

Document name: Medicover Supplier Code of Conduct	Document type: Group Policy	Version: 1.1
Approved by: Board of Directors of Medicover AB (publ)	Document owner: CEO	Date of approval: 10.02.2022



# Medicover Supplier Code of Conduct

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## Content

1	Introduction .....	3
2	Purpose of this Medicover Supplier Code of Conduct.....	3
3	Medicover’s relationship with its suppliers .....	3
3.1	Labour and human rights.....	3
	Health and safety .....	3
	Freedom of association and collective bargaining .....	3
	Zero tolerance of child labour and forced labour .....	3
	Harassment and discrimination .....	4
	Working hours .....	4
	Compensation .....	4
3.2	Environment .....	4
	Systematic environmental responsibility .....	4
	Risk management .....	4
	Precautionary measures .....	4
	Polluter pays principle .....	4
	Life-cycle analysis .....	5
3.3	Anti-corruption .....	5
3.4	Competition law .....	5
3.5	Prevention of money laundering and financing of terrorism.....	5
3.6	Quality requirements .....	5
3.7	Information security .....	5
3.8	Processing of personal data .....	5
4	Verification .....	6
5	Implementation.....	6
6	Reporting .....	6

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## 1 Introduction

The Medicover group (Medicover AB (publ) and its subsidiaries) (“**Medicover**”) is committed to the fundamental principles on human rights, labour rights, the environment and the fight against corruption throughout its operations.

## 2 Purpose of this Medicover Supplier Code of Conduct

The purpose of this Medicover Supplier Code of Conduct (this “**Supplier Code of Conduct**”) is to create a dialogue and partnership with suppliers to ensure they accept and support the International Bill of Human Rights, the ILO’s Declaration on Fundamental Principles and Rights at Work, the Rio Declaration on Environment and Development and UN’s Convention against Corruption as outlined in the UN Global Compact, the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights.

## 3 Medicover’s relationship with its suppliers

Medicover strives to build long-term and stable relationships with its entire supply base including suppliers of goods and services, contractors, distributors, and agents, hereafter referred to as “**suppliers**”, in cooperation with whom we systematically develop products and services. This Supplier Code of Conduct applies to all business relationships between Medicover and its suppliers. Medicover expects all suppliers to conduct their business in a responsible and sustainable manner. The suppliers must comply with all laws and regulations governing their operations and Medicover expects suppliers and their sub-suppliers to comply with this Supplier Code of Conduct, even where it sets a higher standard than that provided by law.

Medicover expects its suppliers to:

### 3.1 Labour and human rights

#### **Health and safety**

Identify and assess health and safety risks and minimise its impact by implementing emergency plans.

Ensure that all employees are protected from exposure to potential health and safety hazards.

Ensure that relevant and functioning personal protective equipment is provided to all employees.

Implement procedures and systems to manage, track and report occupational injury and illness.

Ensure that relevant first aid kits are easily accessible.

Ensure that employees do not work under the influence of drugs and/or alcohol.

#### **Freedom of association and collective bargaining**

Ensure that the freedom of association is safeguarded and recognise its employees’ right to collective bargaining.

#### **Zero tolerance of child labour and forced labour**

Not use or support any form of child labour.

Establish a system to ensure that no children are employed, including systematically checking and maintaining copies of age verification documentation for all new employees. The minimum age for admission to work is 15 years old (or 14 if allowed by local law).

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Protect all young workers (below 18 years old) from performing any work that may be harmful, and not allow them to perform night shift work.

Not use or support any form of forced, compulsory or illegal labour, including trafficking, prison labour or bonded labour.

Ensure that all overtime work is voluntary, unless necessary and mandated according to local laws.

Not require that employees hand over original personal certificates or identification documents.

Not use disciplinary practices such as financial penalties e.g. unfair or illegal deductions from wages.

#### **Harassment and discrimination**

Not tolerate any physical or mental harassment or abuse.

Not discriminate in hiring and employment practices such as promotion, benefits and access to training.

#### **Working hours**

Ensure that working hours comply with local laws, ILO Conventions or collective agreement, whichever affords the greater protection of the worker.

Ensure that working hours are divided, if required by local laws, into normal working hours and overtime hours and shall not exceed the maximum set by local laws.

#### **Compensation**

Comply, at a minimum, with all local laws and regulations relating to wages, including minimum wages, overtime hours and mandated benefits as per custom of the country.

### **3.2 Environment**

#### **Systematic environmental responsibility**

Adopt a systematic approach to its environmental responsibility and have good knowledge of the environmental impacts caused by its operations.

Meet all relevant environmental standards in its production and products.

#### **Risk management**

Establish, implement and maintain a risk-based program to reduce or minimise any negative environmental impact caused by its operations.

#### **Precautionary measures**

Take precautionary measures as soon as there is reason to believe that an action could harm the environment.

#### **Polluter pays principle**

Pay the social and economic costs that arise from its entities that cause damage to the environment.

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### **Life-cycle analysis**

Have knowledge of the environmental impacts of its products or services from a life-cycle perspective.

### **3.3 Anti-corruption**

Have zero tolerance of all forms of corruption, including extortion, giving and receiving of bribes, kickbacks, conflicts of interest, embezzlement or nepotism/cronyism.

Establish processes to prevent corruption e.g. by implementing an anti-corruption policy and by providing relevant training to its staff.

Be aware that Medicover will not accept any benefit intended for a Medicover employee to facilitate the supplier's business with Medicover.

Inform Medicover if, in conjunction with a purchase, there is some form of personal relationship (family relationship, personal friendship, etc.) between the person responsible for the purchase at Medicover and representatives of the supplier involved in the purchasing process.

### **3.4 Competition law**

Respect and comply with applicable competition laws and regulations and establish systems to prevent competition law infringements.

### **3.5 Prevention of money laundering and financing of terrorism**

Ensure preventing its own business from being used for money laundering or financing of terrorism by having established procedures for gaining proper knowledge of its customers, partners and suppliers, and knowledge and understanding of the purpose of a given business relationship.

### **3.6 Quality requirements**

Meet generally recognised or contractual agreed quality requirements.

Ensure that quality requirements are implemented into the supplier business processes in order to provide goods and services that consistently meet Medicover's needs.

### **3.7 Information security**

Manage all information received from Medicover in a secure manner and in accordance with any non-disclosure agreements they have entered into, as well as applicable market abuse legislation.

Ensure that information is never disclosed to unauthorised persons. The contents of offers, fee quotes and agreements are to be regarded as confidential.

### **3.8 Processing of personal data**

Process personal data in accordance with the data protection legislation applicable to the processing.

Respect the right of the registered person to privacy in all processing of personal data. Care must always be exercised if the processing involves transfer of the personal data to third countries or if the processing involves specific categories of personal data.

Take appropriate technical and organisational measures to ensure that the security level for processing meets the relevant legal requirements.

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Immediately notify Medicover if a personal data incident occurs involving personal data that Medicover has shared with the supplier.

#### **4 Verification**

Suppliers accept that if Medicover has reasonable grounds for suspecting that a breach of this Supplier Code of Conduct has occurred or is threatening, Medicover or a third party nominated by Medicover will be given the information and access required to verify the facts.

#### **5 Implementation**

All suppliers are expected to accept this Supplier Code of Conduct, and to use best efforts to ensure that their sub-suppliers also do so.

Further information can be found in Medicover Code of Conduct and Medicover Anti-Bribery Policy on [www.medicover.com/sustainability](http://www.medicover.com/sustainability).

#### **6 Reporting**

The suppliers are required to without undue delay report any non-compliance with this Supplier Code of Conduct to Medicover. The suppliers and any of their employees may report concerns confidentially to: [supplier@medicover.com](mailto:supplier@medicover.com)

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### Document details

	<i>Role</i>	<i>Date</i>	<i>Signature</i>
Author(s)	General Legal Counsel (Jenny Brandt)	19.01.2022	

### Authorisation

	<i>Role</i>	<i>Date</i>	<i>Signature</i>
Authorised by	CEO (Fredrik Rågmark)	19.01.2022	

Signed off by            N/A