




Stärker als gestern.

# Clinical Code of Conduct



Our Code of Conduct is an expression of our values, which apply to us in the context of our activities in the field of healthcare and to which we are committed.



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# 1. Introduction, objectives and scope

VITREA is committed to ensuring that its employees and business partners comply with the ethical standards described in the VITREA Code of Conduct.

VITREA's corporate culture is based on acting in a legally compliant and ethically sound manner. VITREA attaches importance not only to achieving results, but also to how these results are achieved.

**Due to the specific nature of medical ethics,** working in a clinical environment entails additional requirements and responsibilities that go beyond the VITREA Code of Conduct designed for the general business environment. For this reason, the VITREA Clinical Code of Conduct was created.

The VITREA Clinical Code of Conduct **supplements the VITREA Code of Conduct** and applies

- to all VITREA medical staff, such as doctors, nursing and therapeutic staff, as well as all employees who are in contact with patients or provide services for them directly or indirectly (personal scope of application),
- as well as for VITREA companies and healthcare facilities managed by VITREA, such as through operating or management contracts (material scope of application).

**This VITREA Code of Conduct** does not constitute a complete collection of regulations covering all relevant laws, guidelines and standards. If any provision of this Code of Conduct deviates from legal requirements, provisions of the VITREA Code of Conduct or internal VITREA guidelines, the provision that complies with the applicable legal requirements and takes into account the higher ethical and medical standards of VITREA shall always apply.

## VITREA medical staff

- must uphold and implement the principles set out in the VITREA Clinical Code of Conduct in their daily work,
- are obliged to comply with the provisions of VITREA's Clinical Code of Conduct and
- are responsible for reporting suspected violations of the VITREA Clinical Code of Conduct to VITREA Compliance or their supervisor, and are required to participate in compliance training (e.g. e-learning) in accordance with existing internal guidelines.

**The managers of VITREA healthcare facilities** must ensure that medical staff are familiar with the contents of this Clinical Conduct Code and the other provisions of the VITREA Code of Conduct, and that the applicable regulations are observed.

If you have any questions regarding the Clinical Code of Conduct, please contact VITREA Compliance or your line manager.





## 2. Dealing with patients

All decisions and actions taken in a clinical setting must be measured against whether and to what extent they serve the well-being and safety of patients.

Patients have special legal rights when they use healthcare services. The respective legal regulations must be taken into account in accordance with the applicable national legislation. In addition, the following applies to all VITREA facilities:

### 2.1 Information and education

Patients have the right to be adequately and sufficiently informed and educated about their diagnoses, therapies and medical measures.

This information must be provided in a form that is understandable to those affected and must include information about possible treatment options. In addition, it must be ensured that patients have the right to inspect their patient files.

### 2.2 Careful treatment and self-determination

In medicine, there is no guarantee of the success of a treatment.

However, patients have the right to careful treatment and care in accordance with the current state of scientific knowledge and recognised methods, without the use of physical or psychological force. The right to self-determination must be upheld, i.e. competent patients may only be treated with their express consent (declaration of consent). Any living will must be observed.

### 2.3 Dignity and privacy

Patients shall be cared for in a considerate manner, with respect for their personal values and beliefs, and in a way that supports their personal freedom.

Treatment must be provided without discrimination on the basis of age, gender, origin, religion, wealth or the nature and cause of the illness (prohibition of discrimination).

The rights and needs of patients with regard to their privacy are respected. Patient data is treated confidentially and protected against loss or misuse in accordance with the applicable data protection regulations.

### 2.4 Confidential information and data protection

Patient data must be kept strictly confidential in accordance with the applicable legal provisions. Access to patient data is only permitted if it is necessary for the performance of the respective professional duties.

The disclosure of patient data and the granting of access to patient data is only permitted within the framework of the statutory provisions or with the consent of the patients.



## 3. Conduct and actions of medical staff

Medical staff must behave respectfully towards patients. During treatment and care, appropriate care must be taken in accordance with the relevant national legislation.

### 3.1 Communication with patients

When talking to patients and relatives,

- clear, understandable language must be used
- a level of trust must be established in a non-judgmental atmosphere,
- respect their opinions,
- not dominate the conversation with medical jargon,
- avoid disruption as far as possible and
- to take all relevant information, such as living conditions, into account.

**Questions should be asked to ensure** that patients have understood the information. Appropriate resources (e.g. translators) should be made available to employees. Agreements made with patients during consultations must be adhered to.

### 3.2 Professional duties

Medical treatments must be carried out in accordance with the current state of scientific knowledge and after weighing up the benefits and risks (e.g. side effects of medication).

In case of doubt, a second expert opinion must be obtained.

Medical staff, as well as nursing and therapy staff, may only provide those medical services for which they are both professionally qualified and legally authorised. Regular further training and continuing education ensure that their medical knowledge is up to date.



Patient treatment must be documented accurately and kept confidential in accordance with the applicable data protection regulations. Proper handover to subsequent practitioners must be ensured.

When treating patients, cooperation across professions and hierarchies is essential. The team culture should be continuously developed and promoted.





**We work closely  
and trustingly  
together  
in treating  
our patients.**



**The aim is to continuously develop  
and promote the team culture.**



## 4. Quality management

In healthcare, the acquisition and exchange of knowledge is fundamental to the quality of medical services and all services provided to and for patients. Only with qualified and motivated employees can VITREA's quality standards and corporate goals be achieved.

With its extensive range of services, VITREA ensures that the high level of professional competence and qualification of all employees is maintained and expanded. Annual employee appraisals form the basis for individually tailored further development and qualification of employees. Legal requirements for training and continuing education are always met. These include, in particular, training and continuing education on the use of medical equipment. Employees are encouraged and motivated to actively participate in the planning process for their continuing education.

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

### 4.1 Quality standards, safety and hygiene

VITREA's medical facilities and clinical areas are certified in accordance with international quality standards or are striving to achieve such certification.

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 Industry,
- ISO 9001 – Quality management system (general).

**The VITREA Clinical Code of Conduct** must be taken into account when implementing these quality standards. Any incompatibilities must be reported to VITREA Compliance or to the supervisor.

VITREA is aware of the importance and challenge of infections in the context of the operation of medical facilities and clinical areas. VITREA attaches great importance to safety and hygiene and sends employees to numerous working groups and networks that deal with these issues in healthcare facilities.

We are continuously working to further develop our education and prevention measures. All employees must consistently comply with legal and internal regulations on safety and hygiene standards.

More detailed information on safety and hygiene can be found in the respective location-specific guidelines.

### 4.2 Medical processes

Clear treatment pathways (clinical pathways) must be defined and adhered to for each treatment (therapy). These treatment pathways must be continuously developed and adapted to the individual needs of the patient in an individual treatment plan.

The following must be defined and documented in all cases:

- Admission process,
- Medical treatment processes and
- discharge process.

### 4.3 Storage of medicines

It is essential that medicines are stored correctly. The storage conditions specified by the product manufacturer (e.g. protection from light, temperature, hygiene, etc.) and the applicable legal provisions for the storage of medicines must be strictly observed.

Appropriate organisational measures and technical equipment must be used at all times to ensure that unauthorised persons do not have access to medicines.

Responsibility for compliance with all applicable laws and regulations governing the storage of medicines lies with the persons responsible for the respective healthcare facility.





## 5. Dealing with suppliers and referrers

### 5.1 Conflicts of interest

A conflict of interest may arise if an employee's personal interests, particularly financial interests, influence or could influence their ability to make objective decisions within the scope of their professional duties.

VITREA employees – especially medical staff – are expected to avoid situations in which personal interests conflict with the interests of the company or patients. Any potential conflict of interest must be communicated to the relevant manager.

### 5.2 Referrals

Medical referrals may only be made on the basis of medical findings and the treatment needs of patients. Referrals may under no circumstances be made as a favour or on the basis of other advantages for the referring medical staff.

### 5.3 Acceptance of gifts and hospitality

VITREA strictly prohibits the granting or acceptance of unfair advantages, whether in the private or public sphere. Gifts are only permitted if they are customary, of low value, unrelated to business and without influence. Cash and monetary benefits are strictly prohibited. Detailed regulations can be found in the VITREA Guideline on the Prevention of Corruption.

Small promotional gifts and hospitality gifts are permitted if they are legally and internally permissible. Invitations to meals are only permitted within reasonable business limits, must be documented, may not be demanded, and relatives may only participate with permission.

More detailed regulations can be found in the Anti-Corruption Policy.

### 5.4 Documentation and accounting

Agreements, in particular with cost bearers, service providers and suppliers, are concluded in writing in compliance with the applicable regulations.

All documentation, accounting and data collection shall be carried out in full, on time and in accordance with legal requirements and VITREA's internal guidelines.





## 6. Responsibilities

### 6.1 Responsibilities of the company management

VITREA's management is committed to ensuring that our high standards of ethical conduct are met. The management teams of the individual companies within the VITREA Group supervise compliance with legal and ethical standards by the companies they manage.

In order to help our employees at all levels comply with this Code, we have taken organisational measures to monitor the implementation of and compliance with our principles and guidelines for conduct.

In addition to their duties as employees, VITREA managers exemplify proper conduct and act in an exemplary manner. They ensure that their employees are made aware of this code and help them to understand and comply with it. They are available as trusted contacts for any questions. In the event of non-compliance with laws or company guidelines, as well as this code, they take the necessary measures.

### 6.2 Responsibility of employees

VITREA's management is responsible for setting the tone from the top. In order to promote an ethical, transparent and compliant corporate culture, all employees are role models and must be aware of this responsibility.

Employees cannot be forced by their superiors to violate the principles set out in this Code.

Employees must be provided with the applicable guidelines and service instructions on proper conduct at all times and informed of any changes in this regard. If they have any questions, all employees can contact their supervisors or VITREA Compliance at any time.





## 6. Whistleblower system

VITREA attaches great importance to reporting violations or suspected violations of legal requirements, this Code of Conduct or the values and principles underlying it. To this end, VITREA has set up a whistleblower system that is accessible to the public.

The communication tool „VITREA Whistleblower System“ is available to all employees and external third parties on the VITREA website <https://www.vitrea-health.com/>, where possible violations can be reported anonymously and communicated to VITREA Compliance. The communication tool can be accessed directly via the following link: <https://vitrea.integrityline.app/>

Alternatively, reports of (possible) misconduct can also be sent to [compliance@vitrea-health.com](mailto:compliance@vitrea-health.com)

When a report is made, the confidentiality of the reporting person's identity is maintained and it is ensured that the reporting person is effectively protected from any disadvantage or sanctioning as a result of the report. VITREA's business partners inform their employees and suppliers about the existence, availability, responsibility and implementation of the whistleblower system.





## 8. Final provisions

### 8.1. Training

To ensure that VITREA's Clinical Code of Conduct is understood and effectively implemented, mandatory compliance training is provided annually for all employees in the form of an online course. VITREA Compliance ensures that all employees participate in the appropriate training.

In addition, mandatory compliance training is part of the onboarding programme for all new employees to ensure that VITREA's code of conduct and ethical standards are recognised and followed from the outset.

### 8.2 Consequences of violations

Disregard for and non-compliance with legal regulations and generally accepted ethical standards can cause lasting damage to VITREA. VITREA therefore consistently pursues all allegations or incidents of violations. This includes the immediate initiation of internal investigations and the taking of appropriate disciplinary measures, including legal action if necessary.

The aim is to maintain the integrity of the company and ensure that all violations are punished appropriately.

### 8.3 Contact person

VITREA Compliance is available to answer any questions you may have regarding the provisions of the VITREA Clinical Code of Conduct and to provide advice in cases of doubt.





## Clinical Code of Conduct | Internal and external | Group Compliance | Version 1.1, 1 March 2026

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

### Information about the document

- Type of document  
Code of Conduct
- Responsible department  
Group Compliance
- Guidelines Owner  
Group Compliance Officer
- Version  
1.1
- Status  
published

### Validity of the document

- This Code of Conduct is binding throughout the Group.
- Hierarchy of the policy:  
Code of Conduct at Group Level / Group Policy
  - Scope: This Code of Conduct applies to all departments, bodies and employees within the VITREA Group.
  - Valid from  
1 March 2026
  - Next review planned:  
1 year after coming into force or as required