



Medline Code of Conduct & Ethics

Our culture is our success

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Letter from the CEO & CCO



Jim Boyle
Chief Executive Officer

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Erik Johansen
Chief Compliance Officer

A handwritten signature in black ink, appearing to read 'Erik Johansen'.

At Medline, we provide medical-surgical products and supply chain solutions to all points of care. Our comprehensive approach helps address the increasingly complex challenges faced by our diverse network of customers around the world.

From physician offices and surgery centers to hospitals and post-acute facilities, *We Make Healthcare Run Better.*

Since its humble start in a small office near Chicago in 1966, Medline has grown to become a leading global enterprise, offering more than 300,000 healthcare products and a variety of services. Every day, our 43,000 employees in more than 100 countries and territories make healthcare run better by delivering improved clinical, financial and operational outcomes. A lot has changed over the course of our history, but it's what hasn't changed that continues to drive the company's growth and success: our culture.

Our deep and enduring culture of integrity, excellence and community is one of our biggest differentiators. It has guided Medline to where we are today, and will keep us on the right path for years to come. It helps us understand that our relationships are built on trust, our reputation provides opportunity and we must earn the right to serve our customers each and every day.

This Code of Conduct & Ethics reflects our culture by requiring us to always **act with integrity**, for ourselves, for Medline's reputation and for the empowerment of our customers; **prioritize excellence** in all we do, whether in our world-class product portfolio, our market-leading supply chain, our clinical solutions or our day-to-day work; and **focus on serving our community**, including colleagues, customers and the world around us.

Thank you for taking the time to read and understand this important document. Our expectation is that it will provide an even deeper understanding of our business to drive continued growth and success. While our history has been incredible so far, our future looks even better.

Our Code of Conduct & Ethics

At Medline, our Code of Conduct & Ethics (our “Code”) is more than just a document—it defines who we are. It tells our customers, communities and each other what to expect from Medline. It also serves as a guide to ethical decision-making in the interactions we encounter every day. It reinforces our culture and shapes our future success by defining our shared commitment to the highest standards of business conduct.

Our Code applies equally to everyone at Medline, covering all levels of our employees, officers, directors and independent contractors working across our global enterprise (“Covered Persons”). In addition, we expect our customers, vendors and other partners to share our commitment to these guiding principles. Over decades of hard work and dedication to the values explained in our Code, Medline has developed immeasurable trust with our customers, colleagues and communities—all of which has built the credible and dependable reputation we enjoy today. Those in our company who lead others hold a special position of responsibility to set the example of what our Code truly means in practice, establishing the tone for future decades of success. In the case of our non-employee directors, compliance with the Code is subject to the provisions of Medline’s Certificate of Incorporation, Bylaws and any stockholder’s agreements with the company.



Reporting Rights & Obligations

Creating a culture where we all feel comfortable raising concerns is a priority. Medline has established an open, speak up environment in which Covered Persons, without threat of retaliation, have the right and obligation to report any conduct they believe may be non-compliant with the Code, Medline policies or procedures or any applicable law. All Medline leaders are responsible for fostering an environment in which every employee feels comfortable raising questions or concerns.


If something doesn't feel right or you are aware of possible misconduct, it is important that you contact your manager, another manager, the Office of Ethics & Compliance or Human Resources. Any concerns or questions of Covered Persons, including any related to accounting, internal accounting controls or auditing matters, conduct inconsistent with this Code, any Medline policy or any law, should be reported to the company using the following contact information.

Every Covered Person is required to promptly report to the company suspected non-compliance with this Code, any Medline policies and procedure or any applicable law, rule, or regulation applicable to Medline. All reports of conduct that may be non-compliant with the Code, Medline policies or procedures or any applicable law must be made responsibly and in good faith. Don't report allegations that are intended to harass another person, are based on opinion only or are otherwise trivial in nature.

You may report concerns anonymously if you are located in a country where anonymous reporting is permitted. To the extent possible, Medline will keep your report confidential and will comply with applicable data privacy standards.

Medline reviews all reports of misconduct promptly and, when appropriate, investigates. It's possible that you may be asked questions relating to an investigation even if you didn't report anything. Everyone who is asked to participate is expected to cooperate fully and truthfully in any investigation of reported misconduct.

Medline may take any action it deems necessary to remedy any breach or non-compliance with this Code, including but not limited to, terminating an employee or seeking the resignation of a director, and/or recommending that a director not be nominated for re-election to the Board of Directors.

Contacts	Information
Chief Compliance Officer	Phone: +1 847-949-5500 and ask to speak to the Office of Ethics & Compliance Mail: Medline Inc., 3 Lakes Drive, Northfield, IL 60093 USA
Office of Ethics & Compliance	Email: ComplianceOffice@medline.com
Medline's Ethics & Compliance Reporting Line	Web: https://medline.ethicspoint.com 
Additional Ethics & Compliance Reporting Line Detail	Location: Refer to page 19 for a complete list of global contact information, including local telephone numbers.

Resources

Enterprise Policy: Internal Investigations

Enterprise Procedure: Conducting Internal Investigations



No Retaliation Policy

Medline does not tolerate any form of retaliation. Medline prohibits all forms of retaliation against any person who makes a good faith report of any compliance, ethics or legal concern. Anyone who retaliates against a person who makes such a report in good faith or who fails to cooperate with any aspect of an internal investigation will be subject to discipline, up to and including termination of employment. This Enterprise Policy applies to all Medline employees, officers, directors and third parties doing business on behalf of Medline.

Retaliation may occur when someone is treated differently for reporting misconduct in good faith, raising a concern, participating in an investigation or supporting someone else who does these things. It includes obvious punishments, such as firing or a demotion, but also subtler mistreatment, such as a transfer, exclusion from work-related events or meetings, inaccurate reviews or less desirable assignments.

01 Integrity

Our culture of integrity is embedded in all we do. Integrity empowers us to lead with our reputation and values.



Our Reputation & Commitment to Ethical Conduct & Fair Dealing

Since our founding in 1966, we've been taking pride in delivering on our promises and continuing to build and strengthen our reputation through honesty and trust. We don't improperly influence others or let them improperly influence us. We are respectful. We have a bias toward action. And we behave in a direct, open and honest manner.

We always try to deal fairly with our customers, suppliers, competitors and colleagues. We don't take advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts or any other unfair-dealing practice. We're committed to, and expect all of our employees, officers and directors to commit to, the highest ethical standards and compliance with all applicable governmental laws, rules and regulations.

Our reputation reflects the ethical conduct, lawful behavior and hard work of every Medline employee, officer and director around the world.

Financial Reports & Accounting

We maintain clear, complete and accurate books and records. Our recordkeeping follows all applicable accounting principles and undergoes independent auditing. We maintain all necessary documentation to support the accuracy and completeness of each and every accounting and financial entry. All Medline employees have a role to play to ensure the accuracy and completeness of our books and records, including compliance with all applicable policies, procedures and internal controls. The same standards of integrity that apply to the creation of our financial statements and related management tools also apply to our external financial reporting. In addition, we have a responsibility to clearly, accurately and honestly communicate information about our business to our stakeholders. The disclosures we make in our external reports and governmental and regulatory filings, including those filed with or submitted to the Securities and Exchange Commission, and in our other public communications, must be full, fair, accurate, timely and understandable.



Accurate Invoicing, Billing & Documentation

We are committed to submitting accurate invoices to our customers and claim forms to the government and other health plan payers. We don't present false or misleading information in order to obtain payment from the government. We don't present false information that would cause a customer to submit false or misleading information to obtain payment from the government. We prepare all invoices and billing claim forms timely and accurately and maintain the required supporting documentation. We promptly refund any identified overpayments.

Confidential Information & Insider Trading

We safeguard important and confidential Medline information that hasn't been disclosed to the public, such as financial, strategic and product information, as well as confidential information entrusted to Medline by its customers. This is known as "inside" or "nonpublic" information, and it may have significant value to others, including our competitors; disclosure of such information may be harmful to Medline or its customers. Inside or nonpublic information is "material" if a reasonable person would likely consider it important in making a decision whether to buy, sell or hold stock in a company, or if the information could reasonably be expected to affect the market price of the company's security. Both positive and negative information may be considered material.

Examples of material inside or nonpublic information include information about a merger or acquisition proposal, or other significant transaction; change in a company's key leadership, such as a CEO; estimates about earnings or other financial information; significant cybersecurity incidents; product recalls; significant project, product, technology or intellectual property developments or innovations; the gain or loss of an important customer or supplier; and developments regarding significant litigation or government investigations.

During the course of their work, Covered Persons may learn of material inside or nonpublic information about Medline or other entities with which Medline does business, such as customers, suppliers and vendors, as well as entities with which Medline may be negotiating a transaction (including an acquisition, investment, or sale of assets). Anyone who has material inside or nonpublic information must not share it with others, use it for personal gain or to otherwise trade in that company's securities in violation of insider trading laws and our Insider Trading Policy.

No provision of this Code or any other agreement with the company or policy of the company shall be deemed to prohibit any current or former Covered Person from communicating, cooperating or filing a charge or complaint with the Securities and Exchange Commission or any other governmental or law enforcement entity concerning possible violations of any legal or regulatory requirement, or making disclosures, including providing documents or other information to a governmental entity that are protected under the whistleblower provisions of any applicable law or regulation without notice to or approval of the company, so long as (i) such communications and disclosures are consistent with applicable law and (ii) the information disclosed wasn't obtained through a communication that was subject to the attorney-client privilege (unless disclosure of that information would otherwise be permitted by an attorney pursuant to the applicable federal law, attorney conduct rules or otherwise). We won't limit the right of any current or former Covered Person to receive an award for providing information pursuant to the whistleblower provisions of any applicable law or regulation to the Securities and Exchange Commission or any other government agency. Any provisions of any agreement between the company and any current or former Covered Person that is inconsistent with the above language or that may limit the ability of any person to receive an award under the whistleblower provisions of applicable law is hereby deemed invalid and won't be enforced by the company.



Conflicts of Interest

We have a duty to act in the best interests of Medline instead of our own interests, the interests of a friend or family member or those of another organization, especially a competitor. A “conflict of interest” occurs when our personal interests, loyalties or relationships improperly interfere, or appear to interfere, with Medline’s interests. Examples include:

- Working with family members or someone with whom you have a close personal relationship
- Accepting or engaging in outside employment that may interfere with your ability to perform your work or otherwise act in the company’s best interests. This includes outside work performed for a vendor, contractor, supplier, business partner or competitor of Medline or any of its businesses.
- Taking advantage of business opportunities that may be of interest to Medline that you learned about through your work at Medline, or with organizations that may compete with or do business with us.
- Having personal financial investments or a close personal relationship with someone who has a significant financial interest in any organization that does business or competes with Medline.

We avoid or manage conflicts of interest by promptly disclosing through the appropriate channels anything that might be or even appear to be a conflict of interest. Covered Persons should avoid even the *appearance* of a conflict of interest.

Resources

Enterprise Policy: Conflicts of Interest

Corporate Opportunities

Covered Persons owe a duty to the company to advance its legitimate interests when the opportunity to do so arises. We must never conceal or take personal advantage of opportunities that were developed or discovered through the use of Medline property or information or our position with Medline. In addition, Covered Persons should never compete with Medline or use Medline property, information or his or her position with Medline for personal gain.

Resources

Enterprise Policy: Conflicts of Interest

Competitive Conduct

We support free and fair competition. We never discuss pricing, customers or sales agreements with competitors. In all relationships with customers, competitors, distributors and suppliers, we are careful to avoid any arrangement or agreement that restricts our ability to compete with others. Covered Persons should avoid any activity that gives even the appearance of restricting competition. We are fair in marketing and distributing our products and services and avoid anything that may be considered anti-competitive. Additionally, we are fair and factual when making any statements about a competitor, especially when comparing their products and services to ours. We don’t make false or misleading statements about our competitors.

Resources

Enterprise Policy: Antitrust and Fair Competition

Improper Payments

We prohibit bribery in all forms and in all locations and operations where Medline conducts business, regardless of differing business cultures and traditions. In all dealings with healthcare professionals, government officials and private parties, we only engage in ethical business practices. We succeed on the strength of our products, services and people. We don't attempt to gain an advantage by paying bribes or kickbacks or by using any other unethical or illegal means. We don't provide anything of value, including gifts, hospitality, entertainment or travel, to any person in an attempt to influence any act or decision, to obtain or retain business or otherwise secure any advantage for any reason other than a legitimate business reason. Covered Persons should avoid even the *appearance* of improper conduct.

Resources

- Enterprise Policy: Anti-bribery and Anti-corruption
- Enterprise Policy: Global Conflicts of Interest
- Enterprise Procedure: Engaging HCP's and Government Officials
- Enterprise Policy: Corporate Credit Card Usage
- Enterprise Procedure: Expense Reimbursement

International Trade

Medline supports free trade to support our customers around the world. Therefore, we are committed to compliance with applicable international trade laws, including import and export controls, economic sanctions and anti-boycott laws. The rules of international trade are complex, and each of us involved in the international trade business at Medline has a responsibility to understand and ensure that we meet our responsibilities in the countries where we do business.

Marketing Practices

We compete for business openly and honestly. Everyone involved in advertising and marketing our products and services must ensure that our marketing materials and labels are truthful, straightforward and, if technical or scientific in nature, substantiated by data. Additionally, we are committed to ensuring our marketing materials and product labels comply with all applicable regulatory requirements.





External Communication

We communicate externally in a consistent, timely and professional manner about matters concerning Medline. We speak with one clear voice that instills confidence in our products and services and presents our company in the best possible light. Our communications are honest and fair. Only authorized persons may respond to media inquiries or speak publicly on behalf of Medline.

Data Privacy

Medline is entrusted with the confidential information, including personal data, of our customers, employees and others with whom we interact. We carefully handle, process and secure all confidential information, whether it relates to Medline personnel or operations, our customers (or their patients and members), vendors or any other organizations or individuals. As our business becomes more dependent on and driven by data, including personal data, it is essential to understand the rules that govern data categorization, processing, use and disclosure. (Covered Persons must take appropriate steps, including securing documents, limiting access to computers and electronic media, and proper disposal methods, to prevent unauthorized access to confidential information.)

Resources

Enterprise Policy: Global Privacy Standards

Enterprise Policy: Global Acceptable Use

Cybersecurity

As a company, Medline must be prepared to respond to any unauthorized access, acquisition, use, disclosure, modification or destruction of Medline Information or Information Technology Resources (“Data Security Incident”) in order to protect Medline Information, Information Technology Resources, operations, reputation and Affected Parties.

Everyone at Medline is responsible for protecting data and reporting any potential or suspected Data Security Incidents. These include emails containing confidential information sent to the wrong person; unauthorized individuals having access to confidential files; potential security breach of service providers' or other business partners' systems; unknown web links that were opened that may have delivered ransomware or malware to your device or Medline Information Technology; or username/password credentials inappropriately disclosed or used.

Everyone is responsible for reporting any potential or suspected Data Security Incidents through Medline's IS Help Desk Self Service Portal or Data Incident Report Form or by contacting your local Help Desk.

Social Media

Anything we post to social media related to Medline, even if personal in nature, affects the company's business, brand and reputation. As employees and representatives of Medline, when we communicate online, we should respect others. We don't bully or harass, use obscenities or make remarks that could be discriminatory regarding race, sex, sexual orientation, disability, religion or any other status protected by law. We respect intellectual property and don't post copyrighted content. We never post anything that may be confidential.

We are also clear when we express our personal view and never suggest that we are speaking on Medline's behalf. We don't create social media accounts using the Medline brand to communicate with customers on behalf of the company. We obtain approval from Corporate Communications before using Medline or Medline-product branded accounts.

Resources

Enterprise Policy: Social Media

Artificial Intelligence

We use artificial intelligence (AI) tools responsibly, only when explicitly authorized and in compliance with our policies. AI is a technology that creates models to generate text, images, computer code and other data. AI can help us do our jobs more efficiently and effectively, but only when we are appropriately authorized to do so. In healthcare, technology can help providers diagnose diseases, monitor patient health and accomplish administrative tasks. AI presents output that appears reliable and authoritative, but if you are authorized to use it in your work, keep in mind both its limitations and potential harm. We never enter confidential or proprietary information into any AI tool without express authorization.

Resources

Enterprise Policy: Global Acceptable Use

Information & Records Management

Medline's information and business records are vital assets that capture corporate memory, help us meet business goals and maintain compliance with our legal and regulatory obligations. We have a shared responsibility to properly manage all paper and electronic information, including communications like email, according to our policies, retention schedules and local requirements. Prior to disposing of our information and records, Covered Persons should make sure the retention period has been met and that there are no legal actions that would require us to keep the records, even if they are scheduled for routine destruction.

Occasionally, Medline may be involved in an audit, investigation or other legal matter that requires certain information to be preserved beyond our published retention schedules. In those cases, hold notices may be sent to individuals via email with instructions on how to comply. If a hold notice is received, relevant information must not be altered or destroyed until the hold is lifted.

Resources

Enterprise Policy: Global Acceptable Use

Enterprise Policy: Corporate Records Management

Enterprise Procedure: Corporate Record Retention Schedule



02 Excellence

Our culture of excellence drives Medline's future. Excellence enables our deep commitment to serving the complex and evolving needs of our diverse global customer network.



Our Commitment

Our commitment to excellence is the bar we set for ourselves. It is the cornerstone of Medline's reputation for truly understanding our customers' needs, then providing the right mix of products and services to meet those needs. It's our unwavering dedication to quality and safety. We deliver on this commitment with a bias toward action, a strong sense of urgency and the responsibility to help our customers improve their clinical, financial and operational outcomes.

Patient Safety

Medline provides more than 300,000 healthcare products across all points of care. These items play a vital role in the diagnosis and treatment of diseases and range from common medical supplies to more invasive devices. The health and safety of patients, healthcare providers and all caregivers is our primary concern. We acknowledge that a commitment to excellence is essential to protecting our customers and the healthcare community.

Medline only promotes and markets products in accordance with applicable federal and international regulations and standards. We don't promote unapproved use or use that is outside of the labeling of the product.

If any product safety concern arises, it will be evaluated and escalated as necessary to appropriate public health and regulatory authorities.





Product & Service Quality

We recognize the important role our products and services play in the delivery of healthcare across all points of care, and we keep that responsibility top of mind as we procure, produce and deliver a wide range of products and services. Our focus on consistency and excellence is at the center of our commitment to our customers.

Regulatory Compliance

Our product safety processes are strictly regulated by government agencies to promote consistent, high-quality production and prioritize the health of the patient. We maintain robust quality management systems designed to meet all applicable regulatory compliance regulations and standards set by the U.S. Food and Drug Administration, its international counterparts and similar regulatory bodies in the countries where we operate. In addition, our product labeling and marketing practices must comply with all applicable laws, whether U.S. or international, and should be designed to provide clear, accurate and consistent information to customers, providers and patients.

Protection of Assets

Our assets include our buildings, equipment and supplies, as well as our information, finances, intellectual property and our communication systems. We must use these assets carefully to ensure their efficient use and protect them against damage, waste, misuse or theft.

We use Medline's assets primarily for legitimate business purposes with limited personal use. Remember that everything you say or write while working or using our property or systems may be monitored, unless restricted by law.

Intellectual Property

Intellectual property refers to creations of the mind over which an individual or organization can claim ownership. These assets include copyrights, patents, trademarks and trade secrets.

We make sure we have the proper permissions for copyrighted works and patented inventions before copying or using such works or inventions. Written work, videos, graphics and the like may have copyright protection even when it's available for free on the Internet, regardless of whether there is a copyright notice. We use trademarked names, logos and slogans of Medline and other companies consistent with those brands' exclusive rights to them.

We protect the trade secrets of Medline and other companies by sharing this information only with those who both have a legitimate need to know the information and are legally obligated, through non-disclosure agreements (NDAs), to keep the trade secret confidential.

Risk Management

Risk management is critical to fostering a culture of integrity and ethical behavior within Medline. It involves proactively identifying, evaluating and mitigating known or potential risks that may undermine Medline's values, operations or reputation. This approach protects against legal, financial and reputational harm, while fostering a responsible and ethical workplace. We encourage employees to regularly engage in conversations with colleagues and management to identify, address and manage risk, as well as learn how to escalate potential risk issues.



03 Community

Our culture of community connects all aspects of our business. Community is the foundation of our dedication to each other, our customers and the world around us. It's what forms the lasting relationships at the heart of our reputation.



Our Dedication

Medline exists to serve the needs of our customers, patients and each other with integrity and excellence. Our relentless dedication to this diverse and connected community is what sets Medline apart. It's what forms our reputation and focus for continued success.

Teamwork

We know the dedication to customer satisfaction we demand depends on the teamwork of those who work for or with us. That's why maintaining respect for each other is critical to our success. Teamwork means recognizing that our achievements are not ours alone. Our knowledge and skills are built upon those of our teammates and the company at large.

Employee Development

At Medline, we recognize that our greatest asset is our people, and we are deeply committed to their success and continuous growth. Our dedicated training teams offer a comprehensive range of development programs, from enhancing individual skills to empowering future leaders with management essentials. These initiatives are designed to equip our employees to excel in their roles and pursue fulfilling, long-term careers at Medline. By investing in our workforce, we help them cultivate new skills, unlock potential and create pathways for professional advancement, reaffirming our commitment to their success and our shared future.

A Safe & Healthy Workplace

We maintain a safe and healthy workplace by complying with all applicable laws, staying alert to safety risks, complying with all workplace safety rules and reporting any incidents experienced or discovered. We watch for hazards and always follow safety procedures and use appropriate safety equipment.

We never work while intoxicated by alcohol or drugs. We also don't allow the use of any medication that impairs our ability to safely do our job.

We don't tolerate acts or threats of violence or intimidating conduct. This includes the use of obscene, abusive or threatening gestures or language. We Speak Up and protect each other from violence, whether it concerns coworkers, customers, former coworkers or visitors to our facilities.



Customer Value

We take pride in our products and services and our ability to deliver the best possible value to our customers. We do this with a sense of urgency while appreciating the importance of our customers to Medline.

We have built a reputation for excellence by listening to our customers, dealing fairly with them and striving to understand their needs and objectives. Our customers have come to expect this from Medline, and we don't let them down.

Vendors & Distributors

We build cooperative, fair and effective relationships with our vendors and distributors. They are a vital connection to our customers and key to our success. We recognize their contributions to Medline's reputation for excellence.

Belonging

At Medline, we're dedicated to creating a culture of belonging where every employee feels seen for their contributions, supported in their development and connected to their colleagues. By embracing diverse perspectives, acting inclusively and providing the tools and resources for success, we enable our teams to perform at their best. This not only strengthens our workforce but also drives innovation and delivers better solutions for our customers. Simply put, we want everyone to feel comfortable and accepted when bringing their unique qualities and best self to work each day.



Discrimination, Harassment & Bullying

We lead with respect and provide equal employment opportunities, never tolerating discrimination or harassment based on race, creed, color, ancestry, religion, age, sexual orientation, gender, gender identity or expression, national origin, citizenship status, physical or mental disability, pregnancy (including childbirth, lactation and related medical conditions), genetic information (including characteristics and testing), veteran status, uniformed service member status or any other characteristic protected by applicable law.

We don't tolerate any harassment, including any bullying or conduct such as unwelcome comments, jokes or name-calling, or any language or graphics that target any characteristic protected by anti-discrimination laws, or anyone else.



Climate Resilience & Environmental Action

Few industries are as intrinsically tied to the environment as healthcare. While other sectors may not see the immediacy of climate change, hospitals and health systems see the impact on their patients and communities every day. Accordingly, Medline is committed to integrating environmental sustainability into how we build and grow our business, how we serve our customers and how we support patients and communities.

As part of this commitment, we aim to reduce waste in our products and packaging, incorporate more sustainable materials and improve the efficiency of our operations. We're also committed to helping our customers meet their own sustainability goals.

We continuously seek to reduce our carbon footprint and increase our sustainable products. We also plan to continue to invest in technology to improve energy efficiency, transition to renewable energy and reduce emissions of pollutants.

Resources

Enterprise Policy: Environmental
Sustainability Report

Human Rights & Responsible Sourcing

Medline is committed to upholding fundamental rights throughout our operations and supply chain. We don't tolerate human rights violations, including child labor, forced labor, modern slavery and human trafficking. We continually monitor for risks in our own operations and those of our manufacturing partners. We hold these manufacturing partners to the same high standards that we expect of ourselves. Our [Ethics & Compliance Reporting Line](#) is available to all stakeholders, both inside and outside Medline, as a means of reporting any human rights concerns.

Resources

Medline Supplier Code of Conduct

Charitable Giving

We care about the communities we serve and give back through charitable donations. Medline makes charitable donations to nonprofit organizations around the world. We also partner with international aid organizations to responsibly donate surplus or unused products. We follow our policies, procedures and external regulations when making charitable donations of any kind in Medline's name.

Political & Policy Engagement

We encourage everyone to participate in the political process, but it's something to be done on your own time and at your own expense. We must keep our personal political views and activities separate from our association with Medline. This is so that they won't be confused with those of the company.

For this reason, Medline won't reimburse you for political donations. Managers must never ask employees for political donations or pressure them to support certain candidates. If participating in a political process, never use Medline facilities, time or funds, and clarify that the political views and beliefs you express are solely your own and not Medline's.

Corporate Responsibility

Our community engagement is focused on the communities where our employees live and work. In many of these communities, Medline is among the largest local employers. We recognize that this comes with a responsibility for support and engagement. To support our communities, we primarily focus on the circumstances that affect a person's ability to access adequate medical care.



Waiver

Medline will grant a request to waive an element of our Code only in extremely rare circumstances. Any request for such a waiver must be submitted in writing to the Chief Compliance Officer for review. Only the Chief Compliance Officer is authorized to grant any requested waivers, except that any waiver requested by a director or an executive officer must also be reviewed and granted by the Medline Board of Directors (or appropriate committee of the Board) and be disclosed to stockholders promptly as required by applicable law or stock exchange listing rules.

04 Company Resources



Additional Contact Information

Contacts	Information
Europe Legal & Compliance Office	Telephone: +31 26 312 7243 Email: eucompliance@medline.com Mail: Medline International B.V., Catharijnesingel 47, 3511 GC Utrecht, The Netherlands
LATAM Compliance Office	Medline México S.A. de CV: Torre de los Parques, Magnolias 1196-Piso 12-02, Tlacoquemecatl del Valle, Benito Juárez, 03200 Ciudad de México, CDMX
Australia Legal & Compliance Office	Mail: 2 Fairview Place, Marsden Park, NSW, Australia, 2765
Japan Legal & Compliance Office	Email: JPComplianceOffice@medline.com 〒: 112-0002 1-4-1 Koishikawa, Bunkyo-ku, Tokyo Sumitomo Fudosan Korakuen Building 15F
Global Chief Compliance Officer	Phone: +1 847-949-5500 and ask to speak to the Office of Ethics & Compliance Mail: Medline Inc., 3 Lakes Drive, Northfield, IL 60093 USA
U.S. Office of Ethics & Compliance	Email: ComplianceOffice@medline.com
Ethics & Compliance Reporting Line	Web: https://medline.ethicspoint.com 

Speak Up Phone Numbers*

Country	Phone number	Country	Phone number
United States of America	1-866-833-3450	New Zealand	0800 527 507
Australia	1800 490 515	Norway	800 62 575
Austria	0800-017933	Pakistan	00800 900 44510
Belgium	0800 76 264	Panama	507 839-2818
Canada	866-833-3450	Poland	800 005 055
Chile	800 914 573	Portugal	800 181 349
China	400 120 0849	Puerto Rico	866-833-3450
Colombia	01-800-5189501	Saudi Arabia	800 850 0310
Costa Rica	800-032-0053	Singapore	800 492 2586
Czech Republic	800 701 376	Slovak Republic	0800 002 598
Dominican Republic	809-200-1692	Slovenia	0800 688947
Egypt	015 01692175	South Africa	080 098 2758
France	0 800 90 91 33	South Korea	00798-142-030-156
Germany	0800 1803977	Spain	900 997 985
Guatemala	2300 9354	Sweden	020-089 00 27
India	000 800 9190 947	Switzerland	0800 121 103
Ireland	1-800615403	Taiwan	00801-13-7956
Italy	800 727 456	Thailand	1800 013 244
Jamaica	1-844-972-4730	The Netherlands	0800-0230144
Japan	0800-123-7151	Trinidad and Tobago	868-217-6067
Luxembourg	800-2-1157	United Arab Emirates	800 0320976
Malaysia	1-800-81-9671	United Kingdom	0 808 196 5742
Malta	80062420	Vietnam	1800 400112
Mexico	800 681 8204		

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