

Sustainability Report

for 2023

GRUPA LUXMED

Jesteśmy częścią *Bupa*

Table of contents

A few words from the CEO 4
Sustainability in the LUX MED Group 6

About the LUX MED Group 8

Who we are 9
Summary of the key results for 2023 10
2023 in the light of major events 11
Mission, vision, and values 12
Mission 13
Vision 13
Values of the LUX MED Group 14
Business model and services 15
Management structure and corporate governance 22
Committees 26

Healthy planet 32

Energy consumption and greenhouse gas emissions 33
Waste 39

Healthy society 42

Employment and employee development 43
Diversity and inclusive culture 51
Safe workplace 53
Health promotion and preventive healthcare 56
Providing high-quality services and shaping the healthcare system 63
Social engagement 71

Healthy organisation 76

Ethics and transparency 77
Cooperation with organisations and associations 80
Supply chain and supplier relations 83
Responsible marketing communication 85
Privacy and data security 86

About the report 88

About the report 89
Materiality analysis and stakeholder relations 90
Dialogue with stakeholders 92
GRI index 95
Contact 100

Appendices 101

Appendix 1 102
Appendix 2 103

A few words from the CEO

2-22



Ladies and Gentlemen,

I am proud to present to you the LUX MED Group' s second *Sustainability Report*.
This is a moment for me to reflect on what we have achieved so far and an inspiring starting point for further action. At the heart of our daily activities is a relentless drive to improve the quality of life by caring for the health and wellbeing of our patients, who now number more than 2.5 million. This not only brings us great satisfaction but also motivates us to continue the sustainable development of the entire Group.

The year 2023 has been a time of intense work and deep commitment to our strategic goals in the areas of Patient Care, Growth, Digital Transformation, Sustainability, Agile Culture, and Data. Conscious of the changing social, environmental, and corporate landscape, including mandatory reporting, we have continued our efforts to ensure that all our practices comply with ESG criteria. We have also gained valuable insights from the publication of our first report, which has enriched our knowledge.

Patient care is always at the core of our actions. Over the past year, we have focused on creating solutions that not only meet our patients' needs but also enable them to lead healthier and happier lives. As a result, we have exceeded our NPS® target of 65.4, the patient satisfaction index, and we strive to ensure that every patient feels supported in all aspects of their health. One of the answers to these needs is the innovative LUX MED Hospital Insurance – Full Care, which provides our patients with access to comprehensive, top-level hospital care around the clock, regardless of the situation. We have also opened the LUX MED Group Robotic Surgery Centre, equipped with a system that enables procedures using the most advanced minimally invasive surgical techniques. Last year, the LUX MED Group expanded its operations through the acquisition of the leading Orthos hospital in Lower Silesia, making it the 15th in-house hospital available to our patients. Furthermore, we continued to invest in medical education, offering specialisation and residency opportunities, and organising a range of courses and training to support the development of nurses, doctors, trainees, and residents, while also promoting high standards in medicine and demonstrating that the non-public healthcare sector plays a crucial role in the education of medical staff.

We also continue to assist refugees from Ukraine who have come to our country due to the war. Last year, the LUX MED Group provided care for 246,000 people and delivered 443,000 health services. This reflects our commitment to humanitarian aid and to improving health care for those most in need.

In 2023, we also continued our efforts towards pro-environmental initiatives and the promotion of healthy lifestyles. Our involvement in the third edition of the Healthy Cities programme led to further successes. Last year alone, we planted 10,500 trees – one for each participant in the challenge. Once again, we rewarded the most active cities with green budgets worth a total of PLN 60,000 and awarded the winning companies with sponsorships for the revitalisation of 17 hectares of peat lands.

Last year, we also published the results of the second *Healthy Cities Index*. In collaboration with experts from the Warsaw School of Economics and the Foundation for Economy and Public Administration, we are inspiring local governments to create sustainable urban spaces in 66 Polish cities with poviat rights. The analysis of living conditions in Polish cities covered one-third of the country's population. Given the many challenges, Poles need the best possible living conditions, and cities require guidance on how to provide them – particularly in terms of health, across the numerous facets that constitute the urban environment.

In 2023, the LUX MED Group continued its commitment to innovation by investing in start-ups. A key step was the acquisition of 100% of the shares in MC2 Innovations Sp. z o.o., which includes the benefit platform Carrotspot in its portfolio. Additionally, we launched the ApteGo platform. These investments are integral to our growth strategy but, more importantly, they respond to the needs of patients, who remain at the centre of all our activities.

We have also supported significant national initiatives. In 2023, we provided medical coverage for major events such as the European Games and the Men's Handball World Cup. Our strategic cooperation with the Polish Olympic Committee also continues. Furthermore, LUX MED was among the founding members of the new trade organisation Employers for Health, established by the Polish Confederation Lewiatan, which aims to represent employers' interests to state and local administration bodies. I am immensely proud to also serve as the President of this initiative.

With determination and passion, we will continue our mission, caring for the health and well-being of our patients in line with the principles of sustainable development.

I invite you to read on.

Anna Rulkiewicz
LUX MED Group CEO

Sustainability in the LUX MED Group

In the LUX MED Group's 2022 Sustainability Strategy for 2023–2025, we established measurable and time-bound targets concerning the health of the planet, society, and our organisation. Below is a summary of our commitments in the first year. More detailed information can be found in the individual chapters of the report.

LUX MED Group ESG Strategy 2023–2025

Health of the Planet



STRATEGIC TARGETS

- 14% reduction in CO_2 emissions from Scope 1 and 2
- Implement at least one annually scalable circular solution

ACTIONS TAKEN IN 2023

- We are systematically transitioning to renewable energy sources, with 66% of our electricity now coming from green energy. We have been upgrading our car fleet, and by the end of 2023, 75% of LUX MED vehicles are hybrid cars.
- We conducted an internal audit on the segregation of medical waste, resulting in a 45% monthly reduction in this type of waste. Consequently, these audits have been implemented across all LUX MED outpatient clinics in Poland.

Health of the Population



STRATEGIC TARGETS

- Reach a total of 2 million people with our preventive health care activities
- Achieve a patient NPS® of at least 64
- Attain an employee engagement score of at least 80 in the *People Pulse* survey

ACTIONS TAKEN IN 2023

- We provided preventive screenings, vaccinations, and health education to over 2 million people. Additionally, we supported the mental health of more than 4,000 children through a dedicated programme.
- Listening to our patients is a priority. As in last year's NPS® survey, we met our target again this year, achieving a score of 65.4.
- The 2023 *People Pulse* survey resulted in a score of 87 out of 100. To achieve this, we offered employees preventive screenings, vaccinations, and medical consultations to address their health needs. We also provided access to webinars and training on mental health, stress resilience, and workplace challenges. Furthermore, we organised sports activities, yoga sessions, and webinars on healthy lifestyles.

Health of Our Organisation

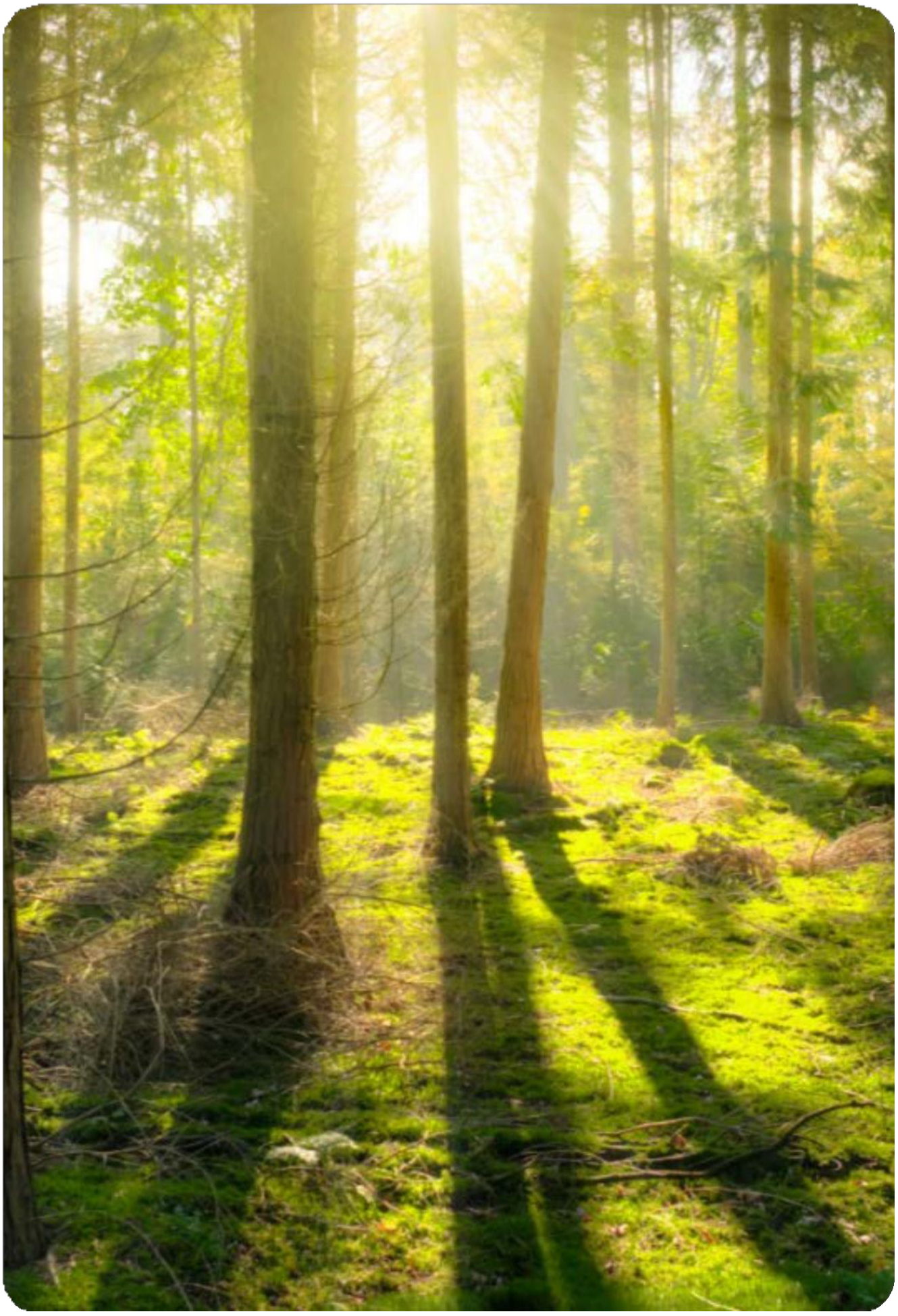


STRATEGIC TARGETS

- 100% of submissions to the Ethics Committee reviewed within six months of receipt
- Quarterly assessment of ESG risks
- Implementation of the Sustainable Supply Chain Principles for LUX MED Suppliers

ACTIONS TAKEN IN 2023

- In 2023, 100% of submissions to the Ethics Committee were processed within six months of receipt.
- Following the publication of our strategy, risk assessments were conducted in two consecutive quarters. Additionally, as part of the work on the 2023 *Sustainability Report*, the materiality analysis led to an expanded catalogue of ESG-related risks, which will be incorporated into the quarterly assessment moving forward.
- We have also developed and agreed upon the Sustainable Supply Chain Principles for LUX MED Suppliers. We are currently working on integrating these principles into the procedures and guidelines governing our cooperation with suppliers.





About the LUX MED Group

Who we are

2-1
The LUX MED Group is the market leader in private healthcare services in Poland and is part of Bupa, a global insurer and healthcare provider. With over 30 years of experience in Poland, the LUX MED Group offers comprehensive care, including outpatient, diagnostic, rehabilitation, dental, psychological, hospital, and long-term care services to more than 2.5 million patients. The Group operates nearly 300 general and specialist medical centres, including 15 hospitals and around 3,000 partner clinics. Employing over 23,000 people, including approximately 10,000 doctors and 7,000 support medical staff, the LUX MED Group is committed to sustainability, with numerous initiatives focused on social and environmental engagement.

Medical care nationwide

We provide comprehensive outpatient, diagnostic, rehabilitation, psychological, dental, hospital, and long-term care services. Our services cater to individual clients, SMEs, and corporate customers.

Each group receives a customised and tailored range of offerings. Individuals and sole traders often opt for medical subscriptions that cover a variety of outpatient services, including premium products and individual insurance, such as hospital insurance. SME and corporate clients often take advantage of occupational health services or tailored insurance products.



Summary of the key results for 2023

Nearly 300 medical facilities, including:

- 15 hospitals
- 7k supporting medical personnel
- 10k doctors
- 2.5mln patients

- 65.4 NPS® Satisfaction Index
- Over PLN 22.7 mln for support of social initiatives
- 20,079.0 MW Energy from RES
- 17,720.5 tCO_2 Total emissions from Scope 1 and 2 (market-based)

Healthy Cities 2023:

- 10.5 k participants
- 10.5 k trees planted, i.e., 1.79 ha of forests
- 1.8 bln steps
- 17.43 ha peatlands undergoing revitalisation



2023 in the light of major events

The year 2023 was filled with challenges for the LUX MED Group, but it also brought many significant milestones and memorable moments in our development. Below are some of the highlights that deserve special mention:

We opened the LUX MED Group Robotic Surgery Centre, equipped with a state-of-the-art system that enables procedures using the most advanced minimally invasive surgical methods.

We supported the European Games, the Men' s Handball World Championship, and other major events by providing medical coverage, ensuring these events took place safely.

We acquired 100% of the shares in MC2 Innovations Sp. z o.o., the company behind the benefit platform Carrotspot.

We launched the ApteGo platform, helping patients find and purchase recommended medicines easily.

We continued our relief efforts for Ukraine, covering 246,000 people and providing 443,000 health services by the end of 2023.

The LUX MED Group became one of the founding members of the new trade organisation Employers for Health at the Polish Confederation Lewiatan.

We published our first *Sustainability Report*.

We organised the second edition of the *Healthy Cities Index*, analysing living conditions in Polish cities, covering as much as one-third of the Polish population.

We organised the third edition of the Healthy Cities pro-health and pro-environmental challenge, which resulted in the planting of 10,500 new trees, the revitalisation of 17,400 ha of peatlands and the allocation of PLN 60,000 to eco-initiatives in the winning cities.

We launched sklep.luxmed.pl, where individual LUX MED services can be purchased online.

We furthered our commitment to education, engaging in postgraduate training for doctors, residents, and organising courses in collaboration with universities and post-secondary schools.

We acquired Orthos, a leading multi-speciality hospital in Lower Silesia, making it the 15th hospital in our Group.

Mission, vision, and values

Mission of the LUX MED Group

We help people live longer, healthier, and happier lives while making the world a better place.

Sustainability efforts are an integral part of LUX MED's mission, and we are committed to integrating environmental, social, and governance (ESG) factors into our business practices. We recognise the healthcare sector's impact on the environment and are dedicated to reducing our carbon footprint and promoting sustainable energy practices.

To achieve our sustainability goals, we have implemented several environmental initiatives, detailed in the Healthy Planet section.

We understand that social responsibility is also a vital part of our mission. We are committed to supporting our employees, patients, and local communities.
You can learn more about these efforts in the Healthy Society chapter.

Creating an ethical workplace is another of our priorities. The Healthy Organisation chapter covers this in more detail, including our Code of Conduct, which outlines LUX MED's commitment to fair practices, the promotion of equal opportunities, and the rejection of any discriminatory actions.

We are proud to be part of Bupa, a global healthcare and insurance provider. In May 2022, Bupa announced that the Science Based Targets Initiative1 (SBTI) had approved the Group's decarbonisation targets. It is noteworthy that Bupa is one of the first healthcare organisations to be involved in the scientific development of targets to achieve zero carbon.

At LUX MED Group, we are committed to building a sustainable future for our patients, employees, and communities. We will continue to strive for excellence in healthcare, promote social responsibility, and address environmental challenges.

Our goal is to achieve zero CO_2 emissions by 2040.



1 Science Based Targets Initiative (SBTI) – an initiative that defines and promotes best practice in emissions reductions and net zero targets, in line with climate science. It provides technical assistance and expert resources to companies setting science-based targets based on the latest climate science.

Mission

We help people live longer, healthier, and happier lives while making the world a better place.

Our mission is deeply valued by us and is evident in our daily work, with everyone contributing to its fulfilment.

We act with our patients, employees, and a better world in mind.

Regardless of the department or area in which we work, we are fully committed to the wellbeing of our patients, seeing this as our responsibility to society.

We operate with the guiding principle that we are here for our patients every day. Our purpose is to help them with the most important issue - taking care of their health. Every action we undertake stems from our desire to care for others.

Vision

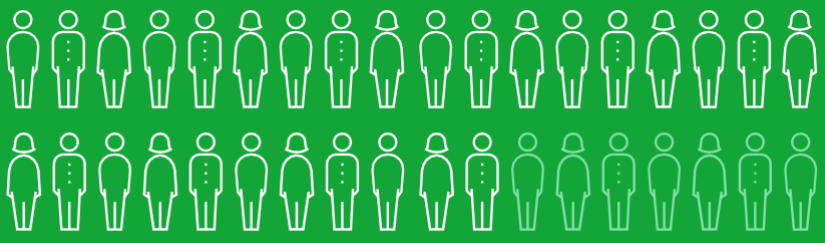
We listen to our patients and care for each one individually.

Across every area of our organisation, we prioritise understanding the needs and opinions of our patients. We are always guided by the welfare of those who entrust us with their health. Based on the nearly one million pieces of feedback we receive each year, we design and implement measures to improve the quality of our services.

Listening and resolving

One of our key initiatives in building a positive patient experience is the 'Listening and Resolving' project. This involves reviewing anonymous recordings of conversations with patients on our helpline to identify issues and find solutions. The directors of various departments, along with their teams, actively participate in this project, led by our biggest ambassador of a patient-centred culture – CEO Anna Rulkiewicz. This is just one of many examples of our commitment to patient-centred care.

76% of our patients would recommend LUX MED Group services to their friends.
Internal Quality Survey 2023



Values of the LUX MED Group

Courage, responsibility, and care are our core values.

As an organisation, we remain flexible and adaptive, responding to the challenges of a dynamic world, where we see opportunities for growth. When making business decisions, we always prioritise the welfare of our patients and the world around us. Our work is guided by values that resonate deeply with each of us.

Courage
We seize opportunities and create new solutions.

Care
We act with empathy and respect.

Responsibility
We are responsible for our decisions and actions.



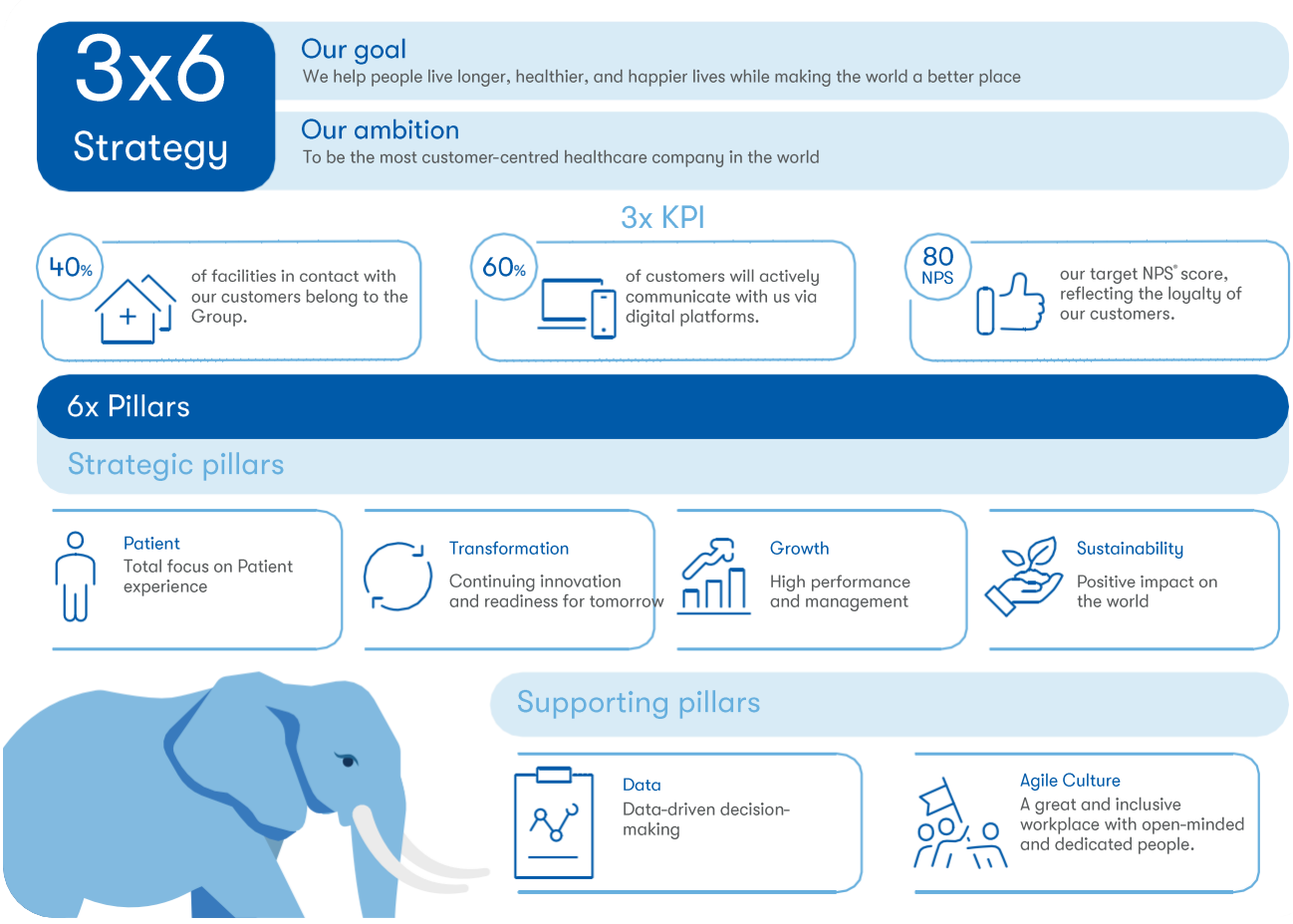
Business model and services

The 3x6 strategy: a few words about the elephant strategy

In pursuing our mission and vision, we adhere to the 3x6 business strategy, also known as the Elephant Strategy, announced by Bupa in 2021. This strategy comprises three key performance indicators (KPIs) that measure our progress towards our goals and ambitions, and six pillars – four strategic and two supporting – that guide our actions and keep us focused.

The elephant is a powerful and resilient animal, but despite its strengths, it must adapt to its environment to survive. Similarly, at LUX MED Group, we recognise our potential, yet we also understand the need to continuously observe the market, anticipate future trends, and move forward with a readiness to embrace change.

One of the pillars of the 3x6 Strategy is sustainability, encompassing all our efforts to make a positive impact on the world around us. By focusing on high performance, efficient management, and innovation in our services, we ensure that the patient experience remains at the centre of everything we do.



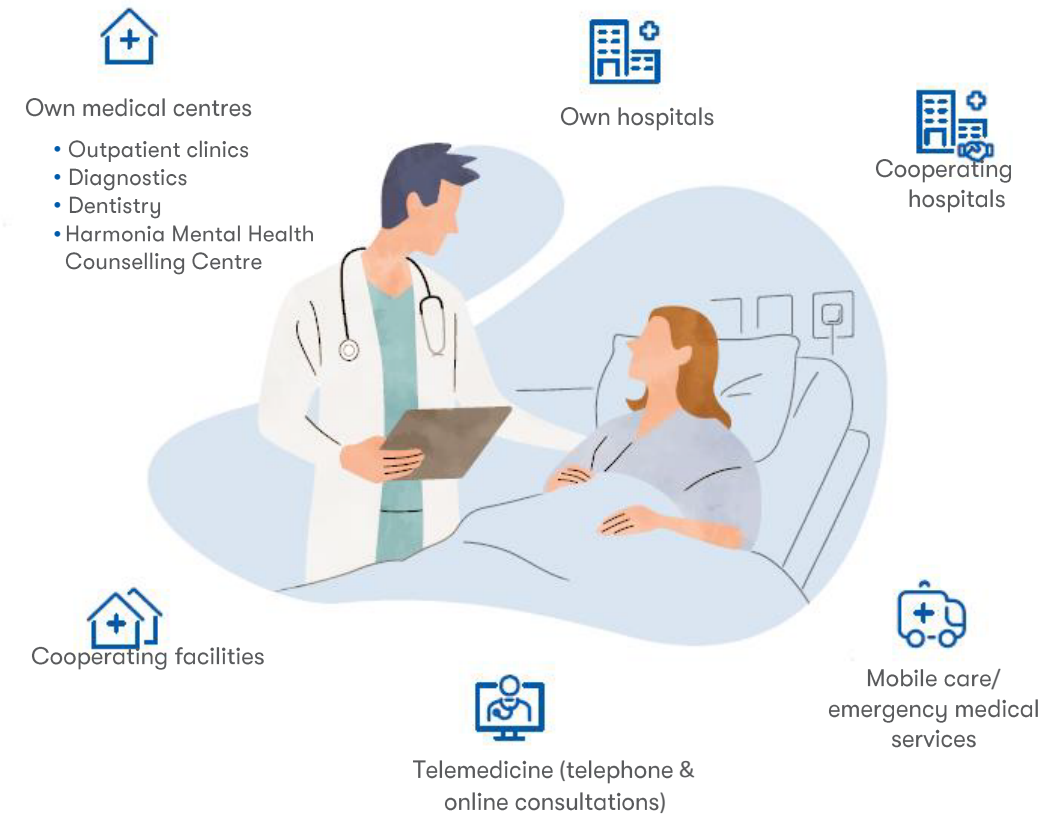
2-6

Patients are at the heart of everything we do.

Continuous development is essential to our journey, which is why we provide patients with an extensive network of medical facilities across the country. Our medical staff comprises highly qualified specialists in various fields, allowing us to offer comprehensive healthcare tailored to individual needs. Patient well-being guides our daily activities. Patients are at the centre of everything we do – from deciding whether to open new facilities to selecting specialists and determining available procedures and treatments.

Patient-centricity – we ensure that every patient receives a solution.

Holistic patient care



Convenient booking and access to a wide network of facilities

- Patient portal
- Reception desk at the facility
- Call centre
- E-market / www website



Easy-to-use tools for convenient service access

in the Patient Portal

- **Preliminary health interview**
- **Referral** for the appropriate service
- **Referral** for tests
- **Appointment scheduling** or cost refund
- **Appointment** at the facility or remotely
- Notifications of **available appointments**
- **Chat with a doctor**
- **Uploading** images and test results
- **Prescription** without consultation
- Basic **healthcare**

Medicines reservation

ApteGo
GRUPA LUXMED

Pre-visit communication

E-mails with booking confirmation

SMS reminders about the appointment

We listen to the voice of our Patients and adapt for them



2-6

Patient Portal

The Patient Portal has become one of the first things users think of when they consider LUX MED and is a leader in digital solutions in the industry in Poland, serving nearly 2 million patients. It' s a place where patients can easily schedule and manage their appointments and take advantage of more than 50 online features – from e-referrals and access to test results, to reserving medicines, remote consultations with a doctor, and support in diagnosis.

2023 | The Patient Portal is now the primary channel for patients' contacts with LUX MED.

+120 mln logins to PP

+25 mln appointments made

~1 mln primary care appts

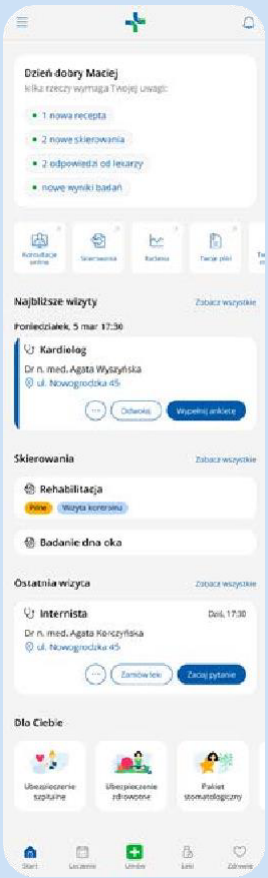
700 k online consultations

+200 k new PP accounts

800 k chats with doctors

8 mln subscrpitions verified

Patient Portal powered-by-Blua offers more than 50 features available online



NOTIFICATIONS ABOUT THE MOST IMPORTANT EVENTS

VIDEO/CHAT TELECONSULTATIONS

APPOINTMENT MANAGEMENT

MEDICINES RESERVATIONS THROUGH APTEGO

ONLINE PRESCRIPTION RENEWAL

ONLINE TEST RESULTS, CHECKING SUBSCRIPTION COVERAGE

PRE-HEALTH INTERVIEW QUESTIONNAIRE

ONLINE E-REFERRALS

POST-VISIT CHAT WITH A DOCTOR / ASK A DOCTOR

PREVENTIVE PLANS, ONLINE CARE PLANS



Our services

We are dedicated to making sure that every patient feels listened to, understood, and properly cared for, whether they are receiving treatment in an outpatient clinic or more specialised, hospital-based care. Our patients can choose from a variety of medical packages or opt to purchase individual appointments. Additionally, we offer insurance options, providing an alternative way to fund services alongside subscriptions.

Learn more about our different types of facilities below.

Comprehensive care

From outpatient clinics to specialist and hospital care

Specialists & outpatient clinics

LUXMED
MAVIT CENTRUM MEDYCZNE GRUPA LUXMED
MEDYCYNA RODZINNA GRUPA LUXMED
OPTIMUM SZPITAL LUXMED
HARMONIA PORADNIA ZDROWIA PSYCHICZNEGO GRUPA LUXMED

Dental clinics

LUXMED STOMATOLOGIA
ORTOFAN CLINIC
DENTestetica GRUPA LUXMED
SMILE DESIGN CLINIC GRUPA LUXMED
MEDISS DENTAL CLINIC GRUPA LUXMED
PROJEKT Uśmiech centrum dentystyczne GRUPA LUXMED
SILVER DENTAL GRUPA LUXMED

Hospitals

CAROLINA SZPITAL LUXMED
Przychodnie zdrowia MegaMed GRUPA LUXMED
med POLONIA GRUPA LUXMED
LUXMED SZPITAL PUŁAWSKA
LUXMED ONKOLOGIA
ORTHOS GRUPA LUXMED
LUXMED SZPITAL ŚW. ELŻBIETY
SWISSMED SZPITAL GRUPA LUXMED
LUXMED SZPITAL

Diagnostics

LUXMED DIAGNOSTYKA

Insurance

LUXMED UBEZPIECZENIA

Long-term care

LUXMED CENTRUM OPIEKI I REHABILITACJI

Start up

LUXMED BENEFITY
ApteGo GRUPA LUXMED





LUX MED Tabita

It is a place designed for seniors who require constant care. It offers a solution for families who may not have enough time to care for their ailing loved ones. It's also an ideal option for short-term stays when a primary caregiver is temporarily unavailable. We offer residential rehabilitation holidays, as well as day and outpatient rehabilitation, including neurological and orthopaedic rehabilitation, and improvement stays.

Harmonia Mental Health Counselling Centre

Harmonia is a network of highly specialised psychiatric and psychological outpatient counselling centres within the LUX MED Group. We assist individuals in finding balance and continuously expand our mental health and development services. Our services are available both in person at our facilities in Warsaw and Wroclaw, and remotely (online or by phone) throughout Poland. We also support both employees and employers through a comprehensive service offering, including special programmes like Harmonia w Biznesie [Harmony in Business].

At the Counselling Centre, we offer consultations with psychologists and psychiatrists, as well as couple, family, and child therapies, psychotherapies, and disorder diagnosis.

LUX MED Outpatient clinics

LUX MED Outpatient clinics include over 150 of our own facilities in several dozen Polish cities, along with 3,000 partner clinics. We offer a wide range of services, including medical consultations, primary care, occupational medicine, laboratory tests, outpatient procedures, rehabilitation, a variety of vaccinations, health check-ups, and preventive packages. Our patients can consult with doctors from over 30 specialisations.

LUX MED Dentistry

LUX MED Dentistry operates more than 70 dental clinics. Our centres are staffed by a team of experienced professionals, including over 700 dentists and 750 dental hygienists and assistants.

LUX MED Diagnostics

LUX MED Diagnostics includes 34 MRI laboratories, as well as 20 CT, ultrasound, and X-ray laboratories in 20 cities. We specialise in mammography exams conducted in mobile diagnostic labs known as mammobuses. We offer examinations in magnetic resonance imaging, computed tomography, mammography, ultrasound, and X-ray.

Hospitals

LUX MED also operates a network of 15 hospitals across Poland. Our patients receive hospital care in areas such as oncology, general surgery, urology, gynaecology, proctology, cardiology, orthopaedics, ENT, ophthalmology, emergency care, and more. Hospital services are provided under the National Health Fund, through our Full Care hospital insurance, subscriptions, and for a fee.

LUX MED Insurance

LUX MED Insurance offers comprehensive group and individual health insurance plans. One of our flagship products is the LUX MED Hospital Insurance – Full Care, which covers the entire treatment process – from diagnostics and emergency assistance to treatment and rehabilitation. We also offer products like PROMED 5 individual health insurance, LUX MED Hospital Insurance Orthopaedic Care, Orthopaedic Care Plus, and more.

Carrotspot

Carrotspot is a benefit platform acquired by LUX MED in 2023 through the acquisition of 100% of MC2 Innovations Sp. z o.o. Carrotspot is a convenient tool for managing a variety of processes, including subscriptions, benefit cafeterias, incentive programmes, and detailed analytics. The platform also facilitates management of the Employee Benefits Fund, creation of surveys and questionnaires, and the setting and monitoring of position and development objectives.

ApteGo

ApteGo is a new online platform where patients can easily check the availability of specific medicines at pharmacies and reserve them. The platform is integrated with thousands of pharmacies across Poland.

Awards and distinctions

Quality Service Star
in the category of Medical Outpatient Clinics

CSR Policy White Leaf by Polityka Weekly

Golden Emblem
in the category of Debut of the Year fot the “LUX MED Hospital Insurance - Full Care” offer in the Consumer Quality Leader Contest

Golden Laurel by Super Biznesmagazine
in the Finance and Insurance category for ‘LUX MED Hospital Insurance - Full Care’

Golden Emblem
in the category of Medical Services and Dental Aesthetics in the Consumer Quality Leader contest

Main Award
in the Employer category for fostering the development of leaders in the ‘Power of Attraction’ contest organised by ‘Puls Biznesu’

1st place in the Ukraine Crisis Champions category
in the Global Good Awards 2023 for humanitarian aid provided to refugess

Bronze Award Winner for Health Services During Crisis
awarded by the International Hospital Federation for the humanitarian aid programme for refugees

Top Brand 2023
in the category of Medical Care Network in the magazine ‘Press’ and ‘PSMM’ study

Golden Mongoose
awarded for outstanding support of grassroots sport, building a healthy society and taking actions for Ukrainian refugees and Ukraine

Business Insider Awards
for CEO Anna Rulkiewicz in the ESG category

Special Award
for LUX MED Group Patron of Paralympic Sports

Management structure and corporate governance

2-9, 2-11

The Management Board of LUX MED Sp. z o.o. as of 31 December 2023 consisted of six members: one woman (17%) and five men (83%), and included:



Anna Rulkiewicz
LUX MED Group CEO

Our mission is to help people live longer, healthier, and happier lives while making the world a better place. This mission is our compass in ESG activities. We strive to ensure that all our actions are sustainable, as this is the only way we can fulfil our mission, achieve our goals, and reach zero carbon by 2040. A truly responsible company cares for both people and the planet, and I am extremely proud to lead such an organisation.



Michal Rybak
Vice-President of the Management Board for Operations

The Group currently manages around 300 of its own medical centres and collaborates with 3,000 partner facilities, and our network continues to grow dynamically. This scale not only provides us with opportunities but also obliges us to actively reduce our environmental impact. Our priority is to gradually build sustainability awareness among the employees of our medical centres and hospitals. Additionally, our employees and patients continuously inspire us to take action.



Krzysztof Kurek, MD, PhD
Member of the Management Board, LUX MED Medical Division

From my perspective, ESG represents a multidimensional responsibility. In an organisation like ours, where the health and lives of patients are at stake, the responsibility for doing a job well is even greater. We need to shape this rensponsibility from the ground up - both by educating young people and continuosly training medical staff. For over 10 years, with the involvement of the LUX MED Emergency Academy, we have been teaching primary school pupils how to administer first aid. By organising various educational events and offering internship and residency positions at our facilities, we are also contributing to the education of medicall staff. This is our responsibility and our contribution to the development of the healthcare system in Poland.



Bartosz Kapczynski
Member of the Management Board, LUX MED Sales and Customer Service Division

In today's business reality, operating in accordance with ESG principles is not only our commitment to the planet and society but also to our business partners. Our customers are increasingly aware of the changes taking place and understand what ESG entails. They set their own social and environmental goals within their organisations and, therefore, seek partnerships with those who share the same values. We are proud to be a sustainable and responsible partner on the path to green business transformation.



Tomasz Garbowski
Member of the Management Board, LUX MED IT and Projects Division

At LUX MED Group, an integrated approach to data security has been our priority for years. After all, the trust of our customers is the invaluable currency of business relationships. Data is one of the six pillars of Bupa's strategy, which guides our daily work. It provides us with comprehensive knowledge of the organisation and enables us to make better decisions. In the age of ESG reporting, data analysis helps us identify the areas that require our greater attention and care.



Jakub Tatak
Member of the Management Board, LUX MED Finance Division

For me, ESG is not just an obligation but also a unique opportunity for a new, innovative approach to business. As a Group, we are growing dynamically and are committed to ensuring that our development is sustainable. ESG is a critical and ongoing component of the Due Diligence process and plays a key role in assessing the development prospects of businesses joining the Group. Our priority is to reach zero carbon by 2040. Already, more than 60% of our electricity comes from renewable sources, and we are working towards making this energy 100% green. This is a significant challenge.

The Management Team of the LUX MED Group consists of the Management Board along with selected top-level Directors. With extensive experience and a high level of competence in their respective areas, the expanded Management Team plays an active role in supporting the implementation of the Group's strategy.

In addition to the Board Members, it includes:



Marta Bartosiewicz
Marketing and Online Sales Director

Numerous studies and analyses show that consumers are increasingly aware of the importance of sustainability and are choosing socially responsible brands. They are also becoming more digitalised and expect quick access to services. To meet these expectations, we are continuously improving our Patient Portal. It offers a wide range of functions that allow users to manage most health and prevention-related matters 'at a glance'. We want our patients to fully understand and utilise all the platform's features, which is why we have declared 2024 the Year of the Patient Portal at LUX MED.



Dorota Sawicz
Human Resources Director

We are one of the largest employers in Poland, caring for more than 24,000 employees who have chosen to pursue their professional lives with us. We provide health-promoting benefits, training and development opportunities, wellbeing programmes, and support from the LUX MED Foundation. This commitment has resulted in high employee engagement scores, with a score of 87 out of 100 in 2023. We take our responsibility for the social pillar very seriously. Our ambition is to be a trendsetter in HR and serve as an example not just within the healthcare industry but across the entire market.



Sandip Godbole
Risk and Compliance Director

In the ESG framework, I am particularly passionate about the 'G', which stands for Governance. The LUX MED Group has a Risk and Compliance Committee that supports the Management Board and the entire organisation in the risk management process. This committee enhances the transparency of our activities and helps us identify both business opportunities and risks. At the same time, it allows us to prioritise issues related to climate, environmental care, and social responsibility.





Lukasz Niewola
Corporate Communications and Sustainable Development Director

Businesses have obligations to local communities that they should strive to fulfil to the best of their ability. Companies must not only consider profit but also actively engage in improving the environment in which they operate. Moreover, from a business standpoint, ESG is a smart investment – an investment in employees, development, innovation, and green energy sources. As a healthcare company, ESG is fundamentally about health: the health of the planet, people, and the company itself. ESG is truly embedded in our DNA.



Maciej Madrala
Director of Hospitals

In the age of ESG, as a market leader in private healthcare and with a continuously growing network of our own hospitals, we face the crucial challenge of making our facilities zero-carbon by 2040. Adapting our hospitals to meet the demands of this new reality requires decarbonisation investments, which, as an environmentally responsible company, we are committed to making.

Detailed information on the experience and competencies of our managers and supervisors can be found on the LUX MED Group website.

Committees

2-17

The Management Team is continuously seeking to expand its skills and knowledge in the area of sustainability. In 2023, the CEO and two members of the Management Team attended the Strategy and Leadership in the Age of ESG course, organised by the International Institute for Management Development (IMD) and Queen Hedvig Academy.
The LUX MED Group has established standing committees responsible for ensuring the smooth operation of the company.

These committees include:

- Risk and Compliance Committee
- ESG Committee
- Business Continuity Committee
- Clinical Governance Committee
- Data Governance Committee (Data Quality)
- Patient Forum
- Tax Committee
- Hospitals Committee
- Product Committee
- Privacy and Information Security Committee

Committees within LUX MED Sp. z o.o. are established by order or resolution of the Management Board of LUX MED Sp. z o.o., with members appointed by the Management Board. Each committee has clearly defined objectives, operating principles, tasks, and responsibilities. Local functional committees may also be established within subsidiaries, which report to the corresponding committees at the head office. As needed, individuals outside the appointed membership may be invited to participate in committees. In the event of personnel changes or adjustments to committee tasks, updated orders and appropriate communications are prepared.



Appointment of persons to management positions and assessment of their qualifications

2-10

The appointment of Management Board Members at LUX MED Sp. z o.o. or Directors and Presidents of subsidiaries who report directly to the LUX MED Management Board follows a policy that ensures the appropriate factual and ethical qualifications, adhering to the Fit and Proper Person standard. This standard also outlines requirements for the proportionate assessment of the qualifications of all employees, based on the level of responsibility associated with each position. Compliance with this standard provides assurance to Bupa' s Management Board, customers, suppliers, and regulators that all Board Members and Directors possess the competence and ethical and professional qualifications necessary to perform their duties effectively. This policy applies to all companies within the LUX MED Group and extends to all employees.

2-18

Our regulations further specify the requirements for a proportionate assessment of employee qualifications according to their respective levels of responsibility. Adherence to these guidelines reassures Bupa' s Management Board, customers, suppliers, and regulators that all Board Members, Directors, and employees have the necessary competence, ethical standards, and professional skills to fulfill their roles effectively. These guidelines are applicable across all LUX MED Group companies and all employment within the organisation.

Remuneration policy

2-19, 2-20

The remuneration policy for Board Members and senior executives within the LUX MED Group aligns with Bupa' s remuneration policy, which aims to promote business development that drives the success of the Group. Board Members and senior executives receive compensation in both fixed and variable forms, structured on a short-term and long-term basis.

The Group does not offer financial benefits such as signing bonuses or incentives for joining the company. However, termination payments are made when required by non-compete agreements. The Group does not provide additional pension or early retirement schemes for Executive Board members.

Long-term remuneration and bonuses for Board Members and senior executives are, in part, contingent on meeting targets related to ESG issues. Performance indicators include, for example, the reduction of CO_2 emissions, the organisation of the working environment in alignment with renewable energy goals, and the optimal management of water resources.

ESG management

2-23, 2-24

In alignment with the LUX MED Group Sustainability Strategy 2023, we have also adopted a Sustainability Policy (formerly the Corporate Responsibility and Sustainability Policy). This policy underscores the LUX MED Group' s responsibility to contribute to and support the achievement of Bupa' s Sustainability Strategy objectives. It addresses the risks associated with fulfilling these plans and outlines the overall expectations for our operations, as well as the requirements for ensuring compliance. The strategy establishes ambitions, targets, and key performance indicators, with a strong focus on the ambitious goal of achieving net-zero CO_2 emissions by 2040. These targets are aligned with scientific principles aimed at limiting global warming to 1.5°C.



2-12, 2-13, 2-14

The advisory and supervisory function on ESG issues within the LUX MED Group has been entrusted to an ESG Committee established by the Board.

Chaired by the CEO, the Committee includes elected Board Members and representatives from key areas of the company's operations.

Monitoring
of annual and quarterly performance for Scope 1, 2 & 3 emissions against Bupa/ELA targets

Analysis
of decarbonisation plans for the LUX MED Group

Due diligence
of emissions for organic/ other growth and M&A

Oversight
of implementation of LUX MED Group's ESG Strategy objectives

Ongoing review
of the non-financial reporting process

Monitoring
of the Healthy Cities initiatives

The Committee meets as frequently as necessary to fulfil its tasks effectively, but at least once every six months. During these meetings, the progress of sustainability efforts is reviewed, and ESG reporting issues are discussed.
Members of the Risk and Compliance Department also attend ESG Committee meetings, and some ESG Committee members are part of the Risk and Compliance Committee.

The organisation also has a Corporate Communications and Sustainability Department, responsible for reporting, addressing sustainability reporting issues, and preparing for future non-financial reporting requirements.
The Director of Corporate Communications and Sustainability, along with the Director of the Finance Division, is responsible for managing and reporting on the organisation's decarbonisation impact to the Management Board. They review and approve management information in this area on a quarterly basis. The Management Board also approves the *Sustainability Report*.



Joanna Wegrzynowska
ESG Manager

99
The fact that the ESG Committee is chaired by Anna Rulkiewicz, the CEO, underscores the significance of this topic for the entire organisation. The Committee's tasks include monitoring impact, analysing decarbonisation plans, and overseeing the implementation of ESG strategy objectives. At regular meetings, the progress of sustainability efforts is reviewed, and if any area requires improvement, the Board prioritises the process.

Risk management in the LUX MED Group

2-25

Our organisation continuously monitors identified risks, which are regularly reviewed and updated. Risk assessment considers the impact of both internal and external environments.

The LUX MED Group has implemented a Risk Management Framework that outlines the core elements of the risk management system, including cyclical risk assessments, dependencies arising from existing policies, and sources of risk knowledge. The framework and accompanying policies define risk categories for each business area and specify the minimum requirements for control activities. These control activities can be supplemented by risk owners to better mitigate potential risks.

The Risk and Compliance Department oversees the risk management system, enhancing awareness and maturity within the organisation. It provides advice, reviews certain assumptions, and ensures a clear understanding of each risk type, its causes, and its consequences. The Department also maintains the organisation' s risk register, analysing it for links, dependencies, and the materiality of risks, including those related to sustainability. Each identified risk is assigned an owner, and corresponding control actions, which also have designated owners, are implemented to mitigate these risks. Risks are identified across all areas, with the main categories defined by Bupa policies in place within the LUX MED Group. The Risk Assessment Matrix is based on a five-point scale measuring both probability and impact. Risks are assessed by their owners on a cyclical basis or on an *ad hoc* basis when updates are required, such as when a new risk factor emerges.





To ensure proper oversight of the risk management and compliance system, and to implement the risk management strategy within the LUX MED Group, the Board has established a Risk and Compliance Committee.
The Committee's primary tasks include supporting the Board and business area management in enhancing risk awareness, reviewing elements of the risk management process, and analysing and assessing current issues relevant to this process. On a cyclical basis, the Committee receives a report on the 'Top Risks', which identifies the most significant risks from the perspective of the Risk and Compliance Department, following an examination of the Risk Register and consultations with individual risk owners. The Committee meets periodically to review and summarise selected elements of the risk management system and processes, basing their assessments on specific indicators. Additionally, at the end of each reporting period, a comprehensive report on the organisation's risk management (ICRMA) is prepared, with final approval by the LUX MED Group CEO.

Through continuous oversight and monitoring of risks, we can identify when to react and implement further control measures and actions. This approach also supports a more investment-oriented development strategy that prioritises climate, environmental care, community welfare, and sustainable development. At LUX MED Group, we understand that effective management of environmental issues, including related risks, offers numerous benefits. Uncontrolled environmental and social risks, like other corporate risks, can have negative consequences, with remediation costs potentially exceeding the costs of proactive management, including preventive measures. The organisation strives to integrate ESG factors at a strategic level in its business operations, addressing these issues with accountability and transparency. This approach not only enhances trust within the community but also increases the organisation's chances of achieving long-term success in this field.



Katarzyna Sniegorska
Risk Management Manager, Risk and Compliance Department

99

Risk management is crucial for the long-termsustainability of our organisation and for building trust among our patients, customers, employees, business partners, and the broader community. In an era of dynamic climate change, rising societal expectations, and tightening regulations, an effective approach to risk management, including ESG risks, not only helps minimise potential losses but also uncovers new opportunities for growth.



Healthy planet

Energy consumption and greenhouse gas emissions

3-3



Energy consumption and greenhouse gas emissions within the LUX MED Group are directly linked to the provision of medical services in our buildings. In our facilities and hospitals, energy is used to illuminate rooms, power medical equipment, and maintain appropriate room temperatures. Additionally, our hospitals operate around the clock, which further increases energy demand.

As a healthcare provider, we recognise that while our operations are designed to improve the health and wellbeing of society, they also have certain environmental consequences. Energy consumption contributes to greenhouse gas emissions, which in turn drive climate change. These emissions are generated both directly, through the combustion of fossil fuels for heating or vehicle use (Scope 1 emissions), and indirectly, through the consumption of purchased energy (Scope 2 emissions). Given the growing challenges posed by climate change, we are actively working to minimise our environmental impact while continuously improving the quality of our services.

Working towards a green future

As part of the LUX MED Group, we are implementing a decarbonisation plan in alignment with Bupa, our parent company. Our shared goal is to achieve net-zero CO_2 emissions from Scope 1 and 2 by 2030, and across the entire business by 2040. This target is in line with, and formally endorsed by, the Science Based Targets Initiative – a global effort supporting the setting of emissions reduction targets and business transformation.

On the path to achieving net zero, each Bupa region has set its own reduction targets. In 2023, the LUX MED Group adopted a Sustainability Strategy for 2023-2025, with the aim of reducing our Scope 1 and 2 CO_2 emissions by 14% compared to the base year of 2019, in line with the target set for the ELA region to which we belong. At the operational level, we developed a plan that accounts for both the emissions growth associated with the Group' s expansion and the mitigation actions necessary to reduce emissions from our operations. This plan was approved by the Director of the Finance Division, who is also a member of the Management Board of LUX MED Sp. z o.o., and the Director of Corporate Communications and Sustainable Development, a member of the Management Team.

Thanks to the strong determination and commitment of our teams, we exceeded expectations by reducing our carbon footprint by 19.5% in 2023, surpassing the original Strategy targets. However, we are not stopping there; we are actively updating our plans as we continue to pursue our long-term goal.

The wellbeing of people and society, both directly and indirectly, depends on the state of our environment. Therefore, our efforts to reduce greenhouse gas emissions and implement sustainable health solutions guide the direction of our activities.



Maciej Kolek Director of the Economic Department

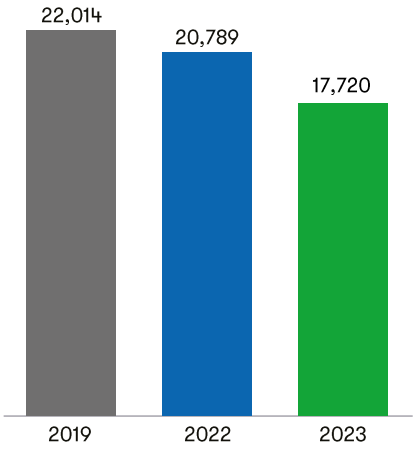
99

In our 2023-2025 sustainability strategy, we set a target to reduce CO_2 emissions in Scope 1 and 2 by 14%. Over the past four years, we have exceeded expectations, reducing our carbon footprint by 19.5%. We are on track to achieve zero CO_2 emissions in Scope 1 and 2 by 2030, and across the entire business by 2040. Everyone in our organisation feels responsible for this goal, and together, we are working towards its achievement.



Reduction plans for the coming years:

Chart 1. Scope 1 and 2 emissions [tCO_2e] – market-based method



In 2023, we implemented several measures to help us meet our reduction targets. Most notably, we have been steadily increasing the share of renewable energy sources within our organisation. **By the end of 2023, nearly 30% of our total energy consumption came from green sources.** This marks an increase of around 8 percentage points compared to the previous year. Additionally, we are investing in the installation of photovoltaic panels and exploring the use of heat pumps. We are also upgrading our lighting systems to LED technology. Business travel is an integral part of the work for many of our employees, so we are gradually replacing our fleet with hybrid vehicles. Currently, 75% of our company cars are hybrids. Thanks to these initiatives, we have reduced CO_2 emissions by 4,294 tonnes compared to the base year of 2019.



Renata Rzadkiewicz-Woznica
Director of the CM Administration Department

99

Currently, more than 66% of the electricity used in our buildings comes from renewable energy sources (RES). We are also implementing various energy efficiency measures, such as replacing lighting with LEDs and optimising heating systems. Additionally, in our new premises, we have repurposed most of the equipment from our previous office. The furniture has been refurbished and reupholstered, a step that saves up to 99% of the carbon footprint compared to purchasing all new equipment.

To support the goals outlined in our Sustainable Development Strategy, particularly those related to emission reductions, we have implemented a Sustainability Policy. To minimise the risk of not meeting our reduction targets, the policy includes continuous monitoring and oversight to ensure timely responses. We have also implemented and maintain an Environmental Management System, which is a key pillar of our Integrated Management System. Our Integrated Management System policy sets environmental objectives focused on pollution prevention, reducing greenhouse gas emissions, and the responsible use of resources (such as water, electricity, heat energy, and fuels) and the proper, legal management of medical and non-medical waste.

The scope of our Environmental Management System includes the activities of our head office at 21 Postepu Street in Warsaw and the medical centre at 21C Postepu Street in Warsaw, encompassing outpatient healthcare services in areas such as prevention, imaging diagnostics, treatment, occupational medicine, and dentistry. In 2023, we worked towards implementing the ISO 14001:2015 standard. The successful implementation of an Environmental Management System compliant with ISO 14001:2015 was confirmed by a certificate issued by an independent, accredited certification body, DNV Business Assurance Poland, in January 2024.

Energy consumption

302-1, 302-3, 305-4

In its operations, the LUX MED Group relies on electricity, heat, cooling, and energy from fuel combustion – used in vehicles and for heating. Over the past three years, purchased energy (electricity, heat, cooling) has made up the largest portion of our organisation's total energy consumption.

Chart 2. Energy

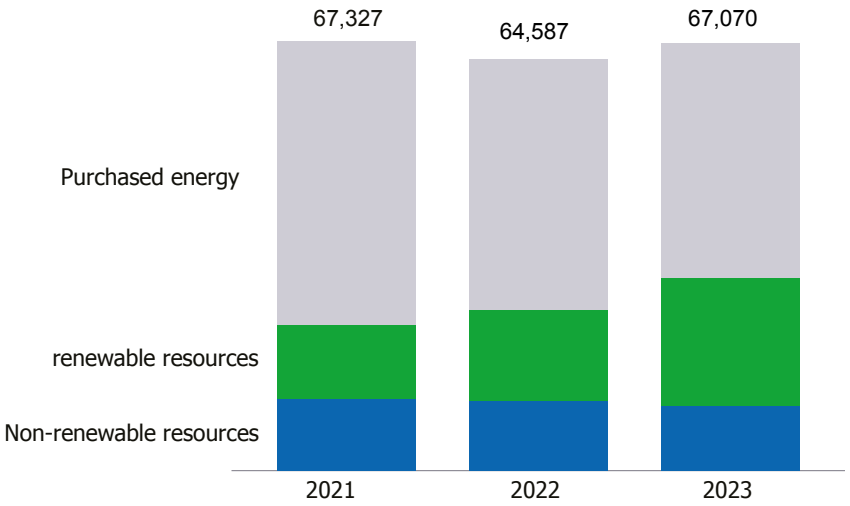
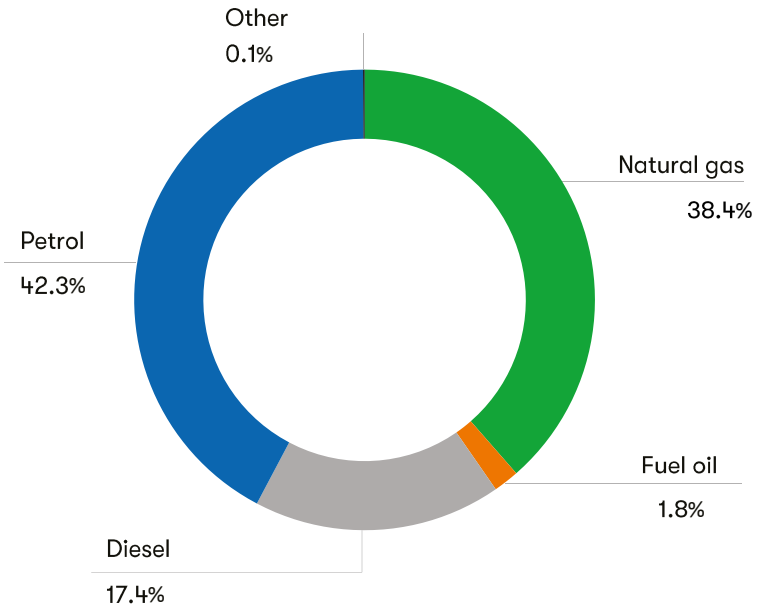


Chart 3. Total energy consumption from non-renewable resources in 2023



Among non-renewable raw materials, petrol holds the largest share, with its year to year increase in consumption directly linked to more frequent business travel post-pandemic. Natural gas, used for heating, ranks second, with a nearly 25% decrease in consumption compared to 2022. The rising consumption of electricity is directly related to the opening of new facilities and hospitals, which require powering additional medical equipment. The total surface area of our properties increased by nearly 16,000 m² compared to the previous year, bringing it to around 252,000 m². Despite this expansion, our energy intensity index remained virtually unchanged (see Table 1.6) at 0.27, a decrease of 3 percentage points, due to the continued increase in the share of renewable energy in our purchased electricity.

21 Postepu Street in Warsaw and the medical centre at 21C Postepu Street in Warsaw, encompassing outpatient healthcare services in areas such as prevention, imaging diagnostics, treatment, occupational medicine, and dentistry. In 2023, we worked towards implementing the ISO 14001:2015 standard. The successful implementation of an Environmental Management System compliant with ISO 14001:2015 was confirmed by a certificate issued by an independent, accredited certification body, DNV Business Assurance Poland, in January 2024.

Greenhouse gas emissions

305-1, 305-2, 305-3

In accordance with the GHG Protocol guidelines, which form the basis for our emissions calculations, Scope 2 emissions are calculated using two parallel methods: market-based and location-based. The market-based method reflects our informed choice of energy supplier and accounts for the guarantees of origin we have purchased. The location-based method presents results based on emission factors specific to locations, considering boundaries such as national borders.

Chart 4. Scope 1 and 2 emissions – market-based 2023 vs 2022

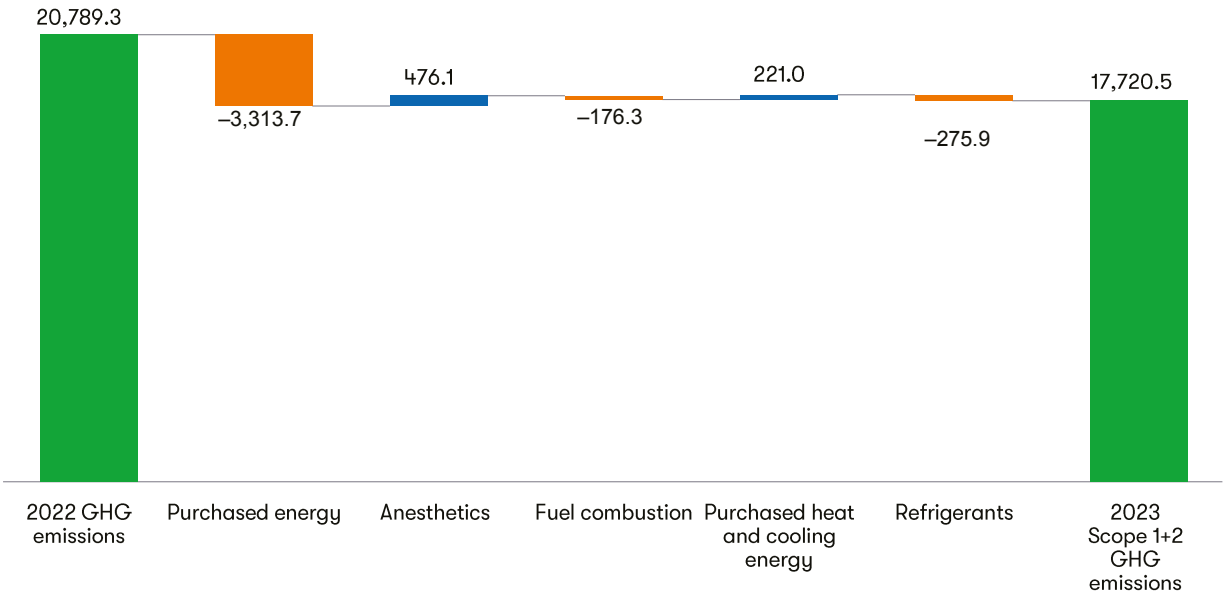
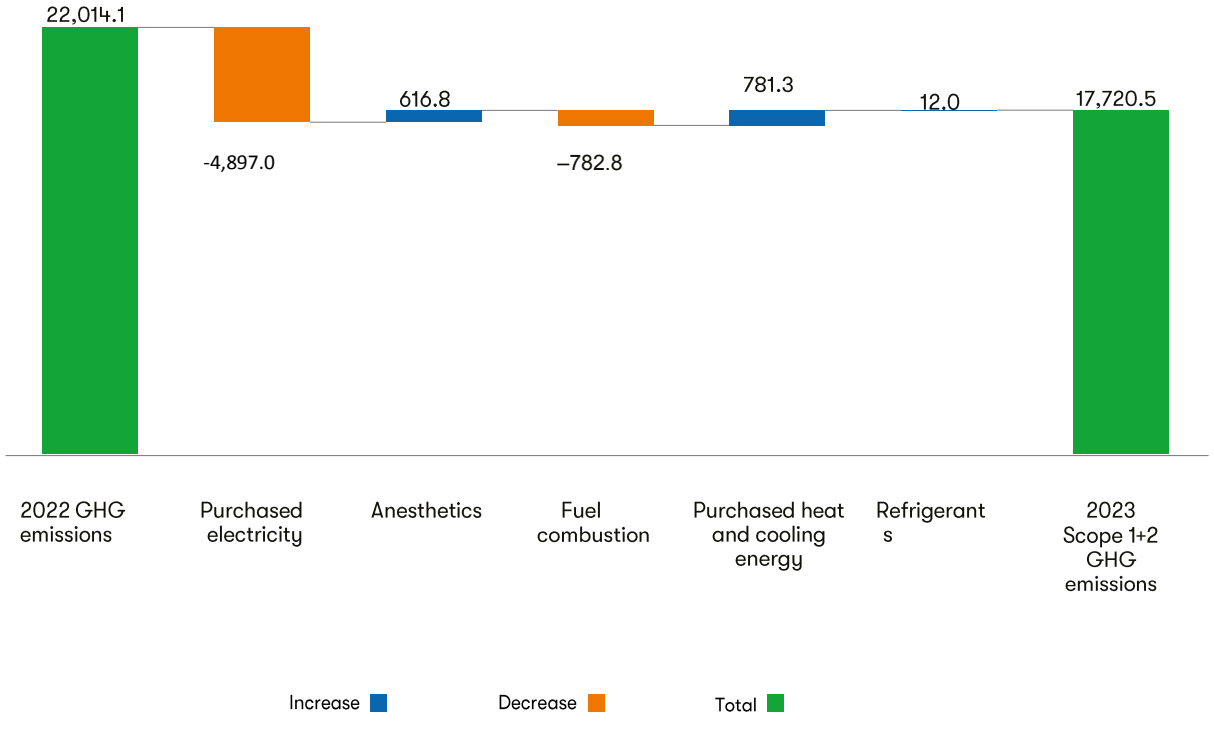


Chart 5. Scope 1 and 2 emissions – market-based 2023 vs 2019

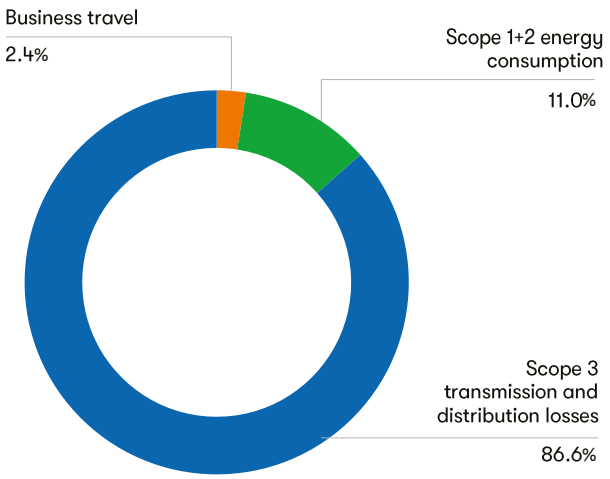


Total Scope 1 and 2 (market-based) emissions were 17,720.5 tCO2e in 2023, representing a 15% decrease from last year and a 20% decrease from the base year. Scope 1 emissions in 2023 amounted to 3,431.0 tCO_2e, marking an increase of nearly 1% from last year but a 5% decrease from the base year. In the period under review, the LUX MED Group increased its consumption of anaesthetics. It was also observed that business travel, which had been significantly reduced during and after the pandemic, increased while natural gas used for heating dropped.

Scope 2 (location-based) GHG emissions amounted to 24 246.9 tCO_2e, up by 10% year-on-year due to an increase in electricity consumption. At the same time, Scope 2 GHG emissions (market-based) in 2023 was 14 289.5 tCO_2e, i.e. down by 18% and 22% as compared to 2022 and 2019, respectively, thanks to the use of renewable energy and the purchase of guarantees of origin.

As part of Bupa, we jointly work on the calculation of Scope 3 emissions. The data presented covers emissions from business travel by rail and air, as well as from fuel and energy. We are working on calculating the remaining significant categories, which we plan to present in subsequent reporting cycles. Scope 3 emissions have declined compared to the base year, while being slightly up (2%) compared to 2022. Scope 3 transmission and distribution losses account for the largest share of consumption.

Chart 6. Scope 3 emissions



GHG emissions data for the LUX MED Group are included in Tables 1.7. and 1.8. in the report's appendices.



Waste

306-1, 306-2, 3-3

The medical industry generates significant amounts of waste that require proper management. Many of these wastes are classified as hazardous, meaning that due to their origin, chemical composition, biological content, or other properties and circumstances, they may pose a threat to human life or health, other living organisms, or the natural environment. The LUX MED Group is aware of the seriousness and magnitude of this challenge and, thus, manages waste in line with legal requirements and a specially developed internal procedure that outlines the waste segregation and storage requirements, including storage locations and waste transfer.

LUX MED organisational units' waste management policies include:

Organisation of waste storage area	Organisation of waste storage and selection system	Securing facilities for waste collection
Organisation of waste transfer to the waste	Controls of waste volumes and types	Reporting waste volumes and types

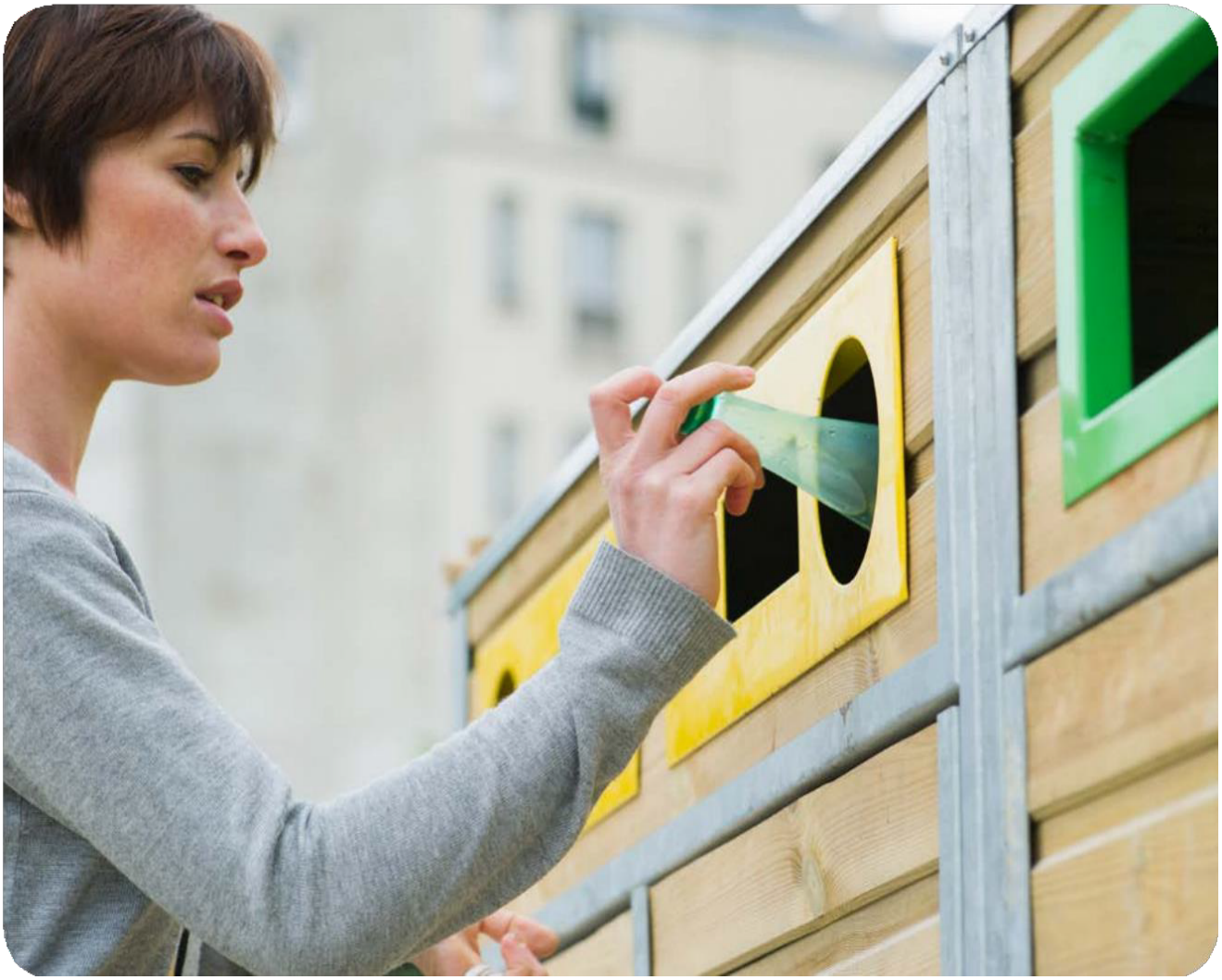
The implementation of the above procedure is supervised by the Medical Centres Administration and Investments Department, and the medical facilities, including dental clinics, aesthetic medicine centres, diagnostic laboratories and hospitals within the LUX MED Group. The director or manager of each unit is responsible for the oversight of waste data collection and monitoring, ensuring the smooth operation of the process and compliance with legal and regulatory requirements in this area. Waste from healthcare services and medical research and experimentation is a major part of our waste stream. Proper management and precautions are therefore essential.

Table 1.9 presents quantitative data on waste.

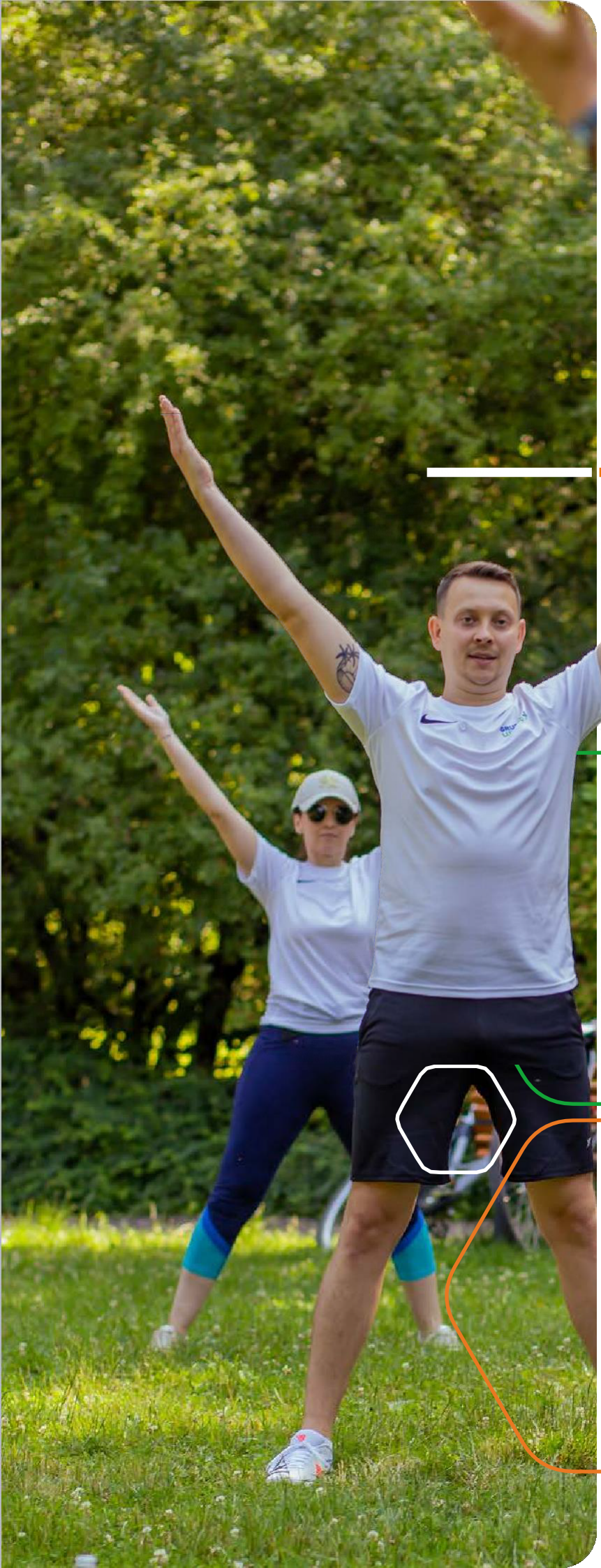
The significant increase in IT waste is due to the large amount of equipment replaced across the country. The COVID-19 pandemic slowed this process and created backlogs, which were addressed once it became easier to move around the facilities, and restored supply chains allowed for regular deliveries.
This mainly occurred last year.

Currently, there are no recycling techniques for most medical waste, which makes up a significant proportion of our waste. However, wherever possible, we adopt best practices in waste recycling and disposal. Additionally, we have set a strategic goal to implement at least one scalable circular solution per year. This year, we conducted an internal audit of medical waste segregation at one of our facilities.

As a result and thanks to the actions taken, we had a 45% reduction in medical waste in the first month. The positive results of the audit have further convinced us that we needed to extend our efforts to include all ambulatory facilities nationwide. Employee safety, awareness of proper segregation and respect for the environment are all crucial aspects of this process. The analysis was an important step towards effective segregation, allowing the size of the bins to be adapted to the specific characteristics of each practice. Identifying where to place bins and providing instructions on how to separate waste were also important. We run information campaigns for both current and new employees. We have developed special leaflets that clearly explain how to sort and separate waste.







Healthy society



We believe that by prioritising health, fostering an equal opportunities culture and supporting employee engagement and development, we create an enabling environment that is key to building a sustainable and efficient healthcare system. We are committed to making a positive impact on the health of society as a whole by raising awareness of the links between climate change and human health and promoting the importance of preventive healthcare.

Employment and employee development

3-3

We constantly strive to ensure that our company consists of committed and loyal employees.
We offer favourable working conditions and take steps to make the LUX MED Group an even better place of work. A challenge faced by all health service providers is the limited availability of medical staff. At LUX MED Group, we strive to effectively manage the risks involved. One way to avoid these risks is to maintain competitive salaries, which also helps us attract new employees to our organisation.



Marta Kasiewicz
Manager of Employer Branding and Employee Experience Department

99

Being a great place to work is our priority. This is why, we have a Diversity, Equality and Inclusion strategy in place at LUX MED Group. As part of this project, we asked our employees how they perceive the organisation's approach to tolerance, openness, respect, anti-discrimination and equality. We also ran focus groups with minority groups – including workers with disabilities or from Ukraine. We organised educational events with experts on diversity and inclusion, which were attended by over 1,300 employees. In our daily work, we also place great emphasis on promoting employee wellbeing. Our efforts have been recognised with awards including Bupa People Leadership Award 2023 for LUX MED Group's Employer Branding activities, and the Wellbeing Institute's The Best of Wellbeing at Work 2023 award.

Employee engagement survey

At LUX MED Group, we listen to our employees and continuously improve our work environment. We use tools such as pulse checks – we conduct the *People Pulse* survey on a biannual basis, asking questions about different experiences of working in our organisation. Based on the results, we create programmes, take initiatives, and implement changes.

In this year's *People Pulse* edition, we scored 87 out of 100 points. The survey is conducted across all Bupa entities.

In 2023, within the HR structure, we established an Employee Experience team, which carries out extensive activities aimed at ensuring workplace satisfaction, including experience maps, surveys, workshops, and interviews with employees.
Following these, corrective action plans are developed, involving individuals and teams within our organisation as well as external consultants.
Tailor-made solutions help us continually improve the daily comfort of our employees and increase their long-term satisfaction with working for us.

Motivation and employee benefits

401-2

The LUX MED Group offers its employees various, both financial and non-financial, incentive arrangements. Benefits that we offer our employees include:

Medical subscription

Employees can access specialist care and extend the services to their family members. The package includes professor's consultations and antenatal care.

LUX MED hospital insurance[1]

Employees have access to private hospital care in over 100 hospitals throughout the country.

Language learning for free

We offer opportunities to learn English, German, Spanish, French, or Italian.

Benefits in kind for 10, 20 and 30 years of employment

Education reimbursement

We are ready to provide financial support for the individual development needs of our employees.

Funding for sports initiatives

We encourage our employees to participate in marathons or half-marathons by covering their entry fees. Additionally, employees can sign up for sports classes or join a football team.

Financial, material, and organisational support

Employees with health problems can count on the support of Dr Joanna Perkowicz's LUX MED Foundation.

Employees of the Group are entitled to benefits guaranteed by law, such as parental leave or pension benefits. These benefits are available to both employees with employment contracts and those employed under other civil law contracts. We also provide medical care, and the level of co-funding for associates (individuals employed under a civil law contract) depends on the number of hours worked per month.

In 2023, the LUX MED Group did not offer employee share schemes, nor did it decide to provide additional, voluntary contributions to Employee Capital Plans (PPK) or other pension schemes.

1 Employees of LUX MED Group and those who work for the Group for more than 60 hours a month can be insured for a symbolic fee of one zloty. Spouses/partners and children of employees can also benefit from these preferential terms.

Employment structure

In the medical sector, a significant proportion of individuals work under civil law contracts, such as mandate contracts or self-employment. Indicators 2–7 (employment under contract) and 2–8 (other forms of cooperation) provide a comprehensive view of the employment structure of the LUX MED Group.

2-7

As of 31 December 2023, the LUX MED Group employed 6,738 people under employment contracts. Women made up 83% of all employees, with 81% of them employed on a permanent contract. Men accounted for 17% of all employees, with also 81% of them had permanent contracts. All employees are based in Poland. Within the LUX MED Group, 90% of employees worked full-time (90% of women and 88% of men).



Chart 7. Gender distribution of employment

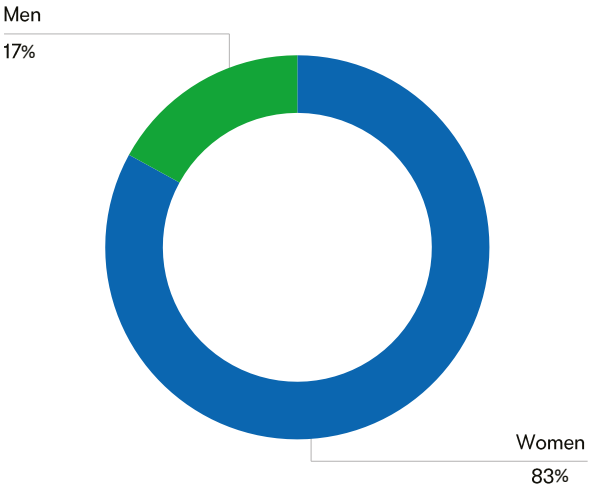


Chart 8. Distribution of employment by contract

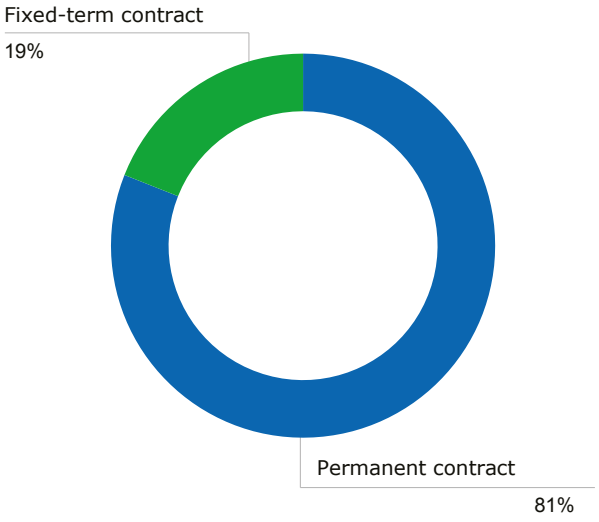
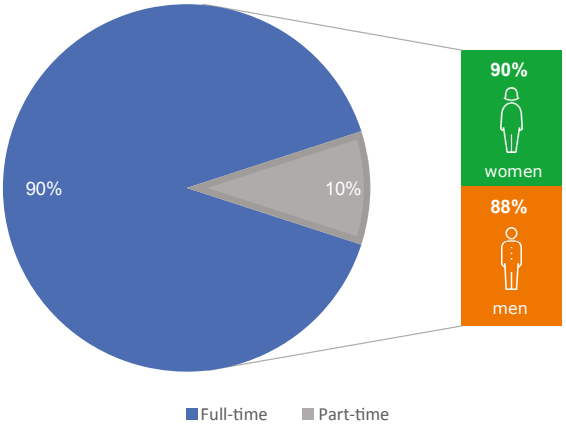


Chart 9. Distribution of employment by working



2-8

Nurses, doctors and other medical professionals typically work with the LUX MED Group on a self-employed basis (approx. 63%) or under mandate contract. The proportion of staff choosing to work under a non-employment contract has remained similar to 2022, at around 74%.

Detailed information on 2-7 indicators is provided in the tables included in the appendices to this report (Table 1.1. and 1.2.).

Pearls of the LUX MED Group

In jewellery, a pearl symbolises qualities such as sincerity, honesty, and wisdom. The Pearls of the LUX MED Group Awards are presented to individuals who demonstrated exemplary behaviour, commitment and achievement in their work over the past year. In doing so, they were guided by the Group' s values of care, courage and responsibility. Awards are also given to teams and projects that contributed significantly to the Group' s development and, most importantly, focused on helping patients live longer, healthier and happier lives.



Respecting human rights

The LUX MED Group has procedures and policies in place for specific areas of human resources management, arising from labour law, such as the work regulations and the anti-bullying policy. Respecting human rights is one of LUX MED Group' s core responsibilities. Our principles are outlined in the LUX MED Group Code of Conduct.



Meaning that:

- We do not employ people under the age of 18.
- We prohibit forced labour, the use of corporal punishment and psychological and physical coercion.
- We are committed to complying with all regulations relating to freedom of association, collective agreements, working hours and wages.
- We respect all individuals, regardless of their gender, age, disability, race, religion, nationality, political beliefs, union affiliation, ethnic origin, creed, or sexual orientation.
- We ensure equal opportunities and do not discriminate in recruitment, employment, promotions, or access to training for professional development. We strive to ensure that these processes are based on objective criteria such as qualifications, competencies, skills and performance. We avoid conflicts of interest, while their management is described in our internal regulations.
- All employees and associates of the LUX MED Group are encouraged to report any observed workplace irregularities to the Ethics Committee.
- We have a zero tolerance policy for aggressive behaviour in the places where we do business and provide services. We take proactive steps to prevent such behaviour.

Education and training

3-3

We aim to develop and strengthen the knowledge and skills of our employees, promote a culture of knowledge sharing, and effectively address identified competency gaps. Our staff development is a crucial aspect of the daily operations of the LUX MED Group as a whole. We define this process as encouraging employees to acquire new or advanced skills and knowledge by providing training and educational support, as well as tools and inspiration. As well as providing opportunities to develop skills, we also offer space for experimentation, testing new solutions and proposing individual initiatives. When planning development activities, we follow the **70/20/10 development model**, which suggests that 70% of an individual's success comes from gaining knowledge through practical tasks and experiences, 20% from the support of others such as supervisors, coaches or mentors, and 10% from training.

Our training and learning opportunities are available to all employees. We believe that the best investment is in development.
We offer employees at all career levels a wide range of opportunities to develop both professional and soft skills. We invest in talent by leveraging best market practices, modern tools and formats, and custom-designed programmes.

Our training activities are guided by the People Policy, implementing the policy of our owner, Bupa. This policy outlines principles and standards in areas such as leadership development, talent management, and employee evaluations. Adherence to this policy ensures that business objectives are achieved in line with the Group's values and vision, supports the safe growth of the business, enables prompt and effective decision making, introduces consistent people management practices across all Bupa companies and promotes the development and engagement of employees.
Additionally, within the LUX MED Group, we have an Staff Training internal procedure, which regulates access to training and development to ensure that everyone can enhance their professional qualifications.

Training for employees

When starting work in our organisation, employees participate in onboarding training designed to ease their transition and provide essential information about internal policies, procedures, processes, and standards.

Employees have access to an e-learning platform called LUXszkolenia, where they can find periodic occupational health and safety training as well as other courses related to safe workplace practices. While the platform does not offer initial and environmental training, except for mandatory ones, it provides a variety of training formats (presentations, webinars, podcasts, knowledge capsules) to ensure that every employee can find accessible and engaging content.

We are also open to the individual training needs of our employees, offering reimbursement for educational costs, including training, courses, and formal studies.

For those who wish to improve their language skills, we offer access to foreign language classes.

As our organisation operates in the healthcare sector, our development programme also includes first aid training. The Rescue Academy hosts sessions with experienced doctors and paramedics. The educational programmes prepared by the Academy are based on current standards of the European and Polish Resuscitation Councils. Furthermore, the face-to-face format of the workshops ensures that the Academy's training delivers immense value to those attending.

In addition, for those working in patient services, call centres and sales, we provide ongoing development activities to build high-level competencies while increasing employee satisfaction and engagement.

In the IT area, the **AGILE** Academy operates to support the development of employees through various training programmes. This is managed by a team of internal scrum masters and agile coaches. For example, we offer introductory training on agile and scrum as part of the IT onboarding process.

Training for medical staff

We provide our patients with the highest level of care
and never leave them without a solution. This is why highly qualified medical staff are so important to us. Recognising the importance of regular training and sharing experiences with other healthcare professionals, we regularly organise training sessions and conferences for this group of employees.

Newly recruited doctors attend training sessions specifically tailored to their needs.
Topics include dealing with difficult patients, managing conflict and assertiveness.

Medical Education Centre

is a unit dedicated to providing specialist training for medical staff. It is unique in its core activities, which are hands-on workshops on unpreserved specimens (cadavers) in the operating theatre. We help improve the competencies and practical skills of doctors, nurses, physiotherapists, paramedics and other healthcare professionals.

In our modern laboratory and lecture computer rooms, the following are carried out:

- Surgical training in more than 22 specialties,
- Workshops on pre-surgical planning and radiological diagnostics,
- Practical training in surgical/diagnostic procedures,
- Conferences, congresses, academies, seminars, and webinars,
- Testing of medical equipment and presentations of its capabilities, as well as scientific research.

Academy of Family and Specialist Medicine and Academy of Nursing and Midwifery

Academies are held once a year in all regions. During these events, lectures are delivered by outstanding specialists, covering key areas of medicine, the latest diagnostic and treatment methods, as well as the legal aspects of the daily work of medical staff.
Every year, hundreds of our employees participate in each event.

Additionally, medical staff can expand their knowledge thanks to unlimited access to the Medical Knowledge Base, which includes current standards, procedures and medical innovations. They can also attend scientific conferences, where they meet other medical professionals from across Poland. Nurses, midwives and physiotherapists can further develop their careers according to the professional experience they possess within the development paths described in our organisation. We continuously provide postgraduate education for doctors and nurses in the form of internships, residencies or supplementary/specialist courses.

In October 2023, the Research and Development Department was established, providing our medical staff with opportunities for scientific advancement, including pursuing academic titles. By the end of the year, we had published seven papers with LUX MED Group affiliation in prestigious peer-reviewed journals.



Training for management staff

When developing training programmes for our managers, we take into account the challenges faced by modern managers. It's not just about achieving business strategies and goals anymore, but also about responsible leadership. Our managers are effective leaders who build their teams on transparent principles, skilfully delegate tasks, set priorities, inspire action, continuously motivate others and seek feedback themselves. To ensure the highest level of competence, we offer the following tools and development opportunities.

Competency assessment

Each year, over 300 managers participate in the 360° competency assessment process. Based on the results of this assessment, we conduct development discussions that enable us to identify talents and plan individual career paths.
As a result of these discussions, we create goals and individual development plans.

Programme for newly promoted managers

In our organisation, we support the development of employees and the opportunity to build internal careers.
Managers who are taking on leadership roles for the first time in their careers can participate in training programmes that develop managerial skills. The programme is based on managerial onboarding within the LUX MED Group and includes training focused on managerial and social competencies.

Effective Leader Academy

In 2023, we implemented a proprietary programme for senior managers called the Effective Leader Academy. This programme utilises lean management methodology and covers the most critical aspects of effective operational management.
We invited senior and mid-level managers to participate, and the knowledge gained was subsequently cascaded throughout the organisation.

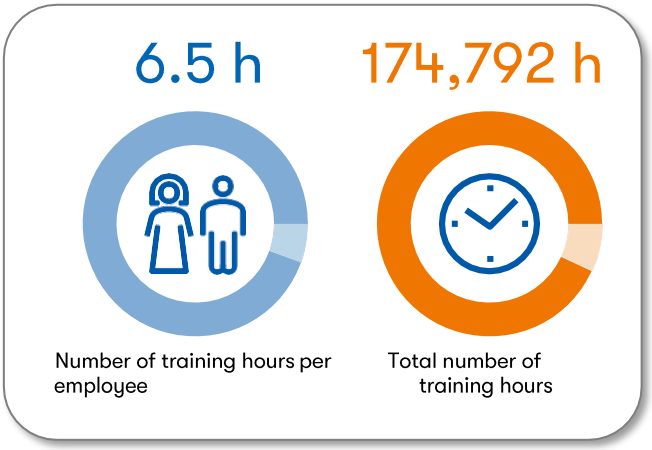
Project management

At LUX MED, we work on a project basis, and as a result, our offering regularly includes workshops that enhance competencies in this area.

We also run mentoring and coaching programmes for management staff, tailored to individual needs.

404-1

In 2023, as part of our central operations, we dedicated 174,792 hours to development activities in the form of internal and external workshops, webinars, e-learning, conferences and coaching sessions. The average number of training hours per employee in our company was 6.5. We strongly encourage all employees to participate in training, including those of a voluntary nature, which is why we continually expand our offerings on the e-learning platform.



Detailed information on the 404-1 indicator is presented in the table included in the appendices to this report (Table 1.5).

404-3

The complex organisational structure and the fact that the majority of our staff are medical professionals, who spend a significant portion of their working time in direct contact with patients, mean that as a Group, we must approach the performance evaluation process flexibly and individually. At LUX MED Group, all employees undergo regular work quality assessments and career development reviews, regardless of gender or employment category. Employees are regularly evaluated by their supervisors in line with the Group's organisational culture, which includes a culture of continuous feedback, working with OKRs (Objectives and Key Results), NPS® (Net Promoter Score), and information from complaints.

Diversity and inclusive culture

3-3

Our goal is to create and promote equal opportunities in the workplace, valuing and leveraging the diversity of each employee, regardless of gender, age, ability, ethnic background, nationality, faith, religion, gender identity, psychosexual orientation or political beliefs. We are committed to ensuring equal treatment for everyone, regardless of their form of employment. We recognise that each of us is different and that we combine various professional and social roles. We strive to create a workplace that is welcoming to all, including people with disabilities, which is why we offer the option of hybrid remote working whenever individual circumstances or the role allow.

405-1

During the reporting period from 1 January to 31 December 2023, the vast majority of employees at the LUX MED Group were women, comprising 83% of the total workforce. The largest proportion of our employees are aged between 31 and 50 years. Detailed information on diversity within the Management Board and other employees is provided in the table included in the appendices to this report (Table 1.4).

Employees and associates of the LUX MED Group are required to perform their tasks and duties with honesty, integrity, mutual respect, and in compliance with legal regulations and common ethical standards.

At LUX MED Group, we adhere to a Code of Conduct that clearly commits us to a range of ethical practices in compliance with legal regulations. Intolerance and discrimination in the workplace are not only contrary to Polish and international standards but, more importantly, to our personal standards of ethics and responsibility. **We believe that regardless of an employee's beliefs, ethnic background, age, gender, sexual orientation, or health status, everyone has an equal opportunity to advance their careers and be treated in accordance with the standards we promote.** We are committed to upholding this practice, as we believe it benefits both our employees and the organisation as a whole, which gains engaged and competent staff. Our actions are aligned with the Universal Declaration of Human Rights and the International Labour Organisation's standards on fundamental principles and rights at work.

In 2023, LUX MED Group launched the Diversity Project. We conducted a survey in both Polish and Ukrainian among 641 employees, as well as focus group studies and workshops for leaders. The areas examined included tolerance, openness, belonging, respect, anti-discrimination and equality. We also asked our employees to evaluate recruitment, remuneration, development and leadership from a diversity perspective. The project involved representatives from business lines and HR business partners. Based on the results, we developed the Diversity, Equity and Inclusion Strategy for LUX MED Group for the coming years.

Additionally, in 2023, we conducted educational initiatives for employees on the topic of diversity. We organised webinars with experts on subjects such as *Diversity, Tolerance and Their Everyday Benefits* and *The LGBT Community – From Personal and Family Perspectives*. Over 1,300 employees participated in these sessions.

406-1

At LUX MED Group, there is a strict prohibition against discrimination and harassment. If an issue arises, we immediately respond with appropriate corrective measures. In accordance with the current Code of Conduct, any employee who observes undesirable behaviour in the workplace can report it through the Speak Up platform. We regularly inform employees about the procedure to follow in such cases, as we do not tolerate any violations of dignity and employee rights. For more information on the policy and the Code of Conduct, please refer to the Ethics and Transparency chapter.

In 2023, the Ethics Committee received a total of 15 reports, of which one resulted in the implementation of a corrective plan, while the remaining 14 did not confirm the allegations made. The reported data includes all complaints submitted to the Ethics Committee during the period, particularly those concerning employee relations, such as allegations of bullying, harassment or unequal treatment in employment. All reports were analysed with the utmost seriousness, thoroughly, fairly and with full confidentiality. If, during the investigation, the Committee does not confirm the allegation but identifies areas requiring improvement, it provides the management of the respective unit with appropriate recommendations.

2-30

At Megamed Sp. z o.o., a collective agreement is in place, with 53% of the company's employees being members.



'LUX MED Group Code of Conduct'

Safe workplace

3-3

Managing occupational health and safety at LUX MED Group

403-1, 403-2, 403-7

We aim to provide all employees and associates with a healthy and safe workplace, regardless of the type of contract or location of their duties. The occupational health and safety management system in place at the Group is based on compliance with Polish legal requirements (Labour Code and other legal regulations related to health and safety). We have also implemented the Wellbeing, Health and Safety Policy, which applies to all companies owned and controlled by Bupa, where Bupa holds a controlling stake of more than 50%. The aim of this policy is to protect the health and safety of employees, patients and others whom we directly impact, as well as to identify and eliminate potential risks and hazards affecting health and safety in the workplace at an early stage. We have developed and implemented internal standards, instructions and guidelines that are specific to the medical industry, including those related to working with sharp tools/medical devices and exposure to chemical, biological, physical and psychological factors.

To meet current requirements, our organisation participates in both internal and external occupational health and safety audits. Through these audits, we review the technical condition of the equipment and facilities used, with the goal of minimising the risk of workplace accidents and occupational diseases as much as possible. Due to the presence of specific types of hazards, we continuously monitor and conduct environmental measurements of harmful factors in the workplace. We engage external entities with the appropriate qualifications and certifications to carry out these tasks. The results of such audits and assessments enable us to properly prepare both the employee and the workplace, thereby significantly reducing the potential impact of any risks.

If working conditions do not comply with occupational health and safety regulations and pose a direct threat to the health or life of an employee, or if the work being performed endangers others, the employee has the right to stop working, having first informed their supervisor. LUX MED Group employees are obliged to report any incidents or potential hazards that could lead to injuries or accidents. Such cases can be reported through the internal RIO (Register of Organisational Incidents) application.
Upon receiving a report, the Occupational Health and Safety Department analyses the situation and takes appropriate corrective or preventive measures. In some cases, due to the complexity of the issue, consultations and actions are conducted in collaboration with other departments, such as medical, infrastructure or procurement, or by seeking the advice of external experts, ensuring that the entire organisation works together to effectively address the challenges.

403-9

In 2023, there were 52 accidents involving employees and 48 accidents involving associates at LUX MED Sp. z o.o.
All of these incidents were classified as minor, most commonly involving injuries. Detailed information is presented in Table 1.3 (Appendix 2).

Engagement, consultation and communication with employees on occupational health and safety matters

403-4

Employee involvement in occupational health and safety consultations is a key element in creating a safe work environment. The active participation of representatives from various professional groups within our company allows us to understand the real challenges and potential occupational health and safety risks.
In 2023, in accordance with the Board's resolution and legal requirements, quarterly meetings of the Occupational Health and Safety Committee were held at LUX MED Sp. z o.o. The Committee included representatives of both the employer and employees, members of the Occupational Health and Safety Department and an occupational health physician. The Committee's responsibilities included:

- reviewing working conditions,
- conducting periodic assessments of the occupational health and safety status,
- providing opinions on measures taken by the employer to prevent workplace accidents and occupational diseases,
- formulating recommendations for improving working conditions,
- collaborating with the employer in fulfilling their occupational health and safety obligations.

403-3, 403-5

All companies within the LUX MED Group conduct occupational health examinations for employees in accordance with legal regulations as outlined in the Labour Code. Employees are permitted to perform their duties in a given position based on an occupational health certificate. Additionally, LUX MED doctors provide preventive healthcare for employees in accordance with the regulation issued by the Ministry of Health and Social Welfare. Furthermore, we organise preventive initiatives based on the analysis of our employees' health status, aimed at ensuring their wellbeing and health.

Every employee is required to complete introductory occupational health and safety training on their first day of work. Employees hired under civil law contracts complete their training through the e-learning platform '3, 2, 1 BHP Start'. Due to the high risk of injuries in our company, which was also the most common type of minor accident in 2023, we provide all employees, regardless of the type of contract, with the training *Injuries – Risks and Prevention*. We also organise training on the proper handling of sharp medical instruments. We educate our employees on standard procedures when working with sharp medical tools, as well as on post-exposure protocols in the event of contact with blood and potentially infectious materials.

403-6, 401-2

We care for the health not only of our patients but also of our employees. Those employed at LUX MED Group can take advantage of numerous benefits, including health-promoting and preventive measures. We provide comprehensive medical care, both outpatient and inpatient. The medical packages offered grant access to, among other things: comprehensive specialist consultations, consultations with a psychologist (including sexologist and andrologist) and psychiatrist, consultations with professors, comprehensive diagnostic tests, outpatient surgical procedures and pregnancy care. The package can also be extended to cover family members and relatives.

LUX MED Hospital Insurance – As a medical company, we want our employees and associates to feel especially cared for, which is why in March 2022, we introduced the option of LUX MED Hospital Insurance – Full Care as an employee benefit. Since 2023, this package has been offered to our staff for a symbolic price of one zloty It is the only benefit of its kind in Poland, providing access to private hospital care in hospitals across the country.

In difficult health situations, employees and associates can also receive support from the Dr Joanna Perkowicz LUX MED Foundation.
The Foundation provides financial, material and organisational support.

You can read about other benefits offered by our organisation in the chapter on employee development and employment.



Slawomir Lopalewski
Managing Director of
LUX MED Insurance

99

As a leader in private healthcare in Poland, LUX MED continually sets new directions for the development of medical services. In an employee-driven market with growing expectations for non-salary benefits, employers are seeking new perks that provide real value to their staff.
An example of such a benefit is the innovative LUX MED Hospital Insurance – Full Care, which we introduced in 2022 and continued to develop throughout 2023 to better meet customer expectations. We now offer this service in 16 of our own hospitals within the LUX MED Group and over 100 partner facilities.



Health promotion and preventive healthcare

3-3

In today's fast-paced and demanding world, taking care of one's health is becoming increasingly important. As a company in the medical sector, we have a responsibility to foster healthy habits within society. Preventive healthcare encompasses various aspects such as health promotion, disease prevention, health education and the provision of healthcare services. At LUX MED Group, we actively engage in each of these areas. We offer professional and effective healthcare, providing our patients with access to a range of preventive screenings and vaccinations. Additionally, we organise educational sessions on healthy lifestyles and wellbeing, offering them in various formats.

As part of our strategic goal to reach 2 million people with preventive measures, we are undertaking a range of initiatives, which are outlined in the diagram below.

Initiatives for Companies

80,000 people
Preventive screenings (in companies)

5,000 people
Rehabilitation sessions

1.5 mln people
Health education (e.g., webinars, seminars, chats, preventive recommendations concerning employees based on medical data)

50,000 people
Other combined preventive actions (combined activities: education, screenings, vaccinations, etc.)

60,000 people
Individual consultations

280,000 people
Screenings in facilities (patients referred for preventive screenings in facilities)

20,000 people
Vaccinations

CSR Activities and Public Programmes:

4,000 children
covered by a programme aimed at improving mental health

6,000 patients
screened/vaccinated during other events (OEEC, EFNI, Economic Forum in Karpacz, Green Festival Picnic with BNP)

The impact of the environment on population health is undeniable. In recent years, we have observed an increasing frequency of extreme weather phenomenons, such as hurricanes, storms and prolonged heatwaves. The rapidly accelerating climate change is causing a range of negative health effects among people worldwide, including cardiovascular and respiratory diseases, strokes and dehydration resulting from heatwaves.

In addition to constantly monitoring the situation and scientific reports on this issue, we are engaged in initiatives that respond to the accelerating climate change.



Healthy Cities – millions of steps for health and the environment

Guided by the motto 'there is no healthy person without a healthy environment', we organised the Healthy Cities challenge for the third time in 2023. The programme combines the promotion of health among participants with encouraging them to adopt healthy habits in their daily lives. Additionally, it has a positive impact on the environment and urban spaces through:

1
implementing health and eco-friendly initiatives in the winning cities

2
revitalising peatlands under the auspices of the winning companies and LUX MED Group

3
planting new trees

The Healthy Cities challenge encourages physical activity, which can be tracked in steps. A minimum of 6,000 steps per day is recommended to improve fitness, health, and the future of the planet, while also allowing participants to compete against others.



Healthy Cities 2023 had two iterations: a corporate challenge, with 90 companies from across Poland participating, and an urban version involving residents of 66 cities with poviat rights. The challenge was supported by a free app, available for download in the App Store or Google Play on the day of the initiative's launch.

In this year's edition, the LUX MED Group planted one tree for each person participating in the challenge. The leading companies took patronage of a project to revitalise peatlands in Poland. The most active cities received a green budget totalling PLN 60,000, which was allocated to pro-environmental initiatives selected by local authorities. Additionally, the winning city hosted first aid workshops for primary school pupils.

Winning cities:

1st place: Swietochlowice

Purchase of floating gardens, duck lounging baskets, squirrel boxes, and the planting of young walnut trees.

First aid workshops titled 'I Can Help' for 425 pupils from eight schools in Swietochlowice, conducted by paramedics from the LUX MED Medical Emergency Academy.

2nd place: Swinoujscie

Purchase of a generator, sportswear, and sports equipment.

3rd place: Zamosc

Purchase of exercise equipment.

Healthy Cities in numbers

Three editions of the challenge

More than 24,500

3.6 billion steps

More than 2.5 billion km, or almost 68 laps around the Earth

More than 465,000 trees planted

PLN 120k from the LUX MED Group for the winning cities

Patronage by the winning companies to revitalise three peatlands covering

The impact of the Healthy Cities challenge:

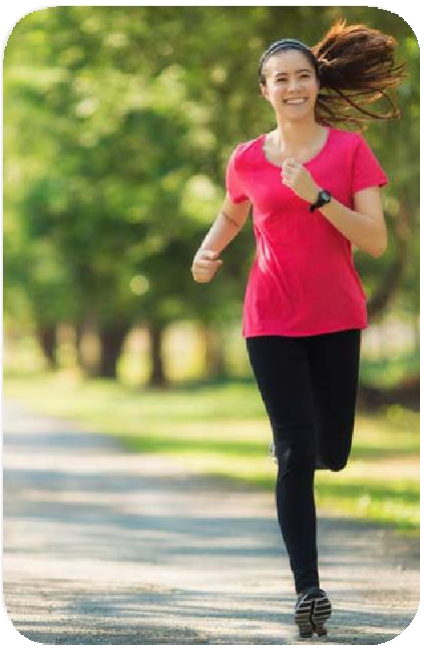
The peatland revitalisation area is home to **89,000 people.**

The areas covered by the tree planting campaign are home to **27,000 people.**

152,000 people included in pro-environment and pro-health initiatives in the winning cities.



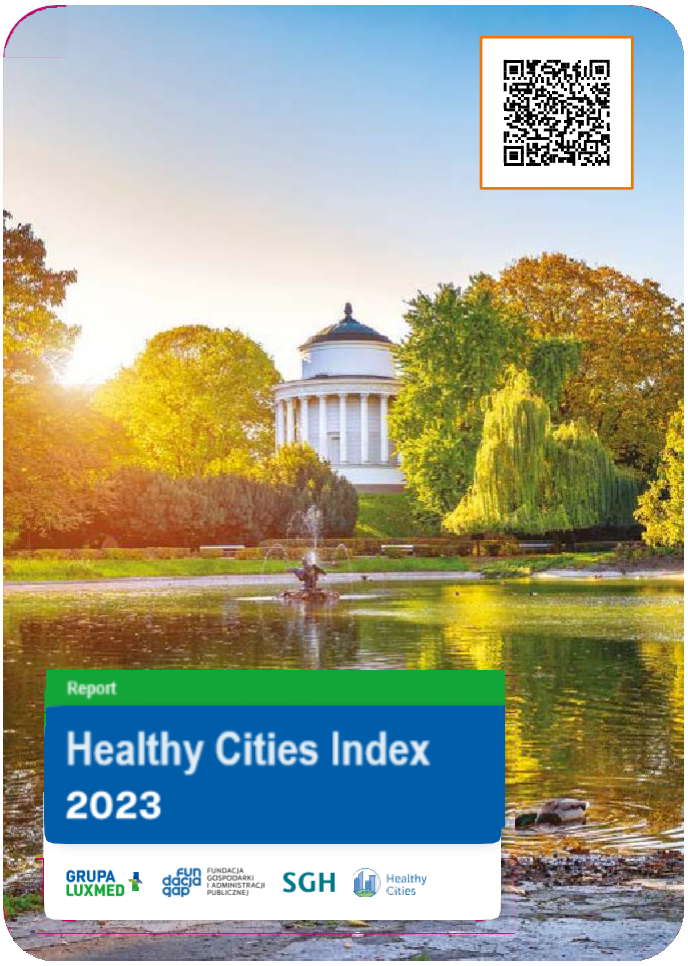




Healthy Cities Index: Where in Poland Do the Healthiest People Live?

The second edition of the Healthy Cities Index was launched in 2023. This publication was created in collaboration with the Warsaw School of Economics, the Foundation for Economy and Public Administration, and the Open Eyes Economy Summit (OEES). The index compares the conditions for healthy living provided by cities with poviat rights in Poland, which are the largest cities in the country, home to nearly 12.4 million people as of the end of 2022, according to the Central Statistical Office.

In recent years, we have observed population growth in large cities such as Warsaw, Wroclaw, Krakow, Gdansk, Poznan, and Rzeszow, with nearly 180,000 new residents added since 2018. Meanwhile, other cities, including Lodz, Bydgoszcz, Zabrze, Bytom, Radom, Katowice, and Czestochowa, have seen a decline in population. One of the most important tasks of local governments, including cities, is to create the best possible living environment for residents. The two editions of the Healthy Cities Index have demonstrated that this initiative supports the efforts of local governments, NGOs, and other institutions to enhance the quality of life, promote prevention, and improve public health.



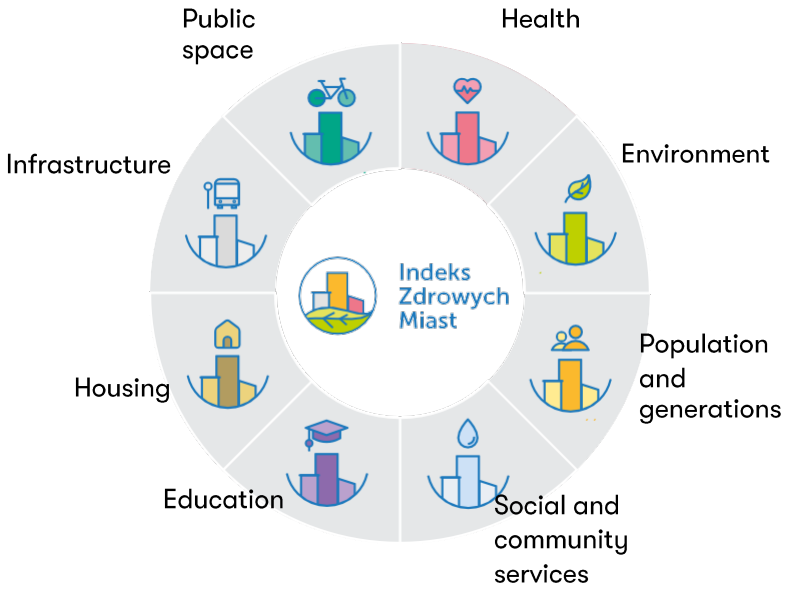


Piotr Wachowiak, PhD
Professor at the Warsaw School of Economics (SGH), Rector of the SGH

City leaders face numerous challenges in ensuring the quality of life for their citizens by making their cities clean, healthy, welcoming, and active. Experience shows that factors such as air quality, access to green spaces, the development of physical activity facilities, and availability of creches and nursery schools attract residents. Cities with a high *Healthy City Index* score often experience growth and attract new inhabitants.

Methodology for building the *Healthy Cities Index*

The work on the Healthy Cities Index involved gathering indicators across eight areas, each encompassing a variety of metrics. These metrics were reviewed through a two-step process that included calculating the coefficient of variation for each measure and conducting a correlation analysis between all indicators. After successfully passing the verification stage, 64 measures were selected and grouped into sub-areas: health, environment, population and generations, housing, education, utilities and social services, infrastructure, and space.



In this year' s edition of the *Healthy Cities Index*, the main ranking was prepared with a slightly different approach. The final values represent a weighted average of the sub-index scores in each category. A value of 100 represents a theoretical ideal city that excels in all assessment categories.

You can read the detailed results in the *Healthy Cities Index 2023 report*.

Winning cities

According to the overall ranking of the latest *Healthy Cities Index*, Warsaw remains the city where people live best, retaining its leadership from last year. It is closely followed by Bielsko-Biala, which jumped from 23rd to 2nd place. Sopot climbed from ninth to third place and is also the leader in the areas of environmental care and housing. Krakow excels in education, while Warsaw leads in health management. Rzeszow ranks first in the categories of population and generations, as well as municipal and social services. Krosno is recognised for its outstanding care of infrastructure, and Chorzow excels in the management of public spaces.

The winners in the individual categories



As defined by the World Health Organisation, **'Health is a state of complete physical, mental, and social well-being, and not merely the absence of disease or infirmity'** [2].

At LUX MED Group, we are acutely aware of the growing need for adequate mental health care, which is why we offer consultations with top specialists in psychiatry and psychology, while continually expanding our services in this area.

We engage in various activities to promote mental health, including spreading expert knowledge, providing access to free psychological consultations, and normalising the act of seeking help for mental disorders. Within the LUX MED Group, we organise events featuring experts in psychiatry and psychology, available both onsite and online. Additionally, LUX MED Group employees can participate in Mental Health Week throughout the year. Our efforts in mental health have been recognised by external organisations; in 2023, we placed third in The Best of Wellbeing competition for our wellbeing projects, maintaining our position from the previous year.

Support for employees

We actively promote a healthy lifestyle and encourage our employees to stay active.
The organisation has established the LUX MED Sports Team, an initiative that brings together employees interested in gamification, expert-led meetings, and competitions. Employees wishing to participate in paid marathons or half-marathons can receive financial support from us. Additionally, in response to staff needs, we have also formed a football team.



2 World Health Organization, *Constitution of The World Health Organization*, 2005.

Providing high-quality services and shaping the healthcare system

3-3

The provision of high-quality healthcare services is fundamental to the operation of any healthcare organisation. Clinical quality is defined as a measure of how well healthcare activities increase the likelihood of desired health outcomes for patients, in accordance with current professional medical knowledge.
Assessing clinical quality involves evaluating factors such as safety and effectiveness. In the context of supporting patients' health, the quality of healthcare services is closely linked to treatment outcomes. This requires us to continually evaluate and update our medical procedures and protocols to ensure we are always using the most effective treatment methods. High quality goes beyond delivering modern, effective healthcare – it also involves creating a patient-centred experience that respects the patient's time, dignity, and privacy. We are dedicated to ensuring that each patient's experience is positive, from the ease of making appointments to interactions with medical and administrative staff.

Committed to the highest quality of service

The LUX MED Group has established a Patient Experience Division, which includes the Service Quality and NPS® Standardisation Department and the Complaints Management Department. These departments focus on developing operational, medical, and service standards for all professional groups in both outpatient clinics and hospitals, as well as listening to the patient's voice through the NPS® survey.

We emphasise three pillars of patient contact: relationship, safety, and responsibility, which are reflected in our standards. A thorough review of operational and service processes allows us to identify areas for improvement and effectively revise guidelines and procedures to provide the best possible experience for our patients.

Proceed in a way that ensures the patient feels supported in every situation. We focus on:

Patients relations

The foundation of the relationship between LUX MED staff and the patient is strong, effective communication built on trust, empathy, active listening, and appropriate responses. We are committed to ensuring that no patient is left without a solution.

Safety

Patient safety involves strictly adhering to LUX MED's established guidelines and working diligently to prevent errors in care delivery. Building a sense of security among patients is directly linked to better treatment outcomes.

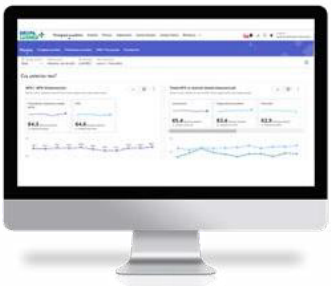
Responsibility

We take, and will continue to take, full responsibility for our patients' health. To ensure the highest level of safety, we are committed to maintaining seamless operations and delivering the highest standard of care.

Every patient is unique, and their individual experiences and the series of events in their healthcare journey drive us to continuously improve the services we offer. Our goal is to build a strong, healthy organisation that actively listens to its patients. To achieve this, we conduct an NPS® survey, which allows us to gather feedback from patients at different stages of their interaction with our services. Maintaining a high and consistent NPS® score is one of the key objectives in our ESG strategy. Management can monitor survey results in real time through the Medallia system, enabling us to respond promptly to reported issues, identify their root causes, and implement the best solutions to prevent similar occurrences in the future. This ongoing feedback loop allows us to continually enhance our interactions with patients – whether in our facilities, through customer service, or via our app and website.

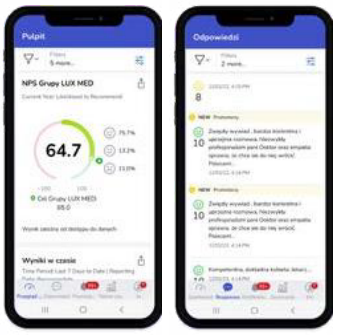
Medallia WEB

multi-level analysis, monitoring of results and reading comments



Medallia Mobile 3

mobile version of reporting



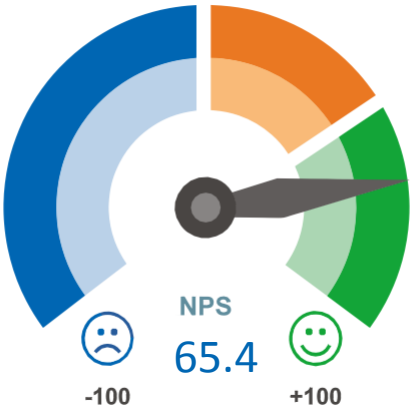
Medallia Voices 2

access to random patient comments



The year 2023 presented numerous challenges in maintaining patient satisfaction, primarily due to difficult access to services caused by a shortage of medical staff in the Polish marked and high patient demand. For the first time in many years, achieving our strategic objective in this area was at risk, but this challenge only fuelled our determination to intensify our efforts. To enhance our patients' experience, we implemented a record number of service improvements. Originally we planned for 300 inititatives in 2023; ultimately, we completed 350, meaning we took action nearly every day to create a better experience for our patients. One notable inititative was the introduction of a process to manage patient needs and direct them to the appropriate service at the booking stage. This allows us to analyse patient needs and tailor the right service more quickly, optimising treatment times. Additionally, to further prepare for visits and better understand individual patient needs, we introduced pre-visit medical questionnaires. Patients also have the option to ask their doctor questions after the visit through a chat feature within the Patient Portal.

Thanks to the tremendous determination and strong mobilisation of all our teams, we achieved an NPS® score of **65.4**, successfully meeting one of our strategic objectives.



As part of the Patient Experience Division, we operate a Quality Monitoring Programme that reviews various sources of contact to identify key areas for improvement and implement corrective actions to enhance service quality. We regularly analyse data from satisfaction surveys, complaints, and the results of Mystery Patient Audits to guide our improvements.

Complaints

The LUX MED Group is committed to being open to all feedback and opinions from its patients. One of our guiding principles is the proactive response to signals of dissatisfaction, particularly in the event of a complaint. By providing prompt and effective assistance in resolving reported issues, we aim to rebuild relationships with patients and foster a culture of ownership within the organisation, focused on preventing incidents that may lead to complaints.

LUX MED's basic rules on complaints:

- The key steps in the complaints process include effective communication with the patient, a thorough understanding of the reported problem, and finding a satisfactory resolution.
- Each complaint is assessed not only in terms of compliance with LUX MED's service principles but also as a reflection of the patient's expectations regarding these principles.
- Every negative opinion or complaint is valuable to us; it is treated as an expression of interest and cooperation and serves as a crucial incentive for improving the care we provide.
- It is the responsibility of every LUX MED employee to understand and implement these principles and to recognise their importance to the company.

We have therefore adopted the following guidelines:

- the primary channel for communication with patients is by telephone; however, in certain situations and respecting the patient's preference, responses to complaints may also be provided in writing;
- the complaint procedure is be initiated using the dedicated complaint channels or if the complainant making the complaint through another channel expresses a clear expectation that the matter will be dealt with in this specified manner;
- there are time limits for handling complaints, which define the maximum time allowed by applicable legislation for a response;
- each complaint is recorded, and the records are used for regular reports that analyse the sources of dissatisfaction;
- the conclusions from these analyses are directed to the relevant units within the organisation and serve as a key source of information on patient satisfaction and areas needing attention;
- discussion of complaints and the associated risks is a regular item on the agenda of Risk and Compliance Committee meetings;
- the complaints handling process is integrated into the company's procedures as part of the Quality Management System, in accordance with the requirements of ISO 9001:2015. It is implemented in each organisational unit and monitored by a dedicated team.

We provide all patients using our services with information about the company's approach to complaints and ensure they have the opportunity to make a complaint.

Patients can choose to submit a complaint through the following methods:

By filling out a complaint form on our website at www.luxmed.pl

By email to opinie@luxmed.pl

By submitting a written complaint at any service point using the Feedback Form

By mailing a letter to LUX MED

Verbally at any service location or via the Info Line at 22 33 22 888

Through a LUX MED employee designated as the complaint contact person

All reported complaints are recorded and analysed.

Broad access to medical care

In order to continually improve our patients' satisfaction with the services we offer, as well as address and make changes as a result of concerns raised, we have introduced numerous changes over the past year that increase access to our services. Below are some of our key achievements:

1. **Increased inpatient appointments.** While the pandemic has altered many aspects of life, we recognise the importance of in-person contact with a doctor. We have increased the proportion of inpatient appointments to enable this for our patients as much as possible.
2. **Introduction of the info back option.** From mid-2023, we introduced a long-awaited feature – notifications about available appointments. This functionality is available on the Patient Portal for selected services. When an appointment becomes available for a service the patient is interested in, the system sends an SMS notification.
3. Since August 2023, we have implemented a **second line of support at the call centre**, ensuring that no patient is left without a solution. If we cannot offer assistance in our facilities, we help patients find a specialist instead of simply offering a reimbursement. In the vast majority of cases, we succeed.
4. **Operation of e-referrals.** E-referrals save time for patients and offer the chance to see highly qualified doctors.



Additionally, LUX MED provides several solutions to optimise the availability of our services. Patients can renew a prescription for previously taken medication without needing a specific appointment, allowing medical staff to assist others in the meantime. If continued treatment is needed, the treating doctor can refer the patient for a follow-up appointment, ensuring priority access to that specific doctor. We recognise that residents of larger cities face fewer challenges in finding specialists and medical assistance. To ease access to medical care for people in smaller cities and towns, we offer telephone consultations.

By analysing reported issues, we aim to better understand our patients' needs and tailor appropriate services accordingly.

Our goal is to create an organisation that meets the needs of all patients, including those with disabilities. Initiatives like the online queuing system, infographics, and Polish Sign Language courses are examples of our efforts to adapt services for people with disabilities. Additionally, as part of the Accessibility Plus for Health Programme, we have taken measures such as adapting our website to the WCAG 2.1 standard, ensuring that online content is accessible to those with disability-related limitations.



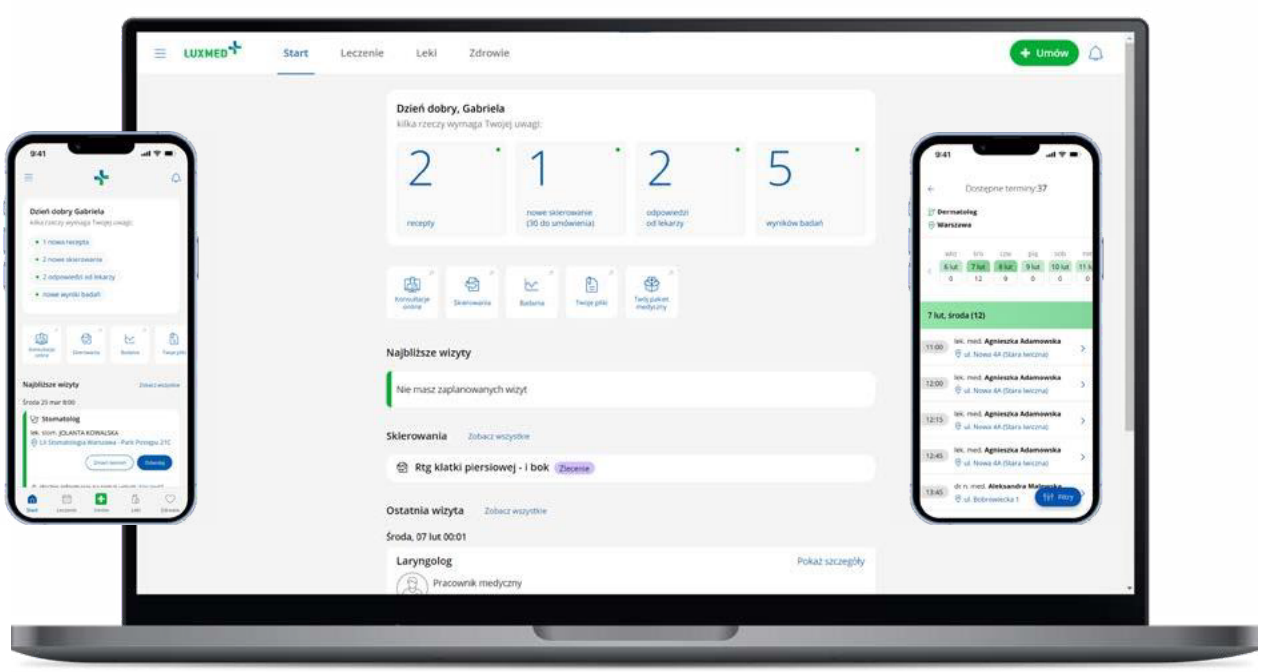
Aneta Skibinska
Director of Service Quality Standardisation and NPS Department, Patient Experience Division

99

In the Bupa strategy that guides our operations, the first of the six key pillars is the Patient. Our goal is to focus entirely on the patient' s experience, as their wellbeing is of utmost importance to us. One of our current priorities is to effectively coordinate the patient' s treatment processes across the various entities within the LUX MED Group, building synergies between outpatient and hospital care. We aim to be a trusted medical partner for our patients, offering comprehensive support for their health – whether managing everyday minor ailments or addressing more complex conditions requiring hospital treatment. With 2.5 million patients under our care, we are committed to providing the most thorough medical care possible.



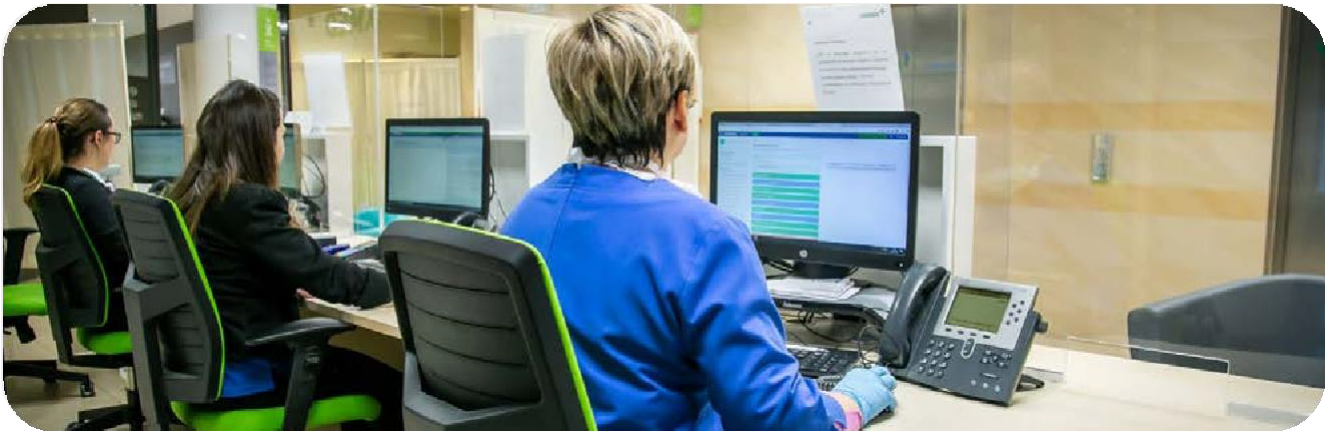
Patient Portal:



Available
24/7

50 features, including:

- Treatment history
- Appointment calendar
- Possibility to order a prescription
- Contact with a doctor



Safety of services

The health of our society is closely linked to the state of the environment in which we live. Acknowledging the significance of this impact, we monitor the latest scientific reports on environmental factors and their negative consequences as part of our clinical surveillance. We analyse trends such as the rise in respiratory diseases and conditions like endometriosis, allowing us to assess and evaluate diagnostic and treatment process indicators. Additionally, we monitor clinical quality indicators and assess the risks posed by high temperatures or extreme conditions on the health of both patients and staff.

Clinical governance policy: a key element in building a clinical safety culture

Continuously improving the quality and safety of care is central to our patient-centred approach, which is more broadly a person-centred approach. We are supported in these efforts by our Clinical Governance Policy, which enables us to manage clinical risks swiftly and effectively, ensure regulatory compliance, and uphold Evidence-Based Medicine. Most importantly, this policy fosters a culture of continuous learning and improvement in care quality. These commitments apply to all Bupa member companies. Below are some of the principles implemented as part of this policy.

Our principles

01

We are building a conscious culture of clinical leadership throughout the organisation.

02

We have systems in place to identify, assess, and control clinical risks, as well as to test the effectiveness of clinical risk management within the oraanisation.

03

We promote an open clinical safety culture that minimises the risk of harm by learning from clinical incidents, complaints, documentation analysis, and clinical indicators, all within a no-fault model.

04

We are committed to maintaining a stable medical workforce by recruiting, retaining, and developing medical professionals, including supporting their scientific development.

05

We ensure that our care delivery model, with all its elements, complies with legislation, guidelines, and Evidence-Based Medicine (EBM).

06

We have a robust programme of management controls and clinical audits across all business units.

07

We continuously improve quality to ensure sustainable changes that lead to better care experiences, improved clinical outcomes, and increased value for our customers, thereby strengthening and developing our reputation, brand, and customer touchpoints.



ISO 9001:2015 Certified quality management system

In a regular cycle, LUX MED facilities regularly undergo external audits to ensure that our Quality Management System complies with the ISO 9001:2015 standard. This certification covers the provision of outpatient healthcare services, including prevention, imaging diagnostics, endoscopic diagnostics, treatment, rehabilitation, occupational medicine, and dentistry.

The high evaluation of LUX MED' s quality measures is further validated by the results of regular customer satisfaction surveys, in which our services are consistently rated very highly. Additionally, we conduct regular internal audits, with the results informing remedial, corrective, and preventive actions aimed at the continuous improvement of our services.



Social engagement

3-3

At LUX MED, our commitment extends beyond providing healthcare services; we are also dedicated to making a positive impact on the lives of the communities we serve. This commitment drives our active participation in various campaigns and programmes that address the needs and expectations of our environment. We contribute by creating new jobs and economic development opportunities, offering support to those in need – such as Ukrainian immigrants – and delivering cultural programmes. Over the past year, we have undertaken numerous initiatives in the areas of social engagement and charitable activities.

Selected social initiatives

Umiem Pomoc [I Can Help]

In the last quarter of 2023, the LUX MED Group conducted the 11th edition of the 'Umiem Pomoc' [I Can Help] campaign.
This edition involved 425 pupils from eight schools in Swietochlowice, where first aid training for school pupils was awarded as a prize to the winning city in the Healthy Cities challenge.

Throughout all editions of the campaign, in collaboration with qualified paramedics from the LUX MED Emergency Academy, we have trained over 7,175 pupils from cities across Poland, including Warsaw, Piaseczno, Krakow, Katowice, Wroclaw, the Tricity, Poznan, Torun, Rzeszow, Olsztyn, Szczecin, Swietochlowice, and Bialystok.



PKOl and PKPar

For another consecutive year, we served as the main medical partner of the Polish Olympic and Paralympic Committees. Our mission remains to support the statutory objectives of PKOl and PKPar, with a focus on promoting the Olympic and Paralympic ideals. Recognising the significant positive impact of physical activity on health, we foster a spirit of sport within society by participating in events organised by these committees.
It is crucial to continuously provide Polish athletes with comprehensive medical care, support from experienced specialists, and access to modern medical infrastructure.



GRUPA LUXMED Jesteśmy częścią Bupa | UMIEM POMÓC | GRUPA LUXMED Jesteśmy częścią Bupa | AKADEMIA RATOWNICTWA

'Wygrywaj zdrowie' [Win Health] Campaign

The Win Health campaign has become a staple in our efforts to promote physical activity. Through the website www.wygrywajzdrowie.luxmed.pl, we encourage our audience to engage in regular sports activities more than ever before. In collaboration with Olympic and Paralympic athletes, we showcase the sports of the Summer and Winter Games and highlight their positive effects on health. The website features videos and articles on health and physical activity. Additionally, we support various sports initiatives, including our partnership with the Warsaw Marathon Foundation. We provide medical coverage for three major running events – the Warsaw Half Marathon, Ekiden (the Relay Marathon), and the Warsaw Marathon – while also organising event zones and participating in the races ourselves.



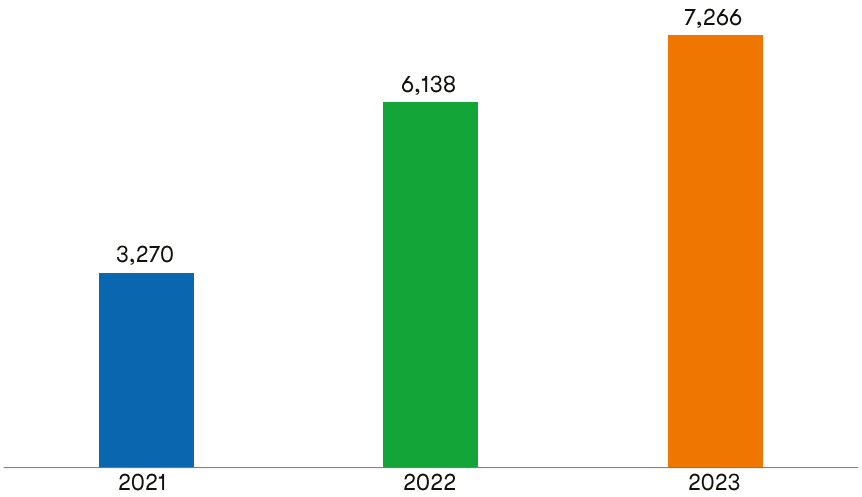
Onkonawigator Programme

The Onkonawigator programme is an initiative designed to support oncology patients, with a strong focus on education. The project centres on providing patients with guidance through oncology counsellors, who play a crucial role in offering quick, effective assistance and building patient awareness during the initial stages of diagnosis and treatment. The programme also supports the education of doctors in fostering oncological vigilance.

At the difficult moment when cancer is suspected, patients are not left alone with their concerns. The Onkonawigator team contacts them to provide helpful information on organising further diagnostics. The counselling team, made up of coordinators, offers dedicated care and additional non-medical consultations to all patients with a suspected oncological disease. They guide patients on how to obtain a DiLO card (oncology diagnosis and treatment card) and where to access diagnosis and specialised treatment close to home. They also assist in securing free psycho-oncological counselling. An important aspect of the counsellor's role is educating patients about oncology procedures and terminology, helping to enhance their sense of security and control over their situation. In 2023, we reached more than 7,000 such patients, and this number continues to grow each year.

GRUPA LUXMED Jesteśmy częścią Bupa | ONKONAWIGATOR KAMPANIA CZUJNOŚCI ONKOLOGICZNEJ

Chart 10. Number of patients in 2021-2023 who benefited from the Onkonawigator Programme



Dr Joanna Perkowicz LUX MED Foundation

The LUX MED Foundation, named after Dr Joanna Perkowicz, was established in 2018 to support the employees, co-workers, and family members of the LUX MED Group. The Foundation assists those who find themselves in difficult life situations due to health issues resulting from illness or accidents. The inspiration for the Foundation came from Dr Joanna Perkowicz-Szulczyk, the long-standing Medical Director of LUX MED and Advisor to the President on Patient Safety and Hospitality. Dr Perkowicz, the Foundation's patron, was known for her dedication to medical quality and her continuous search for solutions and innovative methods to help patients in their fight against illness.

The support provided by the Foundation to LUX MED employees and their family members is extensive, ranging from organising the treatment process and facilitating contact with specialists to funding medicines, medical services, treatments, and operations. Additionally, since the outbreak of war in Ukraine in 2022, the Foundation has been aiding Ukrainian refugees by funding medical care, supporting the employment of Ukrainian healthcare workers, and helping them learn Polish or pursue professional training.

The LUX MED Foundation is registered as a Public Benefit Organisation. You can support the Foundation's efforts by donating 1.5% of your income tax by entering KRS 0000 653 262 in the appropriate field of your PIT return.
Contributions can also be made to account number 40 1020 1026 0000 1702 0282 7806.



Helping Ukraine

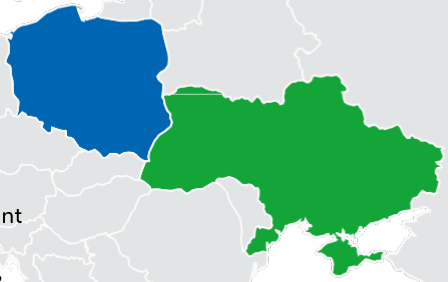
Two years have passed since the Russian aggression against Ukraine, and we remain in solidarity with the Ukrainian people. We felt a deep responsibility for the thousands of refugees crossing the Polish-Ukrainian border daily in need of medical support. Recognising our organisational and management capabilities, we knew we had to act quickly. Through our actions, we highlighted the significant role the private medical sector plays in supporting relief efforts during times of war and humanitarian crisis.

Our relief efforts are primarily implemented through the Dr Joanna Perkowicz LUX MED Foundation, made possible by the financial support of Bupa. We extend our heartfelt thanks to all our employees who have shown unwavering commitment to helping the Ukrainian people in their time of need. We will continue to provide support for as long as it is needed.

The extensive support provided by the LUX MED Group has enabled us to assist nearly a **quarter of the war refugees.**

We have delivered approximately **450,000 services** across our facilities and hospitals nationwide.

From the outset, our staff have been actively involved in providing medical assistance, including at the largest **humanitarian aid centre, PTAK in Nadarzyn.** We also operated a medical centre for refugees in the Marriott building in central Warsaw and were present at critical locations like the central railway station in the capital during the first days of the conflict.



Ukrainian citizens who have arrived in Poland can also count on our support in navigating the job market. **To date, the LUX MED Group has employed 393 people from Ukraine,** including **125 doctors** and **121 nurses** and **dental assistants.**

80 of those employed work in patient services or call centres. We offer employment, legal assistance, and training, including Polish language courses.



So far, 393 people have joined our team.





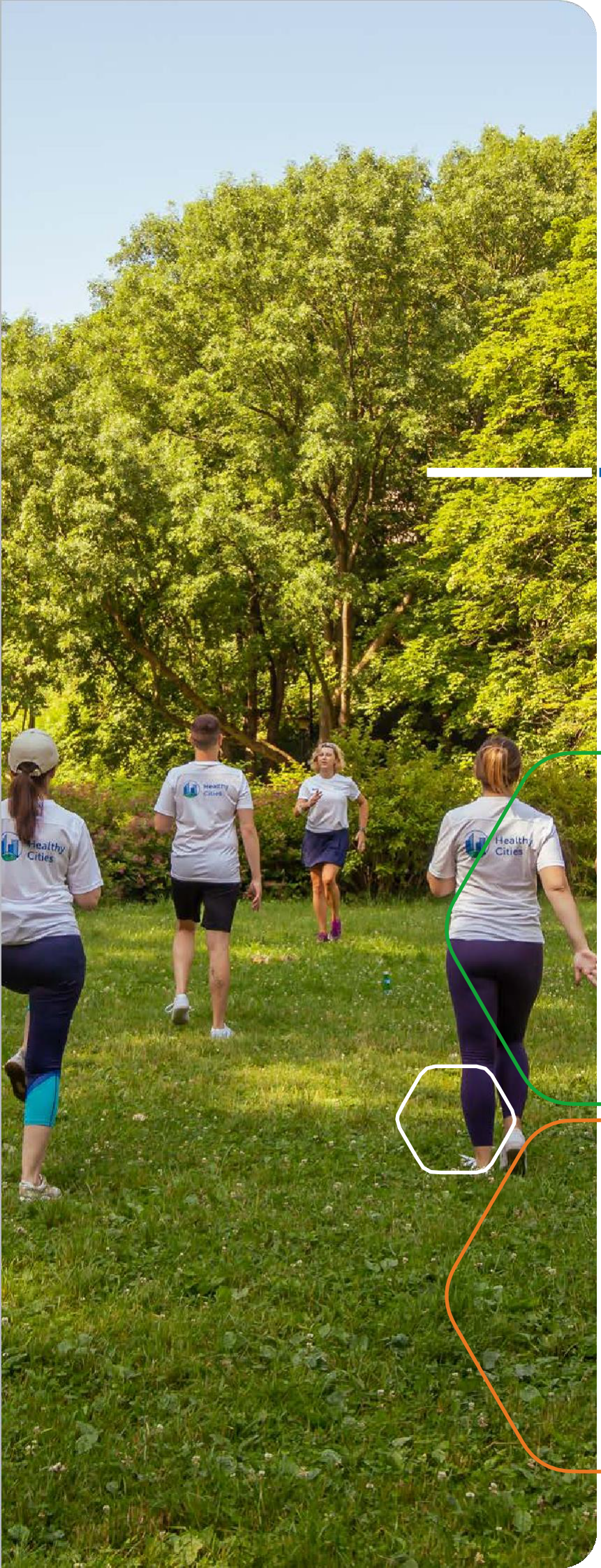




Charity principles

In 2023, we developed the Charity Principles, a document that organises our community involvement and outlines the process for allocating support. We aim for our charitable activities to address the needs of local communities and make a meaningful impact on the lives of those they serve. By implementing the Charity Principles, we also want to empower employees to propose social initiatives that the Group could support.





Healthy organisation

Ethics and transparency



3-3

Ethics in the healthcare industry goes beyond mere compliance with legislation; it involves adhering to ethical values and standards that build trust among patients, employees, and the community. As an organisation, we are committed to implementing clear governance principles and conducting our operations with transparency and integrity. In 2023, we adopted a new version of our Code of Conduct, which outlines the principles that underpin our unwavering commitment to ethical conduct and integrity. The LUX MED Group has also maintained an Openness Policy (Speak Up) for many years, allowing for the confidential reporting of legal violations, breaches of procedures, or behaviours that do not align with the Code of Conduct. In addition, Bupa policies and detailed local procedures are in place within the Group to ensure effective implementation.



2-23, 2-24

Code of Conduct

The Code of Conduct serves as a comprehensive guideline for ensuring the welfare of our patients and employees, safeguarding data security, protecting our reputation, and fostering positive relationships with business partners and public bodies. It also establishes the minimum standards we expect from our partners. The Code outlines how to address breaches of its principles and report inappropriate behaviour. It applies to all employees, associates, executives, and directors, and new hires are required to read and accept its principles. The full Code of Conduct is available online: LUX MED Group Code of Conduct.

Ethics Committee

The Ethics Committee is responsible for overseeing compliance with ethical standards in inter-employee relations. Its primary task is to assess adherence to ethical standards in labour relations by Group employees and collaborators and to recommend appropriate corrective actions. Any employee can report incidents of bullying or discrimination to the Ethics Committee – via email, telephone, or directly to any committee member. These reports are handled with full respect for the Group' s whistleblower protection rules.

Speak up openness policy

2-16, 2-26

LUX MED Group has implemented the Speak Up Openness Policy, locally referred to as the *Whistleblowing and Follow-up Procedure*.
All employees and collaborators are required to familiarise themselves with this procedure through training available on the e-learning platform. The procedure allows employees, co-workers, and other authorised persons to report violations of the law, internal procedures, or behaviour that is unethical and contrary to the Code of Conduct.

Whistleblowers have four reporting channels to choose from:

- Via the online platform at bupa.com/luxmedspeakup,
- By telephone, available 24/7 at 00 800 151 0 165,
- By email to naruszenia@luxmed.pl,
- Directly to the Speak Up Officer.

Reports can be made anonymously or with attribution. The Risk and Compliance Department handles these reports and conducts internal investigations. If a report concerns employees within this department or Board Members, it is managed by Bupa representatives. Whistleblowers are assured of the confidentiality of the proceedings, the protection of their identity, the right to feedback, and protection from retaliation. Investigations conclude with a written report that includes conclusions and, if necessary, recommendations for corrective action. These conclusions are then presented to the relevant management for implementation.

In 2023, Speak Up registered 15 reports, two of which involved HR-related issues and were referred to the Ethics Committee. Most reports concerned violations of internal procedures. LUX MED also has a procedure for reporting and monitoring incidents via the RIO (Register of Organisational Incidents), where operational incidents such as fraud attempts, exceeding authority, or phishing can be reported under the Abuse category. Periodically, general information on the number of reports made through the Speak Up procedure and the number of incidents is presented at meetings of the Risk and Compliance Committee, which includes members of the Management Board.

Conflict of interest

2-15

At LUX MED Group, we have institutional policies in place to prevent financial crimes, including corruption, and to manage conflicts of interest. In accordance with the Group' s Conflict of Interest Policy, all employees are expected to avoid any activities that might compromise their independence. To prevent potential conflicts of interest, we implement proven procedures and organisational arrangements, monitor situations, and manage more serious cases. The Management Board is responsible for supervising and controlling these situations, taking reasonable measures to minimise the negative impact of conflicts of interest on the Group' s activities.

Financial crime prevention

The Anti-Financial Crime Policy outlines the minimum standards required to effectively combat corruption, fraud, improper tax practices, money laundering, and violations of international sanctions. Detailed procedures include guidelines on offering and accepting gifts and corporate hospitality, as well as vetting contractors with whom LUX MED does or plans to do business. Training on corruption and fraud is provided to all employees, with specific groups at higher risk receiving additional training on international sanctions, money laundering, and facilitating tax evasion. All training is available on a training platform, and completion status is monitored.

In 2023, LUX MED Group updated its Anti-Corruption Procedure. This procedure specifies the rules under which gifts and forms of hospitality can be given or received, identifies prohibited gifts and hospitality, and outlines restrictions on gifts offered to public officials. Management regularly reminds employees and colleagues of the basic principles of this procedure as part of its cyclical communication efforts to raise awareness.

205-3

In 2023, as in 2022, there were no confirmed cases of corruption, nor were there any legal proceedings related to corruption.



Beata Gilicinska
Expert on anti-corruption systems, Risk and Compliance Department

Anti-corruption measures at LUX MED are not merely about legal compliance; they are fundamental to our ethical and transparent business practices. By consistently implementing anti-corruption policies and fostering a culture of integrity, we create an environment where honesty and transparency are paramount. This approach not only protects our reputation but also contributes to building a fair and ethical business environment.

Cooperation with organisations and associations

2-28

In 2023, we continued our collaboration with international organisations, participating in various initiatives. Active membership in these organisations is a key element in advancing the medical industry and achieving sustainable development goals. Additionally, since 2023, we have joined three new initiatives: the Responsible Business Forum, Polish Smog Alert, and the Business Accessibility Forum (BAF). Details on these organisations and associations are presented below.

Industry and business organisations

Business Accessibility Forum (BAF)

The Business Accessibility Forum is a partnership initiative by the Widzialni Foundation, Allegro, Microsoft Polska, Orange Polska, and Santander Bank Polska. The Forum serves as a platform for discussion and experience exchange to better meet the obligations under the European Accessibility Act. LUX MED, alongside other members, will work on eliminating barriers to digital resources, sharing experiences in this area, and promoting accessibility as a fundamental right for everyone.

Polish Confederation Lewiatan

The LUX MED Group CEO is the Vice President of the Polish Confederation Lewiatan and President of the Employers for Health Association within this organisation. The Polish Confederation Lewiatan is a business organisation that represents the interests of employers in Poland and the European Union. Its role is to support business development. Within the Polish Confederation Lewiatan, we participate in the Green Transformation Council, the Renewable Energy Council, and the Clean Air Council.

Telemedicine Working Group

The Telemedicine Working Group, co-founded by the LUX MED Group, has been supporting the development of telemedicine in Poland since 2015.

This group, composed of experts from various fields, aims to improve the quality and safety of telemedicine services and promote knowledge in this area. The Telemedicine Working Group publishes numerous positions, recommendations, and guidelines that serve as a basis for national guidelines.

HL7

HL7 is an international non-profit organisation dedicated to creating and promoting standards for interoperability in healthcare. The LUX MED Group is affiliated with HL7 as a co-founder of the Polish HL7 Association.
HL7 maintains and develops several standards, such as HL7 v2 Messaging, HL7 CDA, and HL7 FHIR, for the exchange of medical data.
These standards are currently being implemented in Poland and form the basis for systems like e-prescriptions, e-referrals, and electronic medical records.

Polish Chamber of Medical Informatics (PIIM)

Polska Izba Informatyki Medycznej

The LUX MED Group is a co-founder of PIIM, an organisation that unites various entities within the medical sector, including medical software providers and medical informatics experts. PIIM's activities focus on representing its members in standardisation and legislative initiatives within healthcare, including public consultations and providing opinions on draft legislation. Additionally, the Chamber has a representative on the Interoperability Council.



Organisations promoting the principles of sustainability

Global Compact Network Poland

United Nations Global Compact

The LUX MED Group is a member of the United Nations Global Compact, the world's largest initiative promoting sustainable business, which endorses the Ten Principles related to human rights, labour, the environment, and the fight against corruption. These principles are embedded in LUX MED's organisational culture, business strategy, and daily operations. Membership of the UN Global Compact signifies the company's commitment to the Sustainable Development Goals established by the UN as part of Agenda 2030.

FORUM ODPOWIEDZIALNEGO BIZNESU

Responsible Business Forum

The LUX MED Group has joined the Partnership Programme, the main initiative of the Responsible Business Forum (FOB), the largest and most established organisation in Poland focused on ESG, sustainable development, and corporate responsibility. The programme brings together industry leaders who, through participation, enhance their ESG competencies and collaborate to support sustainable business transformation.

polski alarm smogowy

Polish Smog Alert

In 2023, we became a partner of the Polish Smog Alert (PAS), an initiative uniting civic movements concerned about poor air quality in Poland. PAS aims to improve air quality to levels that do not threaten the health and lives of people in Poland and to meet national air quality standards. The Polish Smog Alert is a cross-party organisation that collaborates with local governments, non-governmental organisations, scientific communities, and anyone dedicated to achieving clean, pollution-free air and protecting the health of Polish citizens.

Sports organisations

Polish Olympic Committee

As the main medical partner of the Polish Olympic Committee, the LUX MED Group is dedicated to providing the highest quality healthcare for athletes. Our priority is to create conditions that ensure their optimal health, which directly contributes to high sporting performance. We are present where needed to support athletes in their swift return to peak form.

Polish Paralympic Committee

The LUX MED Group is the main medical partner of the Polish Paralympic Committee (PKPar) until 2028. The organisation provides comprehensive healthcare for athletes preparing for the Paralympic Games.

Polish Handball Association

The LUX MED Group is the medical partner of the Polish Handball Association (ZPRP) until the end of 2024. The organisation takes comprehensive care of the health of athletes, including national team players.

The LUX MED Group is also actively involved in partnerships with medical universities and medical education in Poland, driven by the belief that shaping medical staff is one of the key responsibilities of a responsible leader in the healthcare industry.

The LUX MED Group cooperates with, among others:

Medical University of Warsaw

College of Engineering and Health in Warsaw

SGH Warsaw School of Economics

Cardinal Stefan Wyszynski University

Lazarski University

SWPS University

Powisle University of Applied Sciences

Prof. Edmund Biernacki Medical Post-secondary

Supply chain and supplier relations

3-3, 2-6

Responsible supply chain management is a key element in achieving LUX MED's mission, vision, and values. Our suppliers include entities that rent retail space, sell real estate, supply energy, and offer IT solutions or medical supplies, among others.

In line with Bupa's guidelines, by 2025 we aim to involve our largest suppliers and healthcare providers in meeting our Scope 3 reduction target and achieving Scope 3 Net Zero. To minimise the negative impact within the supply chain, we require our suppliers to read and comply with the principles outlined in contracts and other purchasing documents. These principles in the social area involve respecting human rights, treating employees with dignity and respect, and safeguarding their health and well-being. We also enforce a zero-tolerance policy for corruption and apply best business practices. In terms of environmental responsibility, we emphasise reducing our carbon footprint, proper waste segregation, and the use of recyclable materials. We also verify that our suppliers have their own sustainability strategies. In 2023, we extended the document Sustainable Supply Chain Principles for LUX MED Suppliers and began work on expanding the current environmental survey to include social and corporate governance issues. This effort has led to the creation of an ESG survey, which will enable us to assess our suppliers more transparently in terms of compliance with Bupa's decarbonisation targets.



We expect our suppliers to collaborate with us in finding solutions to accelerate the anticipated environmental transformation and to uphold our values, which include:

1
Complying with the law

2
Protecting and respecting human rights

3
Achieving CO_2 emission reduction targets

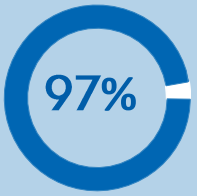
4
Conducting business in a responsible manner

The supplier evaluation process occurs in two phases: at the bidding stage and periodically during the course of the cooperation. During the initial selection process, we assess the business impact of the contractor, evaluating their risk level in areas such as confidentiality, information security, environmental impact, modern slavery, and outsourcing. The results are analysed and stored in our internal resources. If a supplier scores sufficiently, they are classified as meeting the required criteria for cooperation or as a conditional supplier, with whom cooperation is possible under specific market circumstances or dependent on a business decision.

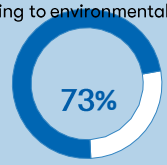
Establishing business relationships with a high-risk supplier requires additional approval from the relevant departments. In case of a disagreement, the final decision rests with the LUX MED Group Management Board and the Procurement Department. The process of cyclical supplier risk assessment is also repeated at the end of each calendar year.

308-1, 414-1

In 2023, 97% of new suppliers were assessed according to environmental and social criteria.



In 2022, the following proportion of suppliers was subjected to evaluation according to environmental criteria:



new suppliers

In 2022, the following proportion of suppliers was subjected to evaluation against social criteria:



new suppliers

According to Bupa' s guidelines, the LUX MED Group aims to involve its largest suppliers and healthcare providers in achieving the Scope 3 Net Zero target by 2025. Careful selection when choosing the Group' s suppliers is essential to ensure the highest possible quality of services provided, while also ensuring environmental sustainability.



Responsible marketing communication

3-3

Responsible marketing communication in the medical industry involves conducting promotional and informational activities in a manner consistent with medical ethics, scientific truth, and good practice principles.

When creating any marketing campaign, there is a risk that the message about the products and services offered may be misunderstood, potentially leading to decreased audience satisfaction. Compliance with medical advertising regulations is therefore crucial. We take extensive measures to protect against this risk and minimise any potential consequences. We have adopted a policy for managing the risk of misunderstanding advertising messages and have established internal controls to enforce it. Responsibility for implementing the policy lies with the Director of the Marketing Division, the Director of Marketing Communications, and the Director of Corporate Communications and Sustainability. Relevant departments, including Legal and Data Protection, Medical, or Risk and Compliance, are involved in reviewing new marketing communications. We have developed guidelines for communication language (both verbal and visual) and for employee statements on social media. We ensure that the statements we make are not offensive, disrespectful, or racist towards individuals or institutions, whether public or private, while upholding the principles of personal freedom and freedom of expression.

We also take steps to make content accessible to everyone, regardless of restrictions. Additionally, we use marketing communications to promote preventive measures, healthy lifestyles, physical activity, and mental health care.

Much of our content shared through various social media channels is purely educational. Through communication on our Facebook profile Zdrowie w stylu LUX MED [Health in LUX MED's style], we reach an average of 920,000 recipients per month. We also publish advisory articles on our website and support local prevention campaigns, such as the Warsaw Olympic Picnic. Furthermore, we organise the 'Zdrowie to Twoja wygrana' [Health is Your Win] campaign. You can read more about these activities in the Health Promotion and Preventive Healthcare section.

We maintain an ongoing dialogue with our audiences through various channels, such as the helpline, requests made directly at reception, email, post-service evaluations, and social media. We strive to respond promptly to comments or questions received through private messages, aiming for a response time of one hour. We moderate social media channels from 8 a.m. to 8 p.m., seven days a week. When we are unable to provide a comprehensive response within the Marketing Division, we redirect the issue to the relevant teams within the organisation, ensuring that concerns are addressed appropriately.

417-2

In 2023, no instances of non-compliance with regulations and industry codes regarding marketing communications were identified.

Privacy and data security

3-3

Maintaining the highest standards of privacy and data security for our employees, patients, and customers is a top priority. To ensure we fulfil our responsibilities in this area, the LUX MED Group has established a Privacy and Information Security Committee. The committee' s tasks include:

Promoting a business culture and corporate structure that prioritises data protection, ensuring compliance with relevant regulations.

Coordinating, monitoring, reviewing, and reporting on personal data processing projects and initiatives related to information security.



Fostering active cooperation between business and organisational units responsible for information security and privacy protection.

Providing analysis and advice on the impact of our business operations on privacy and information security, as well as on IT vendor or service requirements.

Planning tasks in the field of privacy and information security.

Making recommendations and developing training programmes focused on information security and privacy.

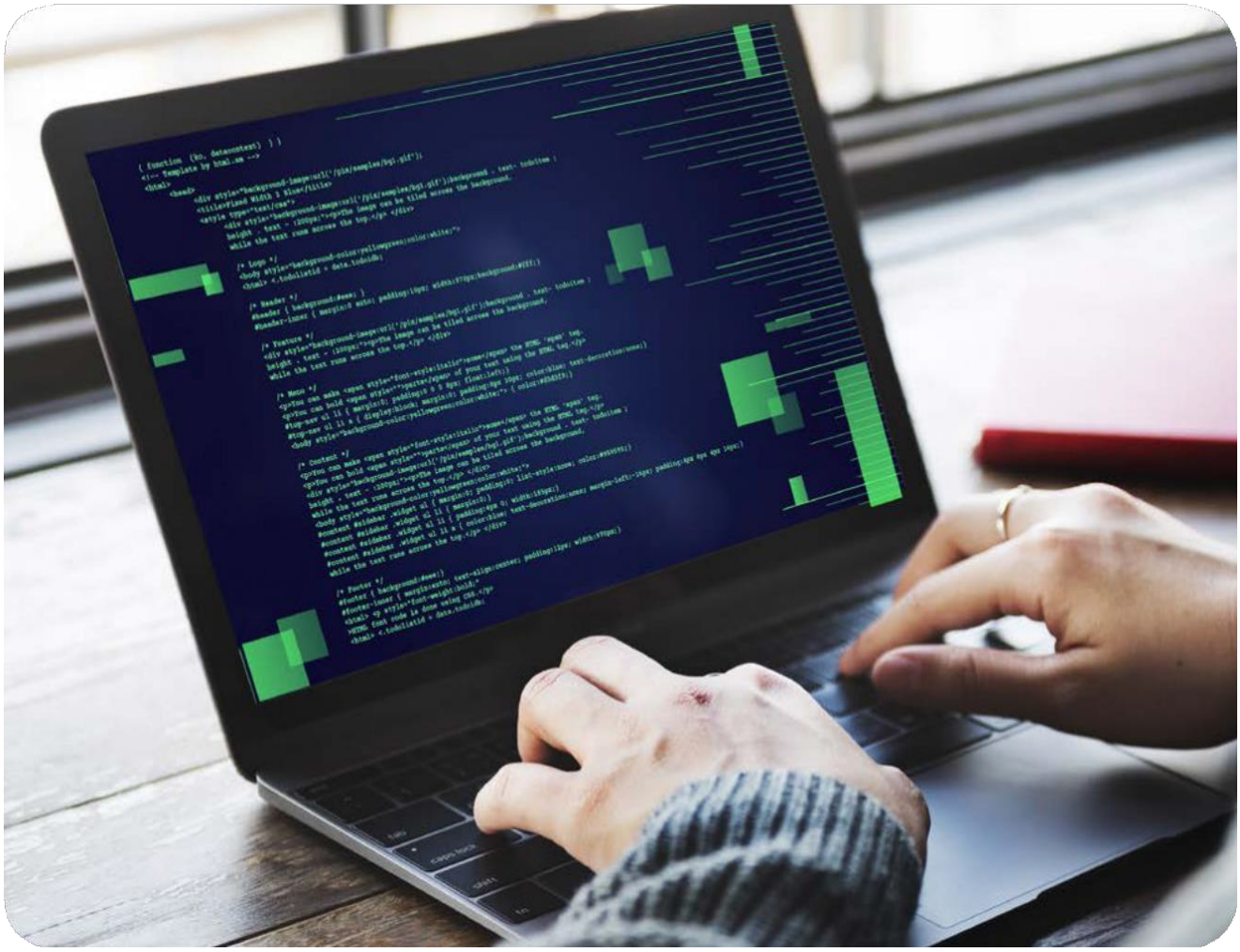
To ensure the proper processing of patient data and compliance with regulations, a Data Protection Officer and their team have been appointed. Their responsibilities include overseeing the correct application of regulations in the areas of information security and privacy protection. In addition to implementing legislation, including the General Data Protection Regulation (GDPR), we apply consistent procedural standards and protection measures appropriate to the level of identified risk. This approach ensures the confidentiality, integrity, accountability, and continuity of data processing.

Access to personal data is restricted to authorised medical personnel who have been appropriately trained in the high level of confidentiality required and are familiar with the correct procedures for data processing and storage. We also provide regular training and education to raise awareness of data protection.

We collaborate with entities and contractors that meet stringent data security requirements. Before entering into a partnership with a new entity, we conduct a thorough verification of the safeguards and data protection measures they employ.

Additionally, we subject our data protection processes to regular audits to assess identified risks, the implemented standards and policies, security measures, and the IT systems used.

We are regularly audited to ensure compliance with security requirements according to international standards, including ISO 27001 certification.





About the Report

Information about the Report

2-1, 2-2, 2-3, 2-4

This report has been prepared in accordance with the latest version of the international non-financial reporting standard, developed by the GRI Universal Standards, effective from 2023.

This is our second *Sustainability Report*, covering the year 2023, and it includes information on the entire LUX MED Group, including the parent company LUX MED Sp. z o.o., consistent with the consolidated financial statements.

The list of companies included in the report can be found in the appendices. Where data for all Group companies could not be obtained, contextual information is provided in the relevant sections of the report.

Companies excluded from this report will be included in sustainability reporting in subsequent reporting periods.
The data presented in the report covers the 12-month period of the financial year: 1 January – 31 December 2023. We produce the *Sustainability Report* on an annual basis. The previous report was published in September 2023, and no adjustments were made to it.



Materiality analysis and stakeholder relations

3-1, 3-2

At LUX MED, we are committed to aligning our strategies and actions with the expectations of our stakeholders and to transparently reporting sustainability information and data in line with best practice. Materiality forms the foundation of our actions and strategic decisions. The results and conclusions of the 2022 materiality survey, conducted in accordance with GRI standards, underpin our sustainability strategy for 2023-2025 and have guided the content of the 2023 Report.

With the aim of achieving full compliance with the requirements of the European Sustainability Reporting Standards (ESRS) in the future, we initiated our efforts in 2023 to meet this goal. This year, we expanded the scope of our materiality analysis to include the aspect of financial materiality, which involves identifying the risks and opportunities in the ESG area within the LUX MED Group.

We also mapped the results of the 2022 impact materiality study against the significant areas identified by the ESRS, leading to updates in the nomenclature of certain areas.
As part of the financial materiality study, we utilised LUX MED Group's existing risk identification process, including those related to ESG.

Materiality Analysis Process:

1. Stakeholder mapping
2. Identification of potentially material topics
3. Survey
4. Review of reference data
5. Benchmarking of reference entities
6. Analysis of results and prioritisation of material topics
7. Mapping of significant impacts and identified risks and opportunities with ESRS topics
8. Workshop discussions on financial materiality assessment
9. Analysis of results and updating of the list of material topics

During meetings with the working team and the owners of each thematic area, we discussed identified and potential risks and opportunities. We also assessed the likelihood of their occurrence and the possible magnitude of their impact on the Group's financial position. The results of both impact materiality and financial materiality analyses were internally summarised with the Corporate Communications and Sustainability Department, the Risk and Compliance Department, and the Finance Division.

The materiality study identified 14 issues where the Group has an impact on the environment or where an area significantly affects the Group. This year's materiality analysis also led to the identification of an additional material area: responsible marketing communications.

In the report, we provide a detailed approach to managing these areas, along with the corresponding indicators.

Area	Topic	Identified risks
Environment	Waste and hazardous materials management	• Risk of insufficient mitigation of adverse climate change impacts on patients and employees • Risk of failure to implement the company's climate change mitigation strategy
	Energy consumption and greenhouse gas emissions	
Society	Shaping healthcare accessibility	• Risk of limited medical staff resources in the Polish market • Risks related to cybersecurity and data protection • Risk of inadequate supervision of the quality of the treatment process • Risk of failing to meet patient expectations regarding the offered care model • Risk of improper marketing communication regarding the products and services offered • Risk of decreased employee engagement • Risk of non-compliance with employee rights • Risk of workplace accidents and occupational diseases • Risk of undertaking social initiatives that do not meet the needs of the targeted community • Risk of employees failing to complete mandatory training and not upgrading their professional qualifications
	Privacy and data security	
	Quality and safety of care	
	Responsible marketing communication	
	Labour practices	
	Employee health and safety	
	Climate change and its impact on population health	
	Social environment and charitable activities, social engagement	
	Employee education and training	
	Diversity and inclusive culture	
Corporate governance	Sustainable supply chains	• Risk of failure to counteract financial crimes • Risk of inadequate third-party verification for financial crime risks and international sanctions, as well as lack of knowledge regarding sanctions • Risk related to maintaining an ethical and sustainability-supportive corporate culture • Risk of non-compliance with regulatory requirements affecting the organisation's operations
	Business ethics and transparency	

Dialogue with stakeholders

2-29

Engaging in transparent, honest and respectful dialogue with our stakeholders is key to building trust both within and outside the organisation. As part of our materiality analysis, we have identified key stakeholder groups, which are presented below. The appropriateness of communication channels and interactions with them is continuously monitored and updated to best meet the expectations of our environment in this regard.



Stakeholder group	Method of dialogue	Purpose of dialogue
Internal environment		
Employees	• Regular chats with the CEO of the LUX MED Group • Meetings between the Management Board and employees at the headquarters and in the regions • Management meetings and internal meetings • Annual employee opinion surveys (*People Pulse*) • Ability to report issues to the Ethics Committee and through the Speak Up procedure • Employee intranet – LUXtranet • Email communication from the Management Board and the leadership of individual Organisational Units regarding important events and projects • Internal thematic newsletters, such as the LUX MED Group newsletter, IT News, HR News, Procurement Department newsletter, Risk and Compliance Department newsletter • Information materials in break rooms • Printed materials: brochures, leaflets, posters	LUX MED Group fosters appropriate working conditions, ensures equal opportunities and promotes diversity. It provides safe working conditions (occupational health and safety) for those employed both by the organisation and by its contractors. The Group organises a range of training sessions and is committed to attracting and developing highly qualified employees, including doctors.
Management Board of LUX MED Sp. z o.o.	• Meetings with employees – Town Hall meetings, chats, regional visits • Meetings with the management team – strategy presentations • Email communication with LUX MED Group employees • Oversight of policies related to ethical behaviour, risk and compliance, safety, etc. • Supervision of the Ethics Committee's activities • Promoting and supporting sustainability initiatives – participation in conferences, discussion panels, interviews • Participation in ESG Committee meetings	The Group engages in dialogue to build relationships between the Management Board and both internal and external stakeholders. This dialogue also provides an opportunity to consider diverse needs, expectations and perspectives in the decision-making process, which is crucial for the sustainable development of the organisation.
Owner: Bupa	• Internal meetings with representatives from various areas within Bupa • Town Hall meetings with employees • Regional meetings (Bupa companies operating within the same region (MU, Market Unit)) • Reporting on the achievement of goals and projects implemented locally • Communication via the dedicated internal platform Workvivo • Implementation of Bupa's Sustainability Policy • Monitoring and reporting risks • Applying for and reporting on funds to the Group Investment Fund • Quarterly reporting of CO_2 emissions • Reporting on the achievement of sustainable development goals	Collaboration with the owner helps monitor LUX MED Group's progress in achieving its existing sustainable development goals. Additionally, it provides a platform for developing action plans that will be consistent across the entire organisation.
External environment		
Patients	• Patient Portal • Helpline • Social media • Website • Visit evaluations • 'Close to Health' (*Blisko zdrowia*) magazine • Mailings • Marketing campaigns • Printed materials	LUX MED engages in dialogue concerning the quality of services provided and patient satisfaction levels. Additionally, it ensures the security of sensitive data.

Stakeholder group	Method of dialogue	Purpose of dialogue
Customers and brokers	• Involving customers in ESG projects (e.g., Healthy Cities) • Providing potential customers with information on ESG indicators • Customer satisfaction and loyalty surveys • Communication channels on social media • Industry and national press • Conferences and industry fairs • Broker Academy • Face-to-face meetings with customers	The Group is committed to fostering ethical behaviour, transparency and a responsible environment in business relationships.
NGOs and environ-mental organisa-tions	• Face-to-face meetings with NGOs • Joint projects in sustainable development and social engagement (e.g., *Healthy Cities Index*) • Industry conferences • Publications • Communication on social media • Press releases, joint media initiatives • Participation in industry associations, such as the Renewable Energy Council, Clean Air Council, Green Transformation Council at the Polish Confederation Lewiatan	The Group collaborates with other organisations to understand the interconnections between environmental issues, such as climate change, in the context of protecting human health and managing related risks.
Public administra-tion	• Establishment of the Employers for Health organisation • Joint participation of LUX MED and public administration representatives at national and industry congresses, where health is discussed from both public and private perspectives, e.g., Economic Forum in Karpacz, Health Market Forum.	The Group engages in dialogue to expand public access to healthcare, co-develop the healthcare system and collaborate with government authorities.
Media	• Press releases • Responding to journalists' inquiries • Interviews and expert commentary from LUX MED Group • Organising press conferences • Meetings during internal LUX MED Group events • Meetings at industry events, congresses and national conferences • Social media: LinkedIn, Twitter, Facebook, Instagram, YouTube	LUX MED establishes and maintains relationships to promote health and preventive healthcare.
Landlords	• Direct meetings between the Administration and Investment Department team and landlords, Negotiation of contracts related to green energy	The organisation engages in dialogue with landlords, ensuring access to energy from renewable sources.
Suppliers	• Distributing a survey to verify potential suppliers regarding the implementation of eco-friendly and environmental actions • Work on developing a Supplier Code of Conduct • Verification of selected supplier groups concerning decarbonisation goals • Signing cooperation agreements that include anti-corruption and social responsibility clauses	The Group establishes and maintains relationships with the group to promote health and preventive healthcare.

GRI index

GRI Standards/Other Sources	Disclosure	Location in Report	Omitted Requirements and Explanations
	General Disclosures		
GRI 2: General Disclosures 2022	2-1 Organisational Details	9, 89	
	2-2 Entities included in the organisation's sustainability reporting	89, 102	
	2-3 Reporting period, frequency and contact point	89, 100	
	2-4 Restatements of information	89	
	2-5 External assurance	n/a	The report has not been externally assured.
	2-6 Activities, value chain and other business relationships	16, 18, 83	
	2-7 Employees	45, 103	
	2-8 Workers who are not employees	46	
	2-9 Governance structure and composition	22	
	2-10 Nomination and selection of the highest governance body	27	
	2-11 Chair of the highest governance body	22	The chairwoman of the supervisory body is also part of the management and serves as the Managing Director of LMG Forsakrings AB, whose branch operates in Poland under the LUX MED Insurance brand.
	2-12 Role of the highest governance body in overseeing the management of impacts		
	2-13 Delegation of responsibility for managing impacts	29	
	2-14 Role of the highest governance body in sustainability reporting	29	
	2-15 Conflict of interest	79	
	2-16 Communication of critical concerns	78	
	2-17 Collective knowledge of the highest governance body	26	ESG training for the Management Board members was not conducted in the 2023 fiscal year.
	2-18 Evaluation of the performance of the highest governance body	27	
	2-19 Remuneration policies	27	
	2-20 Process to determine remuneration	27	

GRI Standards/Other Sources	Disclosure	Location in Report	Omitted Requirements and Explanations
	2-21 Annual compensation ratio	n/a	Due to the structure of employment and cooperation based on civil law contracts at LUX MED, and the resulting difficulty in providing comparable remuneration data, the company does not calculate the ratio of the highest-paid individual in the organisation to the median remuneration of all employees.
	2-22 Statement on sustainable development strategy	4	
	2-23 Policy commitments	28, 78	
	2-24 Embedding policy commitments	28, 78	
	2-25 Processes to remediate negative impacts	30	
	2-26 Mechanisms for seeking advice and raising concerns	78	
	2-27 Compliance with laws and regulations	n/a	During the supervisory audits conducted in 2023, no significant instances of non-compliance with laws or other external and internal regulations were identified within the LUX MED Group.
	2-28 Membership associations	80	
	2-29 Approach to stakeholder engagement	92	
	2-30 Collective bargaining agreements	52	
Material topics			
GRI 3: Material topics 2022	3-1 Process to determine material topics	90	
	3-2 List of material topics	90	
Material topics: Energy Consumption and Greenhouse Gas Emissions			
GRI 3: Material topics 2022	3-3 Management of material topics	33	
GRI 302: Energy	302-1 Energy consumption	36, 107	
	302-3 Energy intensity	36, 107	
GRI 305: Emissions to the atmosphere	305-1 Scope 1 emissions	37, 108, 109	
	305-2 Scope 2 emissions	37, 108, 109	
	305-3 Scope 3 emissions	37, 108	
	305-4 Emissions intensity	36, 109	

GRI Standards/Other Sources	Disclosure	Location in Report	Omitted Requirements and Explanations
Material topic: Waste and hazardous materials management			
GRI 3: Material topics 2022	3-3 Management of material topics	39	
GRI 306: Waste	306-1 Waste generation and significant waste-related impacts	39	
	306-2 Management of significant waste-related impacts	39	
	306-3 Waste generated	110	
Material topic: Labour practices			
GRI 3: Material topics 2022	3-3 Management of material topics	43	
GRI 401: Employment	401-2 Benefits provided to employees	44, 54	
Material topic: Employee health and safety			
GRI 3: Material topics 2022	3-3 Management of material topics	53	
403: Occupational health and safety	403-1 Occupational health and safety management system	53	
	403-2 Hazard identification, risk assessment, and incident investigation	53	
	403-3 Occupational health services	54	
	403-4 Worker participation, consultation, and communication on occupational health and safety	54	
	403-5 Worker training on occupational health and safety	54	
	403-6 Promotion of worker health	54	
	403-7 Prevention and mitigation of occupational health and safety impacts directly linked by business relationships	53	
	403-9 Work-related injuries	53, 104	
Material topic: Employee education and training			
GRI 3: Material topics 2022	3-3 Management of material topics	48	
GRI 404: Training and education	404-1 Average hours of training per employee	50, 106	
	404-3 Percentage of employees receiving regular performance and career development reviews	50	

GRI Standards/Other Sources	Disclosure	Location in Report	Omitted Requirements and Explanations
Material topic: Diversity and Inclusive Culture			
GRI 3: Material topics 2022	3-3 Management of material topics	51	
GRI 405: Diversity and equal opportunity	405-1 Diversity of governance bodies and employees	51, 104	
	405-2 Ratio of basic salary and remuneration of women to men	n/a	LUX MED Sp. z o.o. is currently in the process of job evaluation and grading, which makes it impossible to calculate the gender pay ratio, which would effectively represent the adjusted pay gap, at this time. This ratio will be available for calculation in the following year.
GRI 406: Non-discrimination	406-1 Incidents of discrimination and corrective actions taken	52	
Material topic: Business ethics and transparency			
GRI 3: Material topics 2022	3-3 Management of material topics	77	
GRI 205: Anti-corruption	205-3 Confirmed incidents of corruption and actions taken	79	
GRI 206: Anti-competitive behaviour	206-1 Legal actions for anti-competitive behaviour, anti-trust, and monopoly practices	n/a	In the years 2022–2023, no incidents or proceedings related to anti-trust violations were recorded.
Material topic: Supply chain and supplier relations			
GRI 3: Material topics 2022	3-3 Management of material topics	83	
GRI 308: Supplier environmental assessment	308-1 Suppliers that were screened using environmental criteria	84	
GRI 414: Social assessment in the supply chain	414-1 Suppliers that were screened using social criteria	84	
Material topic: Privacy and data security			
GRI 3: Material topics 2022	3-3 Management of material topics	86	
GRI 418: Customer privacy	418-1 Incidents of data security and privacy breaches	n/a	The indicator has been omitted from reporting due to data sensitivity.
Material topic: Providing high-quality services and shaping the healthcare system			
GRI 3: Material topics 2022	3-3 Management of material topics	63	

GRI Standards/Other Sources	Disclosure	Location in Report	Omitted Requirements and Explanations
Material topic: Health promotion and preventive healthcare			
GRI 3: Material topics 2022	3-3 Management of material topics	56	
Material topic: Climate change and its impact on population health			
GRI 3: Material topics 2023	3-3 Management of material topics	n/a	
Material topic: Social engagement			
GRI 3: Material topics 2023	3-3 Management of material topics	71	
Material topic: Responsible marketing communication			
GRI 3: Material topics 2023	3-3 Management of material topics	85	
GRI 417: Marketing and labelling of products and services	417-2 Incidents of non-compliance concerning product and service information and labelling	85	



Contact

2-3

We encourage you to share any feedback, observations or questions you might have after reading our report. Please feel free to contact:



Lukasz Niewola

Director of the Corporate Communications and Sustainability Department

lukasz.niewola@luxmed.pl



Joanna Wegrzynowska

ESG Manager, Corporate Communications and Sustainability Department

joanna.wegrzynowska@luxmed.pl



Appendices

Appendix 1

2-2

List of Group entities and affiliated undertakings

Company name	Ownership structure
Centrum Edukacji Medycznej Sp. z o.o. (formerly Centrum Medyczne Diagnostyka)	100% LUX MED Sp. z o.o.
Centrum Edukacyjne Medycyny Sportowej Sp. z o.o.	50% Sport Medica S.A. 50% Instytut Patologii Narzadu Ruchu Sp. z o.o.
Centrum Opieki Medycznej COMED Sp. z o.o.	100% LUX MED Sp. z o.o.
ELBLASKA Sp. z o.o.	100% LUX MED Sp. z o.o.
Dr Joanna Perkowicz LUX MED Foundation	100% LUX MED Sp. z o.o.
LMG Forsakrings AB	100% LUX MED Sp. z o.o.
LMG Forsakrings AB Spolka Akcyjna Branch in Poland	
LUX-MED Investment S.A.	100% LUX MED Sp. z o.o.
LUX MED Sp. z o.o.	100% Bupa Investments Overseas Limited
LUX MED Tabita Sp. z o.o.	88% LUX MED Sp. z o.o. 12% Evangelical-Augsburg Parish of the Holy Trinity based in Warsaw
Lux Med Onkologia Sp. z o.o.	100% LUX MED Sp. z o.o.
Medika Uslugi Medyczne Sp. z o.o.	100% LUX MED Sp. z o.o.
MegaMed Sp. z o.o.	100% LUX MED Sp. z o.o.
Pory 78 Sp. z o.o.	75% Sport Medica S.A. 25% LUX MED Sp. z o.o.
Sport Medica S.A.	100% LUX MED Sp. z o.o.
Silver Dental Clinic Sp. z o.o.	100% LUX MED Sp. z o.o.
Tomograf Sp. z o.o.	100% LUX MED Sp. z o.o.
Centrum Medyczne Mavit Sp. z o.o.	100% LUX MED Sp. z o.o.
Projekt Usmiech BIS Sp. z o.o.	100% LUX MED Sp. z o.o.
Smile Design Clinic Sp. z o.o.	100% LUX MED Sp. z o.o.
Szpital Sw. Elzbiety Sp. z o.o.	100% LUX MED Sp. z o.o.
HIFU Clinic Sp. z o.o.	Szpital Sw. Elzbiety Sp. z o.o. – 87 out of 124 shares (70.16%)
Swissmed Centrum Zdrowia S.A.	91.97% LUX MED Sp. z o.o.
Swissmed Opieka Sp. z o.o.	99.2% Swissmed Centrum Zdrowia S.A.
Swissmed Nieruchomosci Sp. z o.o.	100% Swissmed Centrum Zdrowia S.A.
CITOMED Nieruchomosci Sp. z o.o.	100% LUX MED Sp. z o.o.
MED POLONIA Sp. z o.o.	100% LUX MED Sp. z o.o.
LUX MED BENEFITY Sp. z o.o.	100% LUX MED Sp. z o.o. – 41,960 shares
Aptego Sp. z	LUX MED Sp. z o.o. – 51% (51 shares) TLP HOLDING Sp. z o.o. – 49% (49 shares)
Mediss Dental Clinic Sp. z o.o.	100% LUX MED Sp. z o.o.
MedPolonia Foundation	100% MED POLONIA Sp. z o.o.
Medtour Sp. z o.o. (Dentestetica)	100% LUX MED Sp. z o.o.
Orthos Szpital Wielospecjalistyczny Sp. z o.o.	100% LUX MED Sp. z o.o.
Stomatologia Aleksander Makara Sp. z o.o.	100% LUX MED Sp. z o.o.
4DENT Sp. z o.o.	100% LUX MED Sp. z o.o.

Appendix 2

Tables on quantitative data regarding the LUX MED Group, along with contextual information to facilitate understanding of the data

2-7

Table 1.1. Employees on fixed-term and open-ended employment contracts

	Employees on employment contracts					
	2022*			2023		
	Women	Men	Total	Women	Men	Total
Fixed-term	673	3,488	4,161	1,061	215	1,276
Open-ended	164	729	893	4,555	907	5,462
Total	**837**	**4,217**	**5,054**	**5,616**	**1,122**	**6,738**

* Due to the limited scope of data, the 2022 data in the table includes: LUX MED Sp. z o.o., NZOZ Przychodnia Lekarska Pogorze Sp. z o.o., LUX MED Tabita Sp. z o.o., LMG Forsakrings AB, Sport Medica S.A., Pory 78 Sp. z o.o., Centrum Edukacji Medycznej Sp. z o.o., LUX-MED Investment S.A., Elblaska Sp. z o.o., Foundation.

2-7

Table 1.2. Employees on employment contracts by working hours

	Employees on employment contracts					
	2022**			2023		
	Women	Men	Total	Women	Men	Total
Full-time	3,730	431	4,161	5,061	989	6,050
Part-time	777	116	893	555	133	688
Total	**4,507**	**547**	**5,054**	**5,616**	**1,122**	**6,738**

** Due to the limited scope of data, the 2022 data in the table includes: LUX MED Sp. z o.o., NZOZ Przychodnia Lekarska Pogorze Sp. z o.o., LUX MED Tabita Sp. z o.o., LMG Forsakrings AB, Sport Medica S.A., Pory 78 Sp. z o.o., Centrum Edukacji Medycznej Sp. z o.o., LUX-MED Investment S.A., Elblaska Sp. z o.o., Foundation.

403-9

Table 1.3. Accidents in the LUX MED Group

	2022	2023
	Accidents among employees	
Minor accidents	46	52
Serious accidents	–	–
Fatal accidents	–	–
Collective accidents	–	–
Total number of accidents	46	52
Workplace accident rate	–	5.4
Main type of accidents recorded: injuries		
	Accidents among non-employees	
Minor accidents	48	69
Serious accidents	–	–
Fatal accidents	–	–
Collective accidents	–	–
Total number of accidents	48	69
Main type of accidents recorded: injuries		

Only LUX MED Sp. z o.o data

405-1

Table 1.4. Diversity among employees at the LUX MED Group on employment contracts by gender, age group, and job level

	Percentage of board members by age and gender		
2023	Women	Men	Total
<30 years	0%	0%	0%
30–50 years	0%	50%	50%
>50 years	17%	33%	50%
Total by gender	**17%**	**83%**	**100%**

Data per:	Number of people	2022*		2023	
		W	M	W	M
Senior management	quantitative approach	33	26	19	18
	percentage	56	44	51	49
>51 years	quantitative approach	5	4	5	5
	percentage	56	44	50	50
31–50 years	quantitative approach	28	22	14	13
	percentage	56	44	52	48
<30 years	quantitative approach	0	0	0	0
	percentage	0	0	0	0
Management	quantitative approach	474	113	716	159
	percentage	81	19	82	18
>51 years	quantitative approach	108	18	174	33
	percentage	86	14	84	16
31–50 years	quantitative approach	341	89	509	118
	percentage	79	21	81	19
<30 years	quantitative approach	25	6	33	8
	percentage	81	19	80	20
Employees	quantitative approach	3,422	690	4,881	945
	percentage	83	17	84	16
>51 years	quantitative approach	617	88	936	133
	percentage	88	12	88	12
31–50 years	quantitative approach	1,915	419	2,696	555
	percentage	82	18	83	17
<30 years	quantitative approach	890	183	1,249	257
	percentage	83	17	83	17
In total, employees at all organisational levels, including:	quantitative approach	3,929	829	5,616	1,122
	percentage	83	17	83	17
>51 years	quantitative approach	730	110	936	133
	percentage	87	13	88	12
31–50 years	quantitative approach	2,284	530	2,696	555
	percentage	81	19	83	17
<30 years	quantitative approach	915	189	1,249	257
	percentage	83	17	83	17

* Due to the limited scope of data, the 2022 data in the table includes: LUX MED Sp. z o.o., NZOZ Przychodnia Lekarska Pogorze Sp. z o.o., LUX MED Tabita Sp. z o.o., LMG Forsakrings AB, Sport Medica S.A., Pory 78 Sp. z o.o., Centrum Edukacji Medycznej Sp. z o.o., LUX-MED Investment S.A., Elblaska Sp. z o.o., Foundation.

404-1

Table 1.5. Average hours of training in the LUX MED Group

Average hours of training per employee by gender and employment structure							
Gender		2022*			2023		
		Total hours of training	Total number of employees in the organisation	Average number of hours of training per employee	Total hours of training	Total number of employees in the organisation	Average number of hours of training per employee
Senior management	For women and men in total	10,368	221	46.9	10,308	250	41.2
Other employees	For women and men in total	145,155	18,816	7.7	164,484	25,438	6.5
Total: employees of all levels	For women and men	155,523	19,037	8.2	174,792	25,688	6.8

* The number of employees in the organisation refers to the combined information in disclosures 2-7 and 2-8, as LUX MED Group provides access to training opportunities for both employees and collaborates.

302-1, 302-3

Table 1.6. Fuel and energy consumption, including RES (302-1), and energy intensity indices

		2022	2023	Change [%]
Energy consumption from non-renewable resources (MWh)	Natural gas	5,169.5	3,886.4	−25
	Fuel oil	153.8	177.9	16
	Diesel	2,607.1	1,758.9	−33
	Petrol	3,032.7	4,272.4	41
	Other	8.2	8.5	5
	Total	**10,971.4**	**10,104.2**	**−8**
Energy consumption from non-renewable resources (MWh)	RES electricity	14,271.1	20,079.0	41
	Total	**14,271.1**	**20,079.0**	**41**
Purchased energy (MWh)	Electricity	14,371.4	10,378.6	−28
	Heat energy	24,801.9	26,297.7	6
	Cooling energy	171.0	210.5	23
	Total	**39,344.3**	**36,886.8**	**−6**
Total energy consumption in the organisation (MWh)*		**64,586.8**	**67,069.9**	**4**
Energy intensity index (MWh/m2)**		**0.274**	**0.266**	**−3**

* 302-1 and 302-3 data are reported for the LUX MED Group (all properties), while for the fleet, the data covers part of the Group, i.e.: LUX MED Sp. z o.o.; LUX-MED Investment S.A.; Elblaska Sp. z o.o.; Lecznice Citomed Sp. z o.o.

** To record, monitor and analyse emissions, the LUX MED Group uses SpheraCloud Corporate Sustainability software. Intensity is measured as the ratio of total energy consumption (MWh) to the total surface area of all properties in square meters. Surface area in 2023: 251,962 m^2, and for 2022: 236,044 m^2.

305-1, 305-2, 305-3

Table 1.7. GHG emissions per scope in 2023 fiscal year

	GHG emissions [tCO_2e]			2023 *vs.* 2022		2023 *vs.* 2019	
	2019 base year	2022	2023	Change [tCO_2e]	Change [%]	Change [tCO_2e]	Change [%]
Direct emissions – scope 1	3,609.0	3,407.2	3,431.0	23.8	0.7	–178	–5
Indirect emissions – scope 2 (location-based)	21,283.2	21,847.7	24,246.9	2,399.2	11	2,963.7	14
Indirect emissions – scope 2 (market-based)	18,405.1	17,382.1	14,289.5	–3,092.6	–18%	–4,115.6	–22
Total emissions – scope 1 and 2 (location-based)	24,892.2	25,254.9	27,677.9	2,423.0	10	2,785.6	11
Total emissions – scope 1 and 2 (market-based)	22,014.1	20,789.3	17,720.5	–3,068.8	–15	–4,293.7	–20
Indirect emissions scope 3	4,875.8	4,401.9	4,492.7	90.8	2	–383.1	–8
Total (market-based)	**29,768.0**	**29,656.7**	**32,170.6**	**2,513.8**	**8**	**2,402.6**	**8**
Total (market-based)	**26,889.9**	**25,191.1**	**22,213.2**	**–2,978.0**	**–12**	**–4,676.8**	**–17**

305-1, 305-2 and 305-3 data are reported for the LUX MED Group (all properties), while for the fleet, the data covers part of the Group, i.e.: LUX MED

Sp. z o.o.; LUX-MED Investment S.A.; Elblaska Sp. z o.o.; Lecznice CITOMED Sp. z o.o.,

305-1, 305-2, 305-4

Table 1.8. GHG emissions per source in 2023 fiscal year

GHG emissions [tCO_2e]					2023 *vs.* 2022		2023 *vs.* 2019	
	Emission source	**2019 base year**	**2022**	**2023**	**Change [tCO_2e]**	**Change [%]**	**Change [tCO_2e]**	**Change [%]**
Direct emissions – scope 1	Consumption of fuels for heating and/or cooling	926.4	1,005.9	761.7	-244.2	-24	-164.7	-18
	Fuel consumption in vehicles	1,984.5	1,298.5	1,366.4	67.9	5	-618.1	-31
	Refrigerants	206.2	470.1	194.2	-275.9	-59	-12.0	-6
	Anaesthetics	491.9	632.7	1,108.7	476.1	75	616.8	125
Indirect emissions scope 2 (location based	From electricity generation	16,680.0	16,684.2	18,862.4	2,178.2	13	2,182.4	13
	From heat generation, refrigeration processes and steam generation	4,603.2	5,163.4	5,384.5	221.1	3	781.3	17
Indirect emissions scope 2 (market-based)	From electricity generation	13,802.0	12,218.7	8,905.0	-3,313.7	-27	-4,897.0	-35
	From heat generation, refrigeration processes and steam generation	4,603.2	5,163.4	5,384.5	221.0	4	781.3	17
Indirect emissions – scope 3	From energy consumption within scopes 1 and 2	598.1	514.8	492.8	-22.0	-4	-105.3	-18
	Losses related to transmission and distribution	4,108.6	3,834.2	3,892.3	58.1	2	-216.3	-5
	Business travel	169.1	52.8	107.6	54.8	104	-61.4	-36
Total emissions – scope 1 and 2 (location-based) and scope 3		**29,768.0**	**29,656.7**	**32,170.6**	**2,513.8**	**8**	**2,402.5**	**8**
Total emissions – scope 1 and 2 (market-based) and scope 3		**26,889.9**	**25,191.1**	**22,213.1**	**-2,978.0**	**-12**	**-4,676.8**	**-17**
Energy intensity index*		**n/a**	**0.09**	**0.07**	**0.02**	**-23**	**n/a**	**n/a**

To record, monitor and analyse emissions, the LUX MED Group uses SpheraCloud Corporate Sustainability software. All gases are accounted for based on IEA data – 2021 Emission factors database, ©OECD/IEA 2021. No biogenic GHG emissions were identified. The base year is 2019, aligned with Bupa' s targets approved by the SBTi, which is the most representative year due to the lack of COVID-19 pandemic impact. The data includes all properties, regardless of operational control. Market-based method is based on: https://www.aib-net.org/facts/european-residual-mix; Name of factor set (AIB) – PL – residual mix. When the purchased energy is covered by guarantees of origin, the emission factor applied is 0. In our calculations, we strive to follow best practices and improve the data collection process, obtaining increasingly higher quality data. In 2023, the methodology for anaesthetics and refrigerants was updated to include sevoflurane and desflurane, which are anaesthetics with significant CO_2 emissions to the atmosphere, contributing to an increase in Scope 1 emissions.

* To record, monitor and analyse emissions, the LUX MED Group uses SpheraCloud Corporate Sustainability software. Intensity is measured as the ratio of total energy consumption (MWh) to the total surface area of all properties in square meters. Surface area in 2023: 251,962 $_{sqm}$, and for 2022: 236,044 $_{sqm}$.

306-3

Table 1.9. Waste

	Waste generated (Mg)	
Waste	**2022**	**2023**
Packaging waste; sorbents, wiping cloths, filter materials, and protective clothing not included in other categories	1.63	0.43
Waste not included in other groups	3.93	17.29
Waste from construction, renovation and dismantling of buildings and road infrastructure (including soil and earth from contaminated sites)	2.45	0.90
Medical and veterinary waste (excluding kitchen and restaurant waste not related to health or veterinary care)	329.3	351.8
Total	**337.35**	**370.415**

* The categorisation of waste is based on its origin, in accordance with the Waste Catalogue Regulation. There is no information on municipal waste (similar to household waste) generated by clients and employees of medical facilities. The data covers only non-municipal waste that has to be reported. The data was collected based on the BDO register.

** Data for LUX MED Sp. z o.o.

Contact details

LUX MED Sp. z o.o.

ul. Szturmowa 2
02-678 Warsaw

NIP: 527-252-30-80
REGON: 140723603

Reception:
22 450 45 00
22 450 50 05

kancelaria@luxmed.pl

GRUPA LUXMED
Jesteśmy częścią Bupa