

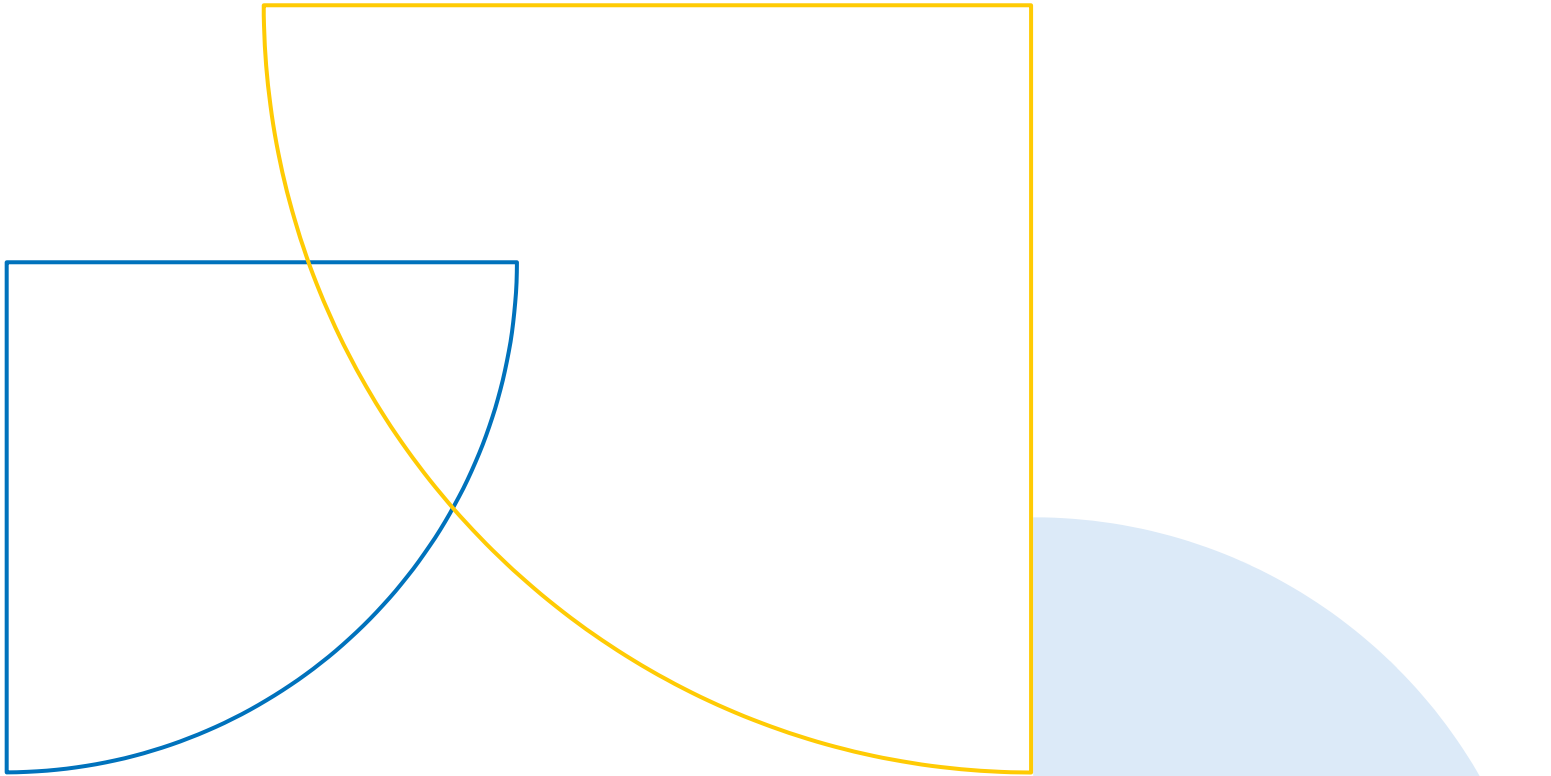


Sana Supplier Code of Conduct



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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, Sana Group expressly pledges its commitment to respecting internationally recognised human rights through this policy statement ([available here](#)). 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.

Partners. Sana Kliniken AG fulfils this responsibility as a healthcare provider operating throughout Germany and is committed to ensuring that the medical products and services we offer are manufactured and delivered in such a way that human rights and the environment are respected, and the fundamental dignity of workers is protected. Therefore, we work only with suppliers who are committed to the same human rights and environmental principles.

We value our relationships with our suppliers and are therefore fair, open and transparent in our dealings with them. In return, we expect our suppliers to share our commitment to ethical, safe and responsible business practices. We expect our suppliers to heed the principles set out in this Supplier Code of Conduct when working with Sana Kliniken AG and/or its affiliated companies. In addition, we expect our suppliers to promote and enforce the same principles in their own supply chains.

We expect all products and services to be manufactured, produced and delivered in accordance with this Supplier Code of Conduct.

We expressly reserve the right to amend this Supplier Code of Conduct at any time if indicated by the risk analyses we regularly undertake. When applying this Supplier Code of Conduct, we expect our suppliers to observe the following principles.



1 Combating child labour

We condemn all forms of child labour. We therefore expect our suppliers not to employ children under the age at which compulsory schooling ends according to the law of the place of employment. Under no circumstances may the age of employment be less than 15 years. Furthermore, we condemn the employment of children under the age of 18 years in any of the following activities:

- Any form of slavery or a practice similar to slavery, such as the sale of children and child trafficking, debt bondage and servitude, forced or compulsory labour, including the forced or compulsory recruitment of children for armed conflict

- Recruiting, procuring or offering a child for prostitution, for the production of pornography or for pornographic performances
- Recruiting, procuring or offering a child for illicit activities, in particular for the production and trafficking of drugs
- Work which based on its nature or the circumstances in which it is carried out is likely to be harmful to the health, safety or morals of children.

2 Combating forced labour

We condemn all forms of forced labour. This includes any work or service that is required of a person under threat of punishment and for which they have not

volunteered, e.g. as a consequence of bonded labour or human trafficking.

3 Slavery

We condemn all forms of slavery, slavery-like practices, servitude or other forms of domination or oppression in the

workplace, such as extreme economic or sexual exploitation and humiliation.

4 Occupational health and safety

We condemn any disregard of occupational health and safety obligations applicable under the law of the place of employment where this leads to a risk of accidents at work or work-related health hazards, notably on the grounds of

- inadequate safety standards in the provision and maintenance of the workplace, workstation and work equipment,

- insufficient protective measures for preventing exposure to chemical, physical or biological substances,
- insufficient measures for preventing excessive physical and mental fatigue, due in particular to the inappropriate organisation of work in terms of working hours and rest breaks,
- inadequate training and instruction of employees.

5 Freedom of association

We reject any violation of the freedom of association. All our suppliers are obliged to respect the right of their employees to form or join trade unions, and not to use the creation, subscription to and membership of a trade union

as a reason for unjustified discrimination or retribution. In addition, all our suppliers must respect the right of trade unions to operate freely and in accordance with the law of the place of employment.



6 Protection against discrimination

Everyone must be treated equally. We reject any form of unequal treatment based on various characteristics – nationality and ethnic origin, social background, health status, disability, sexual orientation, age, gender, political

opinion, religion or belief – unless justified by the requirements of the job; unequal treatment includes, in particular, unequal pay for work of equal value.

7 Payment of appropriate wages

We reject any withholding of appropriate pay and expect our suppliers to pay an appropriate wage. The adequacy of

a wage is judged against the minimum wage determined by the applicable law at the place of employment.

8 Sustainability and environmental protection

We expect our suppliers to be committed to environmental protection principles. This includes compliance with all applicable requirements for the handling, storage, transportation, disposal, recycling and reutilisation of waste, waste gases and wastewater. We also expect our suppliers to commit to climate-protecting principles, especially the

economical use and conservation of natural resources and ensuring and demonstrating continuous ecological optimisation at production and administrative sites (e.g. reducing raw material and energy consumption, emissions, wastewater, noise emissions, waste, hazardous substances and dependence on natural resources with the help of clear targets and optimisation strategies).

9 Expectations placed on suppliers and supplier obligations

We expect our suppliers to publicise the availability of Sana Hintbox, the established and trusted digital whistleblower system already in place at Sana Group prior to enforcement of the LkSG, for the purpose of duly reporting human rights

and environmental violations both among their own employees and vis-à-vis their suppliers, and to encourage all individuals potentially affected to report violations of this Supplier Code of Conduct via <https://hintbox.sana.de/>.

10 Audits

Sana Group suppliers are obliged to accept audits. The respective customer may therefore, at its own expense and with prior notice of at least five (5) business days, conduct an audit at the respective premises and/or operational site or arrange for an audit to be conducted by an independent auditor during standard business hours to verify that direct suppliers are fulfilling the obligations under the LkSG and are operating in accordance with the provisions of the Supplier Code of Conduct. Upon request, the respective customer or its representative must be provided with all reasonable assistance and access to facilities, offices,

employees and documents. Suppliers must make every effort to cooperate with the audit to the best of their ability, to provide the information required to conduct the audit in a timely and appropriate manner, and to support the customer's appointed representatives and/or the auditors accordingly.

Upon request, the respective customer must be provided with copies of certificates – where available – demonstrating compliance with the provisions of the LkSG.



11 Remedial mechanisms and action

If violations of human rights or environmental laws are identified or suspected, appropriate remedial action is to be taken immediately. As a rule, 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. Depending on the severity of the human rights or environmental violation, the action specified therein can range from mere warnings to termination of the business relationship. Corresponding violations and their remediation must be continuously documented and archived in accordance with the statutory provisions.

12 Contacts

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