

# CGM Policy Statement– Our Commitment to Human Rights



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## Foreword

CompuGroup Medical SE & Co. KGaA and its subsidiaries worldwide (CGM) are committed to actively upholding human rights in the healthcare sector. We respect, protect, and foster the human rights of individuals, and we are dedicated to preventing human rights violations both within our own operations and throughout our supply chains.

### What is a policy statement and why do we need it?

With this policy statement, we publicly commit to respecting human rights and demonstrate how we, as CGM, fulfil our responsibility. By publishing this statement, we not only comply with legal requirements, such as the German Supply Chain Due Diligence Act (hereinafter "LkSG"), but also adhere to our own values.

This document is reviewed regularly and updated as needed.

### Scope of applicability

The policy statement applies to all employees as well as to all business partners and other third parties acting on our behalf.

## Our values and principles

CGM is guided by and committed to the following international human rights standards:

- Universal Declaration of Human Rights of the United Nations
- Principles of the UN Global Compact
- Declaration of the International Labour Organization (ILO)
- UN Conventions on the Rights of the Child and on the Elimination of All Forms of Discrimination against Women
- OECD Guidelines for Multinational Enterprises.

We consider the provisions in these standards as minimum requirements. The principles enshrined in these standards are also reflected in our own policies and principles, especially in the following documents:

- CGM Code of Ethics: Describes our expectations for responsible conduct. We commit to socially responsible and ethical behaviour, including respect for human rights, personal rights, and the dignity of our employees and all third parties.
- Supplier Code of Conduct: Describes our expectations regarding social standards, environmental protection, and occupational safety, particularly on the supplier side.
- CGM Values Handbook: We additionally describe the path to achieving our goals in our internal CGM Values Handbook.

The above-mentioned documents specify, based on our regularly conducted risk analysis, the principles by which we conduct our business. This includes, for example, the prohibition of child labour, forced labour, discrimination, and forced evictions, as well as clear regulations regarding freedom of association, collective bargaining, the right to strike, occupational safety, compensation, environmental protection, and data protection. Our employees and suppliers are required to familiarize themselves with and comply with our expectations regarding human rights and environmental protection in accordance with the Supply Chain Due Diligence Act (LkSG).

## Implementation of our responsibility to respect human rights

To fulfil our responsibility for implementing measures in human rights and environmental due diligence, we pursue a holistic approach.

## Governance and responsibility

The managing directors of CGM are responsible for implementing and adhering to this statement. They are supported by the Corporate Responsibility, Procurement, and Group Risk Management departments, which work closely with the subsidiary companies.

## Risk analysis

To timely detect and analyse human rights or environmental risks in the supply chain, CGM relies on established processes within the group's risk management, particularly to regularly raise awareness of human rights issues within its own scope of business and to ensure the continuous capture of internal insights.

In accordance with § 5 (1) of the Supply Chain Due Diligence Act (LkSG), we conduct risk analysis regularly and as needed. These analyses serve to assess and prioritize human rights and environmental risks both within our own scope of activities and among immediate suppliers crucial to our core business processes. In the year of the introduction of the LkSG, an initial risk analysis was conducted to identify human rights and environmental risks within our own scope of business and among our immediate suppliers. The internal surveys conducted across the group, as well as the supplier evaluations oriented towards country- or product-specific risks, did not yield any findings with sufficient probability indicating a breach of the sanctioned prohibitions due to actual circumstances.

## Preventive measures

Based on these risk analysis, effective preventive measures are defined. The adequacy and effectiveness of these measures is reviewed regularly and if necessary.

CGM implements the obligations outlined in §§ 6 (3) to (5) of the LkSG primarily through the following preventive measures:

- **In our own business:** Establishing clear regulations (including the CGM Code of Ethics and CGM Values Handbook) and conducting regular awareness-raising measures, training sessions, and control measures such as audits.
- **With immediate suppliers:** Establishing clear regulations and processes (including the CGM Supplier Code of Conduct, supplier selection process) and implementing contractual assurances, training sessions, and control measures such as audits.

## Remedial measures

If the conducted risk analysis reveals a human rights or environmental risk, or a violation of such obligations, we take the necessary and appropriate remedial measures according to § 7 of the Supply Chain Due Diligence Act (LkSG). The aim is to eliminate or minimize the risk or violation. The specific remedial action is always case-dependent but may include, for example, a plan to terminate or minimize the risk or violation. A particularly serious violation by a supplier may result in the temporary suspension or termination of the business relationship.

## Complaints mechanism

Finally, the provision of a whistleblowing system, our so-called CGM Ethics Line, is an essential part of our efforts to comprehensively fulfil compliance, ethics, and corporate responsibility, as well as to provide all stakeholders with a protected space to report possible misconduct. Through this system, both our employees and external stakeholders (e.g., suppliers) can report human rights and environmental risks and violations.

### Documentation and reporting obligations

We continuously document the fulfilment of our obligations under § 10 (1) of the Supply Chain Due Diligence Act internally within the company. The documentation is kept in accordance with legal requirements, currently for a minimum of seven years.

According to § 10 (2) of the Supply Chain Due Diligence Act, CGM annually prepares a report on the fulfilment of its due diligence obligations. This report is published on the company's website and the Federal Office for Economic Affairs and Export Control (BAFA) within the first four months after the end of a financial year.

### Monitoring of effectiveness

We review the effectiveness of our measures regularly and on an ad-hoc basis, including the complaint procedure, our risk management, remedial actions, and preventive measures.

### Our expectations and contact

For the implementation of this policy statement, we rely on every single employee of CGM. In this regard, our managers, as role models, are the first point of contact for questions relating to this document. Furthermore, we require our suppliers and business partners to also commit to adhering to our principles and to develop and establish appropriate and effective processes to address and prevent risks and violations discovered by us, as well as to uncover further potential risks.

For any further questions or concerns regarding the policy statement, Group Compliance can be contacted at: [Group.Compliance@cgm.com](mailto:Group.Compliance@cgm.com).

**Thank you for your effort.**

Managing Directors:

Prof. (apl.) Dr. med. Daniel Gotthardt (CEO), Emanuele Mugnani, Hannes Reichl, Daniela Hommel,  
Dr. Ulrich Thomé