

Ethics hotline policy

1. PURPOSE

Mölnlycke is committed to maintaining an environment where Personnel and Third Parties can freely report concerns and Grievances. The purpose of this Policy is to provide a means for Personnel and Third Parties to confidentially report concerns in good faith and to set out the standards by which Mölnlycke will handle received Reports.

2. APPLICATION

2.1. This Policy applies to entities controlled by Mölnlycke AB and Personnel working for or on behalf of such entities. This Policy does not apply to entities governed solely by entity board of directors (namely, Tamer Mölnlycke Arabia - TMC).

2.2. This Policy enables Personnel and Third Parties to report suspected misconduct concerning Mölnlycke's business or the behaviour of Personnel in the course of their work (including activities that take place outside the workplace, e.g. during events and business travel).

3. PRINCIPLES

General

3.1. Mölnlycke shall have a whistleblower system with a Mölnlycke Group reporting channel to which suspected violations can be reported (the "Ethics Hotline"). The Ethics Hotline enables written and oral reporting in multiple languages.

3.2. Each Mölnlycke legal entity in the EU/EEA with at least 50 employees shall have a separate Reporting Channel within the whistleblower system if required by local law (the "Local Channels"). The Local Channels enable written and oral reporting and, upon request, reporting at a physical meeting.

Misconduct that can be reported

3.3. All Reporting Channels can be used to report suspected acts or omissions that:

- violate applicable laws or regulations;
- are Human Rights related violations; and/or
- violate Mölnlycke's Code of Conduct, other internal policies and procedures, or industry codes of ethics.

3.4. Reports are to be made in good faith, meaning that the information provided should be honest, accurate, and thorough as possible, based on the Reporter's best knowledge and understanding.

3.5. All reporting channels can be used as Mölnlycke's Grievance Mechanism to report Human Rights related violations. Such reports will be administered and tracked in the same way as other Reports.

How to Report

3.6. Personnel can report their concerns or Grievances through the below Channels:

- Reach out to their regional Business Ethics Officer/Manager, the Global Investigations, Risk and Audit Director, or the Chief Business Ethics & Governance Officer in writing, by phone, through Teams, or in person.
- Use the Ethics Hotline through a written online Report or by phone.

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- The Local Channels, where applicable, by making the relevant selection on the Ethics Hotline webpage, using the Ethics Hotline phone line, or reaching out to the appointed Local Channel Representative by phone, e-mail or in person.

Personnel are also able to report externally to competent authorities. For more information on the competent authorities in the relevant EU countries please refer to the Hub.

- 3.7. Personnel can raise questions or concerns with their manager, manager's manager, Business Ethics Representative or People Partner. Should the concern be in scope of this Policy, such recipient must encourage the individual to report the concern in the Ethics Hotline or offer to support them in doing so. Should the individual not wish to report the concern, it is the responsibility of such recipient to ensure the issue is addressed by using the means of reporting set out in this Policy.
- 3.8. Third Parties can report by using the Ethics Hotline. Links and phone numbers to the Ethics Hotline and the Local Channels can be found on the website. Third Parties are also able to report externally to competent authorities.

Confidentiality and Anonymous Reporting

- 3.9. All Reports will be handled in a confidential manner by Investigators. Reporters can remain anonymous when submitting a Report through the Ethics Hotline. However, Reporters are encouraged to identify themselves when reporting their concerns to facilitate a swift investigation of the Report. If the Reporter chooses to share their identity, Mölnlycke will keep their identity confidential unless Mölnlycke is required to disclose such information in accordance with law or regulations.
- 3.10. If required, information in a Report may be shared with relevant authorities.

Confirmation and Feedback

- 3.11. The Reporter shall receive an acknowledgment of receipt within seven days of submitting a Report.
- 3.12. The Reporter shall receive feedback regarding the investigation and/or measures that have or will be taken due to the Report within three months from the acknowledgement of receipt.

Handling of Reports

- 3.13. Every Report, regardless of how it is submitted, shall be handled confidentially. The person who is the subject of a Report or suspected of being involved in the alleged misconduct shall be treated fairly and their reputation protected. Reports shall be assessed by the Investigators and investigated in accordance with internal investigation procedures.
- 3.14. All Reports shall be stored in the Ethics Hotline case management database, which is only accessible by Personnel who are responsible for handling Reports and investigations or appointed external investigators. Any person who has been appointed to receive Reports or is involved in preparing, coordinating or conducting an investigation of a Report must be sufficiently independent. If their independence is not sufficient, they are responsible to reach out to the Ethics Hotline Committee to ask that another person take over the responsibility of the investigation.

Personal Data

- 3.15. In connection with Reports and investigations due to such Reports, personal data will be processed by Mölnlycke. The personal data will be processed to determine if the identified persons are involved in misconduct. The personal data will be handled in accordance with applicable laws and regulations and Privacy Notice –.
- 3.16. Reports, and information related to investigations of Reports, shall be stored and deleted in accordance with applicable laws and regulations as well as Mölnlycke's policies and procedures.

Cooperation with Government Authorities

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- 3.17. Mölnlycke is fully committed to cooperating with law enforcement and/or regulatory authorities on internal investigations involving criminal conduct. The decision to report an investigation matter to the authorities will be taken by the Ethics Hotline Committee.
- 3.18. Personnel are required to cooperate fully and provide any requested information in connection with any internal investigation and inquiry or investigation by a court, agency, law enforcement, or other governmental body.

Communication and implementation throughout the organisation

- 3.19. The Ethics Hotline and relevant channels are regularly communicated to employees through global and local training so that employees have access to transparent information on the governance, tools and processes in place at Mölnlycke.
- 3.20. Dedicated communication and training is made available to key functions and to managers.
- 3.21. The “speak up culture” is reinforced by regular communication from the Investigators as well as at various levels of management to encourage employees to make sure of the Ethics Hotline and/or other channels. Similarly, information is made public for Third Parties that have concerns to be raised.

Anti-retaliation

- 3.22. Mölnlycke prohibits all forms of retaliation against any individual. For more information see the Anti-Retaliation Policy.

4. RESPONSIBILITIES

General

- 4.1. All Personnel shall comply with this Policy and promote compliance with this Policy. Personnel are expected to report actual or suspected violations of Mölnlycke’s Code of Conduct, policies and procedures or applicable laws and regulations.

Implementation and Supervision

- 4.2. The Chief Business Ethics & Governance Officer is responsible for overseeing compliance with this Policy, overseeing the Ethics Hotline, and supporting the Business Areas, EVPs and Functions in their implementation of this Policy.
- 4.3. The Chief Business Ethics & Governance Officer is responsible for appointing individuals to manage the Local Channels. The appointed individuals are responsible for managing the Local Channels respectively.
- 4.4. The EVPs are ultimately responsible for the regular communication of this Policy and of the applicable Local Channels. The EVPs are also responsible for ensuring that training initiatives and activities for the implementation of this Policy are completed within their area of responsibility.

Management obligations

- 4.5. Managers are expected to be familiar with the Ethics Hotline and investigation process in order to be able to support raise awareness and encourage their use. They are also expected to promote a speak up culture where retaliations aren’t tolerated.
- 4.6. Managers are expected to support their Personnel when they bring questions or concerns. Managers who become aware of a concern which should have been reported under the Ethics Hotline scope, must report it as soon as possible.
- 4.7. To protect all parties involved and the confidentiality of the Report as well as to ensure compliance with Mölnlycke’s global investigation procedures, Managers should not engage in investigations themselves. Managers are expected to support any investigation taking place within their area of responsibility and to cooperate as required by the Investigator based on the investigation mandate.

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Subsidiary Obligations

At Mölnlycke, all sites are required to:

- The Ethics Hotline and additional channels are actively communicated and ensuring the relevant information (provided by the Business Ethics & Governance team) is integrated in local employee handbooks and other supporting material.
- Posters or other communication media with relevant information and guidance on how to access the Ethics Hotline and other channels are displayed in several key locations of the office e.g. local intranet, changing rooms/bathroom stalls, guards/security office etc.
- Regularly (at a minimum once a year) including awareness on the Ethics Hotline to all employees, this can for example be combined with other trainings, with the support of the Business Ethics & Governance team
- Ensuring that leaders have a sound understanding of the Ethics Hotline and processes and are able to engage with their teams on the topic
- Tracking the results of the Employee Engagement Survey relating to the speak up culture and acting upon any negative trends and/or comments
- In addition, each Mölnlycke production site can develop additional operational channels to receive daily concerns but those can only receive and address daily operational issues such as e.g. personal disagreements, complaints about schedule or other work conditions. If other issues are raised through operational channels those must be transferred to the Ethics Hotline without delay.

Human Rights Committee

- 4.8. The Human Rights Committee receives reports of concluded Human Rights Grievances investigation and makes a decision on the appropriate remediation.

Questions, violations and sanctions

- 4.9. Personnel having questions about specific conduct or this Policy should obtain additional guidance from their manager or Business Ethics & Governance.
- 4.10. 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.
- 4.11. 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:

"Channel"	means the various Channels set out in section 3.6 that are available for reporting suspected misconducts.
"Ethics Hotline"	means the digital reporting channel to which identified or suspected misconducts can be reported, and which enables both written and oral reporting in multiple languages.
"Ethics Hotline Committee"	consists of the EVP Legal, the Chief Business Ethics & Governance Officer, the Corporate Controller and the Chief People Officer.
"Grievance"	means a complaint made by an individual regarding a misconduct or other behaviours/practices that are suspected of infringing on their rights.

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"Grievance Mechanism"	is a process by which Personnel and Third Parties can raise any human rights grievances, and that lives up to criteria set out in the UN Guiding Principles. At Mölnlycke, the Grievance Mechanism is the Ethics Hotline and its complementary channels.
"Human Rights"	means the rights inherent to all human beings, regardless of race, sex, nationality, ethnicity, language, religion, or any other status. Human rights include for example the right to life and liberty, freedom of opinion and expression, freedom of peaceful assembly and association, equal pay for equal work and many more.
"Human Rights Committee"	is the decision body within Mölnlycke who has the responsibility to oversee the Human Rights program and its progress. Its detailed roles and responsibilities are outlined in a dedicated Human Rights Committee Charter.
"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.
"Local Channel/s"	means the additional reporting channels for the Mölnlycke entities in the EU/EEA (where applicable).
"Local Channel Representative"	means the Mölnlycke employee responsible for a Local Channel, including receiving, handling, and investigating reported concerns.
"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.
"Report"	means a concern that is within the scope of this Ethics Hotline Policy and reported through a Channel.
"Reporter"	means a person submitting a report regarding a misconduct that is within the scope of this Ethics Hotline Policy.
"Third Parties"	means former employees, jobseekers ¹ and any persons working under the supervision and direction of business partners, contractors, subcontractors, agents, distributors, and suppliers.

6. REFERENCES / RELATED DOCUMENTS

- 6.1. Anti-Retaliation Policy
- 6.2. Data Privacy Notice for Whistleblowing

¹ I.e. 'Reporters whose work-based relationship is yet to begin in cases where information on breaches has been acquired during the recruitment process or other pre-contractual negotiations'.