

Corporate Policy

Smith+Nephew

Privacy

September 2025



Principles

We care for our employees, customers, patients and third-party partners by protecting their privacy in accordance with applicable laws and regulations.

We respect the privacy of individuals and are committed to handling [Personal Information](#) responsibly and in compliance with applicable laws and regulations.

We do not use Personal Information or [Confidential Information](#) for personal reasons or personal gain.

We are committed to the ethical and lawful use of Artificial Intelligence (AI) when processing Personal Information.



Scope and Responsibilities

This policy applies to all Smith+Nephew employees. Our employees are responsible for ensuring that the applicable elements of this policy are cascaded to the third parties with whom we do business including without limitation distributors, consultants, logistics providers, subcontractors, sub-dealers, sales representatives, agents and service providers.

Our [Code of Conduct and Business Principles](#) provides the legal and ethical framework to guide what we do every day and this policy provides the respective principles and rules. If we fail to follow our Code, we face fines, penalties, blacklisting, reduction in business and reputational damage. In addition, our employees face disciplinary action and potentially termination of employment.

Company management are responsible for ensuring that appropriate processes, procedures and documentation within their organisations are created and maintained to demonstrate compliance with this policy.

Additional tools, information and support on implementation of this policy are available on the internal [Global Compliance Programme website](#). Each employee should contact their Compliance Officer or S+N Legal if they require further guidance or support on the implementation of this policy.

Where local law is stricter or conflicts with this policy, local law takes priority.

Requirements

Collection, Protection and Use of Personal Information

Through the normal course of business, we may have access to or collect Personal Information about our employees, our customers and their patients, or our third-party partners. To the extent Personal Information is considered Protected Health Information (PHI) in the US, the S+N [HIPAA Standard](#) applies.

In accordance with our six Privacy Principles:

- We process personal information in compliance with applicable data protection laws.
- We limit collection of Personal Information to what is necessary.
- We limit use of Personal Information. Where required by law, we do not share Personal Information without the consent of the individual(s) concerned.
- We provide notice to individuals and if necessary or required by applicable law, obtain their consent when we are collecting their Personal Information. This notice and the consent include the purpose for which the Personal Information will be used.
- We ensure that the Personal Information we hold is accurate. When informed and as required by applicable law, we ensure that inaccuracies in the Personal Information that we hold are corrected.
- We retain Personal Information in accordance with our Document Management Execution and Retention Standards.
- We use technical and organisational measures to protect Personal Information against unauthorised or unlawful access as well as against accidental loss or damage.
- We transfer Personal Information between jurisdictions in accordance with the requirements of relevant laws.
- We conduct risk-based assessments if collecting or using personal information is likely to create a significant risk to someone's rights and freedoms.

Requirements

- We conduct risk assessments on third party partners that manage Personal Information on our behalf or that have access to Personal Information in order to provide services to us.
- We maintain records of activities that involve Personal Information in accordance with legal requirements.
- We comply with local law and regulation in assessing requests from individuals to exercise rights to their Personal Information including access, correction, deletion and objection.
- We implement mechanisms which permit individuals to opt-out from receiving direct marketing and, where required by applicable law, we obtain consent to opt-in to direct marketing prior to sending such communications.

Privacy Principles



Reporting Violations

We know that we shall report any breach of this Policy that we discover. Failure to report is a violation of the Code of Conduct. By having the courage to raise awareness of potential issues, we help protect our reputation, our employees and our customers. Reports can be made by contacting:



- A **Compliance Officer**;
- The Legal department;
- The HR department;
- A line manager; or
- **Speak Up Line**

We will make sure no action is taken against anyone who reports, in good faith, actual or suspected misconduct.



Definitions



Confidential Information means confidential, secret, and proprietary documents, materials, data and other information, in tangible and intangible form, relating to Smith+Nephew and its businesses and existing and prospective customers, suppliers, investors and other associated third parties. Examples include, but are not limited to, unpublished patents, customer lists, details of contracts, future business ideas, know-how, financial forecasts, and trade secrets.

Personal Information means any information that relates to any living individual who is directly or indirectly identifiable from those data, whether in isolation or in combination with other available information.

Protected Health Information (PHI) means individually identifiable health information held or transmitted by a covered entity or its business associate, in any form or media, whether electronic, paper, or oral. Individually identifiable health information is information, including demographic data, that relates to:

- individual's past, present or future physical or mental health or condition,
- provision of health care to the individual, or
- past, present, or future payment for the provision of health care to the individual,

and that identifies the individual or for which there is a reasonable basis to believe it can be used to identify the individual, including common identifiers (e.g., name, address, birth date, Social Security Number).

Third Party Information means any business, financial, technical or other information received by an individual from a third party that is subject to an obligation of confidentiality pursuant to an express agreement between the Company and the Third Party or by operation of law.



Smith+Nephew

Life Unlimited

For a current version of this document, please refer to the Company intranet.

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www.smith-nephew.com

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