

## 1. Why has Smith & Nephew contracted with NAVEX Global for the reporting of concerns?

NAVEX Global, Inc. is an independent company that provides secure, confidential telephone and web-based systems for use by those who wish to report a concern regarding business conduct. We are one of many organizations that contract with NAVEX Global for this service and believes reporters will be more comfortable reporting a concern if they know they will be submitting them to an independent third-party. In addition to providing service 24 hours a day, NAVEX Global offers translation services that allow telephone and web reports to be submitted in dozens of languages.

## 2. What is NAVEX Global's role?

NAVEX Global's principal responsibilities are:

- Provide confidential telephone and web-based options for reporters to submit concerns about business conduct;
- Where permitted by local laws, respect reporter's decision to remain anonymous;
- Provide translation services for those reporters who may report in languages other than English;
- Transmit information about the concern to designated resources within the company responsible for ethics and compliance so an appropriate investigation can be conducted; and
- Enable communication between a reporter and the company by serving as an intermediary which can relay follow-up questions, as well as information about the resolution of the case.

It is not NAVEX Global's role to take action to address the concern, only to transmit the concern to the appropriate designees.

## 3. What if I have an emergency?

Concerns about an immediate threat of physical harm or damage to property should not be reported to NAVEX Global. If you require emergency assistance, please contact your local emergency services.

## 4. As an employee, should I report my concern through NAVEX Global, my manager or a human resources representative?

First, consider whether you are comfortable raising your concern directly to an internal resource, such as to your manager, your manager's supervisor, or to someone else in your department. If you are uncomfortable reporting your concern, do not know whom to contact, or believe your concern has not been satisfactorily addressed, please proceed with filing a report through NAVEX Global.

## 5. How can I report my concern to NAVEX Global?

If you wish to report a business conduct concern, you may complete a report on this website, or you may speak with a specialist in NAVEX Global's Contact Center, which answers calls to a specially-designated hotline maintained for the company. Regardless of which option you select, so long as permitted by local laws, you will have the option to remain anonymous if you so choose. The website can be viewed in your local language by selecting the appropriate link at the top of the page.

The number you should use to contact the hotline can vary by country. In most cases, the company offers a telephone number you can call with no cost to you. Note the hotline may initially be answered in English. The specialist who answers your call will arrange for fluency in your native language if you would prefer to report your concern in a language other than English.

Contact Center Specialists are available 24 hours a day 365 days a year.

## 6. Should I identify myself?

Preferably yes. If you identify yourself in reporting your concern, the company will make every reasonable effort to hold your name in confidence during the investigation. Many investigations can be completed more effectively and quickly when the reporter is identified because it allows the investigator to follow up directly with the reporter.

## **7. May I report my concern anonymously?**

Please note that local laws mean that we are unable to accept anonymous reports from or about the following countries:

- Spain
- Portugal

If you still wish to report anonymously, you should consider reporting this matter anonymously to your local management.

In general, you should disclose your name when submitting a report (see above FAQ). In individual cases you may also choose to remain anonymous. At the conclusion of the reporting process, you will be provided with a report key and asked to create a password. You will need to use these to access the report you submitted. We encourage you to check back in order to monitor the progress on your concern and add additional information, if necessary. This also allows the company to ask follow-up questions, while protecting your anonymity.

## **8. How does NAVEX Global maintain confidentiality?**

NAVEX Global does not trace phone calls or use functionality such as Caller ID. In addition, NAVEX Global does not generate or maintain Internet connection logs containing Internet Protocol (IP) addresses; no information linking you or your computer to NAVEX Global would be available if you choose to make a report. Reports from a computer would come through a secure Internet portal that does not trace or pass along any other information, such as user screen names or the like.

## **9. How can I monitor progress on my concern?**

At the end of your report, you will be provided with a report key and asked to create a password. With those two pieces of identification, you can follow up on the report by visiting the NAVEX Global Internet portal or contacting the hotline. You may need to wait several days after you make your initial report, at which point you can monitor progress on your report and learn whether any additional information is needed from you to address your concern.

## **10. What should I do if I lose my Report Key or password?**

Because of the high level of confidentiality that is maintained for reports, if you lose your report key or password, you will be required to file a new report. You can mention in the new report that this matter relates to another report you supplied earlier.

## **11. How does Smith & Nephew investigate concerns?**

NAVEX Global notifies designated representatives within the company when a concern is received. As appropriate, the company then commences an appropriate investigation, using internal or external resources with expertise in conducting investigations. The information in your report is shared with appropriate investigation team members, and the concern is investigated promptly and discreetly.

## **12. Where do these reports go? Who can access them?**

Reports are entered directly on NAVEX Global's secure servers to prevent any possible breach in security. NAVEX Global makes these reports available only to specific individuals within the company who are charged with evaluating the type of violation and location of the incident and ensuring that an appropriate investigation is conducted. Individuals receiving these reports have had training in keeping these reports in the utmost confidence.

### **13. What if I face retaliation?**

The company strictly forbids any retaliation against any person who reports a concern. Complaints made in good faith will not expose you to any sanctions, regardless of whether the underlying facts prove to be correct or result in any corrective action. If you believe you have faced retaliation of any kind, please report it so that the company can investigate.

### **14. Does management really want me to report?**

They certainly do. In fact, Smith & Nephew requires you to report your concerns about actions that may not follow our Code, policies or the law. You can contact a manager, the Office of Ethics and Compliance (OEC), Legal, Human Resources or the Integrity Line.\* The cost of remaining silent, if something is wrong, can be high for our Company. We may have to pay penalties, government agencies may stop doing business with us and our reputation may be negatively impacted. We trust you to report your concerns, and you can trust us to take appropriate action.

\* In France and Germany, reporting is not required but is expected and encouraged.