

COPY OF DATA PRIVACY NOTICE AND CONSENT

Below is a copy of the Data Privacy Notice and Consent that reporters must consent to, prior to filing a report.

The Smith & Nephew Ethics Reporting Page is a confidential online reporting system provided by Smith & Nephew to allow you to ask questions and to report incidents relating to the infringements of Smith & Nephew's Code of Conduct and Business Principles. Use of the Smith & Nephew Ethics Reporting Page is entirely voluntary. You are encouraged to follow our existing internal reporting processes, but if you feel that you are unable to do so, you may use the Smith & Nephew Ethics Reporting Page to do so. If your concern pertains to issues or countries not listed, you are encouraged to report them to local management or through our other established reporting channels.

Before proceeding further, please read the notice below and, if you agree, check the consent box that follows. You will then be able to submit a report or question on the Smith & Nephew Ethics Reporting Page. If you do not provide your consent, you will not be able to submit a report or question. If you do not wish to accept the terms below, we are unable to accept any information through this system and would ask that you please report this matter to your Local Management, Human Resources, the Legal Department or Regional Compliance Officer instead.

Smith & Nephew is committed to non-retaliation and to maintaining confidentiality within the limits of the law for those who report misconduct by any method. We will make sure no action is taken against anyone who reports, in good faith, actual or suspected misconduct. Any such action would be, in itself, a breach of our policy. We encourage you to identify yourself in order for us to follow up with questions we may have.

What Information is collected? The Smith & Nephew Ethics Reporting Page captures the following information: your name and contact details, any question you may have, the name and title of all individuals you may be reporting, and a description of any questionable conduct, including all relevant details.

How will the Information be used? The information you provide will be stored on servers hosted by EthicsPoint, a NAVEX Global company in the USA ("Navex") on the account of Smith & Nephew. Navex adheres to the US Department of Commerce's Privacy Shield Principles. Unless otherwise required by law, the information within the Smith & Nephew Ethics Reporting Page database may only be reviewed and used by those individuals who need to access the data to fulfill their job duties. These individuals may include appropriate Smith & Nephew group's human resources, audit, legal, compliance, or security staff as well as external advisers and management functions and employees, or technical staff at Navex. Those individuals may be located in the United States or other countries that do not necessarily share data protection standards equivalent to those applicable in the EU, however all employees are required to follow internal policies on the appropriate handling of personal information. In addition, all information you provide may be stored by Smith & Nephew in the course of answering your question(s) or investigating the report.

Smith & Nephew will evaluate the information you provide, and may conduct an investigation and/or take corrective action.

Please note that because of applicable laws, individuals you identify through the Smith & Nephew Ethics Reporting Page may be informed about the fact that a report has been made. However, the information we provide will not reveal your name or identity, unless otherwise

required by law. In addition, all such individuals you identify will have the right to respond to or correct information you reported.

Any information you submit that is not needed to answer your question or for the investigation of any incident will be deleted or archived, as permitted by local law. In addition, once we have responded to your question or completed any investigation, all information you submitted will be deleted or archived, as appropriate and permitted by local law. Smith & Nephew will take adequate technical, organizational, and legal steps to secure the information you provide. Smith & Nephew also requires Navex to adequately secure your personal data and not use it for any unauthorized purposes. (See the Navex Global Privacy Policy for additional information: <http://www.navexglobal.com/privacy-statement>).