Global Anti-Discrimination & Anti-Harassment Policy



1. Purpose

Making life easier for people with intimate healthcare needs is at the heart of everything we do at Coloplast. Globally, our 16.000+ colleagues are pivotal to bringing this commitment to life in day-to-day operations. Internally and externally, we work to build balanced, transparent, trusting, and respectful relationships with our colleagues, users, healthcare professionals, and business partners.

Coloplast is known for being a highly ethical company, and we have earned this reputation through our commitment to conducting business with respect and uncompromising integrity. This Policy reflects Coloplast's unwavering, global commitment to continually fostering a workplace free from discrimination and harassment.

2. Objective

The objective of this Policy is to outline our acknowledgement of and commitment providing a safe working environment for all employees free from discrimination, harassment, bullying, or other forms of workplace violence. As such, the Policy outlines our global standards and includes the scope, definitions, beliefs, shared responsibilities, commitments, reporting, grievance mechanisms, and governance for Coloplast colleagues worldwide.

3. Scope

This Policy applies to all directors, officers, managers, employees, and contract workers employed within the Coloplast Group. Where Coloplast holds minority investments, Coloplast will use commercially reasonable efforts to ensure that the principles in this Policy also apply to any company that Coloplast invests in.

4. Principles

The Coloplast Code of Conduct, BEST; our Diversity, Equity, and Inclusion Policy; our corporate values, and this Policy serve as the guiding principles for our corporate culture and complement each other. We are guided by and support external principles such as the International Labour Organisation (ILO), the UN Global Compact, and the UN Guiding Principles on Business and Human Rights.

Coloplast has a zero-tolerance policy for all forms of discrimination, bullying, harassment (including sexual harassment), and other forms of workplace violence, including that which is unintentional. Inappropriate, disrespectful, humiliating, or offensive behavior in violation of this Policy can be verbal, physical, or psychological.

This Policy covers all employees and interactions that take place on or off Coloplast's premises, including but not limited to work-related social events, business trips, workshops and trainings, conferences in the physical and/or virtual office space.

5. Employee Obligations

Every Coloplast employee has a responsibility to behave in accordance with this Policy. We expect that all colleagues act in accordance with our corporate values and help us continually build an inclusive workplace, including promoting a culture of health, safety, fairness, trust, and respect.

People leaders have an added responsibility to ensure that their employees work in both a physically and psychologically safe environment, encourage behavior in line with this Policy and the Coloplast Code of Conduct, and address any behavior contradictory to this Policy in a timely manner.

6. Governance

Local policies or guidelines may apply, but both the Coloplast Code of Conduct, BEST and this Policy must be observed; employees must always follow the stricter laws, regulations, or standards.

7. Raising Concerns

Any employee or third party who becomes aware of or suspects a violation of this Policy must immediately contact a manager, Group Business Ethics & Compliance, or use the Ethics Hotline. Coloplast does not tolerate Retaliation of any kind against any Individual who, in Good Faith, reports a suspected violation or wrongdoing or participates in an investigation.

Our Code of Conduct, BEST, outlines procedures and confidentiality measures in more detail.

8. Violations

Failure to follow this Policy and related policies, including failing to report behaviours or actions of others inconsistent with this and related policies, may lead to disciplinary action up to and including termination of employment in accordance with applicable local labour laws and regulations as well as company policies, and may be reported to the relevant authorities.

Third parties acting on behalf of Coloplast who violate this policy may be terminated and Coloplast reserves all rights to pursue any legal action and/or remedy available to Coloplast under applicable law, including reporting the incident to the relevant authorities.

9. References

- Coloplast BEST Code of Conduct
- Coloplast Diversity, Equity, and Inclusion Policy
- Locally established procedures or guidelines

10. Policy Revision

This Policy is owned by our EVP of People and Culture and reviewed in collaboration with internal experts. This Policy should be read together with Coloplast's suite of corporate policies. We review the impact and benefit of this work annually.

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Definitions and Abbreviations

Coloplast Group ("Coloplast"): means Coloplast A/S, including its direct and indirect subsidiaries and affiliates.

Discrimination is defined as treating a person or group of people differently or unfairly based on any range of social identities including but not limited to: age, gender, gender identity, sexual orientation, race, ethnicity, religion, marital status, pregnancy status, mental or physical disability, culture or other physical characteristics. Discrimination can be accidental or intentional and can occur once or repeatedly.

Harassment covers a range of offensive behaviours including actions, gestures, comments, or jokes that can intimidate, humiliate, ridicule, demean, embarrass and/or abuse a person. Harassment can be verbal, physical, psychological, and/or sexual in nature and can be intentional or unintentional in nature.

Bullying includes repeated, offensive actions that are perceived as harmful, offensive, exclusive, and/or degrading to an individual especially where there is an imbalance of power in the relationship. Bullying can include verbally degrading or hostile comments, purposely withholding or distorting information, intentionally excluding someone, and beyond.

Workplace violence entails a vast range of actions or threats of verbal or physical violence, harassment, intimidation, humiliation, oppression, or offensive behavior in the virtual or physical workplace.

Retaliation is any type of reactive action or behavior against an employee who has started and/or is participating in an ongoing complaint or investigation, including those reported to our Ethics Hotline. Retaliation can take many forms, including verbal abuse, removal from a project, exclusion, demotion, withholding of a promotion or even a threat of these actions.

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