

Policy statement on the human rights strategy

The Executive Board of the Universitätsklinikum Schleswig-Holstein (UKSH) issues the following policy statement on the basis of German laws 'Act on Corporate Due Diligence to Prevent Human Rights Violations in Supply Chains' (Lieferkettensorgfaltspflichtengesetz – LkSG):

1 Our commitment to and expectations of suppliers

The UKSH and its subsidiaries are committed to respecting human rights and protecting the environment in accordance with the LkSG. It is the declared aim of the UKSH Executive Board to respect, protect and promote human rights and the environment along the entire value chain. Violations of the protected legal positions of the LkSG are not tolerated. Respect for human rights and protection of the environment apply to all employees and form the basis for our actions.

We expect our suppliers to commit to respecting human rights and protecting the environment and to implement appropriate processes and measures to comply with human rights and environmental due diligence obligations. We expect our suppliers to also address these expectations appropriately with their suppliers.

2 Our procedure for compliance with due diligence obligations

The risk management system described below for the LkSG serves to ensure compliance with due diligence obligations and aims to prevent or minimize human rights risks and environmental risks or to end violations of human rights or environmental obligations. Risk management is anchored in key business processes.

2.1 Our responsibilities for the implementation of due diligence obligations

Overall responsibility for compliance with human rights and environmental due diligence obligations lies with the UKSH Executive Board. In the subsidiaries, responsibility lies with the respective management boards. The respective heads of the organizational units are responsible for the operational implementation of the due diligence obligations. Responsibility is implemented in the procurement departments of the UKSH Group on a task-specific basis.

The Head of Compliance Management is the main point of contact for matters relating to the LkSG and the coordinating body. It supports the Management Board in complying with due diligence obligations and monitors the implementation of the relevant processes. It reports to the Executive Board once a year and on an event-related about the work of the responsible employees.

2.2 Our risk analyses

Risks are appropriately weighted and prioritized. Criteria such as the type and scope of the business activity, the ability to influence the originator, the expected severity, the reversibility or probability of the

breach and the contribution to causation are considered. The results of the risk analysis are stored centrally and can be viewed at any time, particularly by the UKSH Group's procurement departments. For the UKSH Group and its direct suppliers, the risk analysis is carried out once a year and on an event-related basis if the risk situation changes.

For indirect suppliers, risk analyses are carried out on an event-related basis if there are verifiable and serious indications that a breach of due diligence is possible.

2.3 Our preventive measures

If risks are identified, appropriate preventive measures are taken immediately. Preventive measures within the UKSH Group and at direct and indirect suppliers may include, for example, updating our policy statement, offering training or agreeing control measures.

2.4 Our remedial measures

The responsible organizational unit of the UKSH Group takes appropriate remedial action if a violation of a human rights-related or environmental obligation has occurred or is imminent. The remedial action is aimed at preventing or ending a violation or minimizing the extent of the violation.

Cooperation with the people and companies concerned is expressly welcomed.

2.5 Our complaints procedure

The UKSH Group has set up a complaints procedure. It enables people to anonymously report risks and violations of human rights or violations of environmental obligations. The complaints procedure can be found on the UKSH homepage in the [Compliance Management section](#) (For reports click the button „Meldungen“ and select a language).

Compliance Management employees are responsible for implementing the complaints procedure. They are bound to secrecy and must act impartially.

They confirm receipt of the report to the person making the report and discuss the facts of the case with them. Depending on the risk situation, measures will be taken and, if necessary, the whistleblower may be offered a procedure for amicable settlement.

The effectiveness of the complaints procedure is reviewed once a year and on an event-related basis.

2.6 Our documentation and reporting

The fulfillment of due diligence obligations is documented internally at a central location on an ongoing basis. Reporting on the fulfillment of due diligence obligations takes place annually and is published on the website. The report sets out which human rights RISKS and environmental risks or breaches of due diligence have been identified and what measures have been taken. The effectiveness of the measures is evaluated and conclusions are then drawn for future measures.

3 Our priority risks

Based on the risk analysis to date, the focus is particularly on the following risks, which are marked with the symbol "▶" in the table below.

Table 1: Human rights and environmental risks in accordance to LkSG (simplified summary)

Human rights	Protection of the environment
Forms of work ▶ Prohibition of child labor - Ban on forced labor - Prohibition of slavery	Chemicals and waste - Mercury: Prohibition in the manufacturing process and prohibition of non-environmentally sound treatment of waste - Persistent organic substances: Ban on production and use as well as non-environmentally handling that is not environmentally sound, including disposal - Ban on the import and export of hazardous waste
Workers' rights ▶ Occupational health and safety ▶ Freedom of association (association of employees)	
Fairness ▶ Prohibition of unequal treatment of employees ▶ Prohibition of unreasonable wages	
Social rights - Prohibition of environmental damage to the human livelihood ▶ Prohibition of unlawful forced eviction ▶ Prohibition of the use of security forces that violate human rights	

Various measures have been taken for our own business division to counter risks in the areas of employee rights and fairness, for example (selection):

- Various departments and officers have been installed to protect employees: Occupational health and safety, company medical service, equal opportunities officer and employee representatives.
- The [UKSH Code of Conduct](#) summarizes key regulations and principles of conduct that represent our self-image for good cooperation at all levels.
- The Diversity Charter was signed by the UKSH Executive Board in 2016 in order to promote and protect diversity and create respectful and unprejudiced working conditions.

Kiel / Lübeck, 14.12.2023

The Executive Board

Prof. Dr. Dr. h.c. mult. Jens Scholz, CEO

Peter Pansegrau, CFO

Corinna Jendges, COO

Prof. Dr. Thomas Münte

Prof. Dr. Joachim Thiery

Universitätsklinikum
 Schleswig-Holstein
 Anstalt des öffentlichen Rechts
 Ratzeburger Alle 160
 23538 Lübeck, Germany
 www.uksh.de

Executive Board:
 Prof. Dr. Dr. h.c. mult. Jens Scholz, CEO
 Peter Pansegrau, CFO
 Corinna Jendges, COO
 Prof. Dr. Thomas Münte
 Prof. Dr. Joachim Thiery

Responsible Officer:
 Head of Compliance Management
 Department of Corporate Governance
 Tel.: +49 451 500-10800
 E-Mail: compliance@uksh.de

