

Human rights policy

1. PURPOSE

- 1.1. Mölnlycke is committed to identify, prevent, mitigate and (when possible) remediate any potential and actual adverse Human Rights impacts within Mölnlycke's own operations and in its relationship with business partners across its value chain. Mölnlycke endorses the Ten principles of the UN Global Compact, the UN Guiding Principles on Business and Human Rights, and the OECD Guidelines for Multinational Enterprises.
- 1.2. The purpose of this Policy is to outline Mölnlycke's commitment and efforts to respect international Human Rights, including Labour Rights and the protection against Modern Slavery.
- 1.3. This Policy provides a framework and defines the roles and responsibilities in relation to Human Rights, Labour Rights and Modern Slavery issues within Mölnlycke's activities and operations as well as in its relationship with business partners across its value chain.

2. APPLICATION

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).

3. MÖLNLYCKE'S OWN WORKFORCE

Mölnlycke is committed to providing awareness to all Personnel on their rights and relevant Human Rights issues. Mölnlycke invites all Personnel to raise any concerns or grievances with regard to Human Rights.

Fair wages and fair working hours

- 3.1. Mölnlycke aims to ensure that employees receive fair compensation, regardless of their location. Mölnlycke strictly adheres to all relevant local legislation concerning wages and working hours, including minimum wage requirements, maximum working hours, and mandated rest periods.
- 3.2. To prioritise the well-being of our employees, Mölnlycke aims to provide opportunities for adequate rest and work-life balance. Mölnlycke must provide opportunities for family leave in accordance with, at a minimum, the local laws and regulations of each location we operate.

Freedom of association and collective bargaining

- 3.3. Mölnlycke respects employees' right to associate freely, to join or refrain from joining labour unions and workers' councils without the fear of discrimination or retaliation. Mölnlycke shall engage in constructive dialogue with employee representatives with the aim to reach agreements on terms and conditions of employment and, where needed, in resolving employees' grievances.

Freedom from harassment and discrimination

- 3.4. Mölnlycke does not tolerate harassment or discrimination of any kind and promotes an environment where everyone is treated with respect and dignity as outlined in the Anti-Harassment & Anti-Discrimination Policy. Mölnlycke values and celebrates the diversity of each individual and believes in the right to equitable compensation, benefits, and opportunities for development and advancement, for more information see the Diversity, Equity & Inclusion Policy.

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Disciplinary actions

- 3.5. Mölnlycke does not tolerate the use of physical or degrading punishment. Disciplinary actions against employees may only be applied in accordance with applicable processes, relevant local labour legislation and should always be fair and proportionate to the misconduct of the employee. Deductions from wages as a disciplinary measure is not permitted.

Employees' Data Privacy Rights

- 3.6. Mölnlycke protects and respects the rights and freedoms of all employees in respect of the processing of their personal data. This commitment is clarified in its Global Privacy Commitment. Employees shall receive clear and transparent information about how Mölnlycke is processing their personal data, and all such processing must be conducted in accordance with applicable data protection legislations.

Health and Safety

- 3.7. Mölnlycke promotes a safe and healthy working environment for all its employees as well as all Personnel present on its premises such as consultants, suppliers, and service providers as outlined in the Group Sustainability Policy. All Personnel shall be trained on relevant health and safety risks as well as which measures to put in place to avoid or mitigate such risks.

Supporting employees' wellbeing and benefits

- 3.8. Every Mölnlycke location shall have an Employee Assistance Programme (EAP), providing support on a variety of issues such as relationship and family difficulties, stress management, as well as legal and financial advice.
- 3.9. Mölnlycke shall offer employees opportunities for skill development, training, and career advancement. Employees are encouraged and supported to take an active role in their development.
- 3.10. Mölnlycke shall offer opportunities for employees to perform in a flexible working environment to accommodate business and personal needs. Flexible working looks different in the different settings – sales, office and production – for that reason local business units are encouraged to adapt global flexible working guidelines to local legislation and to suit their local needs and context.

4. MODERN SLAVERY

- 4.1. Mölnlycke recognises that all forms of Modern Slavery are a violation of fundamental Human Rights and as such are not tolerated by Mölnlycke. We condemn these practices and shall be proactive in ensuring that our business operations and value chains are free from them.

Prohibition of child labour

- 4.2. Mölnlycke is opposed to the use of child labour and shall proactively ensure that no children are employed in our operations. Therefore:
- a) Employees in all parts of the business must be at least 15 years old unless local legislation is stricter;
 - b) Employees under the age of 18 must not be employed in any hazardous work; and
 - c) Young labour, employees between 15 and 18, is only tolerated if their safety and wellbeing can be ensured and if they are supported in pursuing an education.

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Should child labour be discovered within its value chain, Mölnlycke shall work with the relevant stakeholders to remediate the situation and provide the child and/or its family with a sustainable solution to ensure a safe income and further education for the child.

Forced labour

- 4.3. Mölnlycke is firmly opposed the use of forced labour and respects the rights of its employees to accept or refuse employment. Employment freely. Mölnlycke is firmly opposed the use of compulsory labour, including debt bondage, trafficking and other forms of modern slavery or work performed under the threat of a penalty or coercion. All work, including overtime work, shall be voluntary and employees shall be free to leave their employment after a notice period (if required by relevant law and contract). Mölnlycke shall not require employees to hand over government-issued identification, passports or work permits to be kept by Mölnlycke as a condition of employment.

Migrant workers' rights

- 4.4. Mölnlycke acknowledges that migrant workers are at a higher risk of being exploited and or trafficked and must receive additional protection. Mölnlycke does not make systematic use of migrant workers to meet its recruitment needs. Where migrant workers are employed, Mölnlycke shall provide them with the same working conditions as the local workforce as well as relevant help and support.

5. VALUE CHAIN WORKERS

- 5.1. Mölnlycke recognises that its business can create potential or actual adverse Human Rights impacts. Mölnlycke shall actively aim to identify and prevent any risks linked to its value chain and shall set out expectations on business partners regarding their Human Rights responsibilities.

Supplier Due Diligence

- 5.2. Mölnlycke expects its suppliers to commit to respect and protect Human Rights. The Business Partner Code of Conduct shall anchor these expectations, and regular assessments, screening and audits shall be used to verify such commitment. The Responsible Buyer shall ensure that suppliers commit to the principles set forth in the Business Partner Code of Conduct when entering into a business relationship with Mölnlycke and during the course of the business relationship.

Distributor Due Diligence

- 5.3. Mölnlycke expects its distributors to commit to respect and protect Human Rights. The Business Partner Code of Conduct shall anchor these expectations and distributors shall assessed through a dedicated due diligence which includes Human Rights elements. Distributors shall be required to commit to the principles set forth in the Business Partner Code of Conduct when entering into a business relationship with Mölnlycke and during the course of the business relationship.

6. MÖLNLYCKE'S IMPACT ON COMMUNITIES

- 6.1. Mölnlycke aims to prevent any potential or actual adverse Human Rights impacts on the communities where Mölnlycke operates and the rights of indigenous people where Mölnlycke operates. Mölnlycke encourages all stakeholders to raise any issues relating to Human Rights, including negative impact on communities and indigenous peoples, through its Grievance Mechanisms.

Data Privacy Rights of external stakeholders

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- 6.2. Mölnlycke must ensure sustainable use of, and protect, the personal data entrusted to us. Regardless of whether the personal data relates to our customers, consumers, study or trial participants, collaboration partners, suppliers, or other individuals – all Personnel are obligated to safeguard that the processing of personal data is ethical, lawful, fair, and transparent, and that the rights of the data subjects are duly fulfilled and respected.

Community engagement

- 6.3. Mölnlycke actively recognises and respects the rights of the communities within its operational sphere. This particularly concerns the communities surrounding Mölnlycke's production sites and other facilities. Mölnlycke shall maintain engagement and consultations to understand and address any impacts of its operations.

Human Rights due diligence and impact assessments

- 6.4. Mölnlycke engages with stakeholders and carries out human rights due diligence of its organisation and its value chain to address potential and actual Human Rights impacts. This shall include identifying, preventing, mitigating, and (where possible) remediating potential and actual adverse Human Rights impacts.

7. GRIEVANCE MECHANISMS AND ACCESS TO REMEDY

- 7.1. Employees, as well as external stakeholders whose rights are negatively affected by Mölnlycke, can raise their issue by using Grievance Mechanisms – including the Ethics Hotline or any of the available channels as set out in the Ethics Hotline Policy.
- 7.2. When adverse Human Rights impacts are uncovered (e.g. through the Grievance Mechanisms) it is Mölnlycke's commitment to engage in meaningful dialogue with the affected parties to enable remediation.
- 7.3. Any issues raised shall be addressed following the established processes for internal investigations. Actual adverse Human Rights impacts uncovered through this process shall be remedied to prevent or terminate the violation, mitigate its impact and, if possible, repair the damage caused.

8. RESPONSIBILITIES

- 8.1. All Personnel shall comply with this Policy. Personnel shall promote compliance with this Policy and act in such a way that Mölnlycke's professionalism cannot be questioned.
- 8.2. The Human Rights Committee, as defined in the Human Rights Committee Charter, is the decision body that is responsible for taking decisions relating to Human Rights at Mölnlycke. This includes relevant decisions on remedy for any actual adverse Human Rights impacts identified.
- 8.3. The responsibility for ensuring that Mölnlycke respects Human Rights and puts in place the relevant program lies with Business Ethics & Governance, who shall liaise with all relevant departments to ensure they provide support and implement relevant activities.
- 8.4. 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.
- 8.5. The Sustainable Procurement function is responsible for the implementation of the Human Rights related requirements within the supply chain, this includes defining the approach and delegating activities to the various Mölnlycke Business Areas.

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- 8.6. The People function is responsible for ensuring that labour rights are respected and integrated in its processes. The People function shall also support and collaborate in the implementation of the overall Human Rights program.
- 8.7. The EVPs are ultimately responsible for implementing this Policy in their respective Business Areas. The EVPs are also responsible for establishing the objectives for the implementation and organising adequate/regular follow-ups to ensure compliance with this Policy and relevant due diligence/screening processes. The EVPs shall report results from the follow-ups to the Chief Business Ethics & Governance Officer, who in turn shall report to the ELT and propose changes to the Policy if required.
- 8.8. Personnel having questions about specific conduct or this Policy in general should obtain additional guidance from their manager or Business Ethics & Governance.
- 8.9. 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.
- 8.10. Non-compliance with this Policy can lead to disciplinary and other actions including termination of employment.

9. DEFINITIONS

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

"Data Privacy Rights"	means the protection of the rights and freedoms of natural persons in relation to the processing of personal data.
"Employee Assistance Programme" or "EAP"	means Mölnlycke's confidential and voluntary program that provides resources and services to help employees address personal or work-related challenges that may affect their mental health, emotional well-being, or overall quality of life. Through the EAP, Mölnlycke offers professional assistance and support to employees facing a wide range of issues including stress, anxiety, depression, substance abuse, relationship problems, financial concerns, legal issues, parenting challenges, and more.
"Grievance Mechanisms"	means any formal process and/or channel at Mölnlycke that allows employees and others to raise concerns or complaints regarding adverse Human Rights impacts caused by Mölnlycke's business activities or operations.
"Human Rights"	means the rights inherent to all human beings, regardless of race, sex, nationality, ethnicity, language, religion, or any other status. They 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, as set out by the United Nations, the International Labour Organisation, and the European Union ¹ .
"Human Rights Committee"	means 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.

¹ This includes, but is not limited to, the Universal Declaration of Human Rights, the International Covenant on Economic, Social and Cultural Rights and the International Covenant on Civil and Political Rights, and the ILO Declaration on Fundamental Principles and Rights at Work.

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"Labour Rights"	means the rights internationally recognised through international Labour Laws and ILO standards.
"Modern Slavery"	means practices that cause severe adverse Human Rights impacts such as forced labour, debt bondage, and human trafficking. In some legal context is also includes forced marriage and child prostitution. It refers to situations of exploitation that a person cannot refuse or leave because of threats, violence, coercion, deception, and/or abuse of power.
"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.
"Responsible Buyer"	means the Buyer with overall responsibility for the supplier relationship as indicated in the Mölnlycke Procurement tool Spectra.

10. REFERENCES / RELATED DOCUMENTS

- 10.1. Anti-Harassment & Anti-Discrimination Policy
- 10.2. Business Partner Code of Conduct
- 10.3. Diversity, Equity & Inclusion Policy
- 10.4. Ethics Hotline Policy
- 10.5. Global Privacy Commitment
- 10.6. Group Sustainability Policy
- 10.7. Human Rights Committee Charter