources. All employees and contractors are expected to act as responsible citizens and environmental stewards by adhering to laws, regulations and standards concerning the environment.

**Q.** I heard about a meeting that a competitor is holding at a trade show that I will be attending. I don't think they will allow me to attend if they know that I'm from Avanos. **Can I go if I pose as a customer?**

**A. No.** Obtaining information about a competitor by disguising your identity is never appropriate. Gathering information about competitors is a legitimate business activity when done lawfully and ethically. You should also consult with the Ethics & Compliance or Legal Departments before meeting with a competitor, because any such interactions may raise anti-trust concerns.

**Q.** To help me do a better job at Avanos, I kept several documents that I used at my previous employer describing various processes they used. **Can I use them at Avanos?**

**A. It depends.** If the documents contain confidential or proprietary information, you cannot use or share this with Avanos. Avanos expects all employees to honor confidentiality or nondisclosure agreements or other obligations of confidentiality to their previous employer. If you are unsure, check with your previous employer, and if you are still unsure, talk to the Ethics & Compliance or Legal Departments before accepting, using or sharing suspect information.

**Q.** I have seen activities at Avanos that may compromise the environment or create an environmental hazard. **What should I do?**

**A. Report it to your team leader.** If you are aware of any potential violation of law or company policies or procedures it is your responsibility to report it. The incident or condition will be investigated and, if necessary, corrected. See: [Resources for Asking Questions or Reporting Concerns](#).

## GOVERNMENT

As a global company, Avanos is subject to the laws of all countries in which we operate. We are committed to complying with all applicable government laws, rules and regulations. It is important to remember that compliance with the Code reflects the minimum standard acceptable. Where local or specific provisions are relevant and require an even higher standard of conduct, the more stringent rules may apply (e.g., when interacting with Healthcare Professionals). Additionally, many countries sometimes apply their laws to Company operations and personnel outside of their borders. Always check with our Ethics & Compliance Department or Legal Department if you are not sure what laws apply to your situation.

In addition:

- Be careful to make clear that you do not speak or act for Avanos unless you have been authorized to do so.
- If you are contacted by a government official in connection with your work, or are asked to provide information in connection with a government agency inquiry or investigation, you should contact the Ethics & Compliance Department or Legal Department or a member of the regulatory affairs staff for advice.
- When representing the company, Avanos expects you act as directed by the company and cooperate with any governmental investigations or inquiries. This means you shall provide truthful, accurate, unambiguous, complete, and timely responses. You shall not alter, destroy, falsify, or conceal relevant documents, or threaten, force, obstruct, impede, influence, or otherwise coerce the responses of others.
- Do not contact government departments or personnel seeking to influence legislation, regulations, or decision-making on behalf of Avanos without consulting the Ethics & Compliance Department or Legal Department.

## GIFTS, ENTERTAINMENT AND OTHER FAVORS

Accepting or giving gifts, entertainment and other favors may create a potential, perceived or actual conflict of interest or even violate local laws. "Gifts, entertainment, and other favors" means anything of value. Examples of these include, but are not limited to: meals, lodging, discounts, prizes, travel, tickets, money in any form, stock, or Avanos products. If you have questions about the maximum amount of gifts, entertainment and other favors, which you may accept or give, please contact the Ethics & Compliance or Legal Departments.

### Accepting Gifts, Entertainment or Favors

In the course of your work for Avanos, you may be offered gifts, entertainment or other favors from customers, suppliers, vendors, or other business contacts. Although you may feel that accepting such things would not affect your behavior it may cause some people to feel that they should do something in return. This could affect their ability to make objective business decisions in the best interest of Avanos. To prevent such situations, you should comply with the following guidelines.

In general, the only kinds of gifts or entertainment that you may accept from anyone who does or may do business with Avanos are:

- Infrequent gifts of low value, such as pens, calendars, or small promotional items related to business.
- Occasional reasonably-priced meals with a business contact.
- Occasional attendance at sports, theater, or other cultural events with a business contact.

If you are uncertain about whether a gift, meal or event is appropriate for you to accept, please discuss the matter with your Team Leader or contact the Ethics & Compliance Department or Legal Department.

### Each of us must not:

- Accept anything from a business contact if it will make you feel you should do, or promise to do, anything in return.
- Accept anything in return for giving someone Avanos business.

If you receive anything that does not meet these guidelines, you should return it and explain that our policy does not allow you to keep it. If it would violate a social custom to return it, talk to your team leader or Human Resources about donating it to charity or another solution. If you are not sure whether the gift, entertainment or favor offered to you violates these guidelines or your local policy, talk to your team leader or the Legal Department.

## Giving Gifts, Entertainment or Favors

We are committed to winning business based on the superior features, benefits and quality of our products and services. Offering gifts, entertainment or favors in order to win or keep business is unethical and may be illegal. Additionally, gifts to healthcare professionals must be in compliance with our [Policy on Interactions with Healthcare Professionals](#). There are occasions where it is acceptable to give a modest gift or entertainment to a business contact in order to build or sustain a business relationship and goodwill, keeping it to a minimum.

Any gifts to healthcare professionals must be in compliance with our [Policy on Interactions with Healthcare Professionals](#). Entertainment and other favors to healthcare professionals are strictly impermissible under our policy.

For gifts, entertainment, or favors to non-HCPs:

- Do not give gifts, entertainment or favors to the same person or company more than occasionally.
- Limit gifts, entertainment and favors to what is reasonable and appropriate under the circumstances.
- Do not give gifts, entertainment or favors if you are doing it to make the other person feel obligated to give business to Avanos.
- Do not provide gifts or entertainment that may appear to violate our commitment to respect each other.
- Make sure that you are not violating the other company's gift and entertainment policy.
- Never give cash, checks, money orders, gift certificates, coupons, loans or other types of money or money equivalent.
- Ensure you are in compliance with any local policy applicable in your region/country.

**Q.** I offer a vendor an expensive ticket to the World Cup at Avanos's cost and I later accept from the same vendor an even more expensive ticket to the Olympics. **Isn't that okay?**

**A. No. Both are wrong.** You should not be offering expensive gifts to vendors and just because you have given an expensive gift does not mean you can then accept a more expensive gift.

**Q.** A vendor who would like Avanos' business takes me to lunch at least twice a month. **Is that okay?**

**A. It depends.** Accepting lunch invitations is okay if you are meeting for a business purpose, but frequent or extravagant meals can appear to create a conflict of interest. Consult your team leader if a vendor constantly invites you to lunch. Tell the vendor about the Code and only have occasional lunch meetings with vendors.

**Q.** A vendor offered to deliver scrap materials from a project he completed to my house. The project is finished, and Avanos would just throw away the scrap materials anyway. **Is this okay?**

**A. No.** Never accept items from Avanos vendors for personal use.

## CONDUCT TIP

Accepting expensive gifts from a vendor, including \$500 of Italian china, led to termination.

## Gifts, Entertainment or Favors to Government Officials

Nearly all countries have laws to prevent bribery and corruption. Additionally anti-corruption laws of some countries may apply not only to actions taken by Avanos employees inside these countries but also to actions taken in foreign countries by Avanos subsidiaries and others working on behalf of, or for the benefit of Avanos. Violations of those anti-corruption laws could subject the Company to severe penalties and significantly damage our public reputation.

You should at all times comply with our [Policy on Anti-Corruption](#). You should not offer, promise or give, directly or indirectly, anything of value, regardless of amount, to induce or influence any official government decision or to secure an improper advantage. Examples of payments that may be forbidden include cash gifts, meals, entertainment, business opportunities, Company product, offers or employment, contributions to charitable organizations and more. Additionally, you should not make “facilitating payments” or “expediting payments” to government officials. All of these activities could be considered bribery or corruption.

If the government official might be considered a Healthcare Professional, even stricter rules may apply to interactions with such person.

Do not give or accept bribes and prevent others from doing so. If you have any questions, contact the Ethics & Compliance Department or Legal Department. In those instances, always follow our [Policy on Interactions with Healthcare Professionals](#).

**Q. Who is a government official?**

**A.** A government official is anyone employed by any government or government-controlled enterprise or political party, such as officers, environment and health inspectors, customs officers, postal workers, members of a legislative body, or employees of government-owned hospitals.

**Q.** The only way I can obtain a visa in time to make a business trip in another country is if I make an extra payment to an official at that country’s embassy. **Can I do that?**

**A. No.** Laws of most countries prohibit making payments of this nature and the Company forbids making these payments in any country.

**Q.** A sales representative of one of our distributors described to me the meals and entertainment he is providing to physicians who work at a local government hospital. The meals seem lavish, and I thought providing entertainment to healthcare professionals was prohibited. **What should I do?**

**A. You should immediately contact the Ethics & Compliance or Legal departments.** Under the U.S. Foreign Corrupt Practices Act and similar global anti-bribery laws, the Company can be held responsible for the actions of its distributors, which means that our distributors cannot do what we ourselves cannot do. Our [Policy on Interactions with Healthcare Professionals](#) applies to all interactions with healthcare professionals, and our [Policy on Anti-Corruption](#) applies to all interactions with government entities, including government hospitals.”

**Q.** I was told I have to pay extra to a customs official to clear our products through customs. **Can I do that?**

**A. No.** Laws of most countries prohibit such payments under any circumstance, and the Company forbids making such payments in any country.

## DOING BUSINESS INTERNATIONALLY

As a global company that frequently moves people, products, technology, software, information, money, and equipment and spare parts across national borders, we are committed to abiding by all applicable laws and regulations regardless of where we are located.

If you are involved in moving people, products, technology, software, information, money, or equipment across borders:

- You must know and comply with all applicable import/export laws and regulations.
- You must not engage in any prohibited conduct.
- You must report all requests related to boycotts to the Ethics & Compliance Department or Legal Department.
- Contact the Ethics & Compliance Department or Legal Department, or the Transportation and Trade Compliance Department for up-to-date guidance if you are uncertain about your obligations.
- Always comply with our [Policy on Anti-Corruption](#).

**Q.** We are starting-up a new e-commerce website to sell products directly to consumers. In order to efficiently manage our database of consumer information, we want to engage a service provider located in another country. **Is this a problem?**

**A.** **It depends.** Consult with the Ethics & Compliance or Legal Departments. If the database containing consumer information is going to be shared with the service provider in a different country, there may be data privacy issues. Different countries/regions have different regulatory structures for ensuring that the privacy of personal information is maintained. In some countries, we could be in violation of privacy regulations by exporting consumer data from one country to another.

## CONDUCT WITH OUR COMPANY

Each of us has a duty to protect Company resources and to avoid conflicts of interest with the Company.

### CONFLICTS OF INTEREST

When conducting Company business, we each have a duty to act in the best interest of the Company and to avoid actual, potential, or perceived conflicts of interest. A conflict of interest arises when personal interests, activities, or relationships interfere with our objectivity and loyalty to Avanos. Some conflicts of interest are obvious, such as a kickback payment for awarding Avanos business to a vendor. Other conflicts of interest may be less obvious, such as conducting business with a firm owned by a close family member even when that firm appears to be offering the best value. Any concerns you have regarding actual, potential or perceived conflicts of interest should be discussed with your team leader or the Ethics & Compliance Department or Legal Department. We should each:

- Avoid actions that create or even appear to create – conflicts of interest with the Company.
- Never use our position at Avanos for improper personal gain.
- If you think that you, a family member, another Avanos employee or Avanos business partner has an actual potential or perceived conflict of interest, contact your team leader or the Ethics & Compliance or Legal Departments and have the relationship reviewed.

***Here are some examples of actual or potential conflicts of interest:***

#### Outside Employment

- You or a close relative is employed by, provides services for, or receives payment from any competitor, supplier, or customer.
- You or a close relative owns a business that does business with Avanos.
- You have outside employment or business interests that interfere with your ability to do your job at Avanos (e.g., by causing you to spend Avanos time on your outside employment).

- You conduct business on the side for your personal benefit (not for Avanos) with any Avanos vendor, supplier, customer or contractor.

#### Financial Interests

- You or a close relative has an investment or other financial interest in a privately-owned supplier, competitor or customer of Avanos.
- You or a family member owns more than 1% of the stock of any competitor, supplier or customer of Avanos.

**Q.** A friend of mine who is the owner of a vendor of Avanos has asked me to invest in his company. **Can I make this investment provided that I declare my interest to Avanos?**

**A. No.** Investing in an Avanos vendor is a conflict of interest and disclosing your interest does not remove the conflict.

**Q.** A vendor has invited me to speak at one of their meetings. **Is that okay?**

**A. It depends.** Obtain your team leader's approval before speaking at any external events. Do not disclose any confidential information when presenting to outsiders. Do not accept payment of expenses if it could cause a conflict of interest, such as the vendor gaining favorable treatment from Avanos.

## Public Service

- You volunteer at a charity or other organization that is considering an issue involving Avanos.
- You raise money for charity during working hours (except where sponsored by Avanos).
- You ask customers or suppliers to make charitable donations(except where sponsored by Avanos).
- You are asked by customers or suppliers to make charitable donations (except where sponsored by Avanos).

## Speeches and Presentations

- You are offered a fee for outside speeches or presentations in connection with your work for Avanos.

## Personal Relationships

- You supervise or are supervised by a close relative or partner.
- You are considering hiring a close relative or partner as an employee or contractor.

## Boards

- You are considering accepting a Board appointment but you are concerned that the commitment may interfere with your job.
- You are on a Board that is considering a decision that may affect Avanos.

## Political Relationships

- You work on political campaign during working hours.
- You are expressing political views in a setting where your audience may think you are speaking on behalf of Avanos.
- You make contributions or payments to political parties or candidates on behalf of Avanos.

For more information, please our [Policy on Conflicts of Interest](#).

**Q.** My brother is an electrical contractor and is located near one of our manufacturing facilities. He wants to provide services for the plant. **Is he allowed to perform services at Avanos facilities?**

**A. It depends.** Your brother may approach Avanos to offer his services as long as you have no responsibility for procuring these services, and you have no involvement in the selection process. His company will need to go through the established selection process and meet Avanos criteria. You should tell your team leader about such situations.

**Q.** My wife owns a company which has been providing logistics services for many years to the manufacturing site where I am the purchasing manager. I told Avanos about this when I first joined Avanos and was told it was not a problem. However, in the last 2 years my wife's business has grown significantly and her company now provides 70% of the plant's logistics services. **Is this still okay?**

**A. It Depends.** There is a clear conflict of interest here which may be damaging to Avanos. You should seek further guidance from the Legal Department.

## CONDUCT TIP

Do not email photos of Company processes, equipment, or machinery to third parties without prior permission.

## CONFIDENTIAL INFORMATION

Our businesses operate in a variety of complex and competitive markets. Every employee and contractor needs to be aware that safeguarding of confidential information and trade secrets must be protected in the same manner that other Company assets are secured. Confidential information must be held in the strictest confidence, and reasonable care should be exercised in dealing with such information in order to avoid inadvertent or improper disclosure. You also must protect confidential information by protecting data and equipment from cyber threats. Follow the Acceptable Use Policy to do your part in protecting information and the company.

We are committed to protecting confidential information. In the course of our work, many of us have access to confidential information, including:

- Business plans, including potential acquisitions or dispositions.
- Pricing strategies.
- Financial information.
- Patent or trademark applications.
- Product development or research and development information.
- Employee information, including salary, medical, and contact information
- Manufacturing methods. Customer information and data

Do not disclose any confidential business information to anyone outside the Company, even to members of your own family, unless the disclosure is for a legitimate business purpose, properly authorized, including if appropriate, subject to a written confidentiality agreement. This information must not be used in any way other than in the performance of one's employment duties. Even within the Company and among your co-workers, confidential information should only be shared on a need-to-know basis.

Disclosing confidential information such as acquisitions, product recalls, organizational changes, relationships with customers or vendors, financial information, personal employee information (address, phone numbers, employee numbers), or any other sensitive information outside the Company could hurt the Company's competitive position and its shareholders.

**Q.** If I get an unusual or unexpected request from a leader to email them confidential information, I should reply to the request immediately with the information, right?

**A. Take a pause.** The request may not be legitimate. First, call them personally to confirm the request. They will be glad you did. Then, send confidential information securely following identified business processes and not through email. You can report any suspicious emails, voicemails or text messages to the IT Security team and follow your business team's identified process when receiving fraudulent requests.

**Q.** I have recently made a presentation to senior management about the potential acquisition of a company. The project team has requested that I place this presentation on a SharePoint site. **Is this okay?**

**A. Be Careful.** Before placing confidential information on a SharePoint site it is your responsibility to make sure that access is restricted so that it can only be viewed by the project team and other authorized personnel. If you are ever able to access information on a SharePoint site that you believe should be restricted, you should immediately notify the Legal Department.

## CONDUCT TIP

Be careful what you share outside of Avanos. Even sharing a colleague's name, phone number, and email address may in some circumstances be inappropriate. It could harm the company, create legal problems and could even harm your colleague. Contact the Legal Department before taking any Avanos potentially confidential information outside of the company.

Do your part to protect confidential information:

- Be cautious discussing company business in public, such as in elevators, airplanes and restaurants, and when using mobile phones.
- Do not use your laptop computer on an airplane to work on Company matters when someone can see your screen.
- Refer any questions from investors, analysts, and the media to Corporate Communications or Investor Relations.
- Refer outside questions that seem to ask for confidential information to the [ComplianceSupport@Avanos.com](mailto:ComplianceSupport@Avanos.com).
- Do not allow anyone access to Company facilities without proper written authorization.
- Do not use non-public information about Avanos to trade in stocks or securities.
- Ask the Legal Department if you have any questions about whether it is appropriate to buy or sell Company stock.
- Always follow our [Insider Trading Procedures](#).

Media tools such as social networking sites, blogs, or wikis are subject to the same rules as any other communications. Do not post any information about acquisitions, product recalls, organizational changes, relationships with customers or vendors, financial information, or personal employee information (address, phone numbers, employee identification numbers, etc.) as once posted, it may become available to anyone in the world, including our competitors even if the post is subsequently deleted. You should assume that Company information is confidential unless you are certain the Company has publicly released the information. In addition, all files, records and reports created or acquired in the course of employment are the property of the Company.

## USE OF COMPANY RESOURCES

We are committed to protecting the resources under our control. Company resources include, but are not limited to:

- Equipment, machinery, tools and spare parts.
- Product inventory and supplies.
- Telephones, copiers and fax machines.
- Computers, laptops, mobile phones, tablets, printers, and other technology resources.
- E-mail and internet access systems and tools.
- Confidential information and records.
- Inventions and ideas.
- Trademarks, copyrights and patents.
- Trade secrets and plans.
- Receivables.
- Business relationships.
- Reputation.

### Each of us must:

- Use Company resources responsibly to ensure that they are not misused or wasted; always respect and protect the reputation of the company.
- Manage budgets, expenses, and other funds accurately.
- Follow Avanos travel rules and expense policies which are designed to maximize efficiencies and minimize costs.
- Be attentive to security procedures and be alert for situations that may lead to loss, theft or misuse of Company resources.
- Be cautious when clicking on links from unknown senders or responding to requests for information, even if it seems to come from inside the Company. Review hyperlinks and email content to determine if the email is legitimate. Report any suspicious emails to the IT Cyber Security team.
- Keep personal use of Avanos resources to a minimum. occasional personal use of computers for email or accessing the web, copiers and fax machines, and telephones is permitted as long as it does not distract from your job responsibilities and is in compliance with Avanos policies and procedures.

- Do not allow other people, including friends and family members to use Avanos resources.
- Always use your own user ID and password while on an Avanos computer and never give out your password to anyone.
- Only approved software by IT organization should be used on Avanos computer and mobile devices. Software should not be copied from device to device unless the software license permits it.
- Treat Company assets with care and avoid any use that might lead to loss or damage.

## RECORD RETENTION

We are committed to creating Company records that accurately and fairly present our activities and transactions, and then maintaining those records for so long as required by law or our record retention schedules.

Some examples of Company records are:

- Agreements.
- Invoices
- Employment Records
- Expense reports
- Laboratory notebooks
- Import/Export documentation
- Manufacturing and Production reports
- Quality records.
- Research and development tests
- Environmental records
- Sales activity reports

As required by applicable laws, the Company has policies on the proper administration, maintenance, and retention of records and each of us is responsible for complying with those policies. This means that records must be true and correct, they must be kept and made available to those who need them for their jobs, and they must be properly disposed of when no longer required to be kept by law or as required by our record retention schedules.

**Q.** If I receive an email with a link in it, what should I do?

**A.** Look carefully at the email and link. Even if the email looks like it came from someone you know, it could be a hacked account or a phishing email. Look for misspellings and incorrect grammar. Ask yourself if something seems off about the email or link. Were you expecting this email? If it seems at all suspicious, click your “Phishing Alarm” button. It’s better to double check than regret the click.

**Q.** Our record retention policy states we should only keep emails for a certain length of time but I would like to transfer all of my emails to a thumb drive and keep it forever. It doesn’t take up Avanos storage space. **Isn’t this okay since I know I will need some of my emails after the retention period has expired?**

**A. No.** We all have a duty to dispose of records such as emails when they are no longer required to be kept by law or by our record retention schedules.



## FINANCIAL REPORTING

Avanos is committed to providing fair, accurate, and timely disclosure of financial information. Reporting of financial information requires the highest standard of fairness and honesty.

The integrity of the Company's accounting and financial records is based on the accuracy and completeness of basic information supporting entries to the Company's books and accounts. The harm done to the Company's reputation and to its investors by fraudulent or misleading reporting can be severe.

Dishonest financial reporting can also result in civil or criminal penalties to the individuals involved and to the Company. The reporting of any false or misleading information in internal or external financial reports is strictly prohibited.

All employees and contractors have a role in ensuring our financial integrity:

- Ensure transactions are properly authorized and recorded properly in a timely manner.
- Properly protect Company assets and compare asset records with actual assets regularly.
- Submit, or approve, only valid business expenses for reimbursement.

Follow Corporate Financial Instructions to ensure accuracy and reliability of accounting records.

- Make accounting decisions based on accounting standards and Avanos policies.
- Do not make any false or unsupported statements or entries in the books and records of our Company or in any public disclosure, nor in any internal or external correspondence.
- Properly protect company financial data by not sending system access credentials or personal information to unknown entities. Also, do not send sensitive data via email, even to an internal recipient.

If you become aware of any omission, falsification or inaccuracy of reported information, promptly communicate the information in accordance with the [Protocol for Escalation of Code of Conduct Issues](#).

**Q.** It is near the end of the year, and I have money left in my budget. **Can I prepay an expense I know I will have next year so that it will be applied to this year's budget?**

**A. No.** You must record expenses in the proper accounting period. Charge activities to the year in which they occur. If you need to prepay this year for an activity occurring next year, contact your local finance team to record the item as a prepaid expense.

**Q.** My team leader has asked my team to work as many hours as it takes to get our production goal, but there seems to be an "unwritten rule" that overtime is prohibited and only 40 hours should be put on our time reports. **What should I do?**

**A. Report It.** You should report the actual hours that you work at all times in accordance with local policies, law, and collective bargaining agreements. If your team is working overtime, you should report that overtime accurately. If you are not approved to work overtime, you should stop working when your shift is complete. Never work "off the clock" hours. See: [Resources for Asking Questions or Reporting Concerns](#).

**Q.** My team leader asked me to prepare a purchase order for \$40,000, but her approval authority is only \$20,000. **Can I break the request into two purchase orders to avoid having to get an approval from a higher level?**

**A. No.** Create the purchase order for the \$40,000 and obtain the necessary approvals. If you are uncomfortable challenging your team leader, report it to the Compliance Department or the Compliance and Ethics Helpline. See: [Resources for Asking Questions or Reporting Concerns](#).

## FRAUD PREVENTION

All fraudulent activities are strictly prohibited. Avanos expects employees and contractors to:

- Act with honesty and integrity when working with Company materials, funds, and financial reporting systems.
- Prevent, detect and report fraud.

Some examples of fraud are as follows:

- Stealing cash, inventory, product or other assets.
- Using company funds to buy equipment, supplies, or materials for personal benefit.
- Receiving money or gifts from suppliers in exchange for giving them Avanos business.
- Submitting false or misleading requests for reimbursement.
- Collecting “workers” compensation when you are no longer injured or affected by the incident.
- Writing off recoverable assets or debts.
- Using Company assets for personal benefit.
- Recording sales before the sale is delivered/earned.
- Falsifying time cards or time reporting.
- Making entries into the accounting system that are not valid.
- Authorizing or receiving payment for goods not received or services not performed.

**Q.** A customer has asked me to record sales this month for deliveries we’ll make next month. **What should I do?**

**A. Don’t do it.** This can impact our financial results and is considered fraud. Discuss it with your team leader so they know the difficulties you are facing with this customer.

**Q.** Over the weekend, I accidentally used my corporate credit card to put gas in my personal vehicle. **Am I going to get into trouble?**

**A. No.** We all make mistakes. Just make sure you indicate this in your next expense report and provide payment to cover the charges. However, if this is a habitual problem, there may be disciplinary actions.

## ACTING ETHICALLY IS THE AVANOS WAY

Reading the Code is just a start. We expect everyone to act ethically, legally and in compliance with the Code of Conduct at all times. Each of us is **Accountable** for our own compliance with the Code, to report suspected violations, and to cooperate in the Company's investigation of potential violations. You cannot lose your job or your benefits, or be demoted, suspended, threatened, harassed or discriminated against for raising a Code of Conduct concern in good faith.

The Code is intended to provide guidance on what is ethical when dealing with customers, suppliers, other employees and contractors, competitors and the public. There are a number of resources available to you to answer questions or for reporting violations. Please Ask Us your questions: contact the Ethics & Compliance Department or Legal Department.

*“By **Doing the Right Things the Right Way** every day and being committed to our Code of Conduct, you can help us build a positive, productive workplace. And that’s the kind of workplace we all deserve.”*

**Joe Woody**  
Chief Executive Officer