

Document name: Discrimination, Harassment, and Bullying Prevention Policy	Document type: Group Policy	Version: 1.1
Approved by: Board of Directors of Medcover AB (publ)	Document owner: CPO	Date of approval: 21.03.2025



Medicover Discrimination, Harassment, and Bullying Prevention Policy

Document name: Discrimination, Harassment, and Bullying Prevention Policy	Document type: Group Policy	Version: 1.1
Approved by: Board of Directors of Medcover AB (publ)	Document owner: CPO	Date of approval: 21.03.2025



Content

1 Introduction 3

2 Purpose 3

3 Scope 3

4 Policy 3

5 Definitions 4

6 Responsibilities 4

7 Grievances and Questions..... 5

Document name: Discrimination, Harassment, and Bullying Prevention Policy	Document type: Group Policy	Version: 1.1
Approved by: Board of Directors of Medicover AB (publ)	Document owner: CPO	Date of approval: 21.03.2025



1 Introduction

Medicover's organizational culture is founded on our values and our Medicover Code of Conduct, and reflects international frameworks such as 10 Principles of the UN Global compact and the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct. These foundations shape our ethical awareness and organisational sensitivity and define the rules for relating with and between our people based on principles of diversity, equality and inclusion ("DEI").

2 Purpose

The purpose of this Discrimination, Harassment, and Bullying Prevention Policy (this "**Policy**") is to define Medicover (Medicover AB (publ) and its subsidiaries, "**Medicover**" and each a "**Medicover company**") commitments to ensuring prevention of discrimination, harassment, and bullying in people related practices across all its worldwide organisational units.

3 Scope

This Policy is an organisational policy and it applies to own workforce at Medicover, understood as employees or coworkers hired in entities of Medicover, in line with the given country general laws or labour laws.

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

4 Policy

We believe that respecting fundamental human rights is key to making Medicover a healthy organization where people feel good and want to build their professional future. We aspire to promote equal opportunities for all people in Medicover's workforce irrespective of their characteristics. This is why:

We want to ensure Our People are accepted and respected. We consider discrimination, harassment, and bullying to be reprehensible and condemnable, and:

- we do not tolerate behaviour that leads to discrimination, harassment or bullying in the workplace and we treat manifestations of such behaviour as a violation of our Medicover Code of Conduct and our Diversity, Equal Treatment and Inclusion Policy;
- we hold our managers at all levels responsible for counteracting discrimination, harassment, and bullying;
- due to their harmfulness - we also oblige all our people to react and oppose these phenomena;
- as an employer, we provide support to those who are exposed to discrimination, harassment or bullying in the workplace.

We counteract discrimination, harassment, and bullying in the workplace by:

- monitoring the organization based on periodic employee opinion surveys, allowing us to reveal early manifestations of discrimination, harassment, bullying, or other reprehensible behaviours, and we take action to eliminate them from our organisation;
- educating managers and employees in the field of counteracting and reacting to manifestations of discrimination, harassment or bullying, and other undesirable behaviours;
- supporting initiatives and promoting behaviours that counteract these harmful phenomena.

Document name: Discrimination, Harassment, and Bullying Prevention Policy	Document type: Group Policy	Version: 1.1
Approved by: Board of Directors of Medicovert AB (publ)	Document owner: CPO	Date of approval: 21.03.2025



We provide our people with solutions enabling them to report cases of discrimination, harassment, bullying, or other reprehensible behaviours. We respond to these reports systematically in line with the Medicovert Whistleblower Policy, when applicable.

We do not tolerate retaliation actions against people reporting these violations in good faith.

5 Definitions

In this Policy, we use the following definitions:

Own Workforce, Employees or Our People: every person (employee or coworker) hired in legal entities of Medicovert, who by the given country general laws or labour laws is subject to protection against discrimination, harassment, and/or bullying.

Protected characteristics: set of the attributes protected by fundamental human rights in the workplace context, including but not limited to:

- | | |
|-------------------------------|---|
| a. age | f. racial and ethnic origin |
| b. disability | g. religion or belief |
| c. gender and gender identity | h. sexual orientation |
| d. marital or family status | i. political opinion |
| e. colour | j. national extraction or social origin |

Workplace policies and practices: a set of people and organisational processes in the entire employee hire-to-retire life cycle, including among others:

- recruitment
- establishing or terminating hiring relationship
- setting terms of employment (including remunerating and rewarding)
- providing access to professional development and promotion opportunities

Direct discrimination: occurs when an individual is treated less favourably than another is, has been or would be treated in a comparable situation on any of the grounds of protected characteristics in the workplace policy or practice.

Indirect discrimination: occurs when an apparently neutral policy provision, criterion or practice would put an individual representing a protected characteristic at unfavourable situation or context compared with other individuals unless is objectively justified by a legitimate aim to be achieved and the means to achieve that aim are appropriate and necessary (e.g. different treatment aiming to equalize opportunities).

Harassment: is undesirable behaviour with the purpose or effect to violate an employee's dignity and create an intimidating, hostile, degrading, humiliating or offensive work atmosphere.

Sexual harassment: is any undesirable behaviour of a sexual nature or relating to an employee's gender, the purpose or effect of which is to violate the dignity of the employee, in particular to create an intimidating, hostile, degrading, humiliating or derogatory atmosphere; this behaviour may be physical, verbal, or non-verbal.

Bullying: refers to actions or behaviour relating to an employee or directed against an employee, consisting of persistent and long-term harassment or intimidation, causing him/her to lower his/her professional suitability, causing or intending to humiliate or ridicule, isolating or eliminating the employee from the team.

6 Responsibilities

This Policy is reviewed and amended if required by the Chief People Officer (CPO) and comes into force after authorization by the CEO and approval by the Board and its publication via the online channels available to employees.

Document name: Discrimination, Harassment, and Bullying Prevention Policy	Document type: Group Policy	Version: 1.1
Approved by: Board of Directors of Medicovert AB (publ)	Document owner: CPO	Date of approval: 21.03.2025



The CPO has responsibility at top management level for equal treatment and opportunities in employment; for issuing clear company-wide policies and procedures to guide equal employment practices, and for linking advancement to desired performance in this area.

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

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

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

Document name: Discrimination, Harassment, and Bullying Prevention Policy	Document type: Group Policy	Version: 1.1
Approved by: Board of Directors of Medcover AB (publ)	Document owner: CPO	Date of approval: 21.03.2025



Version history

<i>Version</i>	<i>Date of approval</i>	<i>Author(s)</i>
1.0	29.10.2024	Chief People Officer
1.1	21.03.2025	Chief People Officer

Document details

	<i>Role</i>	<i>Date</i>	<i>Signature</i>
Author(s)	Chief People Offices (Kamila Skorupińska)	14.03.2025	

Authorisation

	<i>Role</i>	<i>Date</i>	<i>Signature</i>
Authorised by	CEO (Fredrik Rågmark)	14.03.2025	
Signed off by	N/A		