



VAMED
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CLINICAL CODE OF CONDUCT

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01 | GENERAL SCOPE OF APPLICATION

The VAMED Group is committed to comply with ethical standards towards its employees and business partners as described in the VAMED Code of Conduct.

VAMED's corporate culture is legally compliant and is to be practiced in an ethically impeccable manner. VAMED not only attaches importance to generating results but also to how they are achieved.

Working in a clinical environment imposes further requirements and responsibilities on the company above and beyond those contained in the VAMED Code of Conduct designed to apply to the general business environment. For this reason, the VAMED Clinical Code of Conduct was developed.

The VAMED Clinical Code of Conduct is designed to complement the VAMED Code of Conduct and applies throughout the world to:

- ▶ the entire medical staff of the VAMED Group such as nursing staff, therapeutic staff as well as all employees of the VAMED Group who are in contact with patients or provide services on their behalf (personal scope) as well as
- ▶ VAMED subsidiaries and the healthcare facilities managed by VAMED e.g. via operating and management contracts (material scope)

This VAMED Clinical Code of Conduct does not include a complete set of rules and regulations covering all applicable laws, guidelines and standards. If any stipulation contained in this VAMED Clinical Code of Conduct deviates from applicable legal regulations it is essential to comply with the respective provision which, on the one hand, is in accordance with the currently valid body of laws, and on the other hand, is more demanding with respect to the ethical and medical principles VAMED adheres to.

The medical staff of the VAMED Group is:

- ▶ obliged to support and apply the principles specified in the VAMED Clinical Code of Conduct in their everyday working life,
- ▶ required to adhere to the stipulations contained in the VAMED Clinical Code of Conduct,
- ▶ responsible for reporting suspected violations of the VAMED Clinical Code of Conduct to the responsible Compliance Officer and is
- ▶ obliged to take part in compliance trainings (e.g. e-learning)

The executives of the VAMED Group healthcare facilities are required to ensure that the medical staff is familiar with the contents of this VAMED Clinical Code of Conduct and further regulations contained in the VAMED Code of Conduct and that the valid rules are complied with.

The responsible Compliance Officer is to be contacted in case any questions arise in connection with the VAMED Clinical Code of Conduct.

02 | INTERACTION WITH **PATIENTS**

All decisions and actions must be measured by whether or not and to what extent they serve the well-being and safety of our patients.

Patients have special legal rights when they make use of healthcare services. The respective legal regulations are to be complied with in accordance with the respective national laws. However, in principle, the following applies to all VAMED facilities.

02|01 INFORMATION AND CLARIFICATION

Patients have the right to be appropriately informed and made aware of diagnoses, therapies and medical measures.

This clarification must take place in a manner which is understandable to the people concerned and must include information about possible therapy options. The right of the patient to view his or her patient records must be ensured.

02|02 CAREFUL TREATMENT AND SELF-DETERMINATION

There is no guarantee of success in the medical profession when it comes to curing a disease.

Nevertheless, patients have the right to carefully implemented treatment and care in line with the latest scientific findings or recognized methods without the use of physical or psychological violence. The right to self-determination must be respected i.e. respective patients may only be treated with their express approval (Declaration of Consent). A Patient Decree must be respected.

02|03 DIGNITY AND PRIVACY

The care of patients is to be carried out in a considerate manner, respecting their personal values and beliefs and supporting personal freedom.

Treatment is to be provided without distinctions being made as to a person's age, gender, origin, religion, wealth, the type and cause of the illness etc. (principle of non-discrimination).

The needs of the patient with respect to privacy are respected. Information about patients is considered to be confidential and must be protected against loss or misuse in accordance with applicable data protection regulations.

02104 CONFIDENTIAL INFORMATION AND DATA PROTECTION

Special protection is granted to safeguard the relationship of trust between patients and the healthcare facility entrusted with caring for them.

Patient data is to be handled in a strictly confidential manner in accordance with the relevant applicable legal regulations. It is not permitted to read patient data when this is not required within the context of the work to be done.

The dissemination of data and enabling third parties to gain access to data is only permissible within the framework of legal provisions or with the approval of the patient.

03 | BEHAVIOUR AND ACTION OF THE **MEDICAL STAFF**

The medical staff must behave respectfully towards patients. Appropriate care must be exercised in all activities involved in treating and taking care of patients in accordance with relevant national legislation.

03|01 COMMUNICATION WITH PATIENTS

In talking with patients, it is essential:

- ▶ to plan a sufficient amount of time;
- ▶ to use clear, understandable language;
- ▶ to create a level of trust in an atmosphere free from accusation;
- ▶ to respect their opinion;
- ▶ not to dominate the discussion as a doctor;
- ▶ to do everything possible to avoid any disturbances and
- ▶ to take account of all relevant information e.g. living conditions.

Questioning the patients is designed to make sure that they understand the information. Agreements concluded with patients during the discussions must be upheld.

03|02 PROFESSIONAL RESPONSIBILITIES

Medical treatment must be carried out in line with the latest scientific findings and by weighing the benefits and risks (e.g. side effects of drugs). In case of doubt, a second expert opinion is warranted.

Medical staff, nursing staff as well as therapeutic staff are only allowed to perform medical services which they are proficient in and for which they are (legally) authorized. Regular training ensures up-to-date medical knowledge.

The treatment of patients must be precisely documented and kept confidential in line with the applicable data protection regulations. The proper handover to subsequent practitioners must be ensured.

Interdisciplinary and cross-hierarchical cooperation is necessary in the treatment of patients. In the process, a team culture should be developed and promoted.

04 | QUALITY MANAGEMENT

In the field of healthcare, the acquisition and exchange of knowledge is crucial for the quality of medical services or all services rendered on behalf of patients. VAMED can only achieve its corporate objectives and meet its quality standards with qualified and motivated employees.

VAMED's extensive offerings enable the company to maintain and enhance the high level of expertise and qualifications of all employees. Annual employee appraisals are the basis for the individually tailored qualification measures targeting employees. Legal requirements for further education and professional development are always complied with. This especially includes the regular training for the use of medical equipment. Employees play an active role in planning their training.

To ensure the quality of medical services and all other services, patient satisfaction at VAMED healthcare facilities is surveyed using various methods. This allows potential for improvement to be identified and exploited.

04 | 01 QUALITY STANDARDS, SAFETY AND HYGIENE

VAMED's medical facilities and clinical departments are certified in accordance with relevant international quality standards or strive to be granted such certifications.

Examples of medical quality standards:

- ▶ JCI - Joint Commission International
- ▶ KTQ - Cooperation for Transparency and Quality
- ▶ EN 15224 - Quality Management System in Healthcare
- ▶ E-QALIN - Quality Management System in the Care Sector
- ▶ ISO 9001 – Quality Management System (general)

The VAMED Clinical Code of Conduct must be taken into account when implementing these quality standards. Any incompatibilities are to be reported to the responsible Compliance Officer.

VAMED is aware of the significance and challenge of infections in connection with operating medical facilities and clinical departments. VAMED takes the issues of safety and hygiene very seriously and sends employees to participate in numerous working groups and networks focusing on safety and hygiene in healthcare facilities. We constantly work on further developing awareness-building and prevention measures. Employees are required to resolutely adhere to legal and internal regulations on safety and hygiene standards. More information on the issues of safety and hygiene can be found in the respective site-specific guidelines.

04 | 02 MEDICAL PROCESSES

Clearly defined clinical pathways must be set up and adhered to for every treatment (therapy). These clinical pathways are to be steadily further developed and adapted to the particular needs of the patient within the context of an individual treatment plan.

In any case, it is essential to specify and document:

- ▶ the admission process;
- ▶ the medical treatment process;
- ▶ the discharge process.

04 | 03 STORAGE OF MEDICINES

The proper storage of medicines is essential. The storage conditions (e.g. light protection, temperature, hygiene) prescribed by the product manufacturer as well as the valid legal regulations applicable to the storage of medicines must be strictly complied with.

It must be ensured at all times that unauthorized persons do not gain access to medication. This can be effectively done by means of suitable organizational measures and technical systems.

Responsibility for compliance with all valid laws and regulations with respect to storing pharmaceuticals is in the hands of the person in charge of relevant activities and operations.

05 | INTERACTION WITH SUPPLIERS AND REFERRING PHYSICIANS

05|01 CONFLICTS OF INTEREST

A conflict of interest can arise if personal interests, particularly of a financial nature, or other personal activities of the employees are influencing or could influence the employees ability to make objective decisions within the context of their professional obligations.

VAMED employees, especially the medical personnel, are expected to avoid situations in which their personal interests are in conflict with the interests of the company or those of patients. Every situation in which a VAMED employee financially or personally profits or could profit due to his position within the VAMED Group or a person associated with him represents a conflict of interest. It is prohibited to accept such financial or personal advantages.

By disclosing secondary activities and cooperations with external partners or other third parties, potential conflicts of interest are identified. Such conflicts of interest are to be documented and assessed as well as measures taken to resolve these conflicts. The transparency gained in this manner serves as the basis for demonstrably making independent and exclusively objective, quality-driven decisions. Conflicts of interest must be promptly reported to the responsible Compliance Officer.

Examples of a conflict of interest / personal advantage:

- ▶ A physician employed by a VAMED subsidiary is a shareholder in a medical technology company supplying the (another) VAMED subsidiary.
- ▶ A physician employed by a VAMED subsidiary receives a price discount for medical products for his private practice or a personal advantage from a medical technology company, because the VAMED subsidiary is supplied by this medical technology company with the same medical products.

05102 REFERRALS

Referrals from medical staff must only be based on medical findings and the treatment requirements of the patients and under no circumstances as a favor or due to other advantages granted to the referring medical staff.

Example of improper referral: preferential treatment in scheduling appointments for patients of a certain referring physician.

05 I 03 ACCEPTANCE OF GIFTS AND HOSPITALITY

Medical staff is not permitted to accept any inappropriate gifts and hospitality.

Gifts and hospitality (even of a low value) are inappropriate in any case if they are directly or indirectly connected with the prescription of medicines or acquisition of medical products.

Invitations/ training courses/ hospitality may only be accepted if all the following prerequisites are fulfilled:

- ▶ Events of an informative nature or those involving training in the field of medicine/ healthcare and the professional field of work of the respective employee.
- ▶ The location as well as the predominant part of the event correspond to the scientific objective, purpose of the training or the practical application of medical treatment.
- ▶ Reimbursement for travel costs or accommodations, appropriate hospitality and an appropriate fee for active participation are permissible.

Events characterized by a considerable share of entertainment as well as reimbursement of costs for accompanying persons are **not permissible**.

05 I 04 DOCUMENTATION AND INVOICING

Agreements, especially those with payers and suppliers, are to be concluded in writing in compliance with all valid legal regulations.

All documentation, invoicing and data compilation must be complete, timely and in accordance with legal stipulations as well as existing requirements for the VAMED Group.

01 | WHISTLEBLOWING & COMPLAINT SYSTEMS

VAMED offers its employees, business partners and their employees, competitors and other stakeholders various channels to report possible violations of this Code.

All employees are free to report possible (past) violations or imminent violations of this Code to their supervisors or the Compliance Officer responsible for them.

Employees who report a possible violation in good faith (i.e. who have good reason to believe that their information is true) must not be disadvantaged in any way. However, employees who recklessly or knowingly make false suspicions or accusations shall face consequences.

All employees have access to the communication tool "VAMED Improvement and Anonymous Whistleblower System" on the VAMED intranet site "Compliance", which can be used to report a possible violation while preserving the anonymity of a whistleblower and to communicate with the Chief Compliance Officer of the VAMED group.

Furthermore, a VAMED Compliance Ombudsman is available to employees as well as to all persons outside the company, in particular business partners and their employees, VAMED's competitors and other stakeholders, to whom possible violations can be reported and with whom confidential communication with the whistleblowers or complainants is ensured.

In addition, to report a possible violation all whistleblowers are free to contact the Chief Compliance Officer of the VAMED group directly or to send an anonymous letter.

The contact details of the VAMED Compliance Ombudsman and of the Chief Compliance Officer of the VAMED group as well as detailed information on the complaint procedure are published on the VAMED website "Compliance".

Gender equality

We attach great importance to gender equality. We therefore use gender-neutral language in this Code as far as possible, but for reasons of better readability we may deviate from this in some places. However, where personal terms are used, these always include all gender identities equally.

