




Stärker als gestern.

Code of Conduct for Business Partners

A large, white, stylized graphic element on the left side of the page, resembling a thick, blocky letter 'K' or a similar abstract shape.

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 and objectives

VITREA is a leading group of companies in the operation of health-care facilities, which has established itself as a reliable partner in the healthcare sector thanks to its many years of international experience and high level of expertise.

VITREA is passionately committed to the well-being and quality of life of its patients.

VITREA's services accompany people on their journey through life with sustainable rehabilitation, dignified care and professional acute medical treatment.

- **The aim is** to enable the people entrusted to our care to lead dignified and self-determined lives. In doing so, VITREA always focuses on individual needs, expectations and possibilities.
- **VITREA's corporate culture** is based on legally compliant and ethically correct conduct. VITREA is committed and determined to comply with environmental and human rights standards and to actively integrate them into its business processes.
- **VITREA is committed to** ensuring that the ethical principles upheld by VITREA are also upheld by its business partners. Compliance with applicable legal regulations is a matter of course.
- **In this VITREA Code of Conduct for Business Partners ("Code")**, VITREA has laid down the requirements and principles for cooperation with its business partners, in particular with regard to compliance with ethical standards, applicable law and integrity. Business partners are all companies not belonging to the VITREA Group from which VITREA obtains goods and services. VITREA's business partners shall ensure that the principles set out below are implemented and complied with in all areas of business worldwide and in their supply chain.

- **The Code is based on international agreements** and ethical standards and reflects our commitment – in particular to the Ten Principles of the UN Global Compact, the Sustainable Development Goals, the Universal Declaration of Human Rights and the International Labour Organisation (ILO) Declaration on Fundamental Rights and Principles at Work, as well as the German Supply Chain Due Diligence Act ("LkSG"). However, it is not a complete collection of regulations covering all relevant laws, guidelines and standards. If any provision of this Code deviates from legal provisions, the provision that complies with the applicable laws and is more demanding in terms of the ethical principles upheld by VITREA shall always apply.

VITREA is passionately committed to the well-being and quality of life of its patients.



2. Scope of application

This policy applies to all companies within VITREA, as well as to joint ventures or cooperations under company law and contractual joint ventures or cooperations controlled by VITREA. In addition, the implementation of this policy should also be pursued in companies and joint ventures or cooperations under company law and contractual joint ventures or cooperations in which a VITREA company holds only a minority stake, which are not controlled by a VITREA company or for which a VITREA company performs management or executive tasks but does not hold any shares.

The requirements set out in this Code must be met by all our business partners. VITREA's business partners shall ensure that the principles listed below are implemented and complied with in all areas of business worldwide and in their supply chain.





3. Definitions

3.1 “Public officials”

are persons who perform legislative, administrative or judicial functions for a legal entity under public law and persons who work in state-affiliated enterprises, i.e. companies that are at least 50 per cent state-owned or otherwise effectively controlled by a state, as further defined by the applicable law.

3.2 “HCP” (Healthcare Professional)

is a natural or legal person who, in the course of their professional activities in the healthcare sector, can influence the purchase of VITREA's services.

e.g. on prices, award decisions, orders;
HCPs are in particular doctors, pharmacists and nurses; however, the term also includes hospitals, pharmacies and health insurance companies and their organs and employees.

3.3 “PEP” (Politically Exposed Person)

is a natural person who holds or has held important public office in the last 12 months. Politically exposed persons are treated as equivalent to their “family members” and “persons known to be close to them” – as defined in the applicable legal provisions.



4. Principles of business conduct

Principle of equivalence

In contractual relationships with our business partners, performance and consideration are always in reasonable proportion to each other.

Principle of documentation

All agreements on services provided in return for payment or free of charge within the scope of business conduct and contractual relationships with our business partners must be made in writing and documented and archived in a suitable form. The written form in the above sense includes the written form and the electronic form as a subform of the written form. If the law or a contractual clause stipulates a stricter formal requirement, this must be observed (e.g. notarial form).

Principle of transparency

All business activities and decisions within the scope of cooperation with VITREA must be open, clear and comprehensible. Upon request, business partners must disclose relevant information (such as conflicts of interest, business practices and financial and contractual agreements) to the responsible VITREA employee in a complete and truthful manner and avoid any opaque or obscuring practices.

The relevant principles (principle of equivalence, principle of documentation, principle of separation) must always be observed.


Separation principle

Private and business interests must be strictly separated. Business decisions must not be influenced by personal interests. In particular, this means that employees and business partners must not derive any private benefits from their business activities (e.g. money, goods or services) or advantages from personal relationships that could influence their objectivity in decision-making. VITREA expects its business partners to proactively inform it of any situations that could lead to a conflict of interest.





**We always treat our
business partners
fairly, respectfully
and reliably.**



**All transactions must be conducted
in compliance with the legal provisions
applicable in the respective country for
the protection of fair competition.**



5. Fair competition

5.1 Compliance with legal provisions

All transactions must be conducted in compliance with the legal provisions applicable in the respective country for the protection of fair competition.

5.2 Compliance with antitrust regulations

We ensure compliance with the prohibition of cartels, the prohibition of abuse of a dominant market position and the prohibition of unlawful mergers or acquisitions.

No illegal agreements may be made with business partners that have the effect or purpose of restricting competition. Not only written and verbal agreements are prohibited, but also concerted practices with the same objective.





6. Prevention of corruption

6.1 Bribery, granting of advantages or acceptance of gifts

It is prohibited to demand, accept or allow oneself to be promised an advantage for the improper performance or omission of a legal act by another person for oneself or a third party. Furthermore, it is prohibited to offer, promise or grant an employee or agent of a company a benefit that is more than insignificant for the performance or omission of a legal act in breach of duty for that person or a third party.

When dealing with politically exposed persons, healthcare professionals and public officials, it must be ensured that the potentially stricter requirements of the applicable local legislation are complied with.

Advantages include not only monetary payments, but also any material or immaterial advantage, such as the provision of airline tickets, the giving of gifts, invitations to business meals, or the payment of hotel expenses.

6.2 Granting of gifts

The granting of gifts with the intention of initiating business transactions is not permitted. Only customary gifts that are in keeping with the culture of the country in question, do not exceed the de minimis limit according to the legal standards of the country in question and do not constitute monetary gifts are permitted.

It is prohibited to demand, accept or allow oneself to be promised an advantage for the improper performance or omission of a legal act by another person for oneself or a third party.





7. Prevention of money laundering and terrorist financing

VITREA's business partners must ensure that the applicable legal provisions for the prevention of money laundering and terrorist financing are complied with.

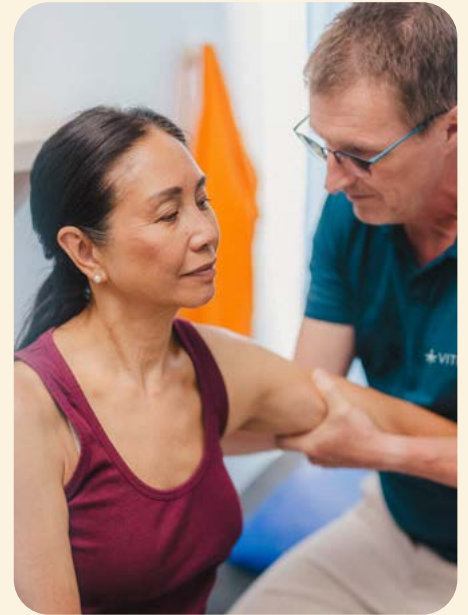




8. Compliance with economic sanctions

Economic sanctions are trade or financial sanctions imposed by one or more countries specifically against a state, group or natural/legal persons. As an internationally active group of companies, VITREA has implemented the measures required by law to ensure that it does not conduct business with sanctioned states, groups or persons.

VITREA's business partners strictly adhere to the applicable laws and regulations governing the import and export of goods, services and information, as well as the applicable embargoes and sanctions.





9. Handling of documents and information

9.1 Purpose of transfer

Documents and/or commercial information transmitted by VITREA in the course of business may only be used for the purposes of cooperation with VITREA and must be treated as confidential.

The business partner undertakes to meet the reasonable expectations of its client, suppliers, customers, consumers and employees with regard to the protection of private information. The supplier must comply with data protection and information security laws and official regulations when collecting, storing, processing, transmitting and passing on personal information.

9.2 Disclosure of documents

Any use of these documents and information other than for the purpose of cooperation with VITREA and/or disclosure to third parties is not permitted.

Intellectual property rights must be respected; technology and know-how transfer must be carried out in such a way that intellectual property rights and customer information are protected.

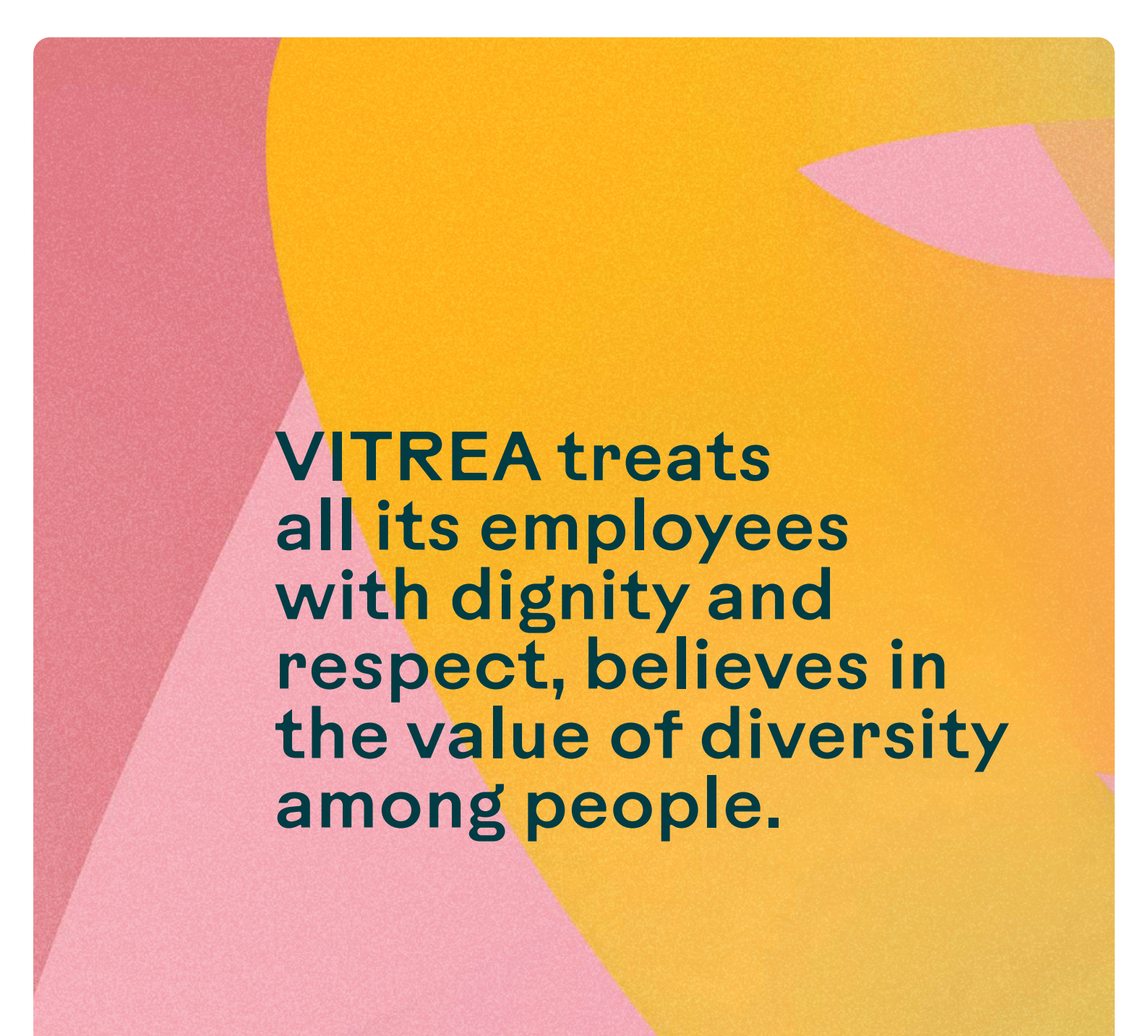





10. Accounting and reporting

All documentation, accounting and data collection in connection with the cooperation with VITREA must be complete, proper and correct, prepared in a timely manner and comply with the applicable legal and contractually agreed requirements.





**VITREA treats
all its employees
with dignity and
respect, believes in
the value of diversity
among people.**



**VITREA expects its business partners
to support equal opportunities for all
people.**



11. Healthy, safe and social working environment

11.1 Health and safety

As a group operating in the health-care sector, VITREA attaches the utmost importance to the health and safety of its own employees, as well as the employees of its direct business partners and indirect suppliers, and all people affected by its business activities. By establishing a suitable work organisation and effective safety precautions, VITREA ensures protection against accidents at work and health impairments, especially when handling hazardous chemical, physical or biological substances. VITREA also expects this from its business partners and indirect suppliers. Employees of VITREA's business partners and indirect suppliers must have access to high-quality, affordable healthcare in a timely manner. Furthermore, appropriate measures must be taken to prevent excessive physical or mental fatigue among employees and to ensure an appropriate workload. In particular, regular breaks, reasonable working hours and ergonomic workplaces must be guaranteed.

Working hours must also comply with applicable laws or industry standards.

11.2 Compliance with health protection regulations

VITREA insists that, in the course of cooperation with its contractual partners, all regulations serving to protect the health and safety of VITREA employees and its business partners and in accordance with the social values of the European Union and the applicable law of the place of employment are always observed. Appropriate occupational safety systems are established and implemented to take the necessary precautions against accidents and damage to health that may arise in connection with the work. In addition, employees are regularly informed and trained on applicable health and safety standards and measures. Employees are provided with access to sufficient drinking water and clean sanitary facilities.

Business partners shall ensure that their suppliers also comply with these requirements.

11.3 Working without impairment

VITREA expects its business partners to carry out their work without impairment from alcohol, illegal drugs or other substances. This also applies to the use of medically prescribed medication if it impairs the ability to work.

11.4 Compliance with human rights and ILO conventions

VITREA treats all its employees with dignity and respect, believes in the value of diversity among people and in the workplace, and, in addition to complying with applicable labour law provisions as a matter of course, is committed to upholding human rights in accordance with the United Nations Universal Declaration of Human Rights, the International Covenants on Economic, Social and Cultural Rights, and the ILO (International Labour Organisation) conventions. VITREA expects its business partners to feel the same commitment.

11.5 No discrimination

VITREA expects its business partners to support equal opportunities for all people and to adhere to the prohibition of discrimination in the workplace.

Business partners shall not discriminate against employees on the basis of age, gender, sexual orientation, national, social or ethnic origin, disability, political opinion, trade union membership, pregnancy, religion, beliefs or marital status when hiring and terminating employment relationships, as well as in career advancement through promotion, performance bonuses, salary classification and/or the assignment of tasks.



11.6 No threats or other harassment

VITREA expects its business partners not to tolerate violence, intimidation, coercion or threats, as well as sexual or other harassment towards their employees. The commissioning or use of private or public security forces is prohibited if, during their deployment, persons are tortured, treated in a cruel, inhuman or degrading manner, injured or killed, or if their freedom of association is impaired.

11.7 No forms of illegal labour

VITREA rejects any form of illegal labour and expects its business partners to supply goods and provide services exclusively on the basis of legal labour and without any form of child labour, forced or slave labour or compulsory labour. All work must be voluntary and carried out without the threat of punishment or other serious harm. Any form of domination or oppression in the workplace is prohibited. Employees must not be younger than the age at which compulsory schooling ends according to the law of the place of employment and in any case not younger than 15 years of age. Young employees under the age of 18 may not be employed for work that is harmful to the health, safety or morals of children. Special protective regulations must be observed. The UN Convention on the Rights of the Child and the UNICEF criteria against harmful exploitation must be observed.

11.8 Fair pay

Remuneration for regular working hours and overtime must be adequate and in line with the applicable statutory minimum wage or industry minimum standards, whichever is higher. Employees must be granted all benefits required by law. Wage deductions as punitive measures are not permitted. The business partner must ensure that employees receive clear, detailed and regular written information about the composition of their remuneration.

11.9 Freedom of association and the right to collective bargaining

The right of employees to form and join organisations of their choice, to engage in collective bargaining and to strike must be respected. In cases where freedom of association and the right to collective bargaining are restricted by law, alternatives for independent and free association of employees for the purpose of collective bargaining must be made available. Employees must not be discriminated against on the basis of establishing, joining or being a member of such an organisation.





12. Environmental protection

12.1 Sustainability

When implementing projects, consideration must always be given to environmentally friendly service provision and sustainability. The diversity, uniqueness and beauty of nature and the landscape, as well as biodiversity (ecosystems, species diversity, habitats), must be preserved through the sustainable use of nature and its resources.

12.2 Ecological principle and protection of natural resources

Within the limits of what is economically feasible, priority must therefore always be given to ecologically valuable solutions. Legal provisions on environmental protection must be complied with without restriction. Similarly, regardless of their legal implementation, the prohibitions on the export of hazardous waste in the Basel Convention of 22 March 1989, the use of mercury in the Minamata Convention of 10 October 2013 and the handling of persistent organic pollutants in the Stockholm Convention of 23 May 2001, in their current versions, must be observed.

Harmful changes to the soil, water and air pollution, noise emissions and excessive water consumption must be avoided if they harm human health, significantly impair the natural basis for food production or prevent people from accessing safe drinking water or sanitation facilities. Land, forests or water bodies whose use secures the livelihoods of people must not be taken away in violation of legitimate rights.

Wastewater from operational processes, manufacturing processes and sanitary facilities must be classified, monitored, checked and, if necessary, treated before discharge or disposal. In addition, measures should be introduced to reduce the generation of wastewater.

Energy consumption must be monitored and documented. Cost-effective solutions must be found to improve energy efficiency and minimise energy consumption.

12.3 Handling of conflict minerals

For the conflict minerals tin, tungsten, tantalum and gold, as well as for other raw materials such as cobalt, the company establishes processes in accordance with the guidelines of the Organisation for Economic Co-operation and Development (OECD) for the fulfilment of due diligence to promote responsible supply chains for minerals from conflict and high-risk areas, and expects the same from its suppliers. Smelters and refineries without adequate, audited due diligence processes should be avoided.

12.4 Responsible sourcing of raw materials

Natural resources must always be used sparingly. VITREA's business partners are required to ensure that the raw materials used in the products they manufacture do not directly or indirectly serve to support groups that are guilty of human rights violations. VITREA's business partners should exercise due diligence with regard to the origin and chain of custody of these raw materials.

12.5 Handling of waste and hazardous substances

The supplier shall follow a systematic approach to identify, manage, reduce and responsibly dispose of or recycle solid waste. The prohibitions on the export of hazardous waste in the Basel Convention of 22 March 1989, as amended, must be observed. Chemicals or other materials that pose a hazard when released into the environment must be identified and handled in such a way that safety is ensured when handling, transporting, storing, using, recycling or reusing these substances and when disposing of them. Mercury must be used in accordance with the prohibitions of the Minamata Convention of 10 October 2013, and persistent organic pollutants in accordance with the Stockholm Convention of 23 May 2001, as amended.



13. 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

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.





14. Management responsibility

14.1

Ensuring compliance within the company

Business partners and the management of VITREA's business partners must take appropriate measures to ensure that their employees comply with the provisions of this Code.

14.2

Ensuring compliance in the supply chain

If VITREA purchases goods or services from business partners who procure them from third parties (suppliers), VITREA requires its business partners to take appropriate and effective measures to ensure that their suppliers also comply with the provisions of this Code of Conduct. VITREA expects its business partners to actively monitor compliance with the requirements set out in this Code within their supply chain and to take appropriate corrective action where necessary.

14.3

Monitoring and audits

VITREA may carry out monitoring measures (including through third parties) to monitor compliance with the principles set out in this Code, including the use of questionnaires, on-site inspections of business premises in serious cases, review of available information or other measures necessary to verify the performance of a business partner. Business partners are expected to cooperate with VITREA and/or share information as necessary to demonstrate that the business partner itself complies with the principles set out herein and also promotes them in its supply chain through appropriate measures.





Code of Conduct for Business Partners | 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