

# CODE OF CONDUCT

Employee Guide



CARING  
FOR **YOUR HEALTH**  
IS **ALL WE DO**

## WHAT IS A CODE OF CONDUCT?

Code of Conduct (CoC) is a document that provides guidance on behaviours that we expect from our employees and co-workers at Medicover.

It says what is perceived as right and wrong and outlines the rules for ways-of-working.

It is built on our values and standards that we believe are essential for business ethics and a moral that the company stand behind.

## KEY PRINCIPLES OF CoC

At Medicover we are committed to high ethical standards and responsible business – this is why:

we measure our **success** not only by growth and performance in economic value, but also by the way we do **business** and take our **responsibilities**.

It is of outmost importance to be a responsible employer and a good corporate citizen. All our activities as an employer/employee must be conducted in a professional way with respect and consideration to:

- accounting standards
- anti-corruption
- human rights
- labour rights
- environment

## WHAT DOES THE CoC CONTAIN?

CoC provides clarification on key business ethics principles. These principles are built around:

1. Accounting practices
2. Anti-corruption
3. Business and personal critical information
4. Political involvement
5. Human rights, employment and work environment
6. Environment
7. Communication
8. Insider trading
9. Supplier relations
10. How to react in case of CoC violations

## ACCOUNTING PRACTICES

We comply with all accounting and tax laws, we do not tolerate money laundering and financing of terrorism.



We comply with accounting and tax laws



We comply with anti-money laundering laws



We combat terrorism financing

## ANTI-CORRUPTION

We have zero tolerance of all forms of corruption, including extortion, giving and receiving bribes, kickbacks, conflict of interest (which is a situation when your private interest is in conflict with the company interest), embezzlement, or nepotism/cronyism. For more information, see Medicover Anti-Bribery Policy.



We do not offer/accept bribes



We avoid conflict of interest

## BUSINESS & PERSONAL CRITICAL INFORMATION

Safety of personal data and medical data of our patients is our top priority. We protect company business secrets and confidential information from improper disclosure. We treat information provided to us from our business partners as confidential.



We do not disclose business secrets



We protect personal data and medical data

## POLITICAL INVOLVEMENT

Medicover is politically neutral and do not support in any form any of political organisations or politicians. Doing business with the government and public officials is subject to additional rules, requirements defined by laws and increased scrutiny. All employees are responsible for knowing and complying with local laws, regulations and applicable company policies.



We do not sponsor, support politics



We comply with local laws

## HUMAN RIGHTS

Medicover respects and works in line with internationally proclaimed human rights. Each of us has a responsibility to show respect for human rights and uphold the laws.



We have ZERO tolerance for any type of forced labour



We comply with labour laws



We provide safe healthy work environment



We do not tolerate discrimination, harassment or bullying



We do not tolerate drugs and alcohol in workplace



We respect right to freedom of association of our people

## ENVIRONMENT

We care for natural environment and our aim is to continually improve environmental performance in all our operations and facilities. We focus on reduction of greenhouse gas emissions, minimise the use of harmful substances and hazardous waste, limit and reduce consumption of finite resources, promote an increased rate of recycling. Want more information – review Medicover Environmental Policy.



We minimize our impact on natural environment

## COMMUNICATIONS

We are committed to provide timely, reliable, accurate and up-to-date communications to all our stakeholders. We maintain good relations with media in order to support Medicover's reputation and brand. All communication with media, analyst or investors, public discussions, or engagement in social media on behalf of Medicover is done by authorised spokespersons. Medicover Information Policy provides guidance on who is an authorised spokesperson.



We provide reliable and on time communications to all our stakeholders

## INSIDER TRADING

Inside information is information of a precise nature, which has not been made public, relating directly or indirectly, to Medicover or Medicover's financial instruments, and which, if it was made public, would be likely to have a significant effect on the prices of Medicover's financial instruments (including both shares and debt instruments) or on the price of related derivative financial instruments.



We comply with insider trading principles and regulations

We are all strictly prohibited from engaging in insider trading or disclosure of insider information to others as prohibited by law. Any violation of insider trading laws is a serious crime and may result in criminal liability and damage Medicover's reputation. For more information, see Medicover Insider Policy.



## SUPPLIERS

Medicover has set high standards on the way we conduct business and we expect the same from our suppliers in their own business and their business relations. Medicover Supplier Code of Conduct applies to all our suppliers and acknowledgement of this Code should be requested from our key suppliers.



We use our Supplier Code of Conduct in relations with suppliers

## REPORT CoC VIOLATION

All employees are encouraged to report violations of laws, the CoC or any other Medicover policy.

Please proceed in one of the tracks below to submit a report:

1. Report the case to your line manager or talk directly to local HR, Legal or Management.
2. If you do not want to contact someone in your organization there is a safe, encrypted channel where misconduct can be reported, anonymously, if you prefer. Reports via this channel will only be available for a few selected employees in the Medicover headquarter in Stockholm, Sweden.

- For serious violations the best way to report is via our secure whistleblower tool:

[medicover.whistleblownetwork.net](https://medicover.whistleblownetwork.net)

- If you cannot access the tool you can also report via e-mail:

[whistleblowing@medicover.com](mailto:whistleblowing@medicover.com)

If suitable for investigating your report – it will be re-directed to your country Legal head and/or HR head for proceeding locally.

Depending on the confidential nature of investigations – the person submitting a violation will receive an adequate feedback, provided that there is a contact (this can be: phone, e-mail – including anonymous e-mail).



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