A photograph of an operating room. Two surgeons in blue scrubs and green surgical masks are performing a procedure. A large, white, articulated C-arm X-ray machine is positioned over the patient. The room is brightly lit with overhead surgical lamps. A green text box is overlaid on the right side of the image.

This training explains the standards and cooperation required by Sana Kliniken AG to minimize risks related to human rights and the environment in our shared supply chain.

# Background: Our commitment – Your cooperation

## Why are you receiving this information?

Sana Kliniken AG is one of the largest healthcare providers in the German-speaking region. As a company with more than 1,000 employees, we are subject to the Supply Chain Due Diligence Act (LkSG). The LkSG obliges Sana to prevent risks, minimize them, and put an end to violations.

**Important:** The LkSG is directed exclusively at Sana Kliniken AG. As a supplier, you are **not** obliged to fulfill the legal due diligence obligations unless you are also subject to the LkSG.

**Your crucial role:** Sana Kliniken AG must also ensure that its suppliers comply with the standards. A commitment to social responsibility and compliance with our supplier code of conduct is therefore an essential prerequisite for long-term business relationships.

Your cooperation helps us to effectively fulfill our legal obligations.

## Significant Risks: Standards for Preventing Violations

Sana Kliniken AG is committed to respecting internationally recognized human rights. We expect our suppliers to adhere to the principles set out in the **Sana Supplier Code of Conduct** and to establish the following standards to prevent violations:

(see next page)



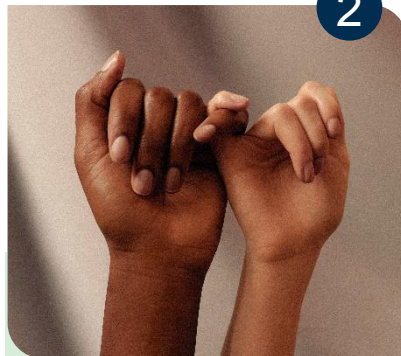
# Standards to be observed



1

## Prohibition of child and forced labor

- Strict prohibition of all forms of slavery
- Prohibition of employment under age of 15 and the worst forms of child labor (prostitution, drug trafficking, hazardous activities)



2

## Fair working conditions

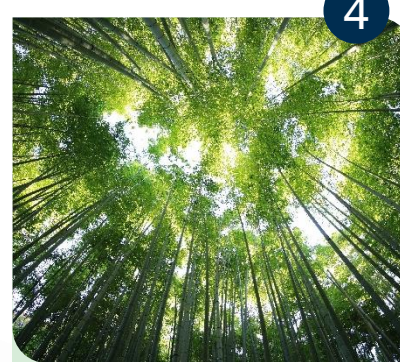
- Respect for freedom of association (right to join/form trade unions)
- Prohibition of discrimination (e.g. on the basis of gender, ethnic origin, sexual orientation)
- Payment of fair wages (at least the applicable minimum wage)



3

## Occupational safety

- Prohibition of non-compliance with applicable occupational safety obligations (safe workplaces, appropriate protective measures, compliance with working hours and break times to prevent excessive fatigue)



4

## Environmental standards

- Compliance with all applicable regulations (handling, storage, transport and disposal of waste/exhaust gases/wastewater)
- Prohibition on the delivery of products containing substances that are subject to the Minamata- and Stockholm conventions (mercury, POPs)

# Prevention: Cooperation for Sana`s Risk Management

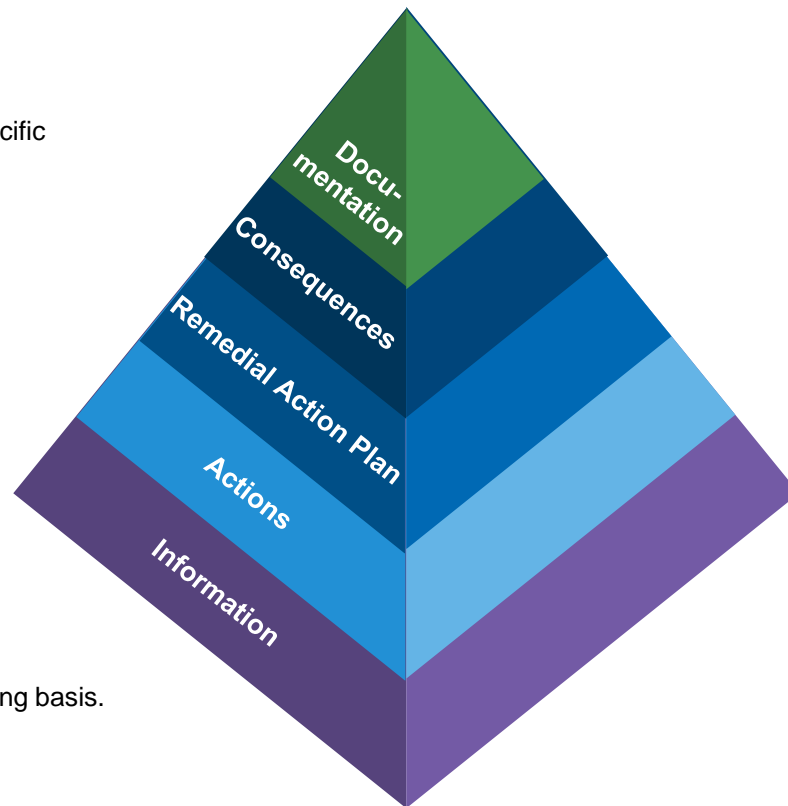
**Die Sana Kliniken AG must implement preventive measures and requires your cooperation to do so.**

- 1) Contractual obligation: Confirm your compliance with the principles of the Sana Supplier Code of Conduct.
- 2) Transparency & information: Provide Sana with the information required for risk analysis.
- 3) Audits: Allow announced audits by Sana or independent auditors.
- 4) Training: Take advantage of training opportunities to raise awareness among your employees.
- 5) Passing on to subcontractors: Ensure contractually that your upstream suppliers also comply with the human rights and environmental requirements of the Sana Supplier Code of Conduct.

Your cooperation in reducing risks is crucial.

# Immediate Action: Cooperation in the Event of Violations

- 1 Information**  
 Inform Sana Kliniken AG immediately of any risks identified or specific violations along your value chain.
- 2 Actions**  
 Take immediate and appropriate corrective action to stop or minimize the scope of the breach.
- 3 Remedial Action Plan**  
 If the violation cannot be remedied immediately, a catalog of measures with a schedule is drawn up, which is to be implemented step by step.
- 4 Consequences**  
 Appropriate remedial measures can range from mere warnings to termination of the business relationship.
- 5 Documentation**  
 Violations and their rectification must be documented on an ongoing basis.



# Complaints Procedure: The Sana-Hintbox:

**Sana Kliniken AG is legally obliged to establish an effective complaints procedure.**

- 1) Reporting channel: Sana Hintbox via <https://hintbox.sana.de/> or email to [compliance@sana.de](mailto:compliance@sana.de)
- 2) Accessibility: The Hintbox is publicly accessible and available to all employees and business partners.
- 3) Subject: Reports of human rights or environmental risks or violations.
- 4) Protection: Reports can be submitted completely anonymously. Sana guarantees confidentiality and protects against reprisals (discrimination or punishment).


**Your obligation:** Inform your employees and suppliers about the possibility of using the Sana Hintbox and encourage them to report violations.



## Further Information and Resources

These resources can help you implement the standards, understand the risks, and thus better fulfill your cooperation obligations:

- **Sana documents**
  - [Supplier Code of Conduct](#)
  - [Policy Statement on Human Rights Strategy](#)
- **International frameworks**
  - [UN Guiding Principles](#)
  - [OECD Guidelines](#)
  - [ILO Core Labor Standards](#)
- **Practical implementation aids**
  - [SME Compass](#)
  - [CSR Risk Check](#)
  - [BAFA Guidelines](#)



If you have any questions, please contact our team of experts:

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# Thank you!



**Your**  
**Sana Sustainability Team**  
[www.sana.de/nachhaltigkeit](http://www.sana.de/nachhaltigkeit)

