

Human Rights Policy Statement

in accordance with the German Supply Chain Act

Our Guiding Principle

“Important is the law of love: You shall love your neighbor as yourself.”

Matthew 22.39

The mission of Nardini Klinikum GmbH with its hospitals in Zweibrücken and Landstuhl is to serve people in need. We respect human dignity. Everyone has the right to recognition and dignity without distinction of any kind, such as race, sex, religion, mental or physical capabilities, social origin, or professional status.

The welfare of the patient requires the cooperation of all occupational groups. Each staff member bears responsibility at their workplace and works for the welfare of the patients.

This requires social and ethical skills in addition to professional competence. Staff members are responsible for safeguarding creation. Staff members are committed to the protection of the environment, and we try to minimize the environmental impact of the hospital. We are aware that motivation and commitment are important at our hospital. We want to muster the courage to embark on new paths.

Preamble

In accordance with article 6, section 2 of the German Supply Chain Law, the top management is required to make a policy statement regarding the human rights strategy. At Nardini Klinikum GmbH, responsibility for the implementation of the policy statement in accordance with the provisions of the Supply Chain Law is controlled by the hospital’s senior management and the board of directors as a central element of business conduct.

With this statement, Nardini Klinikum GmbH commits itself to respecting human rights in its area of business and procures that its suppliers respect and observe human rights.

1. Compliance with international standards

Human rights compliance at Nardini Klinikum GmbH is based on the following, internationally recognized standards:

- Universal Declaration of Human Rights of the United Nations, AEMR A/RES/217, UN-Doc. 217A-(III) (including recognition of the inherent dignity and inalienable rights of all members of the human family for freedom, justice, and peace)
- Principles of the UN Global Compact (including protection of international human rights, prevention of human rights violations, precautionary approach to environmental challenges)
- OECD Guidelines for Multinational Enterprises (including recommendations for responsible business conduct in a global context)
- Conventions of the International Labour Organisation (ILO) and their four fundamental principles (freedom of association and right to collective bargaining; elimination of forced or compulsory labor; abolition of child labor; elimination of discrimination in respect of employment and occupation)
- European Convention for the Protection of Human Rights and Fundamental Freedoms (including a general declaration for the maintenance and further realization of human rights)

2. Implementation of due diligence compliance measures

To ensure full observance of human rights in our own area of business and at suppliers, Nardini Klinikum GmbH has defined the procedures described below according to article 6, section 2 of the Supply Chain Law to comply with the following provisions:

- Article 5, section 1 of the Supply Chain Law (risk management)
- Article 5, section 1 of the Supply Chain Law (risk analysis)
- Article 6, sections 3-5 of the Supply Chain Law (preventive actions)
- Article 7 of the Supply Chain Law (corrective actions)
- Articles 8 and 9 of the Supply Chain Law (complaint procedure)
- Article 9 of the Supply Chain Law (measures regarding indirect suppliers)
- Article 10 of the Supply Chain Law (records and reporting requirements)

3. Identification of risks regarding human rights and the environment

The goals of risk analysis according to article 6, section 2, clause 3, no. 2 of the Supply Chain Law are to determine the most important risks regarding human rights and the environment and weight them appropriately. In our risk analysis we pay particular attention to the following human rights aspects:

- Forced and child labor
- Restriction of freedom of assembly and freedom of association
- Discrimination of any kind (e.g. based on sex, age, ethnic and social origin, nationality, religion or belief, mental or physical disability, sexual orientation)
- Data protection and privacy hazards
- Occupational health and safety hazards
- Health hazards due to environmental pollution
- Corruption and bribery
- Restriction of access to education

4. Expectations regarding human rights and environmental risk management

Nardini Klinikum GmbH expects its employees, business partners, and suppliers to respect human rights and commit to implementing suitable precautions to ensure compliance with due diligence provisions regarding the observance of human rights standards.

If risk analysis shows that certain groups of individuals are affected by human rights and environmental impacts to a higher degree, it is necessary to ensure that these groups are given special protection by the due diligence processes. This applies in particular to the following groups:

- Women
- Elderly people
- Sick people and people with disabilities
- Groups in barely regulated / unregulated environments
- Ethnic / religious minorities
- People with a low level of education or restricted access to education

5. Development of human rights due diligence processes

For Nardini Klinikum GmbH respecting human rights and implementing due diligence regarding human rights in operative processes are an important contribution towards improving the human rights situation. Nardini Klinikum GmbH will ensure that the due diligence requirements arising from the Supply Chain Act are fulfilled and continuously aligned to the evolving human rights situation.

Using our reporting system, established in accordance with the Supply Chain Act, suspected violations of this policy statement or current laws and unlawful, amoral, or corrupt behavior can be reported, also anonymously.

We will communicate this policy statement to our employees and our collaboration and business partners, and we will proactively raise awareness for compliance with our policy.

Zweibrücken, December 1, 2023

The Senior Management and Board of Directors, Nardini Klinikum GmbH