

Anti-retaliation policy

1. PURPOSE

Mölnlycke is committed to the highest standards of professional and ethical business practices. This Policy outlines Mölnlycke's commitment to respect the rights and protection of:

- individuals who report concerns;
- individuals who conduct or participate in investigations; and
- individuals that handle reported concerns.

2. SCOPE AND APPLICATION

- 2.1. This Policy applies to entities controlled by Mölnlycke AB, Personnel working for or on behalf of such entities and third-party employees working on of such entities (such as distributor employees). This Policy does not apply to entities governed solely by entity board of directors (namely, Tamer Molnlycke Arabia - TMC).
- 2.2. This Policy covers not only actions taking place in the physical workplace, but also work-related situations that take place elsewhere. This includes business trips, customer/vendor offices, work-sponsored social events, work-sponsored social media forums, and any forum that is outside of work, but in which the behaviour may impact Mölnlycke's working environment.

3. PRINCIPLES

Raising a concern without fearing negative consequences

- 3.1. Mölnlycke promotes an open and honest culture and encourages all employees to speak up with concerns relating to suspected misconduct. Speaking up is central to Mölnlycke's values, and it is important that employees as well as individuals that come in contact with Mölnlycke feel confident in doing so.
- 3.2. Any individual who raises a concern in good faith, cooperates in an investigation or is an Investigator in such investigation shall be protected from any form of Retaliation by Mölnlycke. Molnlycke also expects business partners to prohibit all forms of retaliation as defined in this policy.
- 3.3. Protection is not provided in cases where Personnel raise allegations of misconduct in bad faith with the intent to harm or harass another Personnel or shield the Reporter from disciplinary action.

Reporting Retaliation

- 3.4. Any individual who believes that they are being retaliated against or is aware of a suspected Retaliation should report it immediately via, available channels described in the Ethics Hotline Policy. Reports of alleged retaliation are assessed and investigated in in accordance with the Ethics Hotline Policy.

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Monitoring risks of Retaliation

- 3.5. Mölnlycke will proactively monitor risks of Retaliation by identifying investigations at risk of Retaliation and will engage with the relevant individuals (e.g. Reporter and/or witnesses).
- 3.6. In addition, Mölnlycke will monitor certain decisions (e.g. performance improvement plans, ratings and exits) to ensure those are not linked to Retaliation.

4. RESPONSIBILITIES

General

- 4.1. All Personnel shall comply with this Policy and report suspected Retaliation. Personnel shall also promote compliance with this Policy.
- 4.2. Personnel with questions about specific conduct or this Policy in general can obtain additional guidance from their manager or Business Ethics & Governance.

Implementation and Supervision

- 4.3. The Chief Business Ethics & Governance Officer is responsible for
 - over-seeing compliance with this Policy; and
 - supporting the Business Areas, EVPs, and Functions in their implementation of this Policy.
- 4.4. The Investigators are responsible for assessing the risk of Retaliation in each investigation, communicating the principles of this Policy to involved Personnel during investigations, and monitoring the risk of Retaliation in ongoing and past Investigations. The Investigators shall record and report instances of Retaliation and inform the Ethics Hotline Committee.
- 4.5. If applicable, People is responsible for monitoring at the locations that there are no signs of Retaliation. Should there be a suspicion of Retaliation, People will escalate to Business Ethics & Governance.

Management obligations

- 4.6. Managers shall report and address any potential Retaliation. This includes responding appropriately and timely to individual concerns regarding perceived Retaliation, cooperating in investigations of any Retaliation claim as well as taking prompt and appropriate actions where concerns of Retaliation are substantiated.

Violations

- 4.7. If you believe this Policy has been violated, please notify Business Ethics & Governance or contact the Ethics Hotline. Mölnlycke will not retaliate against Personnel or any other who, in good faith, report an actual or suspected violation of this Policy.
- 4.8. Non-compliance with this Policy can lead to disciplinary and other actions including termination of employment.

5. DEFINITIONS

In this document, the following words and expressions have the following meaning:

“Investigator/s”	means the employee or external expert responsible for conducting the investigation of the reported concerns. Investigators are appointed by the Ethics Hotline Committee and work under its supervision.
“Personnel”	means all individuals working for or on behalf of entities controlled by Mölnlycke AB, including full-time and part-time employees, officers, volunteers, trainees, interns, temporary workers, and contingent workers (e.g. consultants, contractors, and freelancers), as well as board members.

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“Report”	means the concern raised through a Channel and which is to be investigated. Reports can address identified or suspected misconducts related to Mölnlycke Code of Conduct, internal policies and procedures as well as applicable legal requirements and industry codes.
“Reporter”	means a person submitting a report regarding a misconduct that is within the scope of this Policy or the Ethics Hotline Policy.
“Retaliation”	means any behaviour or action taken against an individual for raising their concerns, supporting or participating in an investigation or planning to. Retaliation can aim at i.e., punishing the individual for raising concerns or discouraging them from doing so. Retaliation can take place outside of the workplace and working hours. Retaliation can take many forms including, but not limited to: • Physical abuse or violence • Socially isolating an individual (e.g., ignoring them, not including them in social activities such as lunch break, etc.) • Demoting an individual • Denial of deserved promotion without legitimate business justification • Rating an individual’s professional performance lower than deserved in performance review processes • Removing an individual from a project without justification • Termination of employment without grounds • Harassing or bullying conduct – making sarcastic remarks, public criticism, etc. • Threats to the individual or their relatives • Spreading rumours about an individual • Filing false complaints about an individual • Adding / removing unreasonable workload to an individual.

6. REFERENCES / RELATED DOCUMENTS

- 6.1. Mölnlycke Code of Conduct
- 6.2. Ethics Hotline Policy