

Document name: Workplace Rights and Prevention of Modern Slavery Policy	Document type: Group Policy	Version: 1.0
Approved by: Board of Directors of Medcover AB (publ)	Document owner: CPO	Date of approval: 21.03.2025



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1 Introduction

Medicovert (Medicovert AB (publ) and its subsidiaries, "**Medicovert**" and each a "**Medicovert company**") is committed to conducting our business ethically and sustainably, in line with internationally recognised fundamental workplace rights standards of United Nations and European Union.

These standards lay the foundation of our Medicovert Workplace Rights and Prevention of Modern Slavery Policy (this "**Policy**") and our practices in interactions with Our People (as defined below) **and others whose rights are impacted by our operations, products or services**.

2 Purpose

The purpose of this Policy is to define Medicovert's commitments to protect workplace rights and prevent their violations across all Medicovert's worldwide organisational units and its value chain.

In particular, this Policy refers to the following workplace rights:

1. Safe working conditions.
2. Equal opportunities and protection from discrimination.
3. Freedom of association and employee representation.
4. Collective agreements and transparent employment terms, including working hours and remuneration and social security.
5. Prevention of any form of modern slavery, servitude, forced and compulsory labour, child labour, and human trafficking, all of which have in common the deprivation of a person's liberty for commercial gains.

3 Definitions

In this Policy, we use the following definitions:

Own Workforce, Employees or Our People: every person (employee or coworker) hired in a Medicovert company, as provided by the respective general laws or labour laws of a given country.

Manager(s): a person responsible for managing and overseeing people in his/her area.

4 Scope

This Policy is an organisational policy, and it applies to Our Workforce at Medicovert.

As this Policy cannot address all local legal matters in all countries in which Medicovert operates, *where a law conflicts with this Policy, the stricter prevails*.

This Policy also sets the principles and standards of expected conduct of our suppliers to ensure that workplace rights are respected and that modern slavery is prevented concerning individuals working in our value chains.

5 Policy

Respecting workplace rights is integral to our principle of acting with integrity and doing business ethically. Therefore:

We are committed to upholding workplace rights to our people and others whose rights are impacted by our operations, products or services, in particular:

- **Work safety.** We comply with health and safety regulations, and through our work safety management framework, which is based on our Medicovert Health Safety and Wellbeing Policy and adequate processes and systems, we identify, prevent, and mitigate work safety risks. We educate our Employees on safety standards,

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and through our active wellbeing agenda, we address main health topics specific to our organisation and raise our Employees' awareness of a healthy lifestyle.

- **Equal opportunities and preventing discrimination.** We comply with applicable regulations to ensure equal opportunities and inclusion and to prevent discrimination. Through our Diversity, Equality, and Inclusion management framework, related policies, and processes, we identify, prevent, and mitigate associated risks and enable the remediation of any adverse impact to which they contribute.
- **Freedom of association and employee representation.** We respect our Employees' rights to freedom of association and representation. We do not interfere with their decisions to form or join their employee representation organisations, and we do not allow actions that could discourage our Employees' membership in these organisations or result in discrimination due to membership in these organisations.

Dialogue with employee representatives. We establish channels for dialogue between management and employee representatives, and we create a work environment where they can carry out their duties without hindrance.

Voice of Employee. Through our employee voice framework, we seek our Employees' feedback related to their engagement, and their work experience. We use our Employees' feedback to improve Medcover as a workplace.

- **Collective agreements and secure employment.** We establish written rules of work organisation and the principles of remuneration which are available for our employees in line with labour law regulations of a given country.

Working time: We comply with provisions of labour laws and our collective agreements related to working hours.

Remunerations: We comply with provisions of labour laws, our collective agreements and related policies on remuneration. We adhere to minimal statutory wages, provide Employees with clear written information on their pay, and we are committed to equal pay and benefits irrespective of gender for work of equal value.

Secure employment terms: We provide written contracts detailing the terms and conditions of employment. We comply with social security laws and employee social benefits and ensure that the work performed by employees is based on respective laws and recognised practices.

We have zero tolerance for any form of modern slavery at Medcover and across our value chains; in particular, we do not tolerate:

- **Servitude, forced, and compulsory labour.** We do not use any form of servitude, forced, compulsory, or involuntary labour. We do not retain our Employees' identity documents, and we respect their will to leave work and terminate their contracts following the terms set out in those contracts, with due remuneration to be paid.
- **Child labour.** We do not use child labour and we comply with all relevant laws across all markets we operate. We support legitimate workplace apprenticeships, internships, and related programmes that comply with adequate regulations for a given country's applicable laws.
- **Violence.** We do not allow any form of physical or psychological abuse, sexual or other harassment, or threat of any of those reprehensible behaviours. We do not tolerate verbal abuse or other forms of intimidation or bullying. We maintain clear grievance procedures available to our Employees through which they can report violations, seek support, and get non-retaliation protection and remedies in case of adverse impact.
- **Human trafficking.** We deem human trafficking as a crime, and whenever during our course of business we witness any form of human trafficking, we report it to and collaborate with authorities to combat any form of this crime.

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We are committed to implementing effective prevention processes, controls, and systems to assess risk, monitor business conduct, and report and react to any form of workplace rights and modern slavery violations in our organisation, in particular:

- **Compliance and monitoring.** We are committed to adhering to relevant laws in every country where we operate. We monitor workplace rights legislation and regularly review and update this Policy and our practices to ensure compliance.
- **Education.** We educate Our People on workplace rights and modern labour slavery and promote awareness of this Policy and related topics through our global employee communications channels.
- **Due diligence and risk assessment.** We will conduct workplace rights and modern slavery risk assessments to identify potential impacts and to implement control measures to mitigate identified risks. We will review and update risk assessments periodically and whenever significant changes occur in the workplace or legislative environment.
- **Reporting, investigation and prevention.** We will require prompt reporting of workplace rights or modern slavery incidents, conduct thorough investigations to identify violations and take disciplinary measures in accordance with the respective general laws or labour laws of a given country. Those who violate workplace rights at work will face disciplinary measures as a consequence. We define learning points from incidents and use them to raise awareness of Our People and prevent incidents from occurring again. We will disclose the number of work-related incidents and severe workplace rights impacts and any related fines, sanctions or compensation for the reporting period, as legally required.
- **Remediation actions.** We will have procedures to enable remediation if the violations have adverse workplace rights impacts via non-judicial grievance mechanisms, known and accessible to stakeholders.
- **Effective communication.** We will effectively communicate this Policy through our global employee communication channels and suppliers' communication channels to increase awareness of Medcover's position on protecting workplace rights and preventing modern slavery and to help everyone learn and understand their responsibilities and comply with this Policy
- **Resources.** We will provide resources to implement the above commitments.
- **Stakeholder engagement.** We will engage with key stakeholders directly and/or indirectly for the purpose of informing and improving Medcover's ability to respect workplace rights across its activities and business relationships.

6 Responsibilities

This Policy is reviewed and amended if required by the Chief People Officer ("CPO") and comes into force after approval by the Board.

The CPO is responsible at the top management level for adopting workplace rights principles in company-wide policies and procedures to guide workplace rights practices and for linking advancement to desired performance in this area.

Country HR heads are responsible for implementing this Policy in their respective business areas.

This Policy can be supplemented by country HR heads to the extent required by the adequate country regulations, after prior agreement with the CPO (subject to the *stricter prevails* principle set out above).

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All Managers are responsible for ensuring that workplace rights are respected and modern slavery is prevented in his / her area, as provided by this Policy and the respective general laws or labour laws of a given country.

7 Grievances and questions

Any grievance and any case of misconduct or violation of this Policy should be reported openly or anonymously via one of the reporting channels below:

- Line manager
- HR representative or Legal department head
- Whistleblower channels of Medicovert, subject to local requirements.

Any doubts or questions related to this Policy can be directed to:

- Line manager
- HR representative (HR head, HR manager, HR Business Partner or other HR person)
- Legal department head.

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