

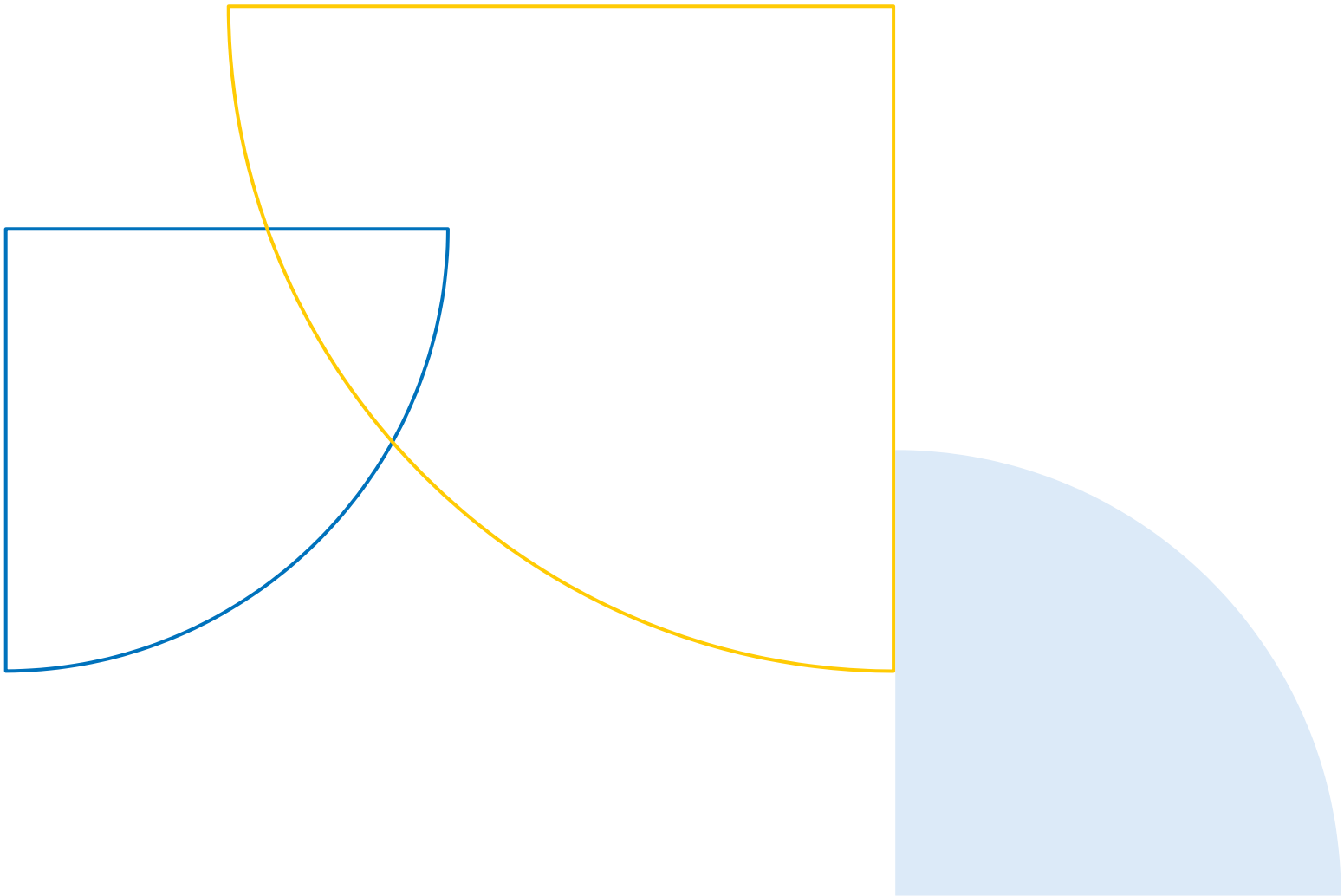


Policy Statement on the Sana Human Rights Strategy



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Preamble

Sana Kliniken AG is one of the largest healthcare service providers in the German-speaking region. Sana Group provides integrated health services for patients, medical facilities and companies comprising preventive care, outpatient and inpatient treatment, aftercare, rehabilitation and medical aids, and B2B services in the sales, logistics and medtech sectors.

The Group is owned by 24 private health insurance companies whose business decisions are focused on patient care and the long-term positive development of the corporate group. Sana Kliniken AG was founded in 1976 with the aim of delivering state-of-the-art medicine in the form of a wide range of care services. With our more than 120 healthcare facilities, including over 50 primary, specialised and maximum (acute) care hospitals, we offer our services to all insured parties and treat approx. two million patients in urban and rural areas every year.

In fulfilling this healthcare mandate, acting responsibly, sustainably and lawfully is to us a matter of course. Our common purpose is to prevent and combat violations of human rights. This has been enshrined in our corporate mission and our Sana Compliance Code of Conduct for many years. With the German Supply Chain Due Diligence Act (LkSG) coming into force, the Sana Group expressly pledges its commitment to respecting internationally recognised human rights through this Policy Statement.

The objective of the LkSG is to improve the international human rights situation and protect the environment. Companies are thus obliged to duly respect human rights and exercise environmental due diligence, ultimately with the goal of preventing and minimising risks and ending violations. Sana Kliniken AG fulfils this responsibility as a healthcare provider operating throughout Germany. Below, we explain Sana Group's human rights strategy, which is aimed at our Executive Board and the management teams of Sana Group, all our employees and our business partners.



1 Risk management

To ensure compliance with the due diligence obligations set out in the LkSG, annual and ad hoc risk analyses of Sana Group suppliers lie at the core of Sana Group's risk management system. Sana Group is supported in this endeavour by a global rating platform, which can be used to determine the specific risk potential of each direct supplier while accounting for industry and country conditions.

Individual sustainability profiles can also be retrieved from the rating platform for individual suppliers and used to conduct a detailed risk analysis. The risk analysis includes a comparison against risk profiles from publicly accessible sources such as internationally recognised indices. In addition to the risk profiles available from the rating platform, Sana Group includes its own procurement data and other sources of information in such a risk analysis.

This comprehensive risk analysis, already initiated by Sana Group prior to the LkSG coming into force, identified only a small number of suppliers as posing an increased risk. The majority of these "high-risk suppliers" were found to come from an industry that is considered critical, i.e. pharmaceutical companies and wholesalers.

The data thus obtained was considered when specifying the human rights and environmental principles to be prioritised. The results from completed risk analyses are shared with the subsidiaries of Sana Kliniken AG at regular intervals and as needed.

As a further risk management mechanism, suppliers of Sana Group considered risky or of special relevance are required to commit to Sana Group's existing human rights and environmental principles throughout the supply chain. This takes the form of declarations of compliance with the provisions of the LkSG or corresponding contractual assurances of observance of the Sana Supplier Code of Conduct ([available here](#)).

Another element of the risk management system consists of identifying human rights and environmental risks within our own business division and taking appropriate preventive measures. Sana Group already makes every effort to prevent human rights violations and consider environmental protection aspects when developing and implementing procurement strategies. All employees in the Group's procurement team receive regular training and are sensitised to risk identification. If necessary, suppliers also receive appropriate training. Furthermore, Sana Group's proven internal control system (ICS), which is used to continuously review the established business processes of the Sana companies, has been expanded to incorporate the obligations associated with the LkSG.

The implementation of preventive measures vis-à-vis indirect Sana Group suppliers is another key element of the risk management system. Sana Group reviews the effectiveness of these preventive measures on an annual and ad hoc basis, particularly if the risk situation is likely to change or expand significantly.

2 Complaints Procedure

Human rights and environmental violations can be reported via Sana Hintbox, an established and trusted digital whistleblower system. Sana Hintbox is openly accessible at <https://hintbox.sana.de/>. All Sana Group employees and business partners (suppliers and customers, etc.) can moreover submit reports – also completely anonymously – of violations against human rights and environmental due-diligence obligations, particularly those of the LkSG. Insufficient preventive and remedial measures to protect human rights and the environment can also be reported accordingly.

Complaints will be reviewed in confidence by the individuals appointed as responsible and appropriate action will be taken, where necessary, in consultation with the relevant Sana Group boards. A whistleblower may not be

disadvantaged or penalised for filing a complaint ("reprisals"), provided that the whistleblower had reasonable grounds to believe at the time of reporting or disclosure that the information reported or disclosed was true. If a whistleblower suspects that they are being subjected to any form of reprisal, they may contact the Legal & Compliance division in confidence, where the matter will be pursued as a compliance case. Any party that has unjustifiably retaliated must then expect to be sanctioned, which in the case of internal reprisals at Sana may be of a disciplinary nature (e.g. warning, termination), among others, and in the case of reprisals on the part of suppliers can lead to termination of the business relationship.



3 Remedial measures

If violations are identified or suspected, appropriate remedial action will be taken. Depending on the violation about which Sana has received substantiated information,

an action plan with a fixed schedule will usually be defined in the first instance and must be completed in stages in the event of continuing violations.

4 Reporting and documentation

Sana Kliniken AG prepares an annual report for its affiliated companies concerning the fulfilment of its due diligence

obligations which is published at <https://sana.de/lieferkette>. Appropriate ongoing documentation is guaranteed.

5 Significant human rights and environmental risks

The Sana Group mission is to set a high standard with a view to respecting and observing human rights through and based upon its working conditions. In this respect, social, ethical and ecological goals must be harmonised with economic and quality-oriented actions. Within the framework of its human rights strategy, Sana Group has prioritised the following human rights and environmental principles in particular, which are to be observed both by Sana Group itself and by all the companies in the supply chain:

Combating child labour

Based on the definition of the UN Convention on the Rights of the Child and the International Labour Organization (ILO), child labour refers to any work by minors that has a negative impact on their mental, social and health development and that violates a child's fundamental rights to education, health, protection and participation.

Sana Group does not tolerate any form of child labour. Children must not be deprived of schooling and thus be restricted in their development due to gainful employment. Their dignity must be respected, and their health and safety protected. This applies especially but not exclusively to the most extreme forms of child labour such as hazardous activities that can be detrimental to a child's health, safety and morals. Sana Group complies with the minimum age for employment.

Combating forced labour

Forced labour is defined by the International Labour Organization (ILO) as any work or service required of an individual against their free will and/or under threat of punishment.

Sana Group does not tolerate and strictly objects to any form of forced or compulsory labour in its business activities.

Protection against discrimination

Discrimination refers to any form of unjustified disadvantage or unequal treatment of individuals or groups based on various perceptible or non-perceptible characteristics. Accordingly, no one may be disadvantaged, favoured, or excluded based on ethnic or social origin or nationality, gender, age, physical appearance, disability, trade union membership, religion, marital status, pregnancy, sexual orientation, gender identity and expression, or any similar criterion.

Sana Group ensures that employees do not suffer any form of discrimination on the above grounds. Sana Group also stresses the importance of creating an inclusive and supportive working environment by respecting diversity when recruiting employees. The diversity of our employees is reflected in their different lifestyles. Sana Group also expects the same from its suppliers.

A fair and healthy working environment

Sana Group promotes a working environment in which employees can achieve their best, innovate, and develop. In particular, employees are supported in developing their individual skills and realising their personal goals and ambitions in line with the company, above all through a comprehensive range of training and development opportunities. Under comparable conditions, equal pay is offered for equal work. Sana Group complies with the applicable occupational health and safety laws and ensures that occupational safety is constantly optimised. Regular training courses ensure that the relevant occupational health and safety provisions are heeded, awareness is promoted



among employees and the risk of accidents is thus reduced. The right to recreation and leisure time, including paid leave, is a matter of course and is afforded top priority in Sana corporate culture. Sana Group promotes the harmonisation of work, family and personal interests by achieving the ideal work-life balance. Employees are free to organise their leisure time as they see fit and take advantage of equal career opportunities for working parents. Through initiatives and a range of health management offerings, Sana Group also actively promotes the mental and physical health of its employees.

Sustainability and environmental protection

Sana Group is committed to all environmental protection principles, and places particular importance on ensuring that all applicable regulations are met in the handling,

storage, transportation, disposal, recycling and reutilisation of waste, waste gases and wastewater. Sana Group is committed to climate protection principles, especially the economical use and conservation of natural resources and ensuring and demonstrating continuous ecological optimisation at its clinical and administrative sites (e.g. reducing raw material and energy consumption, emissions, wastewater, noise emissions, waste, hazardous substances, and dependence on natural resources through clear targets and optimisation strategies).

6 Expectations

Sana Group expects its employees to conduct themselves in line with the principles set out in this Policy. Managers, in particular, are responsible for implementing these principles. They are required to inform their employees about the content and significance of the principles and to advise and support them in applying them in their daily work. At the same time, managers must take the above principles as the basis for every business decision when executing their management duties.

Sana Group also expects its suppliers to respect and uphold the internationally recognised human rights set out in this Policy in the pursuit of their business activities. The commitment of suppliers to fulfil their social responsibilities is an essential prerequisite for long-term business relationships. The criteria and obligations set out in the above-mentioned statutes are incorporated in supplier assessments, are regularly reviewed, and influence both the establishment and the termination of a business relationship with Sana Group.

7 Contacts

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