

Code of Conduct

The principles which we follow

GRUPA
LUXMED 



Courage, caring, responsibility – three important words, our values that define **LUX MED Group Employees and Associates**. The Code of Conduct defines how to put them into practice.

According to the Code of Conduct, each of us should:

- courageously take on challenges and constantly seek new solutions;
- show care, empathy and respect for Patients and Colleagues;
- take full responsibility for our decisions and actions.

This is who we are - we carry out our Mission in accordance with our values. Thank you for listening to Patients and not leaving them without a solution, taking care of a longer, healthier and happier life and making the world a better place.

Anna Rulkiewicz
President of the LUX MED Group



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THANK YOU

Introduction

The LUX MED Group Code of Conduct (the "Code") is a compass that navigates us in our daily work. The principles it contains enable us to take even better care of our Employees, Associates and Patients.

The Code provides information and tools to help us make the right decisions and solve problems that arise in our daily work. It is a set of principles that we also expect our suppliers, contractors, customers, intermediaries and other contractors ("Business Partners") to follow.

It is the duty of each LUX MED Group Employee and Associate to:

- Comply with the provisions of the Code, the law and internal regulations applicable to the LUX MED Group.
- Report violations of the law and behaviour that does not comply with the Code or internal regulations.

It is the responsibility of LUX MED Group Management to:

- Create an environment where people can fearlessly report wrongdoing regarding ethics and ways of doing things.
- Set an example, to model appropriate behaviour in accordance with the Code and our Values.
- Act to prevent violations of the Code and the provisions of the law.

The success and reputation of the LUX MED Group depend on all of us – our decisions and actions. As Employees and Associates, we are responsible for complying with the Code and the provisions of the law.

The LUX MED Group's values that guide our daily work are as follows:



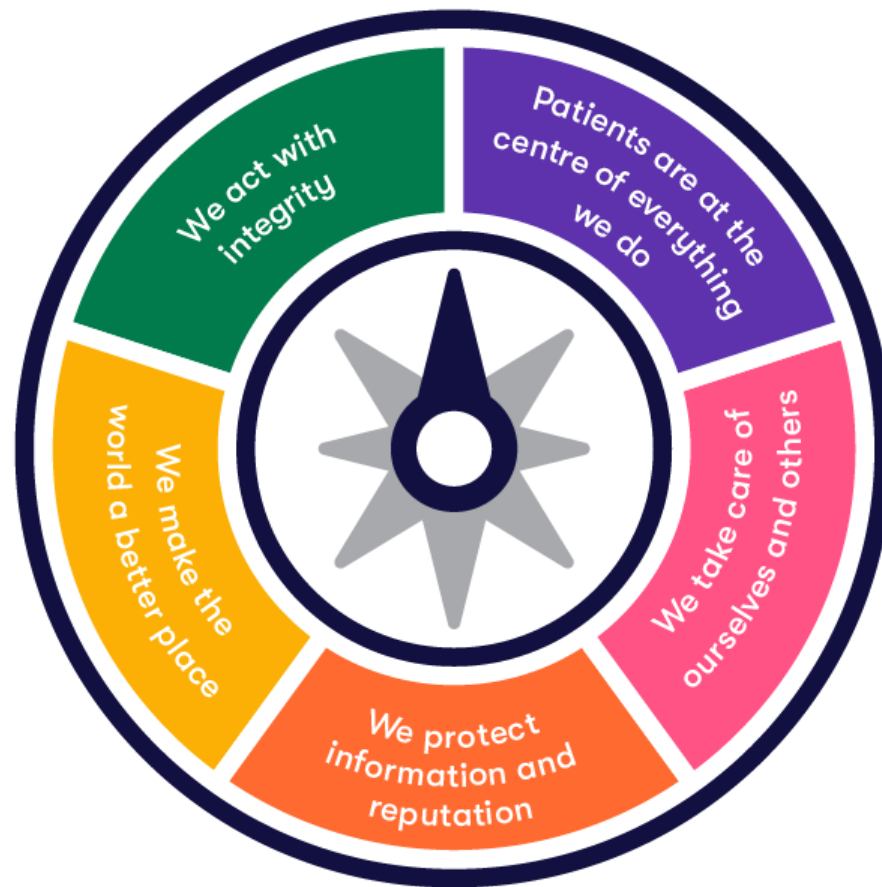
COURAGE – we seize opportunities and create new solutions



CARING – we act with empathy and respect



RESPONSIBILITY – we are responsible for our decisions and actions



**Patients are at the
centre of everything
we do**



1.1. We continually take care of Patients

In every area of our organisation we focus on listening to the needs and opinions of our Patients. Regardless of our department and the tasks we perform, we are always guided by the welfare of those who entrust us with the care of their health.

We are committed to providing patients with the best experience in every contact with us, which is why:



We listen to our Patients and try to learn and understand their opinions.



We anticipate Patients' needs, offering solutions tailored to each of them.



We measure Patient **satisfaction** and implement improvement measures in situations that require it.

1.2. We provide the highest quality standards

We work on the basis of a quality management system, which is subject to systematic verification and evaluation, and corrective actions if necessary, therefore:



We implement procedures and define responsibilities for the processes described in them, regardless of the position, profession or area of the organisation in which we work.



We provide training to improve professional skills to ensure a professional level of service.



We make it possible to report any incidents that indicate a violation of quality management standards.



We maintain and continuously improve quality management systems in accordance with regulatory requirements and market standards.

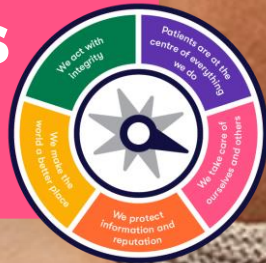
1.3. Clinical safety is a fundamental principle of Patient care quality

We protect the safety of the people we care for, that's why:

- **We are familiar with clinical safety regulations**, based on which we develop internal procedures and continually train ourselves in this area.
- We actively contribute to creating and strengthening **a culture of clinical safety**.
- **We report clinical incidents** and learn from them, ensuring continuous improvement of clinical practice.



**We take care of
ourselves and others**



2.1. We create a healthy work environment and ensure equal opportunities

We value different experiences and encourage listening to each other and sharing experiences. Everyone has equal opportunities in our organisation.

This means that:

- **We care about our own well-being, health and safety**, as well as that of our colleagues.
- We take care to **balance our professional and private lives**.
- **We comply with applicable occupational health and safety laws** and related internal regulations.
- We observe **the prohibition of alcohol and stimulants** and the use of intoxicants in the workplace.
- **We have respect for all people** regardless of their gender, age, disability, race, religion, nationality, political beliefs, union affiliation, ethnicity, religion, sexual orientation.
- **We provide equal opportunities** and do not discriminate against anyone in the processes of recruitment, employment, promotion and access to training to improve professional skills. We make every effort to ensure that these **processes are based on objective criteria**, such as qualifications, competencies, skills and achievements.
- **We adapt the work environment** to people's needs, including health needs.

2.2. We prevent inappropriate behaviour

This means that:

- We treat each other (including our Business Partners) **with dignity and respect**. We behave in an appropriate and professional manner in all dealings with others in the work environment.
- **We have zero tolerance** for any unwanted or inappropriate verbal or physical behaviour, especially those that violate personal dignity, freedom or bear the hallmarks of bullying or discrimination.
- **We counteract all manifestations of discrimination**, in particular by promoting ethical behaviour in the work environment.
- **We organise training for Employees and Associates** on ethical behaviour, including counteracting bullying and harassment.



This means that:

- **We do not employ people under the age of 18.** We adhere to the prohibition of forced labour, corporal punishment, and mental and physical coercion.
- **We are committed to complying with all laws** regarding freedom of association, collective bargaining, working hours, wages and salaries.
- **We avoid conflicts of interest**, and how we manage them is described in the internal regulations.
- All LUX MED Group Employees and Associates should **report any employee misconduct** of which they become aware to the Ethics Committee.
- **We do not accept aggressive behaviour** in the places where we work and provide services. We take measures to prevent them.



2.3. We provide professional development

Continuous learning and professional development ensure that LUX MED Group Employees and Associates have the right skills and competencies to perform their work professionally.

This means that:

- **We are committed to the professional development** of our Employees and Associates.
- **We motivate them to develop** and commit them to update the necessary knowledge and skills.
- We actively **organise and support educational activities**.
- **We identify the educational and development needs** of our teams, make it possible for them to participate in training courses, and then create conditions for them to use the acquired knowledge and skills in their daily work.
- **We base promotion and professional development on equal opportunities**, taking into account individual needs and achievements.
- **We conduct periodic interviews according to established criteria**, in an objective, transparent and principled manner.
- In cases where periodic appraisal is not mandatory, **we inform everyone of the competencies necessary for the proper performance of their tasks** and create conditions for their acquisition or strengthening.

We protect confidential information and personal data. We protect the reputation of the LUX MED Group



3.1. We communicate in the right way

We believe in transparent internal communications based on dialogue. Our external communications provide a strong corporate identity, taking into account the fundamental role we all play in maintaining our brand and reputation.

This means that:

- **We are all ambassadors for LUX MED Group** and therefore we ensure that our actions do not jeopardise its image or reputation. The company's reputation is fundamental in building trust, achieving our strategic objectives and fulfilling our goal of helping people live longer, healthier and happier lives and making the world a better place.
- We are aware that we do not lose our status as LUX MED Group Employees and Associates, even if we do not do our job. Therefore, we must behave appropriately, especially when we identify ourselves as LUX MED Group Employees or Associates **when using social media or other forms of communication.**
- We are careful about the statements we make in social media. We take care not to be offensive, disrespectful or racist to other individuals or institutions, whether public or private, while maintaining the principles of personal freedom and freedom of expression.

- **When speaking in the media, we avoid comments that could:**
 - Denigrate the competition or be perceived as such.
 - Suggest that our Group or someone acting on its behalf is politically involved.
 - Result in negative associations with the company that would otherwise never arise.
 - Be inconsistent with key statements and positions of the LUX MED Group at the market and corporate level.
- At LUX MED Group facilities, we strive to provide Patients with a sense of security and intimacy, so we do not involve them in giving statements to the media, **nor do we consent to filming and photographing the facilities if it is not necessary for substantive reasons** (e.g. in the case of an interview with a specialist).



3.2. We protect personal and other confidential information

All those who entrust us with their personal data trust us. That is why we protect and process it in accordance with applicable regulations. We respect the privacy of our Clients, Patients, Employees and Associates and Business Partners.

This means:

- The personal data of Clients, Patients, Employees, Associates and Business Partners that we process is protected **in accordance with data protection regulations**.
- Personal data is shared only with those Employees and Associates who need it to perform their work.
- **We follow internal data protection policies and procedures**, which are regularly reviewed and updated as necessary.
- **We provide secure access** to computer systems, files and physical documents.
- **We conduct and update information security and data protection training**.



We ensure that confidential information is not disclosed to third parties. Even internally confidential information is shared only with those Employees and Associates who need it to do their jobs.



We protect information regarding the internal affairs and policies of the LUX MED Group.

3.3. We care about our reputation and good relations with Business Partners and public entities

With Medical Partners:

- **We provide our Clients and Patients with care** provided by properly trained and qualified specialists.
- We select our Partners based on **objective, qualitative indicators and evaluation criteria** in accordance with our internal provider selection process.
- We go to great lengths to ensure that the medical services provided at our Partners meet the **standards required by the law and by LUX MED Group**.
- **We streamline administrative processes** in order to best execute our agreements and fulfil our commitments.
- Our relationships are also full of mutual respect and trust that **the Patient comes first**.
- **We ensure that Patients are empowered to make decisions** that affect their own health by providing them with the necessary information.

With Distributors, Agents and Brokers:

- Brokers and Agents from the insurance sector and other Partners involved in the process of selling medical services play an important role in concluding and servicing our Clients' contracts.
- We develop relationships with Brokers, Agents and other Partners, guided by **transparency, compliance with the law and protection of the Client's rights and interests.**
- **We provide our Partners with friendly terms and conditions of cooperation,** based on reliable, accurate and clear documentation and rules.
- We expect Partners to act in the best interests of the Client and to commit to continuous improvement of their services, as well as to conduct themselves in accordance with the law, the requirements of regulatory bodies and the ethical principles of the LUX MED Group.

With Public Administration:

- **LUX MED Group has no political affiliation.** Our relations with political parties, public administration representatives and other social organisations are based on the principle of neutrality and within the limits set by the law and in compliance with the principles expressed in the Code.
- All contacts on behalf of LUX MED Group with representatives of public administration or politicians are reported and monitored in accordance with internal procedures.
- **We do not fund political parties** or election campaigns of candidates for political office.
- If an Employee or Associate engages in political activities, this does not affect LUX MED Group's political neutrality and the Employee or Associate does not have the ability to use the organisation's resources.
- Any participation in an election campaign as a political candidate must be reported in advance in accordance with internal procedures.

We make the world a better place



4.1. We make the world a better place

LUX MED Group's mission is: "Helping people lead longer, healthier and happier lives and making the world a better place."

We make the world a better place every day by supporting our Patients in developing healthy habits, caring for their well-being and sense of well-being, but also through actions taken to ensure the sustainability of our Organisation and the communities we affect.

We ensure that the **LUX MED Group is managed in an ESG (Environmental, Social and Governance) model**, which is also constantly monitored.

These three areas: **environmental, social and governance** issues, properly organised and managed, guarantee the sustainable development of the LUX MED Group, thanks to our concern for the surrounding environment, society and the organisation in which we work.



4.2. The health of the people and the health of the planet are our priority

The principles and standards we have put in place and are constantly improving at LUX MED Group confirm that we are conducting business in an ethical and sustainable manner. We believe that a healthy environment is a healthy person.



We set goals for the environment, society and corporate governance.

One of our main environmental goals is to reach zero-carbon in 2040, a target that has been officially endorsed by the Science Based Targets Initiative, an international organisation that supports business in achieving its goals. We intend to meet this challenge because we believe that a healthy environment is a healthy person, and taking care of people's health and lives is our priority. We are counting our carbon footprint, systematically reducing emissions and constantly monitoring progress.

4.3. We are socially committed and pursue sustainable development goals

This means:

- We realise how business affects its near and far environment. When taking any action, **we always have the welfare of all stakeholders in mind.**
- **We join charitable activities** and support people and institutions that need help.
- **We look for solutions** and implement those that change the forms of our existing activities to be greener, more sustainable and beneficial to society.
- **We support sports**, sports institutions and athletes who follow the principles of fair play. This is part of the promotion of healthy lifestyles and prevention.
- **We focus on the education** and awareness of society, especially in areas as close to us as health, prevention, hygiene and first aid.

This means:



We are making the world a better place by achieving the Sustainable Development Goals. In 2021 the LUX MED Group joined the United Nations Global Compact, the world's largest initiative bringing together sustainable business. By doing so, we have committed to ten principles on human rights, labour standards, environmental protection and anti-corruption.

- At the same time, it is a commitment to the Sustainable Development Goals established by the UN's Agenda 2030.

**We act with integrity
and in accordance
with the law**



5.1. We operate in accordance with the law, we are honest and transparent

LUX MED Group demands the highest ethical standards from its Employees and Associates, in particular acting in accordance with the law, honesty and transparency. We also expect the same from our Business Partners.

This means:

- Our policies and procedures are **based on laws** generally applicable in Poland as well as guidelines from public administration authorities, particularly regulatory authorities, and standards developed by industry and professional organisations ("Regulatory Requirements").
- We ensure that our Employees and Associates are aware of and consciously **comply with the Regulatory Requirements applicable to LUX MED Group**.
- We are aware that violations of the Regulatory Requirements or conduct inconsistent with our ethical standards **may affect our reputation** and our business.

This means:

- **We conduct our business in accordance with applicable Regulatory Requirements** and the highest ethical standards so that Clients, Patients and Business Partners trust us and our business can continue to grow in a safe, ethical and sustainable manner.
- **We act in the interests of our Clients and Patients**, are open and honest in our business approach, and record financial transactions in documents and accounting records in a transparent and reliable manner.
- **We provide internal training**, comply with internal regulations, and provide appropriate controls to properly manage processes and counter the risk of financial crimes.
- **We develop, update and follow procedures** to ensure that LUX MED Group's financial statements are prepared in accordance with the rules and standards applicable to them.
- **We take responsibility** for the accuracy, reliability, completeness and timeliness of the information we use.



5.2. We counteract the risk of financial crimes



We have zero tolerance for corruption.

This means:

- **We do not offer or accept bribes** and do not allow anyone to do so on our behalf.
- **We follow the LUX MED Group's procedure for giving and accepting gifts** and forms of corporate hospitality. Before giving or accepting gifts, forms of hospitality or donations, we always review in detail whether it is appropriate and legal to do so, ask ourselves whether it is appropriate for our Customers and Patients and the LUX MED Group, and whether it complies with applicable procedures.
- **We remain vigilant** for potential fraud and inform the appropriate authorities when we detect suspicious activity.
- **We protect LUX MED Group assets** and safeguard them against theft or misuse.
- **We verify suppliers**, contractors, intermediaries and other counterparties against the risk of financial crimes and expect them to do similar verification on their counterparties.
- **We comply with international economic sanctions**, applicable money laundering, anti-corruption and tax evasion laws.

5.3. We select our Business Partners responsibly

We expect our Business Partners to strictly comply with the law in their business operations and the ethical standards described in this Code, both in their collaboration with LUX MED Group and in their business relationships (i.e. throughout the supply chain). We also expect the LUX MED Group commitments to sustainable development goals to be respected.

This means:

- **We have a transparent process for verifying and selecting** Business Partners so that we are aware of who we are working with.
- We work with partners who:
 - **Conduct their business activities in a responsible manner**, contributing to society, and share our commitment to sustainable development, including the protection and respect of all human rights.
 - **Strive to reduce the environmental impact** of their operations and manage climate risks, including complying with all environmental laws and regulations and respecting sustainability in their supply chain.
 - **Comply with the rules** of occupational health and safety.

This means:

- We work with partners who :
 - **Adhere to a zero tolerance for the risk of corruption and bribery** and other financial crimes, have anti-corruption procedures and Codes of Ethics in place, and conduct periodic training in this area for their Employees.
 - **Carry out verification of their counterparties** in terms of risk, committing financial crimes (corruption, fraud, money laundering, violation of international sanctions and facilitation of tax avoidance) and establish cooperation with entities that act ethically and in accordance with the law.
 - **Protect confidential information entrusted to them** and process personal data in accordance with the law.
 - **Inform LUX MED Group of conflicts of interest** that arise between an entity and a LUX MED Group company.



**We report cases of
abnormal behaviour**



6.1. What we should do in case of a breach of the Code

Report a breach/Speak Up

If we observe behaviour or a situation that may violate the law, LUX MED Group's internal regulations or the provisions of this Code, we should **immediately report it** through one of the available reporting channels under the **Speak Up Procedure**. Reporting a violation or irregularity will enable us to take action to investigate and propose corrective measures so that a similar problem does not occur in the future.

Who can report a breach and how

LUX MED Group actively promotes a culture of openness and allows Employees, Associates and persons performing work for suppliers, contractors, subcontractors and other eligible persons ("Whistleblowers") to report violations of law, procedures and unethical behaviour of which they become aware in connection with their work.

Reporting may be anonymous.

Confidentiality and whistleblower protection

We ensure the confidentiality of the identity of the Whistleblower and the information obtained in the course of the investigation. Any retaliatory actions against persons who have reported in good faith actual or potential violations of the law, internal procedures or rules set forth in this Code are prohibited. The Whistleblower receives protection from retaliatory actions by law and the right to receive acknowledgement of the report and feedback on the results of the investigation.

6.2. Speak Up application channels

Applications can be made through one of the following channels :



Via the platform www.bupa.com/luxmedspeakup.



Around the clock by phone at **00 800 151 0 165**.



By email at naruszenia@luxmed.pl.



Directly to the Speak Up Officer.

Thank you

Do you want to learn more about the
LUX MED Group? Visit luxmed.pl

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