

Approved by the Mehiläinen Konserni Oy Board on 11 December 2023

## **HUMAN RIGHTS POLICY OF THE MEHILÄINEN GROUP**

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## 1. Purpose, scope and objectives of the human rights policy

The purpose of Mehiläinen's human rights policy is to express the commitment of the company's Board and management to human rights and to guide all activities related to human rights in Mehiläinen Konserni Oy and its subsidiaries (hereinafter referred to as "Mehiläinen"). The purpose of the policy is to describe the principles, objectives and key procedures of Mehiläinen's human rights work.

This policy applies to all persons working at Mehiläinen, private practitioners and subcontractors in a contractual relationship with Mehiläinen in Finland and in the subsidiaries based abroad. In addition to this policy, Mehiläinen's quality policy, HR policy and Code of Conduct also guide the consideration of human rights in Mehiläinen's operations.

## 2. Mehiläinen's human rights commitment

Mehiläinen is committed to respecting all internationally recognised human rights. We respect the implementation of human rights in our own operations and we also expect this from all our partners and subcontractors. We avoid causing or contributing to negative human rights impacts by developing our operations and acting with due care.

We comply with national laws and regulations. In addition, Mehiläinen respects international law, such as the following declarations and conventions: The UN Universal Declaration of Human Rights, UN International Covenant on Civil and Political Rights, UN International Covenant on Economic, Social and Cultural Rights and ILO Declaration on Fundamental Principles and Rights at Work. In addition, our operations are guided by the OECD Guidelines for Multinational Enterprises as well as the UN Guiding Principles on Business and Human Rights. Mehiläinen is committed to the UN Global Compact initiative.

In all our operations, we strive to ensure the fundamental rights of our employees, customers and stakeholders, regardless of their age, gender, sexual orientation, ethnic and cultural origin and religious or political affiliation. We are committed to respecting the human rights of our customers and business partners, and we also require them to comply with the human rights commitments when operating with Mehiläinen. We are committed to ensuring a safe, fair and non-discriminatory working environment for all of our employees.

We respect our customers' right to self-determination in the sphere of social welfare and health care activities, and we strive to strengthen its implementation with active measures.

### 2.1 Commitment of the senior management

The senior management, consisting of the members of Mehiläinen's Board of Directors and Management Team, undertakes to respect and promote human rights. The human rights commitment and policy were processed by Mehiläinen's Management Team and approved by Mehiläinen's Board of Directors.

## 3. Human rights in Mehiläinen's operations

### 3.1 Employee rights

We are committed to respecting the human rights of all Mehiläinen employees and private practitioners. By human rights in this context, we mean the rights set out in the UN Universal Declaration of Human Rights and ILO's core conventions. We comply with local labour laws and local collective agreements in all of our countries of operation, and we do our part to promote the freedom of contract and association of our employees. Remuneration systems in accordance with the provisions of collective agreements ensure equal pay. The salary is determined in a transparent and equitable manner in accordance with the tasks,

while taking into account, among other things, the requirements of the work, appropriate salary level for comparative tasks, local legislation and any applicable collective agreement.

The Group's occupational well-being programme, the equality and non-discrimination plans and the operating model for preventing inappropriate behaviour at work are based on the company's values and guide the management of work ability and occupational health and safety. Good working conditions, premises that are designed to take into account diversity and appropriate tools make it possible to carry out effective, safe and healthy work.

Each member of the work community is responsible for acting in accordance with the principles of human rights and promoting equality and non-discrimination. The employer's representatives and supervisors have an employer responsibility for the promotion and implementation of the obligations laid down in the legislation. The right and obligation to equal treatment of individuals and gender equality covers the entire life cycle of the person's employment relationship. In the organisation of work, the Group promotes the positioning of all Mehiläinen employees according to their potential and creates equal opportunities for them to advance their careers on all levels of the organisation. Employees are trained in a needs-oriented manner. The principles concerning development opportunities and access to training for different professional groups and individuals are open, transparent and non-discriminatory.

Mehiläinen's Code of Conduct defines the ethical principles of our operations as well as the expectations that we have for our employees and private practitioners. We require that all our employees undertake to treat all members of the work community in a non-discriminatory manner and with respect for international human rights and the basic principles of working life.

We do not, under any circumstances, accept forced labour, child labour violating children's rights or forms of modern slave labour at Mehiläinen or in our supply chain. Mehiläinen's suppliers commit to Mehiläinen's Supplier Code of Conduct, according to which we require them to respect human rights and the rights of their employees.

## 3.2 Customers' rights

Mehiläinen is a private provider of social and health care services which operates in several countries. For our customers, the key human rights impacts are related to the services offered to them. At Mehiläinen, every customer has the right to receive good treatment and care as well as the right to be treated well. We promote our customers' right to health by improving our services and their accessibility. We respect the inviolability of our customers' human rights and privacy in all our operations. Where possible, we take into account the customer's native language, culture and individual needs.

### 3.2.1 Patients' rights in health services

In our operations, health services are subject to the prohibition of discrimination in accordance with the Constitution. Our patients have the right to receive high-quality, appropriate and effective treatment. When providing health services, people must not be discriminated against, for example, on the basis of their age, state of health or disability. In addition, treatment decisions must not be influenced by reasons other than medical ones.

Our patients have the right to personal safety as well as the right to participate in informed decisions regarding their treatment, including giving consent or refusing treatment. Patients have the right to privacy and secure processing of their health data, and their health data may not be disclosed without the patient's consent or a legal basis. Patients have the right to give feedback or complain about their treatment, and the feedback must be processed within a reasonable period of time.

### 3.2.2 Social services

In social services, the customers are children, young people, their families as well as adults and elderly people. Customers have long-lasting or even lifelong special needs for help and support. Customers need the presence, guidance or care of another person in their daily lives.

In addition to the other human rights conventions mentioned in the human rights policy, the UN Convention on the Rights of the Child and the Convention on the Rights of Persons with Disabilities are highlighted in social services, both of which are conventions ratified by Finland. The right to self-determination is strengthened as the guiding principle of social services, and the personnel's competence in the right to self-determination is developed.

Social service customers are in a vulnerable position and special attention must be paid to their treatment. Despite their specific needs, each customer has the right to make decisions independently or with assistance. The will of each customer is clarified, even if it is difficult for the person to express themselves. The customer is always involved in the planning of their own treatment.

### 3.2.3 Privacy and data protection

Mehiläinen is committed to respecting everyone's fundamental rights to privacy and personal data protection. These fundamental rights are secured, for example, by the EU Charter of Fundamental Rights and the European Convention on Human Rights, and they are regulated both in EU legislation and at the national level. In the context of social welfare and health care, the right to privacy and data protection play a key role in the realisation of patients' and customers' rights. Patient records and customer data are confidential information, the processing of which is regulated by national special legislation.

The protection of our customers' privacy and personal data is strongly embedded in our values, culture and operating methods. Privacy and data protection are integrated into our practices, ways of working and operating environment. Protecting these fundamental rights creates and strengthens trust between us and our customers, which contributes to ensuring and enabling a confidential and successful treatment relationship. Privacy and data protection strengthen the good customer experience and are prerequisites for a confidential treatment relationship and part of high-quality social welfare and health care.

## 3.3 Subcontracting chain and suppliers

Mehiläinen ensures that the operation of its supplier network is responsible and safe and that the business operations are conducted in accordance with the requirements set for sustainable development. Mehiläinen requires suppliers to comply with the laws, agreements and terms of employment as well as to commit to Mehiläinen's current Supplier Code of Conduct. The Code of Conduct emphasises compliance with legislation, honesty and transparency of operations, financial responsibility, business ethics, social responsibility, aspects related to employer responsibility and environmental issues. Suppliers must comply with internationally accepted labour standards, respect human rights and treat their employees equally. The supplier is liable for the performance of its own subcontractors as for its own.

## 3.4 Non-discrimination and equality work

Mehiläinen is committed to promoting non-discrimination, equality and diversity. The employer requires every employee, supervisor and private practitioner working at Mehiläinen to take these matters into account both as guiding principles and as practical actions. One of the principles is that we treat everyone equally and respect human rights. Every Mehiläinen professional has the opportunity to work and advance in their career according to their abilities, regardless of their background, gender, sexual orientation, religion or other personal factors. Non-discrimination, equality and diversity at Mehiläinen mean inclusion, consideration of each individual and individual interaction and working together in accordance with Mehiläinen's values in order to fulfil the mission of the company. We do not tolerate any form of harassment, bullying or sexual harassment in our work community or towards our customers.

The realisation of equality, equitable treatment and non-discrimination in the company is monitored with separate surveys and as part of the personnel survey. The equality and non-discrimination plan in accordance with Finnish legislation also guides the Group's large-scale development.

### 3.5 International recruitment

Mehiläinen conducts international recruitments both as part of normal operations and as a separate business focusing on international staffing. This section discusses how we operate in our international recruitment and staffing business.

Mehiläinen conducts international recruitments carefully by, for example, preventing human rights risks and human trafficking through its processes. In our operations, we comply with the Ministry of Social Affairs and Health's publication "Vastuullisuussuosituksia sosiaali- ja terveysalan henkilöstön rekrytointiin" (Responsibility recommendations for the recruitment of social and health care personnel) and the WHO Global Code of Practice on the International Recruitment of Health Personnel.

We do not use subcontractors in recruitment, but operate without intermediaries. Our personnel identify each person to be recruited and only deal with them directly. The person being recruited and the receiving recruiting customer can verify the progress and performance of the studies of the recruited person and, for example, the processes related to entry to the country through our own system. Through these actions, we ensure fair treatment and progress in studies and minimise the risk of exploitation by different intermediaries at different stages of the recruitment and training process.

The training we offer is always free of charge. We do not require the persons to be recruited to have a previous degree in the field, as we provide them with the necessary training. In this way, we prevent the recruitment of trained professionals for less qualified work in the target country.

During the process, we clearly communicate the tasks in which the people will be placed after completing the training as well as the minimum wage level of the task. We provide training related to the employee's rights and obligations as well as the collective agreement applicable to the work. This ensures fair treatment of employees once the employment relationship has started.

We provide training in the reception of employees from another culture for both internal and external customer representatives as well as housing, assimilation services and integration support to recruited individuals.

## 4. Development of human rights work at Mehiläinen

### 4.1 Organisation and responsibilities

Mehiläinen's management is committed to human rights in accordance with the above commitment, and Mehiläinen's Board of Directors approves the human rights policy in force at the time. Human rights issues

at the group-level are discussed in the Group's Social Responsibility Steering Group, which also monitors the Group's human rights assessment and the implementation of the measures derived from it and prepares measures for the Group as a whole. In accordance with Mehiläinen's risk management policy, the business line management is also responsible for risks related to human rights in its own business operations, and the support functions support the business in accordance with their respective responsibilities.

Issues related to human rights are reported as part of the Group's annual responsibility reporting and the risks associated with them are handled as part of the Group's risk management process. In the future, the assessment of human rights-related negative impacts and corrective measures will be implemented as part of the human rights due diligence.

## 5. Notification channels

We encourage the professionals working at Mehiläinen and our customers to express and report any shortcomings they may have detected, such as misconduct or actions contrary to our policies. The notification channels are regulated in Europe by the EU Whistleblowing Directive and the ensuing national legislation in each Member State.

Notifications are handled confidentially and the notifier is protected from retaliation in accordance with the applicable legislation. The whistleblowing channel is organised in Mehiläinen at the group level. In the Finnish operations, it is organised in a centralised manner and, in other operating countries of Mehiläinen, locally in accordance with the legislation on reporting channels in each country of operation.

## 6. Processing and approval

Any changes made to the policy are prepared by Mehiläinen's Social Responsibility Steering Group, processed by the Mehiläinen Audit Committee and approved by Mehiläinen's Board of Directors. External expert consultation was used in the preparation of this policy.

### Version history:

Version	Status
4.12.2023	New document created
11.12.2023	Processed by the Audit Committee
11.12.2023	Approved by Mehiläinen Konserni Oy Board