Human Rights Policy

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Introduction

MDT technologies, hereafter MDT, is committed to ensuring that human rights are respected throughout all business activities and throughout supply chain. In line with the UNGPs, our commitment is based on the International Bill of Human Rights (consisting of the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights and the International Covenant on Economic, Social and Cultural Rights) and the principles set out in the International Labour Organization's Declaration on Fundamental Principles and Rights at Work.

We aspire to foster a safe and encouraging work environment that is free of any and all discrimination, coercion, abuses of power, harassment and violence. All employees are entitled to a freely chosen safe, clean, and pleasant work environment.

As outlined in MDT's Anti-Bribery and Corruption policy, we have zero tolerance corruption and bribery. We also have zero tolerance position on modern slavery.

MDT is committed that where national law and international human rights standards differ, we will follow the higher standard; where they are in conflict, we will adhere to national law, while seeking ways to respect international human rights to the greatest extent possible.

This policy applies to all MDT employees. We also expect our suppliers and business partners to respect human rights in their own operations and supply chains.

Creating Our Policy

In developing our human rights policy, we have considered different resources and expertise to provide a comprehensive representation of our commitment towards respecting human rights. The development of the policy has been led by senior management, and the following resources have supported the shaping of this policy:

- Engaging with external experts. The development of this policy was guided by engagement with an external partner who specializes in sustainability, human rights, and social impact.
- Reviewing of existing policies and processes. A full review of our policies and processes was undertaken to identify our existing coverage of human rights topic and determine potential gaps and opportunities for alignment.
- Identifying most relevant human rights topics. A process of human rights risk impact assessment focusing on MDT's own operations and supply chain conducted in partnership with external experts.
- Feedback from internal stakeholders. We have engaged with MDT employees, to ensure that their views have been heard.

Managing our human rights risks and impacts

Following a risk assessment process of our internal operations and our supply chain, we have

identified our priority human rights topics. We will continue enhancing our policies, procedures, and management capacity to effectively implement our human rights commitment on an ongoing basis.

MDT has taken a risk-based approach in identifying potential risks related to human rights adverse impacts. We have weighted and prioritized the risks proportionately and have taken steps towards management capacity improvement to address them accordingly.

As part of the assessment, the following risk topics were identified as relevant to MDT's value chain:

- Prohibition of any discrimination: regardless of race, color, ethnic origin, sex, physical or mental disability, age, religion or belief, political opinion, or social origin: We believe all people have the right to work in a safe and encouraging work environment that is free of any and all discrimination and promotes equal opportunities. Only by maintaining a positive and inclusive workplace we ensure our employees benefit from their full capabilities, creativity, and talent.
- Occupational health and safety: MDT ensures the highest protection and safety standards are provided in our operations and production facilities. Our compliance with the strict national health and safety regulations is additionally supported by an efficient management system and practices to monitor and prevent accidents and incidents at the workplace. The company follows strict workplace safety processes and conducts regular root-cause analysis to prevent incidents repeating. Additionally, MDT provides its employees with access to social and medical benefits, in alignment with national regulations.
- Freedom of association and collective bargaining: MDT is committed to an open and constructive dialogue with all people employed by our company. Our employees are free to join organizations of their choice that represent them in accordance with local law. Employees who act as representatives will not benefit in a favorable treatment from the company, nor face any disadvantages.
- Appropriate remuneration: We provide our employees with fair and competitive compensation and benefits, including medical and social benefits. Our wages ensure an adequate standard of living for our employees and their families. We also provide paid time leave above the mandatory minimum and respect the right to leisure and free time.
- Equal opportunities and treatment (DE&I): MDT is committed to providing equal and equitable opportunities and treatment in the workplace. We continuously strive for transparency and inclusion in our recruitment practices, as well fair and equitable remuneration to our employees.
- Working hours and work-life balance: MDT follows local legislation and maximum expected hours within a work week are clearly stated in work contracts, including overtime or unusual situations. We engage in conversation to our employees to address their need and adapt working hours to provide better flexibility when feasible.

- Free choice of employment (no forced labor) and prohibition of child labor: MDT strictly prohibits any form of forced and child labor. We follow strict recruitment procedures in our own operations and directly employ all our employees, hence closely evaluate legal age and freedom of choice to work. We encourage whistleblowing of any suspicion connected to any type of involuntary labor within our own operations. We also have high expectations from our business partners to respect and adhere to the prohibition of forced and child labor.
- Abuse of Force: We strongly forbid any kind of abuse of force. All our employees and those of our business partners are entitled to respectful treatment and a work environment free of any unwelcome, offensive, or demoralizing conduct.

We recognize that there are different risks and priorities within our supply chain and our own operations and will continue to develop our policies and processes accordingly. For example, the risk topics related to forced and child labor, as well as abuse of force, have been identified as material to our supply chain but not our own operations. In the context of MDT's country of operations and full compliance with national regulations, the overall risk in our own operations of forced, child labor and abuse of force is evaluated as very low. Nevertheless, our company strives to raise awareness on all human rights risk topics across our business partners by communicating our commitment to this policy, our Code of Ethics, and Anti-Bribery and Corruption policy.

How will the policy be implemented?

Overall responsibility for human rights within MDT sits with our Chief Finance Officer. At an operational level, our Human Resources Manager leads this area, in collaboration with other relevant functions, such as our Supply Chain Manager. Additionally, MDT expects each employee to follow the company's policies and act accordingly to ensure protection against violation of human rights in day-to-day work and responsibilities.

We encourage whistleblowing in critical situations and strive to foster an open community where individuals can speak freely without fear of consequences. Therefore, to promote a "speak-up" culture, we practice an "open-door" approach in our daily activities, and provide a safe and reliable complaint channel, that guarantees anonymity to every person submitting a complaint in good will.

The policy is communicated as part of our onboarding process, and we ensure that every employee is informed of our commitment to respecting human rights.

Tracking, monitoring, and reporting performance

We recognize that the key to effective policy engagement is on-going tracking, monitoring, and reporting on progress and management of concerns related to human rights.

The progress and effectiveness of our approach to human rights is monitored continuously, by conducting annual reviews, discussing human rights' topics at board level, and incorporating feedback from employees and complaints received.

To support this, we provide an accessible, predictable, and transparent reporting mechanism, that guarantees to internal and external stakeholders the possibility to anonymously submit any concerns related to MDT's business activities. We proactively encourage participation internally and include in our internal reporting potential breaches of our commitments in this policy and lessons learned. We have a strict non-retaliation approach to submitting any concerns that will better MDT's business conduct. We are committed to providing for, or cooperating in, the prevention, mitigation, and remediation of adverse human rights impacts which MDT has caused or contributed to. In cases where MDT may be linked to human rights violations through business partners, we will strive to encourage mitigation and remediation of adverse impacts.

We welcome internal and external feedback that supports our human rights commitment and informs improvement decisions of our due diligence process.

The challenges companies face in upholding human rights standards are changing over time. We will therefore continue to review our position on human rights and ensure that the measures implemented remain effective and up to date.

Roger Karner (CEO)