

VIACAMA

VIACAMA HUMAN RIGHTS DECLARATION

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01 | Our Human Rights Responsibility

As defined in our VIACAMA Code of Conduct, we consider it part of our corporate responsibility to conduct business in an ethical and responsible manner. This includes respecting internationally recognised human rights, protecting the environment and using resources efficiently. In doing so, we are guided by international standards and applicable legislation.¹

This document acknowledges our commitment to supporting, protecting and promoting human rights and closely related environmental issues - in the following collectively referred to as "human rights". It builds on our Statement of Commitment on Human Rights published in 2020, reflects the further development of our efforts to embed human rights in our business activities and complements other relevant policies where applicable. It also complies with the requirement of the German Act on Corporate Due Diligence in Supply Chains (Lieferkettensorgfaltspflichtengesetz - LkSG) to publish a statement of principles on human rights.

The principles set out in this statement apply to all our business activities and to all employees of the VIACAMA group. The VIACAMA group comprises the following Business Units:

- VAMED Standortentwicklung und Engineering GmbH
- VAMED Management und Service GmbH
- VIACAMA Technical Services GmbH
- VAMED-KMB Krankenhausmanagement und Betriebsführungsges.m.b.H.

Furthermore, this statement also covers VIACAMA AG (holding company of the VIACAMA group).

02 | Our basic Principles

In order to make our human rights responsibility clear, we explicitly commit to the following human rights aspects - both in our own business activities as a group and in our supply chains - as fundamental principles for our corporate actions.

¹Our commitment outlined in this statement is guided by the United Nations Guiding Principles on Business and Human Rights (UNGPs) and relevant internationally recognised human rights standards and frameworks, such as the United Nations (UN) Universal Declaration of Human Rights, the United Nations International Covenant on Economic, Social and Cultural Rights, the United Nations International Covenant on Political and Civil Rights, the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work. In cases where international human rights standards are restricted by local laws, we strive to promote the principles reflected in the international standards without conflicting with local laws.

We are committed to complying with applicable national laws, such as the German Act on the Due Diligence Obligations of Companies in Supply Chains (Lieferkettensorgfaltspflichtengesetz - LkSG).

02 | 01 PROVIDING FAIR AND SAFE WORKING CONDITIONS

We are committed to respectful workplace practices with fair and safe working conditions. We pay wages that meet or exceed local industry conditions or local minimum wages. When setting wages, we take into account the prevailing market conditions². In doing so, we comply with the relevant laws and regulations of the respective place of work and are guided by international labour law standards.

Occupational safety and occupational health are core elements of our business. We are committed to identifying, mitigating and preventing potential hazards and risks to health and safety in the workplace. In this way, we foster a culture that promotes a safe work environment and prevents harm³.

02 | 02 RESPECT FOR THE RIGHT TO FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING

We respect the freedom of association and the right to collective bargaining, including the right of our employees to freely choose whether to form or be represented by a particular collective or trade union, always in accordance with local employment laws.⁴

02 | 03 STRICT REJECTION OF CHILD LABOUR, FORCED LABOUR, EXPLOITATION AND MODERN SLAVERY

We do not tolerate the use or threat of violence or other forms of coercion in our business activities. We strictly prohibit the use, support or approval of exploitative and illegal child or forced labour⁵ and any other form of modern slavery. Employment relationships must be voluntary and employees must be able to terminate them at any time at their own free will and with reasonable notice in accordance with applicable laws. Salaries must be fair and in accordance with the laws of the place of employment and must not be unlawfully withheld.⁶

02 | 04 PROMOTION OF EQUAL TREATMENT AND CONDEMNATION OF DISCRIMINATION

We do not tolerate any form of discrimination, harassment or unjustified disadvantage based on national or ethnic origin, colour, social origin, health status, citizenship, disability, sexual

² Payment of a decent wage at least equal to the minimum wage established by law; guided by International Labour Organisation (ILO) Conventions 26 and 131.

³ Observance of occupational health and safety obligations under the law of the place of work if this creates a risk of occupational accidents or work-related health hazards; guided by ILO Conventions 1, 4, 155 and 164.

⁴ Guided by ILO Conventions 87, 98, 135 and 154.

⁵ Guided by the ILO rules prohibiting child labour below the minimum age under ILO Convention 138 and prohibiting the worst forms of child labour under ILO Convention 182.

⁶ Respect for the prohibition of forced labour, with the exception of work and services in accordance with ILO Conventions 29 and 105 or the United Nations International Covenant on Civil and Political Rights of 1966.

orientation, age, gender or gender identity, gender expression, marital status, pregnancy, political opinion, religion or belief and any other criteria protected by local laws and regulations⁷.

02 | 05 PROTECTION OF SOCIETY AND THE ENVIRONMENT

We are aware of the close connection between human rights and environmental protection, and this is the declared basis of our actions. We are therefore committed to protecting the environment and to using its resources carefully. Accordingly, VIACAMA's business activities aim at avoiding possible negative impacts on the environment and health.

By doing so, we commit ourselves to refrain from damaging or impairing soils, water and air pollution, unnecessary noise pollution and excessive water consumption in the course of our business activities, to preserve people's health, the natural basis for food production and people's access to clean drinking water or sanitary facilities.

We do not participate in the unlawful displacement of people or the unlawful expropriation of land, forests or waters that provide people's livelihoods.

02 | 06 PROTECTION OF PERSONAL DATA AND CONFIDENTIAL INFORMATION

We respect the privacy of every person. We are aware of our responsibility for the personal data of our patients, employees, customers and suppliers and are committed to protecting personal data and confidential information. In doing so, we take into account the particular sensitivity of employee data as well as patient data and health data.

02 | 07 TAKING RESPONSIBILITY IN OUR SUPPLY CHAINS

The high standards we set for ourselves are also expected from third parties with whom we work. We expect our suppliers and other business partners to respect the principles set out in this statement. This includes the practical implementation of appropriate processes to respect human rights. We therefore expect our suppliers and other business partners to demonstrate how they comply with the human rights principles relevant to us.

⁷ Guided by ILO Conventions 110, 111 and 159.

03| How we implement our commitment to respect Human Rights

In order to fulfil our responsibility towards people and the environment, we continuously pursue and further develop our human rights risk analyses and due diligence measures. In line with our group-wide approach, each business unit has established risk management systems according to its specific business model and organisational structure.

Our due diligence is based (both for our own business operations and for our supply chains) on the following four pillars.

03 | 01 RESPONSIBILITIES & GOVERNANCE

The Executive Board of VIACAMA AG monitors our group-wide human rights due diligence programme. Operational implementation is guided by clear responsibilities: We have established a VIACAMA Human Rights Committee as well as appointed human rights officers in each business unit. These human rights officers work closely with the departments relevant for the implementation of our commitment to respect human rights. The specialist departments of the respective business unit, e.g. Human Resources or Procurement, provide their expertise for risk assessment and are responsible for taking appropriate risk management measures in their respective areas of responsibility.

For their part, the managing directors of the individual Business Units provide the Executive Board of VIACAMA AG with all information in an appropriately prepared form so that it can fulfil its human rights due diligence and documentation obligations in the best possible way.

03 | 02 RISK ANALYSIS & IMPACT

We rely on complex supply chains and we are aware that human rights risks can arise both in our own business operations and in our supply chains. Therefore, it is our goal to comprehensively and regularly analyse, document and manage these risks.

In order to identify, terminate, prevent or minimise human rights risks or impacts, we have implemented appropriate risk management processes. For such processes, we have been guided by the UNGP (= United Nations Guiding Principles on Business and Human Rights) as well as applicable national laws.

To identify human rights risk areas, we follow a risk-based approach. In our risk analysis, we consider potential risks according to country- and industry-specific aspects as well as aspects specific to the business field. We prioritise risks based on an additional assessment of the potential impact and likelihood of occurrence, as well as the extent to which we can contribute to the realisation of the risk through our business activities. The risk analysis for our own business activities as well as for the relevant business partners is generally carried out annually and, if required, also on an ad hoc basis.

03 | 03 PREVENTION & REMEDY

In order to prevent, end or minimise human rights risks, VIACAMA's Business Units take appropriate preventive measures within their own business activities or in the business activities of the companies assigned to them as well as in the respective supply chains and implement these measures.

We are committed to taking effective and according to the nature of the violation adequate remedial action, wherever our business activities have caused or contributed to human rights violations.

03 | 04 COMPLAINTS PROCEDURE

We acknowledge the importance of open communication and aim to create an environment where patients, employees, members of local communities and business partners or other potentially affected persons can report potential compliance or human rights violations via the VIACAMA Compliance Ombudsman or via the electronic improvement and anonymous whistleblower system. These are accessible to internal and external stake-holders.

We are committed to appropriately investigating complaints from internal or external stakeholders. If a complaint is found to be justified, we will take appropriate action. We will carefully review complaints to improve our business processes and take steps to correct and improve as necessary.

04 | Human Rights-Related Measures and Focus Areas in the VIACAMA Group

Human rights due diligence for each business unit is aligned with our group-wide approach to human rights. In addition, the business units take into account applicable regulatory

requirements, in line with their business models and their organisational structures. Throughout the VIACAMA group, we incorporate the results of our risk assessments into the adaptation of processes. Wherever risks arise, we take appropriate preventive and remedial measures.

Fair working conditions are an essential part of VIACAMA's mission statement. The corporate culture is characterised by diversity of people, open dialogue, mutual appreciation, respect, caring, clear goals and determined leadership. The values, strategies and goals can be experienced through open, intensive and direct communication.

As an expression of our corporate culture, we are committed to upholding ethical standards not only in our dealings with our own employees, but also with customers, suppliers and other business partners.

In order to ensure compliance with these high standards, VIACAMA has set up a group-wide Compliance Management System, which ensures all (self-)obligations laid down in VIACAMA's mission statement and in the VIACAMA Code of Conduct.

Respect for human rights is also part of our corporate responsibility. Therefore, VIACAMA has implemented a group-wide guideline on the protection of human rights, formulated a VIACAMA Human Rights Declaration, established a human rights organization with a VIACAMA Human Rights Officer, provided for a complaint mechanism, and introduced a human rights risk analysis.

The risk analysis in accordance with the specific requirements of the German Corporate Due Diligence in Supply Chains Act (Lieferkettensorgfaltspflichtengesetz - LkSG) is currently being carried out for our own operations and within supply chains. The results of the risk analysis will be included in the Human Rights Declaration and regularly updated thereafter.

05 | Effectiveness Monitoring

We commit to carefully monitor which regulatory developments related to human rights apply to our own operations and supply chains. We also commit to monitoring the effectiveness of our actions.

Throughout the VIACAMA group, we control our human rights risk management process by conducting annual effectiveness reviews. On this basis, we update remedial or preventive measures as needed.

06 | Documentation & Reporting

VIACAMA will regularly report on efforts to implement human rights due diligence including measures and their progress in accordance with the relevant legal requirements.

We will document all relevant human rights due diligence activities in accordance with relevant legislation.

07 | Looking Ahead

Respecting human rights in all the activities of an international healthcare provider and ensuring compliance in its many supply chains is a complex but forward-looking task. We believe that our stakeholders deserve the patience and care we put into our current and ongoing efforts.

We are determined to listen to and learn from other organisations and stakeholders to make continuous progress along the way.

VIACAMA AG

Executive Board