



Human Rights Policy

01. 01. 2026

 **VITREA**
Human Rights Policy

Group-wide policy on the protection of human rights

Internal | Group Sustainability & ESG, Group Compliance

Version 1.0

We attach great importance to equal treatment, diversity, and inclusion. Gender-neutral language is therefore used in this policy. Where possible, references to persons are gender-neutral or use a colon. For reasons of readability, different wording may be used in individual cases. However, all references to persons refer equally to all gender identities and stand for respect, equality, and diversity in our company.

Table of contents

1. Introduction and objectives	4
2. Scope of application	4
3. Our responsibility as a company – “VITREA Human Rights Declaration”	5
4. Risk analysis on human rights and ESG	6
5. Implementation in operational activities	7
6. Implementation in the supply chain	7
7. Complaints mechanism and whistleblower channels	7
8. Further development and review	8
9. Responsibility and governance.....	8
10. Implementation	8

1. Introduction and objectives

At VITREA, we are committed to protecting and promoting human rights in all areas of our business. This policy reflects our commitment to acting as a responsible company that respects the dignity, freedom and rights of all people, ensures fair working conditions and makes a positive contribution to the environment and society.

Our approach is based on internationally recognised human rights standards, in particular the UN Guiding Principles on Business and Human Rights and the ten principles of the UN Global Compact. In addition, VITREA actively supports the implementation of selected United Nations Sustainable Development Goals (SDGs), in particular:

SDG 3 – Good health and well-being

SDG 5 – Gender equality

SDG 8 – Decent work and economic growth

SDG 13 – Climate action

The aim of this policy is to ensure that all actions, processes and decisions within the VITREA Group are in line with these principles and contribute to sustainable, fair and responsible corporate development.

2. Scope of application

The Human Rights Policy applies to all companies within the VITREA Group (hereinafter referred to as “VITREA” or collectively as “the VITREA companies”), as well as to corporate and contractual joint ventures or cooperations controlled by VITREA. Furthermore, 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 VITREA only holds a minority stake, which are not controlled by VITREA, or in which VITREA performs management or executive tasks but does not hold any shares.

3. Our responsibility as a company – “VITREA Human Rights Declaration”

Respecting human rights is part of our corporate responsibility.

VITREA is committed to:

- treating all employees with dignity, respect and appreciation,
- prevent discrimination, harassment, violence, coercion or intimidation in any form,
- ensure equal opportunities for all people and actively promote diversity,
- ensure safe, healthy and inclusive working conditions,
- understand data and patient safety as a central component of ethical corporate governance, and
- live the principles of good corporate governance as the basis for trustworthy value creation.

No one should be treated unfairly because of their gender, age, background, skin colour, sexual orientation, religion, political beliefs, disability, or family situation. VITREA totally rejects any form of child labour, forced labour, or illegal labour, and recognises the right to freedom of association, collective bargaining, and co-determination.

As a group of companies operating in the healthcare sector, VITREA is aware of its special responsibility towards patients, employees and business partners. The physical and mental health, safety and self-determination of patients and employees are at the heart of everything we do.

Data protection and information security are understood to be an essential part of personal rights. The protection of personal data follows the principles of confidentiality, transparency and proportionality.

We are committed to the responsible use of natural resources, the continuous reduction of emissions and the use of climate- and resource-friendly technologies.

We expect our business partners to make a clear commitment to protecting human rights and to actively fulfil their responsibilities throughout the entire supply chain.

Our services, in particular improved access to local medical care, make a significant contribution to the protection and promotion of human rights.

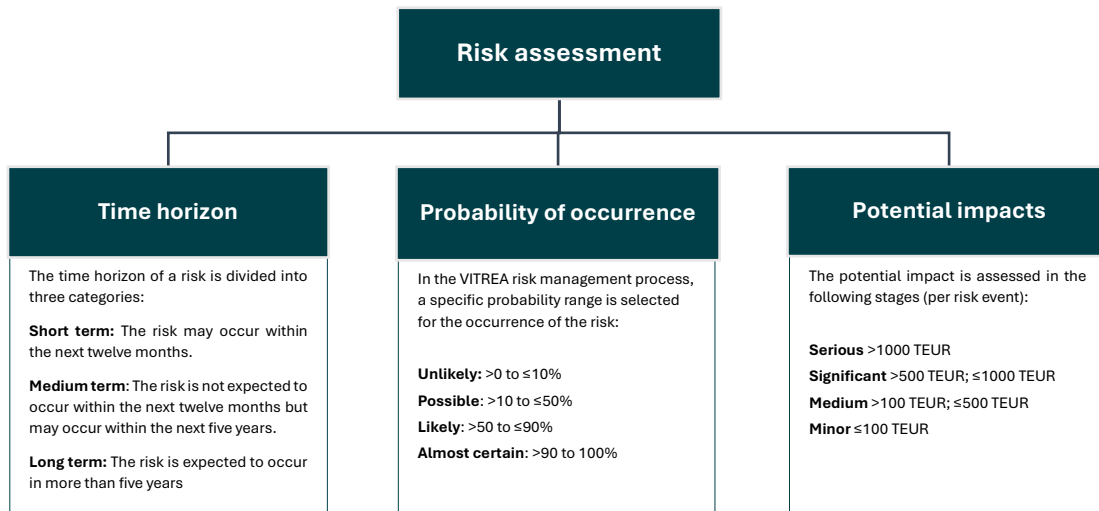
4. Risk analysis on human rights and ESG

4.1 The VITREA Group operates a systematic risk management system that incorporates human rights and ESG issues.

4.2 These analyses serve to identify, assess and prevent potential risks in the following key areas:

- Working hours, breaks and absences
- Occupational health and safety
- Remuneration/fair wages
- Discrimination and unequal treatment
- Patient rights and dignity
- Supply chain and external service providers
- Environmental human rights risks
- Data security, data protection
- Governance, compliance

4.3 The risks are assessed on the basis of the following factors:



4.4 The result of the risk analysis, which was carried out on the basis of three factors – time horizon, probability of occurrence and potential impact – classifies the risk areas into the following categories:

- Risk avoidance: The underlying activity or circumstance that poses the risk is avoided. No risk is taken.
- Risk acceptance: A specific risk is accepted (informed decision) and no (further) precautions are taken to minimise the probability of occurrence or the potential

impact (e.g. if the risk is assessed as very low or the costs of the alternatives are higher than the potential impact of the risk).

- Risk mitigation: A particular risk is accepted, while precautions are taken to minimise it by reducing either the probability of occurrence or the potential impact, or both. This can be done through technical or organisational measures or through risk diversification.

5. Implementation in operational activities

5.1 A risk analysis on human rights and ESG-related issues shall be carried out at least once a year.

5.2 In the case of company acquisitions and other investments, an assessment of human rights issues must also be carried out as part of the due diligence or business partner review process. This shall include at least a risk-based screening and a review of documents and evidence. If necessary, appropriate precautions must be taken.

5.3 In the event of identified or imminent human rights violations, appropriate mitigation measures must be taken immediately.

6. Implementation in the supply chain

6.1 VITREA has incorporated the standards set out in this policy into its code of conduct for business partners and, together with its partners, is committed to ensuring that the values it represents are also implemented throughout the entire value chain.

6.2 If there is suspicion of human rights violations or non-compliance with sustainability requirements in the supply chain, investigations will be initiated immediately. Depending on the severity, measures up to and including termination of the contract may be taken.

6.3 VITREA expects all suppliers to exercise due diligence throughout the supply chain to prevent child labour, forced labour, discrimination, environmental pollution or corruption.

7. Complaints mechanism and whistleblower channels

VITREA offers employees, patients, partners and third parties the opportunity to report actual or suspected human rights violations via the VITREA whistleblower system. The communication tool can be accessed directly via the following link: <https://vitrea.integrityline.app/>. The report can be made anonymously or non-anonymously.

All reports are treated confidentially and investigated according to defined processes.

8. Further development and review

VITREA is committed to the ongoing development of this policy. Adjustments will be made in the event of changes to the legal framework, new findings or potential for improvement.

The implementation and effectiveness of the policy will be evaluated at least once a year by the Human Rights Committee.

9. Responsibility and governance

9.1 Ultimate responsibility for compliance with this policy lies with the management of the respective VITREA company. Within the management team, responsibility shall be assumed by the member of the management team responsible for compliance.

9.2 Human rights officers shall be appointed in all cases where this is required by law.

9.3 To ensure implementation, a Human Rights Committee has been established, consisting of the Group Sustainability & ESG Team, General Counsel, Group Compliance Officer, Head of Internal Audit & Risk, Chief People Officer and Head of Group Communications.

9.4 The Human Rights Committee meets at least once a year and as required. It reports to the Executive Board of the VITREA Group and makes recommendations for the further development of the policy and its implementation.

9.5 The management boards of the respective VITREA companies are obliged to review the effectiveness and appropriateness of the measures taken in accordance with this guideline and their implementation at least once a year and to adjust them if necessary. For this purpose, a standardised evaluation questionnaire is used, which must be completed by each respective VITREA company in full, truthfully and on time. The questionnaire is initiated, coordinated, collected and evaluated by the Group Sustainability & ESG team. The results of the respective companies are submitted to the Human Rights Committee, where they are analysed, discussed and used to derive improvement measures.

9.6 The measures and their implementation must be documented accordingly and stored in accordance with the legal regulations of the respective country.

10. Implementation

10.1 The member of the company's management board responsible for compliance is responsible for implementing this policy in the respective VITREA companies and for providing appropriate training to the employees concerned.

10.2 The member of the management board responsible for compliance at the respective company must ensure that, where necessary, supplementary regulations are put in place to enable and support the effective implementation of the provisions of this policy and all local legal regulations in this regard.

10.3 If the implementation of a provision of this policy is not possible due to mandatory legal provisions, an alternative solution must be developed and implemented after approval by the VITREA Human Rights Committee.