



# Code of Conduct



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Essity is a leading global hygiene and health company and, as such, we impact the lives of many people. We are committed to conducting our business responsibly for the good of our company, the wider population and the environment. Our Code of Conduct helps us do this, guiding us to make sound judgments in our daily work. As an Essity employee or representative, you are personally responsible for understanding and adhering to the letter and spirit of our Code of Conduct.

By living by and practicing our Beliefs and Behaviors and the commitments embodied in the Code of Conduct, we can maintain the reputation that makes us all proud to work for Essity and retain the trust of our stakeholders. By doing so, we will achieve our vision; dedicated to improving well-being through leading hygiene and health solutions.

*Magnus Groth*

**Magnus Groth**  
**President and CEO**

# About the Code

Our Code of Conduct (the “Code”) describes how we act as employees and how we do business. It also outlines Essity’s expectations of employees and business partners and what our stakeholders can expect from us.

We take all violations of our Code seriously and breaches may lead to disciplinary action, up to and including termination of employment.

The Code applies to all Essity employees worldwide. It is the responsibility of each one of us to read, understand and act in accordance with the Code.

If you are an Essity line manager, it is your responsibility to champion the Code, making sure it is a part of the way you, and your team, do business. This includes leading by example and ensuring that employees receive necessary information and training. It is also your responsibility to be available should an employee be uncertain about how to act or wish to raise a concern or report a violation.

All companies wholly owned by Essity are bound equally by the Code. We expect any business in which we have partial ownership to adopt either the Code or other standards that are equivalent to those reflected in our Code.

All our suppliers and other business partners are expected to adhere to similar standards to those reflected in our Code. Compliance with such standards is a prime factor when selecting our business partners.





AT WORK



IN THE  
MARKET



IN SOCIETY



**We act with integrity towards all stakeholders**



# Essity's Code of Conduct

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# Our principles

In our business activities and working relationships:

- We act with fairness, respect and integrity
- We follow applicable laws and Essity policies
- We take personal responsibility for our actions
- We raise questions and seek advice when in doubt

As a signatory to the UN Global Compact since 2008, we actively support human rights and conduct our business in a manner that is socially responsible and consistent with the principles of the Global Compact, the International Bill of Human Rights, the ILO Core Conventions and the OECD Guidelines for Multinational Enterprises. These principles have long been a fundamental part of Essity's identity and are reflected throughout this Code.

# Your guide to making decisions

Our Code of Conduct does not cover all situations, relevant laws, regulations and internal policies. Throughout the Code, you can read examples and tips for compliance. These are included to demonstrate how the Code applies in certain situations and are not all inclusive.

On occasion, you may face situations where it is difficult to determine what is the right thing to do. In such cases, you should use your sound judgment and ask yourself the following questions:

1. Is this consistent with our Code of Conduct, our policies and the law?
2. Is it aligned with our Beliefs and Behaviors?
3. How would this look to others inside and outside Essity?
4. Could this harm the reputation of Essity?

If you feel uncertain about how to act, consult with your manager or members of our Compliance & Ethics, Legal or Human Resources team.

When local law or custom conflicts with the principles set out in our Code, you should always seek advice from Essity's legal or Compliance & Ethics team.



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# AT WORK

We provide an open, healthy and respectful workplace based on fair and responsible practices



# Safe and healthy work environment

We are all entitled to a safe and healthy workplace that provides a sustainable work environment for all our employees. In this regard, we have a zero vision for work-related accidents, meaning no one should be injured or harmed while at work. To achieve this goal, we must prevent, mitigate and address safety and health-related risks and promote the well-being of our employees.

Each one of us is responsible for contributing to a safe and healthy workplace by knowing and following all applicable health and safety rules. Managers must also ensure that employees and contractors are provided with adequate training and necessary safety equipment.



## Remember

- Take personal responsibility for your own health and safety
- Promptly report any unsafe conditions, accidents and work-related injuries and illnesses
- Talk to your manager or the health and safety team whenever you are unsure of how to act

## Dos and don'ts

- Promote a safety culture by questioning or stopping any activity that appears unsafe or harmful
- Never disregard safety devices on machines or the need for personal safety equipment
- If you employ any young worker (over 15 but under 18 years of age), make sure they are not engaged in any hazardous work or tasks and that you follow applicable laws that grant them additional protection
- For your own safety and that of others, never engage in work-related activities under the influence of alcohol, drugs or while using medication improperly
- Help ensure that those you work with, including contractors and visitors, are familiar with relevant safety procedures

## Learn more

- Read our  [Occupational Health and Safety Instructions](#)



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## Open and respectful workplace

We engage in fair workplace practices and expect everyone to be treated with dignity and respect. We value inclusion and encourage each other to contribute and speak openly. Harassment, intimidation, bullying or other inappropriate behavior in the workplace is not tolerated.

## Equal opportunities and non-discrimination

We place value on having a diverse workforce and our aspiration is to help every employee reach their full potential.

We recruit, select, evaluate and promote employees based on objective criteria without regard to gender, marital or parental status, ethnic or national origin, sexual orientation, religious belief, political affiliation, age, disability or other categories protected by applicable law.



### Remember

- Always act respectfully toward everyone you interact with at work
- Base employment decisions on objective criteria and qualifications, such as education, prior experience and merit

### Dos and don'ts

- Be aware that humor may be perceived differently by different people, and avoid jokes or distributing material that could be offensive to others
- Immediately report or challenge inappropriate behavior that comes to your attention

### Learn more

- Read our [Recruitment Policy](#)
- Read our [Diversity Policy](#)

# Fair working terms

We apply fair labor practices and follow applicable national and international labor standards. Furthermore, we provide fair wages and benefits in accordance with national law and applicable collective agreements. When no collective agreement exists, we follow relevant industry standards.

Open and honest communication is fundamental to establishing trust. We engage in a fair and open dialogue with all employees and their representatives. To this end, we also ensure that all employees receive clear and understandable information regarding the terms and conditions of their employment and their job performance.

# Freedom of association

We recognize the right of employees to decide whether they wish to be represented by a union, to organize and to bargain collectively or individually. We also respect an employee's right to refrain from joining a union.



## Remember

- Managers should communicate clearly and openly the reasons for any change affecting an employee's role or terms of employment
- Fair labor practices also mean respecting human rights, which is further outlined under "Human Rights"

## Dos and don'ts

- Respect the right of employees to form and join a trade union of their choice and never discriminate against or intimidate anyone based on union affiliation or activity
- Don't interfere with the official, legally sanctioned activities of workers' representatives



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## Company assets

Essity's assets are reserved for use in company business in accordance with Essity policies. It is our responsibility to protect and use such assets with care and sound judgment to ensure they are not lost, stolen, misused or wasted. This applies to physical assets such as computers and vehicles as well as intellectual property (IP). We protect our IP, such as patents, trademarks, copyrights, designs, domain names and know-how, by enforcing our IP rights against unauthorized use.

## Financial books and records

All our business and financial records must be accurate, and financial transactions must be reported in a non-misleading manner in accordance with Essity's accounting practices.

### Dos and don'ts

- Never use company assets and equipment, such as computers and mobile phones, to engage in illegal or inappropriate activities that may damage Essity or its reputation
- Make sure that any images or materials you obtain from the internet or a third party are used lawfully
- Don't share Essity's proprietary information with any third party without proper approval, and secure the necessary confidentiality agreements
- Make sure you properly record all business transactions
- Don't misrepresent the true nature or terms of transactions with business partners

### Learn more

- Read our [Financial Policy](#)
- Read our [Tax Policy](#)



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# Information security

Information is one of our most valuable assets and, as such, we must safeguard it and treat it with care.

Confidential information is any information that is not public, such as Essity's trade secrets, business and marketing plans, product development information, inventions, manufacturing methods, employee and salary information, and financial information.

We must proactively protect confidential information from loss, inappropriate use or disclosure. We handle information according to Essity's information classification standards to ensure it is effectively safeguarded.

## Privacy and personal data

We respect the privacy of all individuals and will collect and process **PERSONAL DATA** responsibly and always in accordance with applicable laws. We collect, process and store personal data from customers, consumers, employees or third parties for legitimate business purposes only and will protect it from unauthorized use or disclosure.



### Dos and don'ts

- Use caution when discussing company business or when working with company information in a public space
- Protect information according to Essity's Information Classification Standard
- Be cautious with links and attachments in unusual e-mails or in e-mail from senders you are not familiar with
- Don't share company information on social media or on other online services unless you have permission to do so
- Make sure you only process personal data with appropriate consent or agreement

### Learn more

- Read our [Individual Responsibility for Information Security](#)
- Read our [Data Protection Policy](#)
- Take the [STOP.THINK.ACT security e-learning course](#)
- Read our [Information about Data Protection on Essentials](#)





# Travel

Whenever we travel for Essity, we should do so in a safe, efficient and responsible manner. While travelling, we should consider our personal safety, and it is our obligation to safeguard any Essity assets and information in our control.

During business trips and work assignments, we are representatives of Essity and may not engage in illegal or inappropriate activities that may damage Essity or its reputation.

## Remember

- During business trips we represent Essity and should therefore act as ambassadors of the company, always following Essity policies

## Dos and don'ts

- Read travel alerts and information to understand the current situation at your destination, particularly if you are travelling to a high-risk country
- Be careful with company documents and information and take appropriate precautions when working in public areas

## Learn more

- Read our  [Meeting and Travel Policy](#)



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# IN THE MARKET

We conduct our business fairly and build relationships based upon honesty and integrity



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# Fair competition

While Essity will always compete vigorously for business, we must do so fairly and in compliance with competition laws (also called “antitrust” laws). These laws generally prohibit agreements or understandings between competitors that limit competition, including price fixing, allocation of customers or geographic markets, bid rigging or abuse of a dominant position.



## Remember

- Competition laws are complicated and can vary significantly in their application depending on the individual case and the country. If you have any doubt about what constitutes appropriate competition, contact a member of the Essity legal team
- Violation of antitrust laws and regulations can seriously damage Essity’s reputation, lead to substantial fines and may result in criminal and civil liability for the employees involved

## Dos and don’ts

- Don’t propose or enter into agreements or understandings – whether express or implied, written or oral – with any competitor that deal with such commercially sensitive matters as product pricing, bids, terms and conditions of sale or sales territories
- Exercise caution in activities involving competitors and consult with a member of the Essity legal team before any interactions with competitors
- Collect competitive intelligence through publicly available information only

## Learn more

- Take the  [EU Competition Law Training](#)
- Take the  [US & Canada Antitrust Law Training](#)



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# Conflicts of interest

Our business decisions must be made based on Essity's best interests. To this end, we must avoid conflicts of interest and properly disclose actual or potential conflicts of interest as soon as we become aware of them.

A conflict of interest arises when our private interests, personal relationships or activities outside Essity influence, or even appear to influence, our ability to make an objective decision.

## Remember

- Managers have a special responsibility to ensure that employees do not participate in decisions in which they have a conflict of interest

## Dos and don'ts

- Always keep your relationships with business partners professional and don't involve or give favorable treatment to family or friends
- Avoid any investment, interest or activity that could cause others to doubt your objectivity or loyalty to Essity
- Don't permit direct or indirect reporting relationships to exist between individuals who are related or intimately involved
- Promptly report potential conflicts of interest to your manager as soon as you become aware of them

## Learn more

- Read our  **Conflicts of Interest Policy**



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# Inside information

Inside information is non-public information that could reasonably be expected to have an effect on the price on Essity's financial instruments, such as the share price.

We are committed to complying with all applicable insider rules and regulations. We must never disclose inside information to third parties, including family and friends. Employees who possess inside information may not sell or buy Essity shares or advise anyone else to do so based on such information.

## Remember

- Violation of insider trading laws can damage Essity's reputation and result in individual criminal and civil liability

## Dos and don'ts

- Only discuss insider information with those who are authorized to have access to such information
- Do not trade in financial instruments or share insider information when you are registered on Essity's insider list, for example during the period immediately prior to the publication of the company's financial reports

## Learn more

Read our  **Insider Policy**



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# Products and safety

We are committed to delivering sustainable high-quality solutions to our customers, consumers and patients. Health and safety are central in everything we do. Our products and services will meet applicable legislative and regulatory requirements related to product safety and labelling.

## Remember

- Ensure you have the right people involved when making a decision that could affect the quality, safety or regulatory requirements of our products
- Quality issues is not only the responsibility of the quality department. It is everyone's responsibility

## Dos and don'ts

- Take quality and safety concerns seriously and promptly report any issues that come to your attention
- Follow Essity procedures for approving the sale of products in new countries or regions, e.g. compliance with local laws
- Always follow applicable approval procedures to ensure that our products satisfy applicable legal and regulatory requirements before launching any products in the market

## Learn more

- Read our [Quality Policy](#)
- Take the [Quality and Regulatory Awareness e-learning course](#)



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# Responsible sourcing

By purchasing responsibly, we build sustainable relationships with our suppliers, vendors and contractors. All our purchasing decisions should be based on fair and objective criteria, including the requirements outlined in Essity's Global Supplier Standard.

## Remember

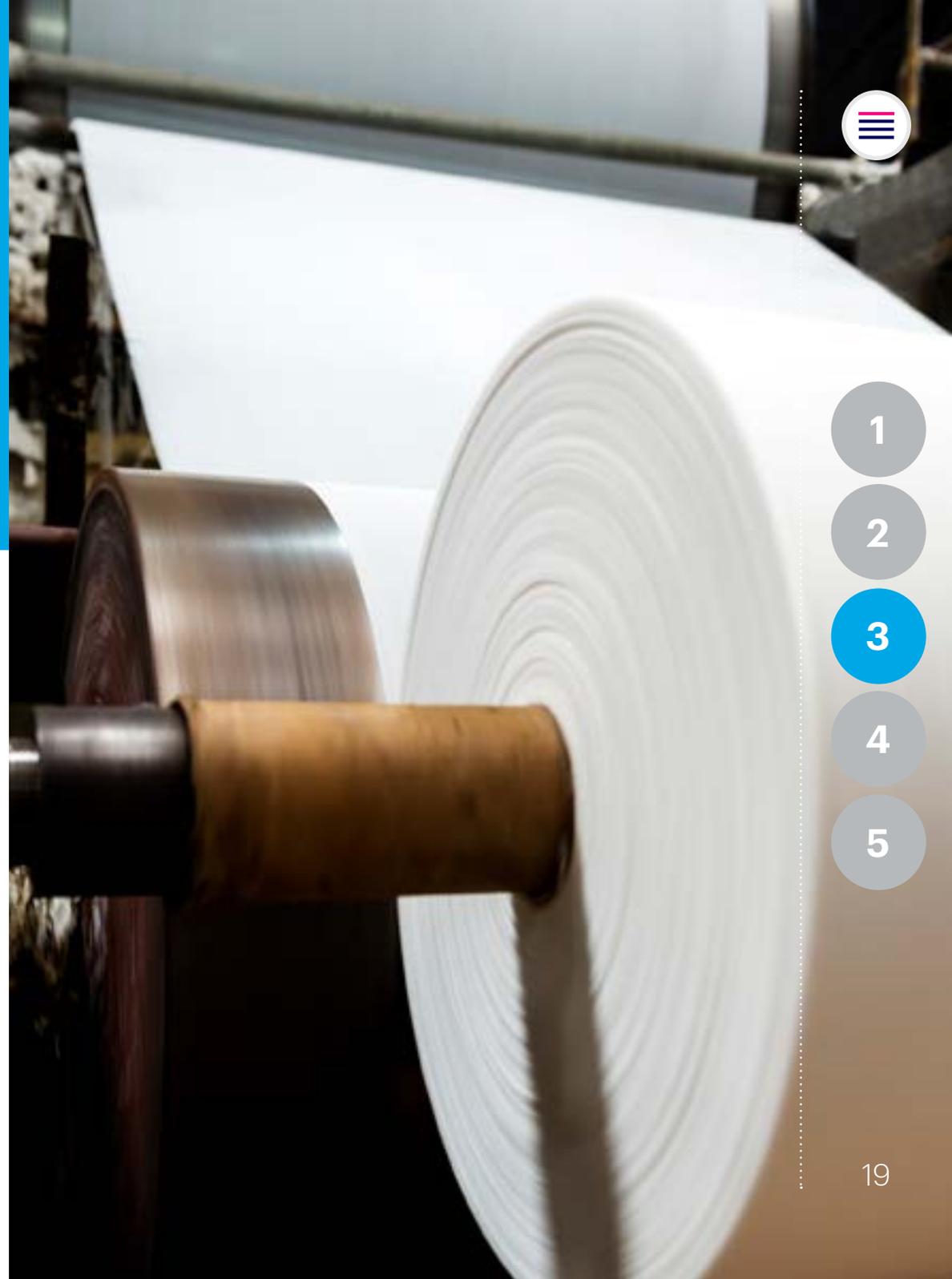
- By sourcing responsibly, we reduce our risks while also using Essity's resources in the most efficient way

## Dos and don'ts

- You should involve the sourcing team when you need to make a purchase so that all relevant Essity terms and conditions are considered
- Promptly notify your manager and refrain from participating in any decision making if a family member or a close friend is working for a potential or existing supplier to Essity

## Learn more

- Read our [Purchasing Policy](#)
- Read our [Fresh wood based fiber sourcing policy](#)



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# Marketing practices

We advertise, promote and label our products and services responsibly, by respecting applicable product regulations and marketing laws as well as relevant industry codes and standards.

## Remember

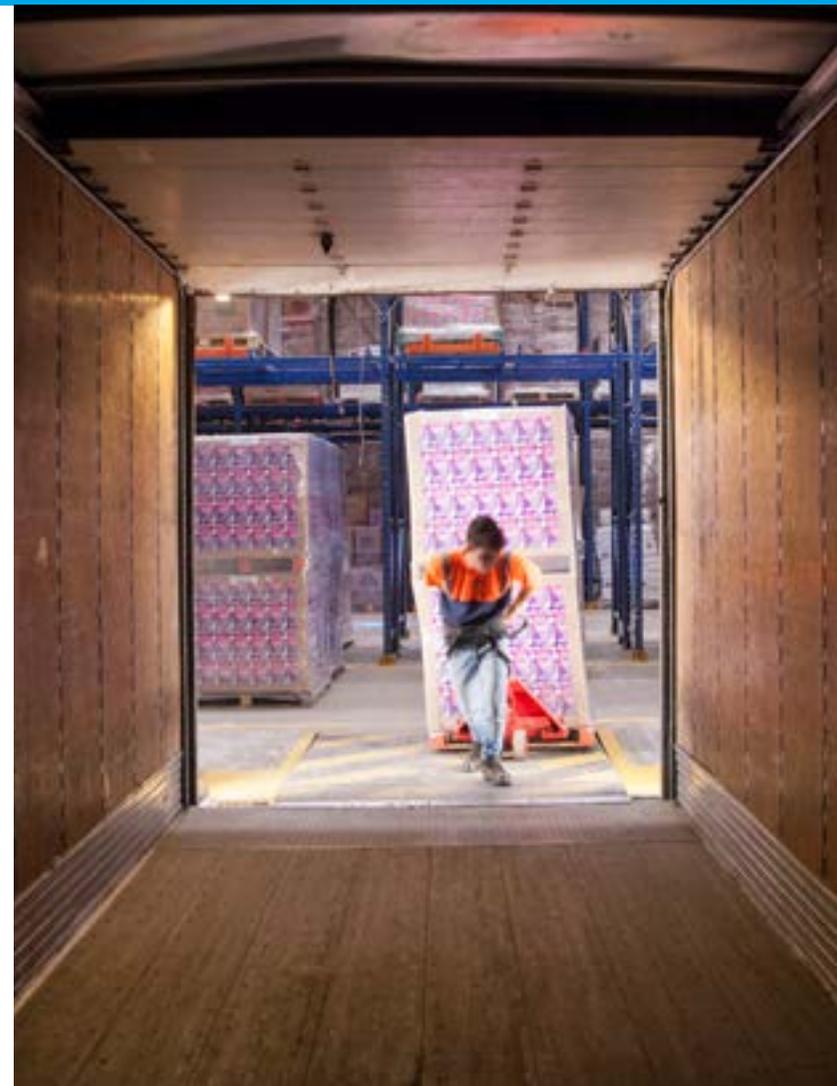
- Any promotions and samples of medical or healthcare products must strictly follow the specific regulatory requirements and industrial standards that apply

## Dos and don'ts

- Only use promotional materials in the markets for which they have been approved
- Whenever our marketing activities feature or concern children, remember to consider there may be special legal protections and ensure that our marketing practices do not negatively affect a child's rights or well-being
- Ensure that you always properly document the products you are exporting, the export destination and the end user

# Trade sanctions and restrictions

We conduct Essity's business in accordance with applicable trade laws and regulations. This could include **SANCTIONS**  and import/export restrictions related to certain products or doing business with certain individuals, countries or businesses.



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# IN SOCIETY

We value our position as a trusted corporate citizen in all communities in which we operate

# Respecting human rights

We support and respect internationally recognized human rights wherever we operate.

Based on the United Nations Guiding Principles on Business and Human Rights, we continuously evaluate how our products, operations and business relationships impact human rights and we take steps to avoid violations of such rights. When facing conflicting requirements, we will adhere to national law, while seeking ways to honor and respect the principles of international human rights.

To this end, we do not tolerate any form of **FORCED, BONDED OR COMPULSORY LABOR** or physical punishment. No one may be required to lodge deposits, or be deprived of their identity papers upon commencement of their employment. Under no circumstances should workers be charged fees or expenses related to their recruitment, and they must always be free to leave their employment in accordance with applicable law or contract.

## Dos and don'ts

- Take suspected or actual abuse of human rights seriously and ensure your concern is addressed promptly
- Whenever you use labor agencies or contractors, make sure that workers have legal permits to work and that the agency follows all applicable labor standards, including those related to compensations and benefits

## Learn more

- Read the [Information about the ILO Core Conventions](#)



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## Children's rights

We recognize children as stakeholders who require special protection. Guided by the Children's Rights and Business Principles, we respect and support children's rights in our business and society. We do not accept **CHILD LABOR** or other forms of exploitation of children in our operation or value chain, and will always strictly follow applicable national laws and international standards regarding minimum working age. When our activities impact children, we will have their best interests in mind.

### Dos and don'ts

- Understand the minimum age requirements under applicable laws before employing anyone below the age of 18 years

### Learn more

- Read  **Children's Rights and Business Principles**



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# Bribery and improper advantages

We are committed to combatting corruption in all forms and do not tolerate bribery or improper advantages in our business.

This means that we do not offer, accept, request or authorize gifts, payments or other advantages that could affect or appear to affect the objectivity of a business decision. This includes facilitation payments made to speed up administrative or other routine tasks. Stricter rules may apply when dealing with **PUBLIC OFFICIALS**  and **HEALTHCARE PROFESSIONALS/ORGANIZATIONS** .

We provide gifts, hospitality or entertainment in a lawful and transparent manner, and only as an appropriate compliment to legitimate business relationships. We do not give or accept anything that could lead to a conflict of interest or raise questions about our integrity.



## Remember

- If you interact with healthcare professionals, you must ensure you are familiar with applicable industry codes and have engaged in required training
- During tender or contract negotiations, hospitality could easily be perceived as inappropriate. In these situations, you should always consult with your manager or your legal or compliance team before proceeding
- There may be country or industry-specific standards related to gifts and hospitality. Check with your legal team whenever you are unsure

## Dos and don'ts

- All your contacts with healthcare professionals and healthcare organizations must be for legitimate business or scientific purposes
- Don't provide anything that you know may breach the gift policy of other companies or organizations
- Under no circumstances should you give or accept cash or cash equivalents
- Always pay for your own accommodation and travel expenses when attending third-party events

## Learn more

- Read our  **Anti-Bribery and Corruption Policy**
- Take the  **Anti-Corruption e-learning course**

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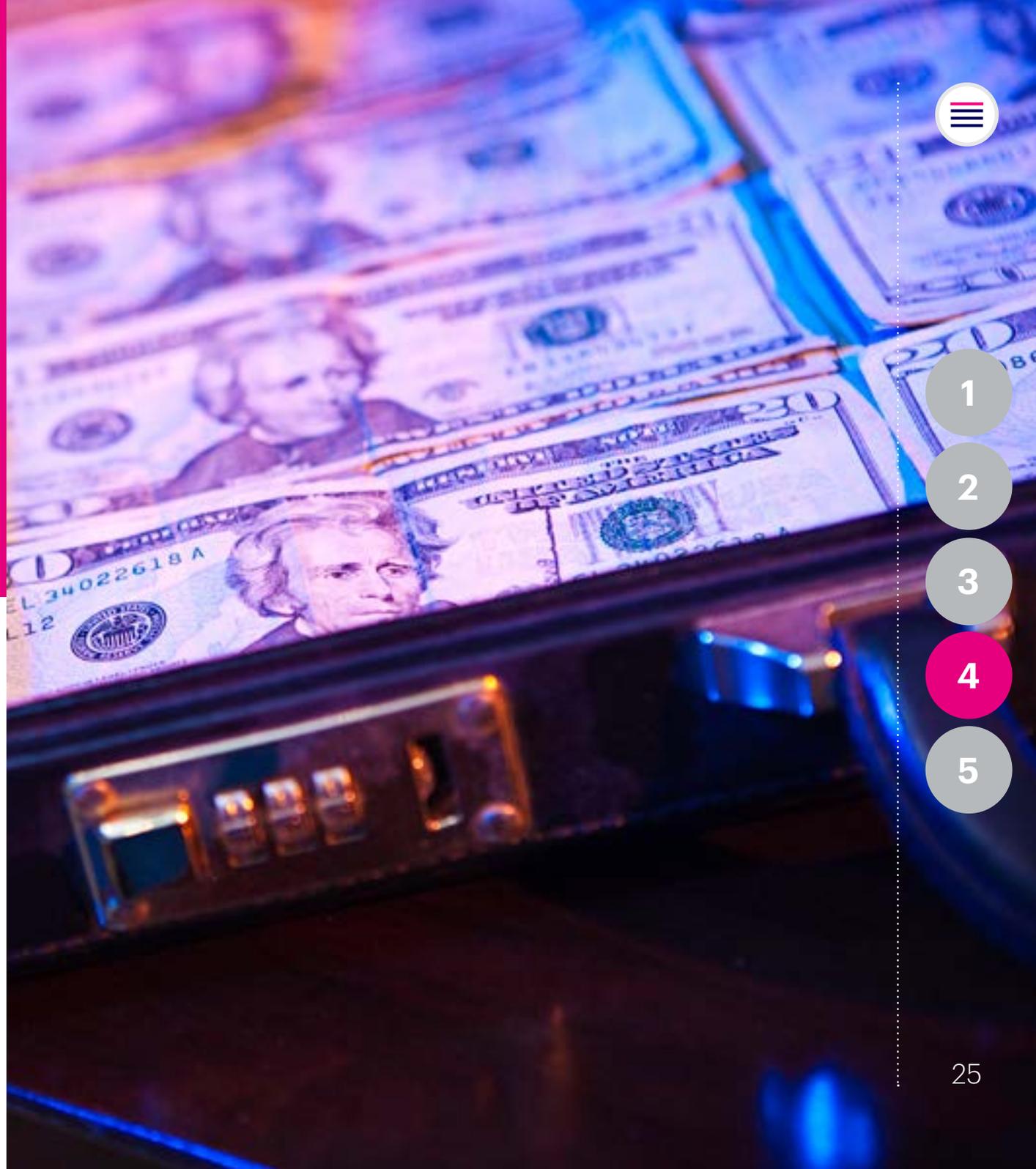


# Money laundering

To protect Essity's assets and reputation, we must ensure our revenues are earned lawfully. To this end, we comply with anti-money laundering laws worldwide. Money laundering is any arrangement where the proceeds of crime are disguised or made to appear legitimate.

## Dos and don'ts

- Take reasonable steps to identify and assess the integrity of our business partners and ensure they are engaged in legitimate business activities
- Be cautious and escalate the matter if you are asked to transfer funds in any transaction to a country unrelated to the transaction



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## Environmental responsibility

Caring for the environment is at the heart of everything we do. We evaluate our environmental impact across the entire life cycle of our products, from the responsible sourcing of raw materials to resource-efficient production and development, as well as optimized waste management.

We take active steps to continuously reduce the environmental footprint of our products and services. Our innovations are focused on the delivery of sustainable solutions that are safe, resource-efficient and environmentally sound.

### Dos and don'ts

- Go about your daily work in an environmentally conscious way. Ensure that your activities at work allow for efficient use of resources and reduction in all kinds of waste and polluting emissions
- Follow our procedures and local regulations and ensure that Essity's management and disposal of waste, chemicals or other hazardous materials are carried out in an environmentally safe way

### Learn more

- Read our  [Sustainability Policy](#)



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# Communications

We are committed to professional and transparent communications within the limits of our confidentiality obligations. We seek to form a constructive and productive dialogue with all our stakeholders.

# Community relations

We strive to contribute positively to our local communities by building lasting, long-term relationships based on open and honest dialogue. We engage in community initiatives with organizations whose mission and purpose are in alignment with Essity's own.

## Remember

- You are personally responsible for what you publish online. When using social media in reference to the company you must know and act in accordance with Essity's Code of Conduct and other company policies

## Dos and don'ts

- Make clear to readers that your views are personal and in no way the views of the company whenever you identify yourself on social media as an Essity employee
- Don't give the impression that you are speaking on behalf of Essity in personal communications, including social media, without proper authorization
- Don't use your company email address to publish personal blogs
- Refer all inquiries from analysts or investors to Essity's Investor Relations team
- Make sure you follow our procedure for community relations and sponsorship and obtain the appropriate authorization before making donations to a community organization in Essity's name
- Exercise due care when selecting a sponsor or donation recipient, and verify funding was used as expected

## Learn more

- Read our [🔗 Communications Policy](#)
- Read our [🔗 Community Relations and Sponsorship Instructions](#)
- Read our [🔗 Social Media Guidelines](#)



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## Political activities

Essity is politically neutral and does not make payments or donations in any kind to political parties or candidates, or their institutions, agencies or representatives. Our company name may not be used in political campaigns or to promote the interests of political parties or candidates.

While Essity does not participate directly in party politics, we will continue to engage in policy debates on subjects of legitimate concern to our business, our employees and the communities in which we operate. This can be done through processes such as lobbying.

### **Dos and don'ts**

- Consult with Essity's Public Affairs team if you have questions about activities related to interactions with governments
- While engaged in personal political activities/discussions, don't imply that you speak for Essity or that the company supports your views
- Don't use company assets in connection with your personal support of a political candidate or party



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# Raising concerns about a potential Code of Conduct violation

Every one of us is responsible for maintaining Essity's integrity and reputation.

Essity encourages an open and honest culture where every employee can report suspected violations of law or the Code in good faith.

You can always raise your concern with your manager, your legal team, the human resources department or your union/works council representative in accordance with locally established complaint procedures.

You may also use Essity's reporting hotline, operated by an independent third party, to raise your concern in confidence. Such reports can be made anonymously when permitted by local legislation.

Essity will investigate reported violations and take appropriate action. Any information provided during such investigations will be kept confidential unless disclosure is required by law or the matter involves criminal conduct.

We do not accept discrimination or retaliation against an employee for reporting a suspected violation in good faith. Retaliation is itself considered a serious violation of the Code and will result in disciplinary action up to and including dismissal.

An employee who knowingly makes a false or malicious allegation will be subject to equally serious disciplinary action.



Essity's reporting hotline enables employees to report serious breaches that would possibly not be reported otherwise.

You can submit a report via the website below or by phone in your local language by using **Essity's Access Code**. You will receive a unique case reference number that you should keep and you will be requested to set a password so you can monitor progress in the matter.

Reporting website: [🔗 information about how to report a violation on Essentials](#)

Toll-free telephone number by country (found [🔗 HERE](#))

Essity's Compliance & Ethics team receives the translated information from the third-party operator and will evaluate and assess the information received and recommend an appropriate course of action.

Retaliation or discrimination against any employee who, in good faith, reports a concern will not be tolerated and will be subject to disciplinary action. Good faith does not mean that your concern must be correct, but that you believe you are providing complete and truthful information when you are reporting the concern.

If you have any concerns about retaliation, you should include this information in your report.



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## Definition

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**Personal data:** Any information related to a natural person or that can be used to directly or indirectly identify the person.

**Sanctions:** Restrictions placed on trade with certain goods or services to specific countries.

**Forced labor:** Refers to situations in which persons are forced to work through violence or intimidation, or by other means, such as accumulated debt, retention of identity papers or threats of report to immigration authorities. Most situations of slavery or human trafficking are also covered by the definition of forced labor.

**Child labor:** Refers to work that is mentally, physically, socially or morally dangerous and harmful to children, or could interfere with their schooling.

### **Healthcare organizations (HCO):**

Covers any legal entity that is a healthcare, medical or scientific association or organization, such as a hospital, clinic, foundation, university or other teaching institution, through which healthcare professionals provide services. This definition also includes healthcare institutions (HCI). The meaning of HCO may vary from country to country.

### **Healthcare professionals (HCP):**

Includes members of the medical, dental, pharmacy or nursing professions or any other person who, in their professional activities, may prescribe, purchase, supply, recommend, or administer a medicinal product. This also includes any official or employee of a government agency or other organization that may prescribe, purchase, supply or administer medicinal products. The meaning of HCP may vary from country to country.

**Public officials:** Broadly defined, public officials are people who perform a public function, such as tax or customs officials, regulators, politicians and employees of state-owned or international organizations.

The definition may vary from country to country, so check with your legal team if you have any questions about the definition in your location.



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