

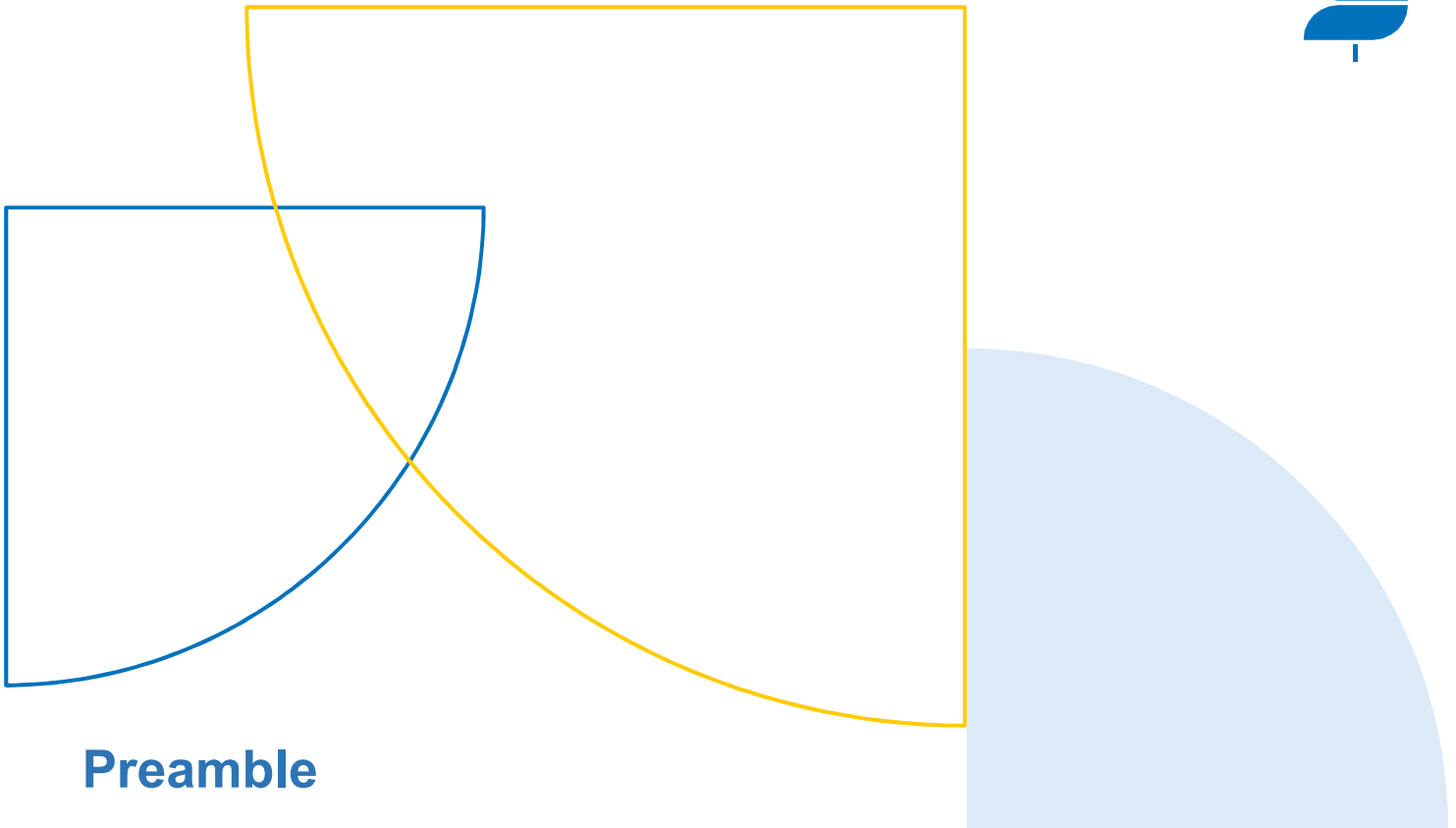


Procedural Code for the Sana Supply Chain Complaints Procedure



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Preamble

With the German Supply Chain Due Diligence Act (Lieferkettensorgfaltspflichtengesetz, LkSG) coming into force, Sana Group expressly pledges to respect globally recognised human rights. A Policy Statement and Supplier Code of Conduct is in place, detailing the expectations of Sana Group vis-à-vis its own employees and its direct suppliers with a view to protecting human rights and the environment (available at www.sana.de/lieferkette). We demand that our own employees and our direct suppliers observe the communicated expectations.

Sana Kliniken AG has established a complaints procedure for itself and its subsidiaries with which to identify any violations of our Policy Statement and our Supplier Code of Conduct. Individuals can thus report human rights and environmental risks, and violations of human rights or environmental obligations that have arisen from commercial activities in their own business unit or on the part of a direct supplier.

Sana Hintbox is the established and trusted digital whistleblower system used as a complaints portal by Sana Group. Sana Hintbox is openly accessible at <https://hintbox.sana.de/>. All Sana Group employees and business partners (suppliers and customers, etc.) can moreover report – also completely anonymously – violations against human rights and environmental due-diligence obligations, particularly those of the LkSG. Inadequate preventive and remedial measures for protecting human rights and the environment can also be reported accordingly. The reports are investigated confidentially by the Group's Sustainability division, notably by Human Rights Officer Dr Clemens Jüttner, and the Group's Legal & Compliance division, notably by Central Compliance Officer Dr Christian Bichler. If necessary, appropriate action is taken in consultation with the relevant boards of the Sana Group and chief executives of the Sana Group companies involved.



The key points of the Procedural Code for our Supply Chain Complaints Procedure are detailed below.

1 What can be reported?

Complaints relating to our Policy Statement and/or our Supplier Code of Conduct can be submitted via Sana Hintbox at <https://hintbox.sana.de/>. Alternatively, the report can be emailed directly to the Central Compliance Officer (compliance@sana.de), who can also be reached by telephone (see below for contact details). Complaints must be based on facts. As far as possible, complaints should initially contain all relevant information representing the facts, insofar as the person submitting the complaint (hereinafter referred to as “whistleblower”) is in possession of this information.

2 Who can file a report?

Anyone who has become aware of risks or violations relating to human rights and environmental protection within the meaning of the LkSG can file a complaint. This also applies to associations of individuals such as NGOs.

3 How is a whistleblower protected?

Complaints can be submitted anonymously. Furthermore, submission of a complaint will not result in any discrimination or sanctions against the whistleblower. If a whistleblower suspects that they have been affected to any form of reprisal, they may contact – also via Sana Hintbox – the Legal & Compliance division in confidence, which will pursue the matter as a compliance case.

However, this protection only applies if, at the time of the report or disclosure, the whistleblower had reasonable grounds to believe that the information they reported or disclosed was true. It is essential to refrain from deliberately untruthful allegations or untruthful facts, given that such actions can constitute a criminal offence on the part of the whistleblower.



4 What does the complaints procedure involve?

a) Upon submission of the form and receipt of the report, the whistleblower immediately receives confirmation of receipt and details (username and password) with which to access their complaint and the associated correspondence with the person responsible for handling the report. This combination allows the whistleblower to track the progress of the procedure in the complaints portal and access any questions addressed to the whistleblower, where applicable. If the complaint is submitted by email, confirmation of receipt of the report will follow within a maximum of seven days.

b) The next step involves an assessment of the admissibility of the complaint by the Human Rights Officer and the Central Compliance Officer (hereinafter referred to collectively as the “Complaints Unit”). To this end, the whistleblower may need to be contacted to obtain further information, if necessary, with respect to investigating the admissibility of the complaint. If the complaint is not pursued further, the whistleblower will receive notification along with justification for the decision via Sana Hintbox.

c) If the complaint is admissible, the Complaints Unit will clarify the matter as far as possible by involving the whistleblower. In this context, the Complaints Unit is required to clarify any existing expectations concerning preventive or remedial action with the whistleblower.

d) Once the matter has been clarified, the Complaints Unit – depending on the violation identified or anticipated – will work with the appropriate specialist units of Sana Group to find appropriate solutions. Preventive and remedial action will be taken where required, appropriate and expedient. Depending on the violation, a plan of action will usually be defined in the first instance along with a fixed timetable to be followed step-by-step in the event of continuing violations. The action specified therein can range from reminders to the termination of the business relationship. The respective violations and their remediation are successively documented and archived in accordance with statutory requirements.

e) The Complaints Unit must inform the whistleblower of the intermediate steps and the outcome achieved.

f) The effectiveness of the complaints procedure is subject to annual and ad hoc reviews. Any necessary amendments to the complaints procedure or in relation to remedial measures will be implemented in a timely manner.

5 How long does the complaints procedure last?

The complaints procedure can last several weeks or months; this very much depends on the individual case. Sana Group strives to deal with complaints and find suitable solutions as swiftly as possible. The whistleblower will be informed of any action taken within three months of receipt of their complaint.



6 Points of contact

If there are any questions relating to the procedural code for the complaints procedure, please contact:

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