

# RULES OF PROCEDURE

for the complaints procedure in the event of a violation of the  
German Supply Chain Due Diligence Act  
(Lieferkettensorgfaltspflichtengesetz, LkSG)

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## PREAMBLE

Pursuant to the German Supply Chain Due Diligence Act (LkSG), the ASKLEPIOS Group has a duty to appropriately comply with due diligence obligations concerning human rights and the environment in its supply chains and in its own scope of business.














In accordance with Section 8 para. 1 of the LkSG, the ASKLEPIOS Group must establish a complaints procedure that allows employees, as well as any person external to the company, to alert the company to risks concerning human rights and the environment as well as to any breach of obligations concerning human rights or the environment that are the consequence of the commercial activities of a company within its own scope of business or those of a direct supplier. These Rules of Procedure provide an overview of the complaints procedure, the complaints channels, and the process for the review of a complaint regarding any (potential) breach of due diligence obligations concerning human rights or the environment in the supply chain.

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# 1. SCOPE OF APPLICATION

These Rules of Procedure exclusively apply to complaints that suggest a (potential) violation of the requirements or due diligence obligations set forth in the German Supply Chain Due Diligence Act (LkSG). In particular, complaints concerning the following potential risks and/or breaches of duty concerning human rights and the environment may be submitted:

MATTERS CONCERNING HUMAN RIGHTS	WITHIN THE SUPPLY CHAIN	 CHILD LABOUR, FORCED LABOUR, SLAVERY	 WITHHOLDING OF ADEQUATE WAGES		
		 FAILURE TO COMPLY WITH OCCUPATIONAL SAFETY AND HEALTH OBLIGATIONS	 UNLAWFUL EVICTIONS AND THE UNLAWFUL TAKING OF LAND, FORESTS, WATERS		
		 FAILURE TO RESPECT THE FREEDOM OF ASSOCIATION	 <small>Bereich wird Videoüberwacht</small> HIRING AND USE OF SECURITY FORCES IN VIOLATION OF HUMAN RIGHTS		
		 EQUAL TREATMENT	 OTHER		
		MATTERS CONCERNING THE ENVIRONMENT	WITHIN THE SUPPLY CHAIN	 HANDLING, COLLECTION, STORAGE AND DISPOSAL OF WASTE IN A MANNER THAT IS NOT ENVIRONMENTALLY SOUND	 PRODUCTION AND USE OF PERSISTENT ORGANIC POLLUTANTS
				 IMPORT AND EXPORT OF HAZARDOUS WASTE	 MANUFACTURE OF MERCURY-ADDED PRODUCTS, USE OF MERCURY AND MERCURY COMPOUNDS, TREATMENT OF MERCURY WASTE
 HARMFUL POLLUTION OF SOIL, WATER AND AIR, EXCESSIVE WATER CONSUMPTION, HARMFUL NOISE EMISSION					

## 2. OPTIONS FOR SUBMITTING A COMPLAINT

Complaints may be reported confidentially, including anonymously, as follows:

Using the: "LkSG reporting form"	By email: <a href="mailto:compliance@asklepios.com">compliance@asklepios.com</a>
By telephone:  +49 (0)40 1818 82-6582 or +49 (0)40 1818 82-6588	By regular post: Asklepios Kliniken GmbH & Co.KGaA Konzernbereich Recht Versicherungen & Compliance Attn. Compliance Rübenkamp 226 22307 Hamburg, Germany

There are no separate (additional) costs for reporting a complaint. Employees of Asklepios may also use the whistle-blower system that has been activated on the intranet to submit a report. In addition, complaints concerning potential violations may always be reported directly, in particular to the employees of the compliance department of Asklepios Kliniken GmbH & Co. KGaA.

## 3. COMPLAINTS PROCEDURE PROCESS

The process of the complaints procedure is as follows:



If the reporting person consents to being contacted, they will receive a confirmation of the receipt of the complaint within seven days of its receipt. They will also be informed of the results of the complaint's review, at the latest when that review has been completed, typically within three months. The time required for reviewing the complaint depends on its scope and complexity.

#### **4. CONTACT / RESPONSIBILITIES**

Where a complaint is not addressed to a specific person within the company, complaints will be received by the compliance department, which is responsible for organising and processing the complaints received. It may consult with other Group departments or third parties external to the company in processing the complaint, taking into account the general principles of the proper processing of complaints.

The persons entrusted with handling the complaints have the authority to process them independently and impartially and are not bound by instructions. They are subject to a duty of confidentiality.

#### **5. ANONYMITY AND CONFIDENTIALITY**

Complaints concerning matters relating to human rights or the environment are treated as confidential in accordance with the applicable legal regulations. In this context, confidentiality means that information about the person submitting the complaint and the facts contained in the complaint will not be disclosed to third parties where such disclosure does not seem necessary to address the facts reported in the complaint and/or where such disclosure might endanger the personal safety of the reporting person.

The person submitting the complaint may provide their name or submit the complaint anonymously. If the person submitting the complaint wishes to remain anonymous, it needs to be taken into account that this may also limit or exclude the possibility of contacting this person for the purpose of clarifying facts and/or reporting the completion of the review.

#### **6. GOOD FAITH**

All complaints must be submitted in good faith which means that nobody may be wrongfully accused intentionally. This does not mean that the review has to show that the complaint was correct, however the person submitting the complaint must have been able to reasonably assume that the content of their complaint was correct when they submitted the complaint.

Employees acting with the intent of consciously or maliciously harming third parties will not be protected (cf. Section 7) and will face consequences.

#### **7. PROTECTION AGAINST RETALIATION**

No person submitting a complaint, whether they are employees or third parties external to the company, may suffer any negative consequences when submitting a complaint with respect to a potential breach of due diligence obligations under the LkSG.

## **8. DATA PROTECTION**

Personal data will be retained for a period of three years. The office handling the complaints will ensure compliance with the statutory retention obligations and data protection regulations. Any personal data collected in the context of complaints and investigations will be retained for a period of three months as of the completion of the investigation. Where the completion of the investigation is followed by disciplinary actions or legal proceedings, as well as other disputes, for which the data is necessary, this period will be extended accordingly.