

# Anti-Discrimination and Anti-Harassment Policy

## 1. Objective

Coloplast has a culture of inclusion that respects and fosters diversity at all levels in the organisation. Coloplast does not tolerate Discrimination or Harassment, including Sexual Harassment, of any kind and is committed to fair and equal treatment of all employees.

This policy is established to ensure that Discrimination and Harassment of any kind, including Sexual Harassment, is prevented or identified and addressed appropriately.

## 2. Scope

This policy applies to all employees of Coloplast and its subsidiaries. In addition to this policy, local processes and procedures implementing local legal requirements may also apply.

## 3. Definitions

**Discrimination** is defined as treating a person or group of people differently or unfairly based on e.g. gender, age, ethnic origin, religious belief, marital status, sexual orientation, disability or physical characteristics.

**Harassment** is defined as any form of harassment, including but not limited to psychological harassment, physical harassment, discriminatory harassment and sexual harassment. Harassment covers all kinds of behaviours of offensive nature that demean, humiliate or embarrass a person. Examples of conduct or behaviour which constitutes harassment include, but are not limited to:

### Verbal conduct:

- Offensive comments relating to gender, age, race, ethnic origin, religious belief, marital status, sexual orientation, disability or physical characteristics
- Verbal abuse, humiliation or ridicule
- Condescending remarks
- Offensive sexual, racist or abusive comments, stories and jokes

### Physical conduct:

- Bullying and psychological abuse
- Physical violence
- Exclusion or continued isolation

**Sexual Harassment** means unwelcome conduct of a sexual nature which offends, humiliates and/or intimidates a person. Examples of conduct or behaviour which constitute sexual harassment include, but are not limited to:

### Physical conduct:

- Unwelcome physical contact including patting, pinching, stroking, kissing, hugging, fondling, or touching

### Verbal conduct:

- Repeated and/or unwanted social invitations for dates or physical intimacy
- Explicit sexual messages or messages with sexual or other inappropriate undertones
- Requesting sexual favours against a promotion or other benefits

**Non-verbal conduct:**

- Display of sexually explicit or otherwise sexual or inappropriate suggestive material
- Sexually suggestive gestures

**Retaliation** is any type of retaliatory action or behaviour as a reaction to an employee lodging or otherwise being involved in a complaint alleging Discrimination and/or Harassment, including Sexual Harassment. Retaliation can take many forms, including being removed from a project, being ostracized, being demoted, lack of promotion, and threats.

#### 4. General principles

Coloplast is committed to providing a safe working environment for all its employees free from Discrimination and Harassment of any kind, including Sexual Harassment. Coloplast expects its employees to behave professionally and according to its company values, with cultural sensitivity and with respect for the diversity of the company's workforce and its business partners.

##### 4.1 Zero tolerance for Discrimination and Harassment

Coloplast does not tolerate any form of Discrimination or Harassment (including Sexual Harassment), even unintentional, in the workplace. All allegations of Discrimination and Harassment, including Sexual Harassment, are taken seriously and promptly investigated with respect and thoughtfulness for the people involved.

Any form of Discrimination and Harassment, including Sexual Harassment, is prohibited whether it takes place on Coloplast's premises or outside, including but not limited to work-related social events, business trips, training sessions, or conferences.

Coloplast will take immediate and appropriate measures if it is determined that Harassment or Discrimination, including Sexual Harassment, has occurred.

##### 4.2 Non-retaliation

Coloplast does not tolerate retaliation, further details are available in [Coloplast Global Anti-retaliation policy](#).

##### 4.3 Complaint process

If a person experiences Discrimination or Harassment, including Sexual Harassment, the complaint may be filed through one of the following channels:

- their People & Culture business partner/People & Culture department
- the Legal department
- their Manager
- the Business Ethics & Compliance department
- the Ethics Hotline

##### 4.4 Confidentiality

All complaints and investigations are treated confidentially to the extent possible, and information is disclosed strictly on a need-to-know basis. All employees involved in an investigation, including any follow-ups, must adhere strictly to this requirement of confidentiality. Any breach of the confidentiality obligation will be sanctioned as appropriate.

During an investigation, in some instances, it is necessary to reveal the identity of the claimant and/or the injured party to the parties involved and it is the responsibility of the People & Culture department to take adequate measures to ensure that the claimant and/or the injured party is protected against retaliation during and after an investigation.

All information pertaining to a complaint or investigation under this policy will be maintained in secure files.

## **5 Management obligations**

It is the responsibility of each people manager to ensure that their employees work in a safe environment. Managers play an active role in encouraging the right behaviour and they are expected to address any negative behaviour they observe in a timely manner and ensure that proper training is provided to their teams.

## **6 Sanctions**

Any employee who Discriminates, Harasses, Sexually Harasses, or retaliates against another person, including a third party, may be subject to sanctions up to and including termination.