



---

## Össur's Anti-Money Laundering and Sanctions Policy



# Össur's Anti-Money Laundering and Sanctions Policy

At Össur we are focused on delivering innovative products that improve our customers' mobility. We accomplish our goals by conducting ourselves according to highest standards of ethical conduct and abiding by all applicable rules, regulations and industry standards that govern our business. This policy prohibits anyone employed by Össur from participating in money laundering, terrorist financing and sanction breaches. Any employee who breaches this policy will face appropriate disciplinary action, which could result in dismissal.

Each person subject to this policy is expected to know and comply with all applicable anti-money laundering and terrorist financing laws and regulations, as well as applicable sanctions. If you have any questions regarding this policy, including whether a particular act constitutes money laundering, terrorist financing, sanction breaches or is otherwise inappropriate, contact Össur Global Compliance.

## Background

Össur is committed to conduct all of its business in a lawful, honest and ethical manner. Most of the countries in which Össur does business have laws that forbid money laundering and terrorist financing, and they have also imposed or are obliged to follow sanctions on certain countries and/or persons.

## What is Money Laundering?

Money laundering is the term used to describe the process by which criminals disguise the original ownership and control of the proceeds of criminal conduct by making such proceeds appear to have derived from a legitimate source.

## What is Terrorist Financing?

Terrorist financing refers to activities that provide financing or financial support to terrorists. Transactions associated with terrorist financing tend to be in smaller amounts than is the case with money laundering. It may involve funds raised from legitimate sources, such as personal donations, profits from businesses and charitable organizations.

## What are Sanctions?

Sanctions are political and economic decisions that are a part of diplomatic efforts by countries, multilateral or regional organizations against states or organizations, either to protect national security interests or to protect international law and defend against threats to international peace and security.

## Prohibited Actions

Össur employees shall NOT

- a participate in money laundering in any form;
- b participate in terrorist financing in any form;
- c do any business in a sanctioned country without clearance from Össur Global Compliance;
- d do any business with a sanctioned person.

## Your Responsibilities

1. You cannot participate in money laundering in any form.
2. You cannot participate in terrorist financing in any form.
3. You cannot do any business in a sanctioned country without clearance from Össur Global Compliance.
4. You cannot do any business with a sanctioned person.
5. It is your responsibility to know your business partners. That means you need to do appropriate screening of your business partners to ensure that they do not participate in money laundering or terrorist financing, and that they are not a sanctioned person.
6. If you know of or suspect there has been a breach of this policy, you must report it to Össur Global Compliance as soon as possible.

## Reporting Suspected or Actual Violations

If you are asked to participate in money laundering or terrorist financing, or if you suspect that any money laundering, terrorist financing or a sanction breach or other breach of this policy has occurred or may occur, you must report it as soon as possible to Össur Global Compliance. Persons who make such reports in good faith will be protected from any retaliation.

### CONTACT ÖSSUR GLOBAL COMPLIANCE

**e-mail:** [compliance@ossur.com](mailto:compliance@ossur.com)

**Tel:** 1-888-627-8810 (US)



© Össur 2018