



Code of Conduct

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Code of Conduct

Introduction

MedicaNatumin is aware of its corporate social responsibility and the objective is to combine sound business operations with social, ethical and environmental responsibility. Based on this commitment, we have set up the MedicaNatumin Code of Conduct to make our position clear for all stakeholders such as suppliers, employees and other relevant partners.

Our Code of Conduct contains internationally recognised requirements on business ethics, human rights, labour rights, as well as environmental protection. Companies supplying MedicaNatumin with products or services shall comply with the MedicaNatumin Code of Conduct. MedicaNatumin also expects all suppliers to ensure that their own suppliers of both goods and services are in compliance with our Code of Conduct.

The Code of Conduct applies to everyone and covers all the companies within the MedicaNatumin group. The Code should be used as a guide to ensure that everyone acts and is treated the same way. Employees and partners are expected to maintain high ethical standards, at all times, and must comply with this code when carrying out their work for/with MedicaNatumin.

Legal Requirements

As a general rule, suppliers and subcontractors must follow their respective national laws. Should the provisions of national law and the requirement of our Code of Conduct differ, the highest standard shall apply.

Business Ethics

Business shall be conducted ethically without bribery, corruption or any type of fraudulent business practice, adhering to the applicable rules of business ethics in the countries in which the company operates and requires its partners to do the same.

- The company supports fair competition and does not engage in any unethical activities that limits competition.
- Fraud and deliberative misleading actions with intention to obtain advantage is forbidden
- MedicaNatumin has a zero-tolerance towards bribery which means that gifts, benefits, kickbacks that could influence the recipient's behaviour are not allowed.
- Business relationships and all business decisions must be taken in the company's best interest.
- Employees and partners may not forward confidential information on MedicaNatumin to any person outside the company. Confidential information includes; company secrets, details of customers, legal documents, various working documents and sensitive information on the company's business plans. High ethical standards in all relationships is applicable.

Human and Labour Rights

The provisions of The ETI Base Code, according to the conventions of the International Labour Organisation (ILO), constitute the minimum standards. This code should not be used to prevent companies from exceeding these standards. Companies applying this code are expected to comply with national and other applicable law and, where the provisions of law and this Base Code address the same subject, to apply that provision which affords the greater protection.

1. Employment is freely chosen
 - There is no forced, bonded or involuntary prison labour.
 - Workers are not required to lodge "deposits" or their identity papers with their employer and are free to leave their employer after reasonable notice.
2. Freedom of association and the right to collective bargaining are respected
 - Workers, without distinction, have the right to join or form trade unions of their own choosing and to bargain collectively.
 - The employer adopts an open attitude towards the activities of trade unions and their organisational activities.
 - Worker's representatives are not discriminated against and have free access to carry out their representative

functions in the workplace.

- Where the right to freedom of association and collective bargaining is restricted under law, the employer facilitates, and does not hinder, the development of parallel means for independent and free association and bargaining.

3. Working conditions are safe and hygienic

- A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.
- Workers shall receive regular and recorded health and safety training, and such training shall be repeated for new or reassigned workers.
- Access to clean toilet facilities and to potable water, and, if appropriate, sanitary facilities for food storage shall be provided.
- Accommodation, where provided, shall be clean, safe, and meet the basic needs of the workers.
- The company observing the code shall assign responsibility for health and safety to a senior management representative.

4. Child labour shall not be used

- There shall be no new recruitment of child labour.
- Companies shall develop or participate in and contribute to policies and programmes which provide for the transition of any child found to be performing child labour to enable her or him to attend and remain in quality education until no longer a child; "child" and "child labour" being defined in the appendices.
- Children and young persons under 18 shall not be employed at night or in hazardous conditions.
- These policies and procedures shall conform to the provisions of the relevant ILO standards.

5. Living wages are paid

- Wages and benefits paid for a standard working week meet, at a minimum, national legal standards or industry benchmark standards, whichever is higher. In any event wages should always be enough to meet basic needs and to provide some discretionary income.
- All workers shall be provided with written and understandable information about their employment conditions in respect to wages before they enter employment and about the particulars of their wages for the pay period concerned each time that they are paid.
- Deductions from wages as a disciplinary measure shall not be permitted nor shall any deductions from wages not provided for by national law be permitted without the expressed permission of the worker concerned. All disciplinary measures should be recorded.

6. Working hours are not excessive

- Working hours comply with national laws and benchmark industry standards, whichever affords greater protection.
- In any event, workers shall not on a regular basis be required to work in excess of 48 hours per week and shall be provided with at least one day off for every 7 day period on average. Overtime shall be voluntary, shall not exceed 12 hours per week, shall not be demanded on a regular basis and shall always be compensated at a premium rate.

7. No discrimination is practised

- There is no discrimination in hiring, compensation, access to training, promotion, termination or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation.

8. Regular employment is provided

- To every extent possible work performed must be on the basis of recognised employment relationship established through national law and practice.
- Obligations to employees under labour or social security laws and regulations arising from the regular employment relationship shall not be avoided through the use of labour-only contracting, subcontracting, or home-working arrangements, or through apprenticeship schemes where there is no real intent to impart skills or provide regular employment, nor shall any such obligations be avoided through the excessive use of fixed-term contracts of employment.

9. No harsh or inhumane treatment is allowed

- Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation shall be prohibited.

Environmental Protection

We follow up our environmental impact on a regular basis and new products are designed and components chosen in ways that are environmentally beneficial.

Use of Resources and Impact on the Local Community

- No form of environmental criminal activity or ruthless exploitation of resources shall take place in the local environment.
- The local environment at the production site shall not be excessively exploited or degraded by pollution. Hazardous chemicals and other harmful substances shall be carefully managed.
- In cases of conflict with local communities concerning the use of land or other natural resources, the parties shall through negotiation ensure respect for individual and collective rights to land and other resources based on common custom or tradition, including in cases where such rights have not been formally registered.
- Production and the extraction of raw materials for manufacturing shall not contribute to the destruction of the resource and income base for marginalised population groups, for example by laying claim to large land areas or other natural resources upon which such population groups depend.

National and International Environmental Legislation and Regulations

- Production shall not conflict with national or international environmental legislation and regulations.
- Procedures and standards for waste management; for handling and disposal of chemicals and other dangerous materials; and for emissions and effluent treatment shall be established and must meet or exceed minimum legal requirements.
- Environmental aspects should be taken into consideration throughout the entire value chain and shall not be limited to the company's own operations. Local, regional and global environmental issues shall be taken into account.

Compliance, Implementation and Follow-up

This Code has been approved by the Board of Directors of MedicaNatum. The CEO of MedicaNatum bears the responsibility for compliance with the Code. Unit managers are responsible for implementing the Code by ensuring that all MedicaNatums employees and stakeholders understand its content.

MedicaNatum will not accept any actions that conflict with this Code. In those occasions the Code does not provide exact answers or unclarity arises the employees are urged to seek guidance from their immediate manager or CEO.

All employees and partners are urged to report any breaches of the law or conflicts with the Code to their contact person, immediate manager or a higher manager in the organisation. If none of these reporting channels is appropriate, due to the nature of the issue, reporting should be done via the whistleblower box.

Follow up and report on the implementation of the code will be part of management review and also reported to the board.

For further guidance and how the Code of Conduct should be interpreted there are supported documents to take note of:

- IMM:s code on gifts, rewards and other benefits in business
- The ETI Base Code <https://www.ethicaltrade.org/eti-base-code>
- MedicaNatum Quality Manual and Company Policy
- MedicaNatum aktiepolicy
- MedicaNatum operational routines concerning environmental protection, occupational health, purchase etc.

Approved by the MedicaNatum board on the 23rd of February 2018.