

Document name: Medicover Code of Conduct	Document type: Group Policy	Version: 7.0
Approved by: Board of Directors of Medicover AB (publ)	Document owner: Group HR Director	Date of approval: 28.11.2018



Medicover Code of Conduct

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Content

1	Introduction	3
2	Purpose of this Medicover Code of Conduct	3
3	Who is covered by this Code of Conduct?	3
4	Definitions	4
5	Business Representatives	4
6	Business Ethics.....	4
6.1	Accounting practices	4
6.2	Anti-corruption	5
6.3	Business and personal critical information	5
6.4	Political involvement.....	5
6.5	Human rights, employment and work environment.....	6
6.6	Environment	7
6.7	Communication.....	7
6.8	Insider trading.....	7
6.9	Suppliers.....	7
7	Responsibilities	7
7.1	All general managers and HR/Legal	7
7.2	All managers.....	8
7.3	All employees	8
8	Questions and reporting of violations	8
8.1	How do I know that I act in line with this Code of Conduct?	8
8.2	Reporting of violations	8
	Appendix	10
	Statement of commitment.....	10

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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 our operations. Medicover accepts and supports 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. Together with local laws and regulations these are principles that the Medicover business is committed to adhere to.

2 Purpose of this Medicover Code of Conduct

The purpose of this Medicover Code of Conduct (this “**Code of Conduct**”) is to ensure that all employees (as defined below) and Business Representatives (as defined below) are informed and aware of the fundamentals for Medicover’s business ethics and ways of working. Medicover’s values are key for everything we do. We strive to keep our customers as healthy as possible, to deliver the highest standards of healthcare and to continually improve what we do. We live by our five core company values, amongst which passion for quality is at the forefront.



Medicover is committed to high ethical standards and responsible commercial success, which means that 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 human rights, labour rights, environment and anti-corruption.

Medicover operates in various countries with local laws and regulations. All companies within Medicover shall operate in compliance with relevant laws and regulations where it operates. By conducting its operations in accordance with this Code of Conduct we ensure that we comply with relevant laws and regulations. The requirements set forth in this Code of Conduct must be respected and followed even when they go beyond local laws and regulations.

3 Who is covered by this Code of Conduct?

This Code of Conduct applies to every Medicover company and its employees (as defined below) and Business Representatives (as defined below). All employees and Business Representatives are required to abide all applicable laws and regulations, in addition to this Code of Conduct.

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4 Definitions

When used in this Code of Conduct:

“**Business Representatives**” include agents, brokers, intermediaries, representatives, contractors, consultants, lobbyists, service providers, and any other person engaged or instructed to act for or on behalf of Medicover.

The term “**employee**” includes every person who works for or provides services to any Medicover company, under an employment contract or as contracted by Medicover on a self-employed basis or similar. The term “**employee**” also includes every member of the board of directors, management board, supervisory board and other corporate bodies of a Medicover company.

“**HR/Legal**” means, when used in relation to reporting, complaints, questions or concerns, your business unit HR/Legal head, or your division HR/Legal head or Group Legal or Group HR, primarily the one closest to you in the organisation, if you prefer.

5 Business Representatives

Medicover engages Business Representatives to perform a variety of services. Those engaged to act for or on behalf of Medicover must comply with this Code of Conduct, in addition to all applicable laws and regulations.

The terms of the engagement should be in writing including a reference to this Code of Conduct.. Do impress upon the Business Representative that Medicover has a culture of adherence to the highest ethical standards and compliance with all applicable laws and regulations.

6 Business Ethics

6.1 Accounting practices

All financial transactions shall be fully and accurately recorded in the company’s accounting records in accordance with generally accepted accounting principles, policies and applicable local laws and regulations. All the company’s books, records, accounts and financial statements must be maintained in appropriate detail and accurately reflect the company’s transactions. Medicover shall meet requirements set forth in applicable national legislation and international principles, including assurance on its commitment to pay all taxes and fees to local governments in countries of operation.

Money laundering

Medicover shall adhere to applicable anti-money laundering laws throughout the world and our countries of operations. Medicover is committed to the highest standards of Anti-Money Laundering and Combating Terrorism Financing (AML/CTF) compliance and requires all employees to adhere to these standards in order to prevent money laundering practices. Medicover’s anti-money laundering policy provides for the minimum general unified standards of internal AML/CTF control that must be followed by all employees and all companies within Medicover.

Approval

Before entering into any document, agreement, statement or contracts on behalf of Medicover all employees must ensure that they have the proper approval, authorisation and signatory powers to do so.

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6.2 Anti-corruption

Medicover has zero tolerance of all forms of corruption, including extortion, giving and receiving bribes, kickbacks, conflict of interest, embezzlement, or nepotism/cronyism. Corruption undermines integrity and reputation and has a significant negative impact on the value of Medicover's business and success. All countries in which Medicover operates or do business have laws prohibiting companies and individuals from engaging in corrupt activities to influence decisions. Medicover comply with these laws and participates only in business activities where Medicover can compete honestly and fairly. All attempts to improperly influence decisions or gain favourable treatment for a Medicover company are prohibited. Medicover conducts business responsibly, ethically and free from any form of bribery, regardless of local practice or custom. Medicover does not make business decisions based on any personal benefit given or offered to us. For more detailed information, see Medicover Anti-Bribery Policy.

Conflict of interest

A conflict of interest exists when a person's private interest interferes or may interfere in any way with the interests of the company. A conflict situation can arise when an employee takes actions or has interests that may make it difficult to perform his or her company work objectively and effectively. Other examples of potential conflicts include employees in a supervisor-subordinate relationship who marry, become domestic partners or become involved in a significant relationship.

In addition, it is a conflict of interest for an employee to work for a competitor, customer, supplier, lender or adviser. For example, employees are not allowed to work for or be associated with a competitor in any capacity while being contracted or employed by Medicover.

In certain circumstances medical professional employees working on a part time basis may also provide medical services on behalf of competitors. This may be permitted on a case by case basis as long as it is disclosed to the direct supervisor of the medical professional employees, the technical and administrative staff, or to the country HR head or the country general manager (or equivalent country manager).

6.3 Business and personal critical information

Employees must protect confidential information from improper disclosure. Confidential information contained from those Medicover does business with must be treated in the same way. All employees are responsible for protecting the confidentiality of all such information.

IT environment and information security

All personally identifiable information and personal health information is processed and stored in Medicover in accordance with the relevant EU and local data protection laws and regulations. For more information about IT environment and information security, see Group Information Security Policy.

6.4 Political involvement

Medicover is politically neutral with regard to political parties and candidates. It is strictly prohibited to give anything of value, directly or indirectly, including money, gifts, or promises of employment, to officials or local and/or foreign governments or local and/or foreign political candidates in order to obtain or retain business and to make payments to government officials. Doing business with the government and public officials is subject to additional rules and increased scrutiny. There are standards for nominal gifts and entertainment that vary from country to country and even region to region within those countries. All employees are responsible for knowing and complying with local monetary limits, laws, regulations and applicable company policies.

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6.5 Human rights, employment and work environment

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 law.

- Medicover has zero tolerance for any form of child, forced, or compulsory labour.
- Medicover ensures 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.
- Medicover pays wages and provides benefits that are market competitive and consistent with industry standards in the countries in which Medicover operates.
- Medicover recognises and respects our employees' right to freedom of association and collective bargaining.
- Medicover provides a safe and healthy work environment.

Discrimination, harassment and bullying

Medicover provides a work environment that is equal, fair and non-discriminatory and prohibits discrimination, harassment and bullying behaviours, of any kind by any employee. Discrimination, harassment, slurs or jokes based on a person's race, colour, creed, religion, national origin, citizenship, age, sex, sexual orientation, marital status or mental or physical as well as other individual attributes or statuses that may be protected under local law, are not tolerated.

Bullying includes intentional or non-intentional verbal or non-verbal conduct by one or more individuals against another individual, continuously and systematically over a period of time (i.e., a single offensive comment is unacceptable and may require disciplinary action however, it is not bullying. Similarly, a critical performance review may have an adverse impact on an employee's mental wellbeing, but it is not considered as bullying).

Bullying can be an action that:

- Intimidates, shows direct or passive aggression, offends, disgraces, or ostracizes any employee;
- Impedes an employee's productivity or overall performance; or negatively impacts the mental or physical health.

Drugs and alcohol

Medicover maintains a drug and alcohol-free workplace in order to ensure a safe, healthy and productive work environment for employees. The unauthorised use of alcohol during work or at company-sponsored events is prohibited.

Safe and healthy work environment

Medicover is committed to provide safe and healthy working conditions and to prevent workplace accidents. All employees are required to obey the company's health and safety rules and practices, to report incidents, accidents, injuries and unsafe equipment, practices of conditions, and to exercise caution in all their work activities.

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6.6 Environment

Medicover strives to continually improve environmental performance in all its operations and facilities. The environmental work should include (but not be limited to) activities and processes to limit and reduce 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, monitor other relevant environmental issues and create value by incorporating environmental considerations into the company's business activities. For more information, see Medicover Environmental Policy.

6.7 Communication

All communication from Medicover shall be timely, reliable, accurate and up-to-date. Medicover shall 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.

6.8 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. All Medicover's employees are strictly prohibited from engaging in or becoming involved 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.

6.9 Suppliers

Medicover has set high standards on the way Medicover conducts business and Medicover expects the same from its suppliers in their own business and their business relations.

Medicover Supplier Code of Conduct is applicable on Medicover's suppliers. Acknowledgement of Medicover Supplier Code of Conduct should be requested from key suppliers. For more information, see Medicover Supplier Code of Conduct.

7 Responsibilities

Managers at all levels are responsible for implementing this Code of Conduct and to inform employees of *their rights, duties and responsibilities linked to this Code of Conduct*.

Specific responsibilities are set out below.

7.1 All general managers and HR/Legal

Each country general manager (or equivalent country manager) is responsible for implementing this Code of Conduct.

Local HR/Legal of each Medicover division and operating business unit is responsible for implementing procedures appropriately designed to make employees aware of this Code of Conduct and applicable laws. Local HR/Legal of each Medicover division reports, in this role, to the General Legal Counsel and Group HR Director of Medicover AB (publ).

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7.2 All managers

It is the responsibility of each manager within Medicover to ensure that its employees are informed, understand and adhere to this Code of Conduct.

7.3 All employees

All employees are individually responsible for reading this Code of Conduct and for compliance with this Code of Conduct as well as applicable laws and regulations. All known or suspected actual or potential violations of this Code of Conduct or applicable laws and regulations must be reported.

Failures to comply with this Code of Conduct could lead to disciplinary action, which may include written warning or ultimately, depending on the circumstances and requirements of the local law, termination of the employment.

8 Questions and reporting of violations

8.1 How do I know that I act in line with this Code of Conduct?

To be sure that your action or decision is in line with this Code of Conduct, always ask yourself the following questions:

- Is it legal?
- Is it consistent with Medicover's values, this Code of Conduct and other Medicover policies?
- Am I comfortable with it?
- Am I doing what is right for my team, customers and Medicover's business?
- Would I want my actions to be made public?

If the answer is no, or you are not sure, stop and ask for advice from your manager. Questions regarding this Code of Conduct should be addressed via the Code of Conduct information site on the Medicover intranet.

8.2 Reporting of violations

All employees are encouraged to report any conduct that you believe, in good faith, to be a violation of laws, this Code of Conduct or any other Medicover policy to your manager.

Any harassment or discrimination, providing the supportive justification and evidence, shall be reported immediately to your manager or the local responsible for HR or Legal. In cases where a serious breach of this Code of Conduct is suspected, and the issue cannot be discussed with the local manager or in the local organisation, it shall be addressed in accordance with Medicover Whistleblower Policy

Policies related to this Medicover Code of Conduct that needs to be considered:

Medicover Anti-Bribery Policy

Medicover Anti-Money Laundering Policy

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Medicover Communication Policy

Medicover Environmental Policy

Medicover Group Information Security Policy

Medicover Insider Policy

Medicover Supplier Code of Conduct

Medicover Whistleblower Policy

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Appendix

Statement of commitment

I have received and read Medicover Code of Conduct. I understand the principles contained in it. I understand that there may be additional policies or laws specific to my position and to where I work.

I express my personal commitment to adhere to the principles contained within Medicover Code of Conduct, and to the relevant Medicover policies developed in alignment with local legislations.

If I have questions concerning the meaning or application of Medicover Code of Conduct, any Medicover policy, or the legal and regulatory requirements applicable to my work, I know I can consult my manager, my country general manager (or equivalent country manager) or the Group HR Director.

I understand that Medicover Code of Conduct can be updated, amended, suspended or rescinded at any time, and I understand that it is my sole responsibility to become familiar and to observe the revised versions of it.

If in a management position, I commit myself, as a manager, to educate and train my team members on the content and understanding of Medicover Code of Conduct and on its proper application.

I, the undersigned, agree with the above statements.

Signed by _____

Employee name _____

Department/title _____

Date and place _____

Please sign and return this form to your local head of Human Resources.

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Version history

<i>Version</i>	<i>Date of approval</i>	<i>Author(s)</i>
6.0	27.06.2017	Group HR Director
7.0	28.11.2018	Director of Corporate Communications & IR

Document details

	<i>Role</i>	<i>Date</i>	<i>Signature</i>
Author(s)	Director of Corporate Communications & IR (Paula Treutiger)	19.11.2018	

Authorisation

	<i>Role</i>	<i>Date</i>	<i>Signature</i>
Authorised by	CEO (Fredrik Rågmark)	19.11.2018	
Signed off by	Group HR Director (Liselotte Bergmark)	19.11.2018	