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Approved by	EVP, Chief People Officer (Chair, Human Rights Committee) EVP, General Counsel & Company Secretary
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Introduction

At Convatec, we support and enforce human rights in the way we do business. This topic is central to how we impact the communities that we serve, how we develop and manage our entire workforce, and how we engage our business partners throughout the value chain.

Convatec is a signatory and member of the United Nations Global Compact (UNGC) – an initiative in which companies pledge to align their strategies and operations with the Ten Principles of the UNGC on human rights, labour, environment and anti-corruption. As part of our membership in the UNGC, we commit annually to learn from each other and play our part in advancing shared goals.

Our approach to human rights builds on our commitment to the following treaties, but is not limited to the:

- United Nations Guiding Principles on Business and Human Rights
- United Nations Universal Declaration of Human Rights
- United Nations Declaration against Corruption and Bribery in International Commercial Transactions
- International Labor Organization’s 1998 Declaration on Fundamental Principles and Rights at Work (including 2022 revisions)
- OECD Guidelines for Multinational Enterprises

Policy statement

Convatec is committed to upholding the human rights of all the people we are in contact with, directly and indirectly, through our operations and business practices, in line with our core values. We are taking clear steps to ensure our actions benefit all our stakeholders, including our customers, employees, shareholders, business partners and the communities in which we live and operate.

This Human Rights & Labour Standards Policy (policy) sets out overarching approach which are also embedded throughout our global policies, systems and operations. This policy should be read in conjunction with a range of other policies that support these commitments into practice.

Our vision, promise and values

Our vision of ‘Pioneering trusted medical solutions to improve the lives we touch’ expresses the purpose in our mission. This vision reflects the values that we have deeply embedded in our culture, which is one that encourages integrity in our business decisions and fosters respect for all across our operations.

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Our promise to be ‘forever caring’ is a distinctive commitment to those we serve to ensure we meet their needs today and into the future, and our values reflect who we are as a company, dedicated to: Improve care, Deliver results, Grow together, Own it and Do what’s right.

Governance

Convatec’s Environmental, Social and Governance (ESG) Steering Committee is responsible for reviewing and overseeing ESG strategy and programmes, providing visibility and oversight to our Board of Directors.

Convatec’s Executive Leadership Team (CELT), led by the Chief Executive Officer, oversees the implementation of our ESG strategy, programmes, and policies, and through its sub-committee (Convatec Human Rights Committee), coordinates our efforts to identify, address, train and report on our human rights practices and risks (see Annex A).

Our approach

This policy applies to all our employees and business partners around the value chain. As a signatory of the UN Global Compact, we are committed to responsible business, including respecting human rights by avoiding infringing on human rights and addressing negative impacts. Our business partners are also called on to adhere to our policies and procedures on Human Rights, Labour, Environmental Protection and Anti Bribery & Corruption principles.

We comply with the concepts provided under the International Labour Organization Standards, by assuring equal opportunities, dignity at work, employee safety and health and freedom of association. We also prohibit discrimination, workplace harassment and all forms of modern slavery, child labour or compulsory labour.

We have identified the following principal areas of responsibility:

1. Human rights

Convatec supports and complies with the United Nations’ Universal Declaration of Human Rights and seeks to honour the principles of internationally recognised human rights wherever it operates.

Each Convatec employee shall be treated with dignity and shall not suffer harassment, physical or mental punishment or other forms of abuse.

Convatec has effective grievance mechanisms which are transparent, equitable and predictable to enable the remediation of any adverse human rights impacts that may arise in its operations.

Convatec promotes effective employee engagement throughout its operations and welcomes open feedback from employees on all matters of business.

2. Freedom of association

Convatec recognises and respects the right of employees, without fear of reprisal, intimidation, or harassment, to establish and join (or not join) organisations (i.e., trade or labour unions) which are designed to engage in collective bargaining and other initiatives to further and defend the interests of the workforce.

No Convatec employee shall be dismissed or otherwise prejudiced for reason of membership of such an employee organisation or because of participation in that

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organisation outside of working hours, or with consent of their line manager, within working hours.

Convatec employees shall enjoy protection against discrimination by virtue of their membership of an employee organisation and employment shall not be conditional upon an employee not joining or relinquishing membership of such an organisation.

3. Forced or Compulsory labour and human trafficking

Convatec does not accept nor condone any form of modern slavery whether forced, compulsory or trafficked labour. Without limitation, Convatec does not engage sweatshop labour, convict labour or indentured labour under penal sanction.

All Convatec employees shall provide their services to the Company on an entirely voluntary basis and no one shall be forced to remain in the employ of Convatec against their will. Convatec provides fair working conditions for its employees and complies with all applicable legislation. Convatec is committed to ensuring that its employees are not paid less than the amount required by applicable law.

Convatec has a zero-tolerance approach to modern slavery and human trafficking and encourages all employees to raise concerns about any issue or suspicion of such activities in any part of the Convatec business at the earliest opportunity.

4. Child labour

Convatec adheres to and strictly complies with international child labour conventions and child labour laws and regulations in the countries in which it operates, prohibiting all forms of child labour.

The minimum age of a Convatec employee shall be not less than the age of completion of compulsory education in the country of location of the relevant Convatec business unit, and in any event, shall not be less than 16 years. Where the work concerned is by its nature or the circumstances in which it is carried out, deemed to be 'hazardous' under the definition provided by the International Labour Organisation 138 Concerning Minimum Age, the minimum age of the Convatec employee shall be not less than 18 years. We support legitimate workplace apprenticeships, internships and other similar initiatives that comply with all applicable laws and regulations.

Convatec has a clear policy position prohibiting all forms of child labour, our membership of the UNGC and endorsement of treaties as outlined above, deplores all forms of infringements to children's rights, such as the sale and trafficking of children, debt bondage and serfdom and forced or compulsory labour, including forced or compulsory recruitment of children for use in armed conflict, or work which, by its nature or the circumstances in which it is carried out, is likely to harm the health, safety or morals of children.

5. Discrimination

Convatec strictly prohibits discrimination and harassment against any Convatec Employee or any applicant for employment with Convatec, whether such discrimination or harassment is based on sex, race, age, colour, ancestry, religion, political opinion, disability, sexual orientation, marital status, or any other feature protected by law. Convatec is committed to providing a safe and inclusive work environment and promoting equality of opportunity and providing fair treatment to all employees. Any act creating an intimidating, hostile or offensive work environment is strictly prohibited.

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This provision should be read in conjunction with Section VIII of the Convatec Code of Ethics and Business Conduct which contains further guidance on the Convatec position with regard to discrimination, harassment and other potential issues in the workplace.

6. Working hours and wages

Convatec's employees are provided with competitive wages and benefits that comply with applicable laws and regulations, as well as binding collective agreements, including those pertaining to overtime work and other premium pay arrangements. Convatec offers employees opportunities to develop their skills and capabilities and provides advancement opportunities where possible. Convatec complies with all applicable laws and mandatory industry standards including but not limited to regular working hours and overtime hours, with breaks, rest periods, holidays, sick leave and medical leave, as well as parental leave. To the extent any employee has an employment contract, Convatec complies fully with the terms of said agreements.

7. Environment, health & safety

Convatec provides a safe working environment for our employees. Risks are continuously evaluated such that protective measures can be taken to ensure a safe and healthy working environment. Convatec maintains a productive workplace by minimizing exposures to accidents, injuries and health risks to our employees, visitors, and contractors. Convatec provides potable drinking water, lighting, appropriate temperature controls, ventilation, sanitation and personal protective equipment together with well-equipped workstations. In addition, facilities are constructed and maintained in accordance with the standards set by applicable laws and regulations. For further information, view our environment, health, safety policies [here](#).

Beyond compliance

Convatec operates our facilities in full compliance with all applicable laws and regulations. Convatec shall obtain, keep current and follow the reporting guidelines of all the required environmental permits and registrations to be legally compliant at any time. Convatec's commitment to environmental stewardship and reducing our impact on the planet goes beyond compliance expectations or requirements.

Labour standards

We have set out the following principles to underpin our approach to ensuring we have clear labour standards throughout our business and operations:

1. All employment must comply with all applicable laws and regulations of the countries in which Convatec operates. Where the applicable local laws and regulations require higher or additional levels of protection of human and employment rights than those set out in this policy, or otherwise conflict with international standards, the local laws and regulations will take precedence. In such circumstances, the Business Unit will advise the relevant Human Resources team in the preparation of local policies or procedures to supplement this Policy to ensure full compliance with the local laws and regulations, whilst respecting international human rights to the greatest extent possible.
1. As provided in our Global Confidential Reporting and Non-Retaliation policy, all Convatec employees are required to report any actual, suspected or potential violations of Convatec's Code of Ethics and Business Conduct, Convatec's Global Policies on Business Conduct and all other company policies, including this Human Rights Policy. Failure to do so may lead to disciplinary action, up to and including termination of employment.

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2. This policy shall be reviewed regularly and updated where necessary to ensure the continuous improvement of working conditions and management of labour risks in Convatec's global operations.
3. Convatec shall make available sufficient resources to give effect to its commitment to year-on-year improvements to working conditions and management of labour risks in its global operations

Our reach

We are committed to run an ethical and responsible business partnering with all the members of the value chain, to use our scale to drive positive action. We strive to develop, manufacture, sell and distribute our products in a responsible and sustainable way. As well as our employees, our Human Rights framework extends to all the members of our supply chain and business partners. Equally, our principles signal what we stand for as a business and will champion these more broadly.

Our Global Third-Party Compliance Manual (Compliance Manual) governs our relationship with our business partners and constitutes the foundation of how we work with them. The Compliance Manual sets forth our expectations of our third-party business partners' standards of conduct regarding human rights protections, and the prohibition of child labour, compulsory labour and human trafficking. All new and existing suppliers are required to act in accordance with our Compliance Manual and must agree to ensure transparency and address any shortcomings.

We evaluate our current and prospective suppliers using a business review process that focuses on the quality of the product manufactured, the standard of documentation in place and other performance indicators. We also carry out cyclical quality audits assessing compliance with relevant regulations. As highlighted above all new Direct material and Contract Manufacturing suppliers receive and are required to agree to our Compliance Manual.

Our use of technology, including Risk Methods, EcoVadis and Sedex platforms, continue to be utilised as the main resource in our Risk Assessment activities.

Internally, the Convatec Code of Ethics and Business Conduct (the Code) defines our core principles of ethical business practice and our standards for professional and personal behaviour, the Code, and also includes sections on advancing human rights and protecting against discrimination and harassment.

Our environmental impact

We will protect our planet and the communities we serve through the way we operate and the contribution we make to the world around us.

We have science-based targets aligned to our goal of achieving net zero (Scope 1, 2 and 3) by 2045. Our new product development processes and our key product development priorities will be focused on achieving more sustainable portfolios and reducing our global footprint.

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Reporting

Assessment of our human rights compliance is ongoing at all levels of the organisation, ensuring all our activities meet the outcomes we have committed to. We encourage our employees, with an open and trusting approach, to report any violations of human rights related to our operations internally or externally. Our reporting and non-retaliation policy emphasises the value we place on employees that make such reports and the protections we will give them, to assure we fully investigate any allegations and assess our adherence to human rights standards.

We recommend that all concerns or complaints be reported to the Convatec Compliance Helpline, operated by Navex EthicsPoint, a third-party vendor. Reports can be made online [here](#). All reported matters will be kept as confidential as possible, and anonymity will be granted upon request.

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Annex A: Convatec Human Rights Committee Terms of Reference Version 2 (July 2024)

As a sub-committee of the ESG Steering Committee, the Human Rights Committee will meet at least twice each calendar year. The Committee can be convened to meet on an ad-hoc basis, if needed, by the Committee Chair or their representative. The Committee's scope of work includes, but is not limited, to:

- Overseeing audits from business partners/third party adherence to our global human rights policies, standards and practices
- Reviewing annual UK Modern Slavery Act Statement, and requirements in other markets as required, to support disclosure arrangements
- Following changes in stakeholder expectations and sharing best practices on Human Rights-related topics to further embedded these across the business and its operations
- Commissioning additional activities in furtherance of our global human rights policies, standards and practices that further embed these in our business operations such as education and training of employees and third parties