

The background image shows a modern office interior. On the left, there are several large green plants in white pots. In the center, a glowing "LUXMED" logo is mounted on a light-colored wall. To the right, there is a reception desk with a wooden top and a dark green panel. A sign on the desk reads "obsługa serwisu premium" with a star icon. Three white pendant lights hang from the ceiling. A black table with two black chairs is in the foreground. A large blue and green graphic overlay is on the right side of the image.

LUXMED

Sustainability Report

for 2024

**GRUPA
LUXMED** 
Jesteśmy częścią Bupa

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A word from the CEO

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Dear Readers,

I am delighted to present to you the third Sustainability Report of the LUX MED Group.

With conviction and a sense of responsibility, we have gone through another year, making every effort to ensure that the growth of our organisation is as sustainable as possible. This is extremely important to us, as we are well aware of how human health and well-being are influenced by the state of the natural environment, a fair and caring approach to society, and ethical conduct in business. This Report has been prepared in accordance with GRI indicators.

At the same time, we analysed our readiness to report in line with ESRS indicators and, drawing on them, we have included additional information in the Report.



At the heart of our operations are our patients, who now number over 3 million. One of the most important indicators of our success is the NPS – a measure of patient satisfaction with the medical care provided within the LUX MED Group. In 2024, we achieved a score of 70.5, made possible by the continuous improvement of our services. Over the year, we implemented as many as 427 patient-oriented enhancements, each of them underpinned by the ideas and determination of our employees. One of the more significant initiatives was the introduction of Polish sign language interpreter services across all our facilities.

In the environmental area, our greatest achievement was the signing of a vPPA agreement, which secured 100% renewable electricity supplies for the next 10 years. This represents a major step towards decarbonising our operations and an innovative move on a national scale, ensuring that we more than deliver on our existing greenhouse gas reduction targets. In 2024, our Scope 1 and 2 emissions were already 43.3% lower than in 2019. Moreover, thanks to a variety of initiatives, we reduced paper consumption by as much as 17.4% year-on-year.

It is worth emphasising that all of this has been achieved while our organisation has continued to grow rapidly. In 2024, six new companies joined the LUX MED Group, and we made 16 new medical facilities and the LUX MED Hospital in Kraków (formerly Ortopedikum) available to our patients.

Our insurance business line is developing dynamically, and thanks to the strategic partnership established this year with Nationale-Nederlanden, we launched the 'Insurance support programme in case of illness'. Our Harmonia brand is also expanding – it now comprises seven mental health clinics as well as the possibility of remote consultations across Poland. This enabled us to offer free psychological support to people affected by floods at the end of 2024.

Meeting the growing demand for medical services presents the great challenge of ensuring access to qualified professionals. We are constantly expanding our team while also

supporting medical education in Poland, for example by organising internships and a residency programme for young doctors. As the education of medical staff is of utmost importance to us, we have gone a step further – in 2025 we will inaugurate the operations of our own university, the LUX MED University of Medical Sciences in Warsaw.

This has been a year of major change, one of which was relocating our company headquarters. The building we moved into meets the highest standards, holding both BREEAM and WELL certification. The interiors of our office have been designed in line with the 'Healing nature' concept, rooted in environmental care and the connection with nature.

At the same time, we introduced a new standard for our medical facilities, which will be rolled out gradually to ensure the best possible conditions for both our patients and our staff.

We look with great interest at innovations in the medical sector and the development of new companies. This year we were particularly proud of the Polish start-up Moodmon, which won the Bupa eco-Disruptive competition. Their application is designed to support the treatment of depression and bipolar disorder.

In 2024, physical activity took on particular significance. During the summer, we all followed the efforts of our wonderful Olympians and Paralympians, whose health we have proudly supported for years as partners of the Polish Olympic Committee and the Polish Paralympic Committee. Through our 'Win Health' campaign and the fourth edition of the Healthy Cities challenge, we encouraged people across Poland to stay active.

Walking at least 6,000 steps a day is the most basic thing we can do for our health.

As always, the Healthy Cities initiative resulted in tree planting – one tree for each of the record-breaking 15,000-plus participants. In addition, support was provided to initiatives selected by the winning teams and cities, and 41 hectares of peatlands were restored. Furthermore, the LUX MED Emergency Medicine Academy trained nearly half a thousand children and young people in Jaworzno, which, as the winner of Healthy Cities, received not only a budget for eco-investments but also this first aid training as a reward under our 'I Can Help' campaign.

For the third time, we carried out an analysis of the living conditions of one-third of Poland's population, as part of the Healthy Cities Index. Noting the publicity gained by the previous editions and the strong need for public debate on this subject, this year, together with the Warsaw School of Economics and the Open Eyes Economy Summit, we inaugurated the Healthy Cities Congress: People – Business – Environment. This inspiring event brought together experts as well as representatives of national and local government from across Poland to discuss ways to improve the quality of life in cities.

In 2024, the LUX MED Group also became a partner of the Chapter Zero Poland programme, coordinated by the Responsible Business Forum. I joined its Programme Council, while Łukasz Niewola, Director of the Corporate Communications and Sustainable Development Department, joined its Steering Committee. I am very pleased that we are increasingly active in new areas, establishing further partnerships. Together we can inspire and support one another to achieve the best results in pursuing sustainable development.

I invite you to read the Report.

Anna Rulkiewicz

CEO of the LUX MED Group

Implementation of the LUX MED Group ESG strategy

In 2024, we were halfway through the three-year ESG strategy planned for 2023–2025. Below we present the level of achievement of the objectives set out in the three pillars: Planet Health, Social Health, and Organisational Health.

Planet Health



STRATEGIC OBJECTIVES

- 14% reduction in Scope 1 and 2 CO₂ emissions by 2025
- Implementation of at least one scalable circular solution per year

Actions taken in 2024

- We signed a 10-year vPPA agreement for the supply of zero-emission electricity, which already covered the entire 3rd and 4th quarter of 2024. As a result, and thanks to other initiatives, emissions in 2024 were reduced by 43.3% compared to the base year.
- We launched the Paperless campaign, comprising a range of activities, including the implementation of electronic invoice circulation, which enabled us to reduce paper consumption by 17.4% compared to 2023.

Social Health



STRATEGIC OBJECTIVES

- Achieve a People Pulse survey score of at least 80
- Reach a total of 2 million people with our preventive health care
- Achieve a patient NPS® score of at least 64

Actions taken in 2024

- In 2024 we conducted two editions of the People Pulse survey. In May, with a participation rate of 91%, we achieved a score of 86, and in November, 85 out of 100 points with a 90% participation rate. Employees appreciate the stable and supportive working environment as well as the benefits offered.
- In 2024, we reached around 2 million people with preventive health activities, offering personalised health recommendations, educational meetings and free preventive examinations at events organised by LUX MED Group's partners and under public programmes.
- Listening to the voice of patients is our priority. In 2024, we achieved an NPS® score of 70.5, significantly improving patient experience. We implemented 427 patient-oriented enhancements.

Organisational Health

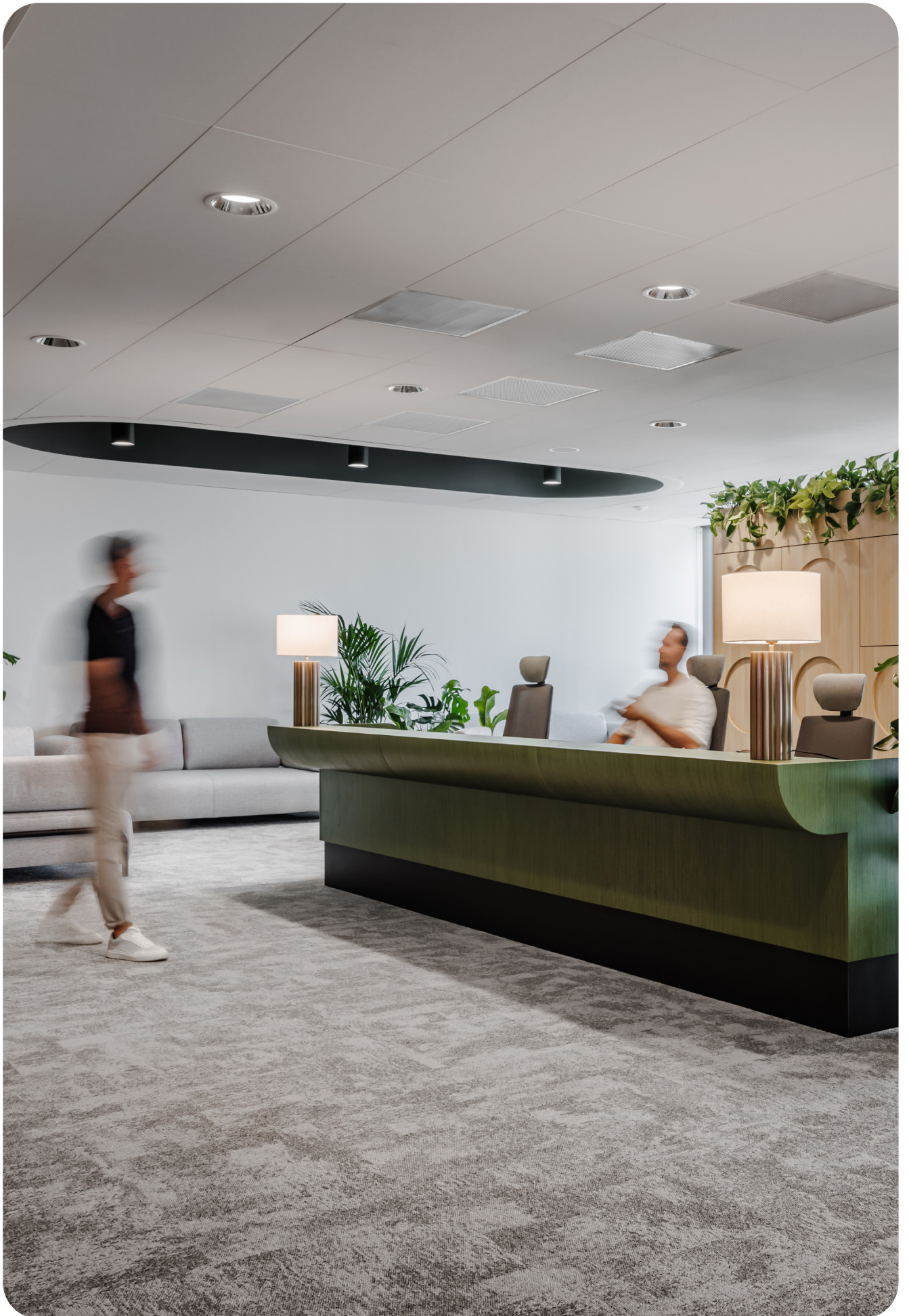


STRATEGIC OBJECTIVES

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

Actions taken in 2024

- In 2024, 100% of submissions to the Ethics Committee were reviewed within six months of receipt. Every case of misconduct is treated with the utmost seriousness, and corrective measures are introduced.
- Due to the specific nature of our operations, in 2024 a decision was made to replace quarterly ESG risk assessment with ongoing (dynamic) assessment, carried out whenever circumstances require – for example, the emergence of new risk factors (at least once a year). In 2024, ESG risk assessments were conducted three times.
- We implemented and published supplier guidelines on www.luxmed.pl. These constitute an important element of our cooperation with suppliers and clearly set out our expectations with regard to their practices. In this way, we have a positive impact on ethical standards in the market.



General information



Basis for preparing the report

This Report has been prepared in accordance with the latest version of the international non-financial reporting standard developed by the GRI Universal Standards, which has been in force since 2021. In addition, the GRI Index includes possible references to the reporting requirements of the ESRS (European Sustainability Reporting Standards).

Who we are

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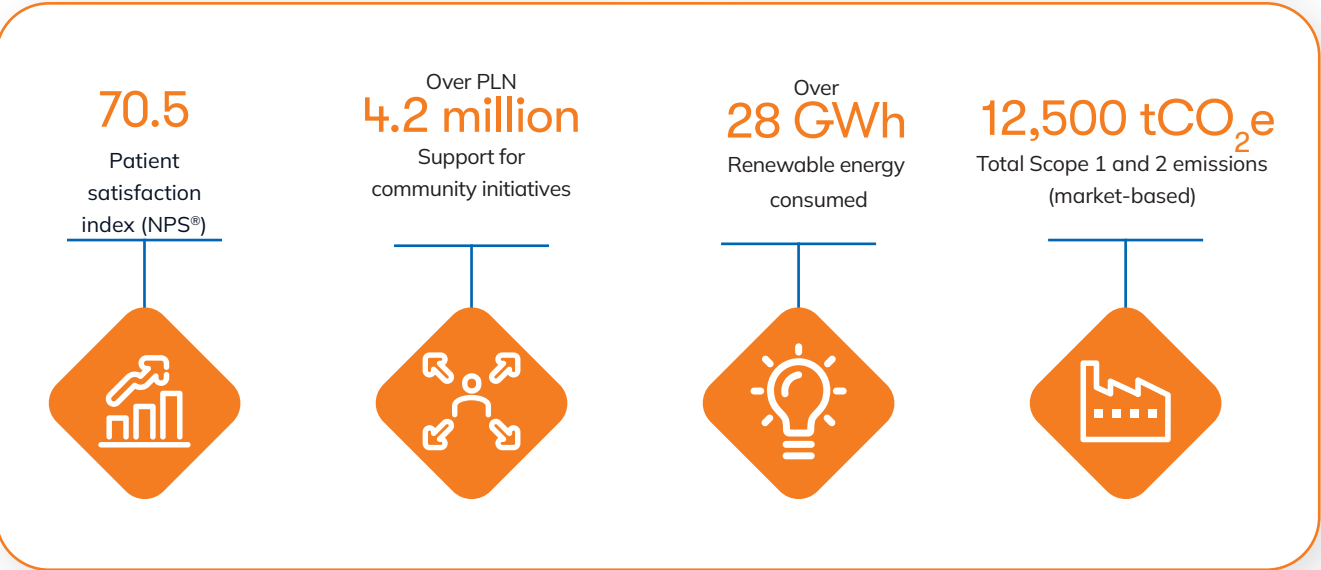
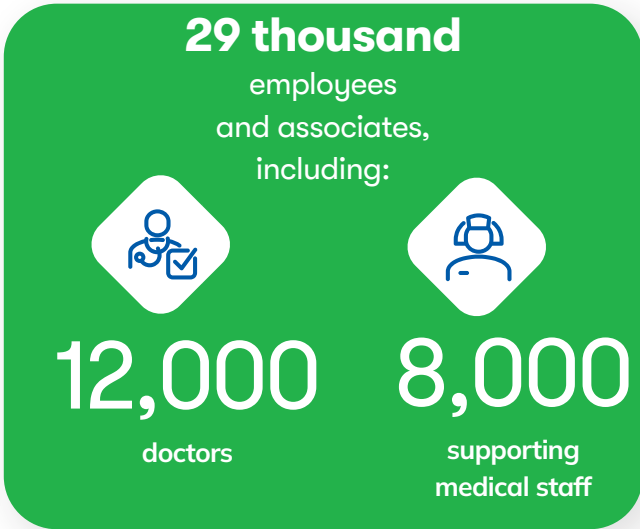
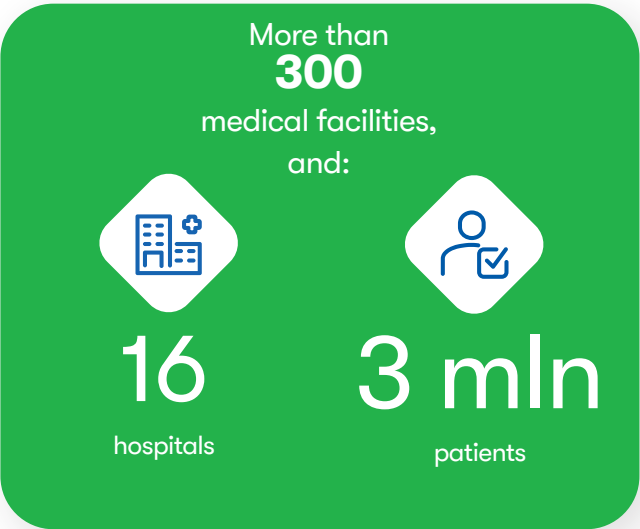
The LUX MED Group is the leader of the private healthcare market in Poland and part of Bupa, which operates globally as both an insurer and a healthcare provider. The company has been operating in Poland for over 30 years, offering comprehensive healthcare: outpatient, hospital, diagnostic, rehabilitation, dental, psychological and long-term care for more than 3 million patients.

They are served by over 300 medical centres, both publicly accessible and workplace-based, including 16 hospitals and approximately 3,000 partner clinics. The LUX MED Group employs nearly 29,000 people, including more than 12,000 doctors and 8,000 supporting medical staff.

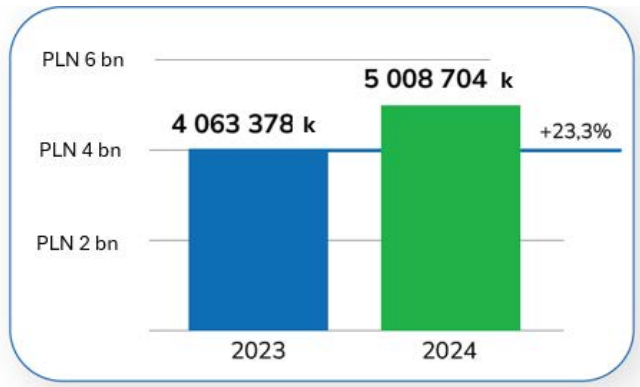
In its day-to-day operations, the Group is guided by the principles of sustainable development, undertaking numerous initiatives in the fields of community engagement and environmental stewardship. The LUX MED Group is the Main Medical Partner of the Polish Olympic Committee and the Main Medical Partner of the Polish Paralympic Committee. We are continually expanding our network of business partners to reach a wider audience. Drawing on their expertise, we build a product offering tailored to the needs of our patients.



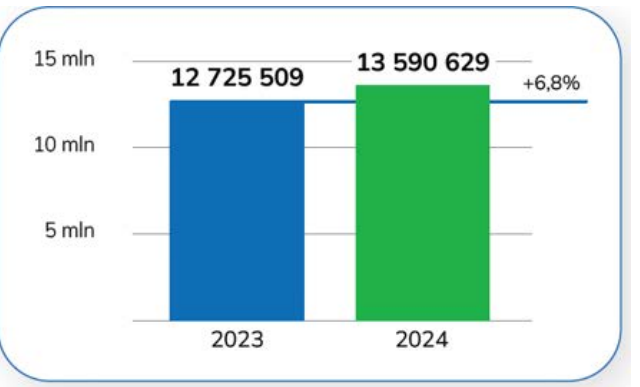
Summary of key results for 2024



Revenues:



Services delivered:



The year 2024 in light of key events

The year 2024 was a period full of challenges for the LUX MED Group, but also of highly significant milestones in terms of development. Below we present those that particularly deserve recognition.



Awards and honours

Silver ESG Leaf
of Polityka Weekly



Customer Service
Quality Star 2024
in the category Medical
Clinics



Top Brand 2024
in the category Healthcare
in the study by Press
magazine and PSMM



CSR Poland Awards
– nomination for CEO
Anna Rulkiewicz in the category
CSR Leader



Main Award
in the Power
of Attraction competition
organised by Puls Biznesu
, in the category Employer
Developing Leaders



ESG Ranking 2024
– 2nd place in the category
Pharmacy and Medicine



Grand ESG Award
by Press magazine
– nomination in the category
Best ESG Communication



Dream Employer
2024 Award
in the category Employee
Well-being



Dream Employer

POLAND 2024

Digital Excellence Awards
in the category Digital
Customer Experience



Governance structure

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As at 31 December 2024, the Management Board of LUX MED Sp. z o.o. consisted of six members: one woman (17%) and five men (83%). The CEO, Anna Rulkiewicz, also serves as General Manager of LMG Försäkrings AB, whose branch operates in Poland under the LUX MED Insurance brand.

Detailed information on the experience and competencies of the management team is available on the [LUX MED Group website](#).

The LUX MED Sp. z o.o. Management Team consists of the Management Board and the Senior Management Team. With their relevant experience and competencies in their respective areas, the extended Management Team actively supports the implementation of the strategy.

In total, the Management Team comprises fourteen members, including five women (36%) and nine men (64%):



Anna Rulkiewicz
CEO



Michał Rybak
Vice-President
of the Management
Board for Operations



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



**Bartosz
Kapczyński**
Member of the
Management Board,
Sales and Customer
Service Division



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



Jakub Tatak
Member of the
Management Board,
Finance Division



**Marta
Bartosiewicz**
Marketing and
Online Sales
Director



**Dorota
Sawicz**
Human Resources
Director



**Iwona
Radko-
Jarosińska**
Director of Patient
Experience
Department



**Adriana
Żuber-
Samborska**
Director of
Legal and Data
Protection
Department



**Łukasz
Niewola**
Corporate
Communications
and Sustainable
Development
Director



**Maciej
Mądrała**
LUX MED Group
Hospitals Director



**Sandip
Godbole**
Risk and
Compliance
Director



Michał Plit
Director of
Strategy and
Innovation

Appointment of management positions and assessment of qualifications

2-10, 2-18

The appointment of Management Board Members, as well as directors and presidents of subsidiaries who report directly to the Management Board, takes place in accordance with the internal Fit and Proper Person standard. This standard sets out the requirements for the proportionate assessment of the qualifications of all employees, in line with the level of responsibility assigned to each position.

Compliance with this standard provides assurance to the Bupa Management Board (the owner of the LUX MED Group), customers, suppliers and supervisory authorities that all Management Board Members and directors possess the necessary professional and ethical competencies to perform their duties effectively. It applies throughout the LUX MED Group and covers all employees.

In addition, candidates for managerial positions reporting to Management Board Members are verified against the LexisNexis database.

Committees

LUX MED Sp. z o.o. has permanent committees responsible for the efficient functioning of our organisation.

These include:

- Risk & 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 are established on the basis of an order or resolution of the Management Board, and their members are appointed by the Management Board. Each committee has defined objectives, operating rules, tasks and responsibilities. In subsidiaries, local functional committees may be established, reporting to the committees at headquarters.

If necessary, persons from outside the committee may be invited to attend meetings. In the event of changes in membership or committee responsibilities, the relevant updating orders and communication are prepared.



Sustainability management

2-12, 2-13, 2-14

The ESG Committee, established by the Management Board, performs an advisory and supervisory role with regard to ESG matters within the LUX MED Group. The Committee is chaired by the CEO, and its membership comprises selected Management Board Members and representatives of the company's key business areas.

The Committee meets as often as necessary to perform its tasks effectively, but not less than once every six months. During the meetings, progress in sustainability matters is reviewed and ESG reporting issues are discussed. Members of the Risk & Compliance Department also participate in the Committee's meetings. In addition, some ESG Committee members are also members of the Risk & Compliance Committee.

The Corporate Communications and Sustainable Development Department is responsible for sustainability reporting and for preparatory work to ensure compliance with future reporting requirements. Responsibility for managing and reporting to the Management Board on the organisation's greenhouse gas emissions lies with the Director of Corporate Communications and Sustainable Development and the Finance Division Director. They review and approve management information on this subject on a quarterly basis. In 2024, Joanna Węgrzynowska, previously ESG Manager, was also appointed ESG Representative of the Management Board, underlining the growing importance of ESG matters for the

Management Board. The Board is engaged in the materiality assessment process and approves the Sustainability Report.

In 2024, an ESG Working Group was also established. It consists of representatives of organisational units whose involvement is essential to ensure effective ESG management and reporting, and meets once a quarter. Its purpose is to strengthen communication and understanding of ESG issues, as well as to increase the effectiveness of cross-functional actions in this area. Members of the Working Group will actively contribute to the development of the ESG strategy for the coming years. The results of the Working Group's activities are presented during ESG Committee meetings.

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The Management Team continuously develops its skills and knowledge in the field of sustainability by participating in training and programmes. In 2024, these included:

- Training 'ESG – a new market and regulatory context' delivered by Deloitte experts – attended by six directors and four members of the Management Team.
- The INSEAD Business Sustainability Programme for senior executives – two Management Team members obtained the [INSEAD Certificate in Global Management](#).
- The Executing Sustainability Strategies programme at Imperial College Business School for corporate sustainability leaders – attended by two directors and the ESG Officer to the Management Board.

Mission, Vision and Values

Mission

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

Our mission is of great importance to us, it is reflected in our daily work, and each of us contributes to its fulfilment.

Regardless of the department or area in which we work, we do everything we can to care for the well-being of patients and treat this as our commitment to society.

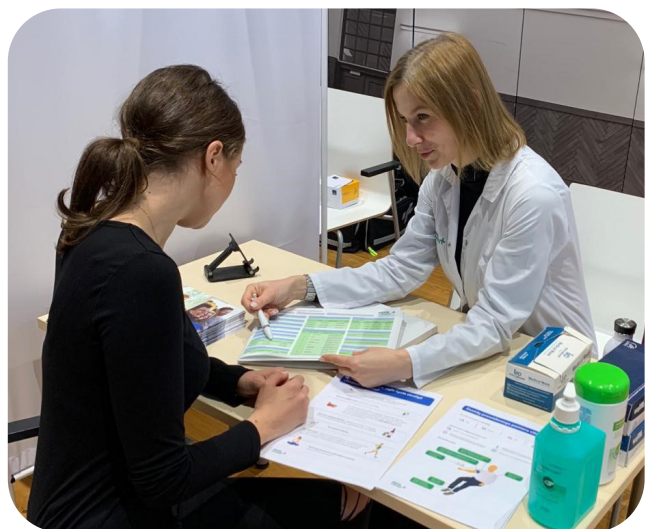
We are proud to be part of Bupa, a global healthcare and insurance provider.

As the LUX MED Group, we strive to build a sustainable future for our patients, employees and communities. We will continue our efforts to achieve excellence in healthcare, while promoting social responsibility and addressing environmental issues.

Vision

We listen to our patients and care for each one of them.

Our priority is to listen to our patients and to care for each and every one of them. In every part of our organisation, we focus on understanding patients' needs and opinions. We always act in their best interests, as they entrust us with their health. Based on nearly one and a half million items of feedback each year, we design projects and implement actions aimed at improving the quality of our services.





In 2024 we published the report: 'With the Patient on their Path to Health. The Patient Experience Improvement System' at the LUX MED Group'. It presents

the patient experience research system within the LUX MED Group and the ways in which we translate the findings from this research into practical, patient-oriented actions. The report is addressed to a wide audience, including other healthcare providers, as inspiration for developing a patient-centred approach in healthcare.

The report is available on the [LUX MED website](#), and more about our activities in this area can be found in the chapter [Management of patient experience quality](#).

LUX MED Group's Values

Courage, care and responsibility are our values.

As an organisation, we are flexible, we evolve, and we respond to the challenges of a dynamically changing reality in which we see opportunities for growth. When making business decisions, we always take into account the well-being of our patients and the world around us. In our work, we act in accordance with values that are close to each of us.



Courage

We seize opportunities and create new solutions.



Care

We act with empathy and respect.



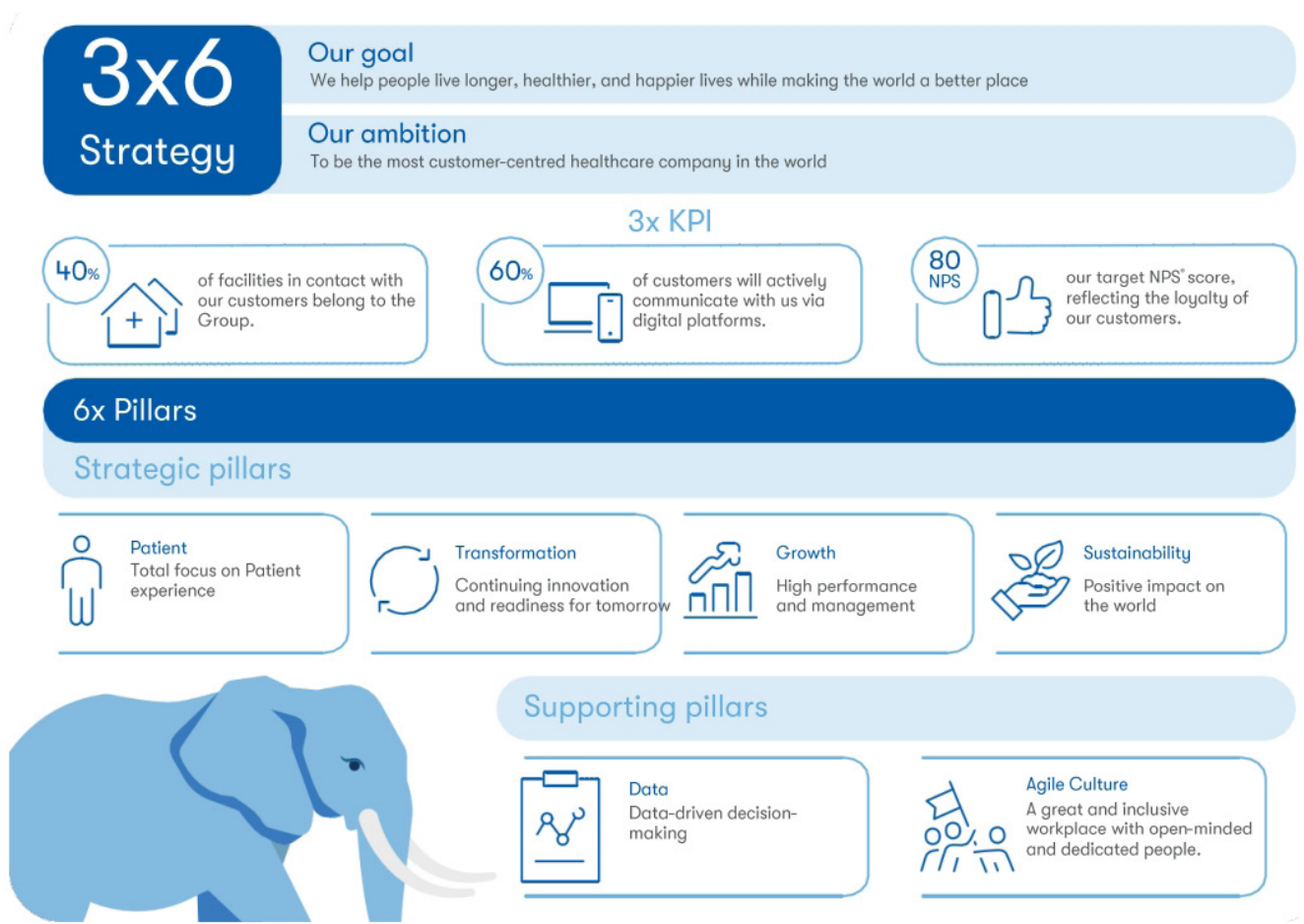
Responsibility

We are accountable for our decisions and actions.

Business model and services

3x6 Strategy

As part of delivering our mission and vision, between 2021 and 2024 we implemented the 3x6 Strategy. **This strategy was based on three Key Performance Indicators (KPIs)**, assessing progress towards our goals and ambition, and on **six pillars – four strategic and two supporting**, which helped us to focus on the right actions.



3x6 Strategy in a nutshell



Patient

Over recent years, our NPS has been growing. Last year we achieved a score of 70.5. In 2024, we also introduced 472 improvements. All our leaders listen to the voice of patients, and we regularly encourage employees to do the same.



Agile culture

An agile organisational culture enables us to act quickly. It is based on openness, transparent communication and the genuine development of people. We also place strong emphasis on diversity. This helps us build a great place to work, which is confirmed by the high results of our People Pulse engagement surveys.



Transformation

Thanks to the digital transformation of our main contact channel – the Patient Portal – we can better respond to the expectations of our patients. Over the past few years, the Portal has undergone a real transformation. Today, around 80% of our patients use it.



Growth

To maintain our leadership position, we must continue to grow – and we are doing so faster than the market. Over the past four years, we have doubled our revenues. We are constantly investing. Our business lines are developing very well, and by the end of 2024, our insurance business had 154,000 people covered by the LUX MED Full Care Hospital Insurance.



Sustainability

We are delivering on our sustainability strategy. Over the past five years, we have reduced our Scope 1 and 2 emissions by 43.3%. Last year, we signed an agreement that is key to this process. We are also implementing numerous ESG-supporting projects such as Healthy Cities, the Healthy Cities Index and the Healthy Cities Congress.



Data

Thanks to data, we understand the needs of our patients and customers, and we can provide our services more effectively and precisely. We have implemented and are further developing LUXanalytics. This tool enables us to optimise operational efficiency, which in turn reduces costs.

In 2025 we are launching a new three-year strategy – Savannah27.

It sets out the next objectives and enables us to pursue our ambitions. Of course, our Mission, Vision and Values remain unchanged. Part of this strategy is also the Better World strategy, which defines new sustainability ambitions.



How will we deliver the Savannah27 strategy?

Quality

We strive for outstanding quality of our services and patient experience. In 2025, we aim to achieve an NPS of 75 and implement even more enhancements to our services.

Patients

We want to help an even greater number of patients. Our goal is 5 million patients by the end of 2027. We also want them to live longer and healthier lives. That is why we will offer more products, including those strongly supporting the treatment of lifestyle diseases and prevention.

Growth and development

We want and intend to grow, while at the same time pursuing our ESG strategy. Over three years, we plan to double our business. We also place strong emphasis on building strategic alliances with partners. We will open more facilities – 50 new ones by the end of 2027.

We will continue acquisitions and invest in hospital development. We will also focus on internal synergies, making us even more efficient.

Medical staff education

We face the challenge of a shortage of doctors on the market. That is why we will continue to invest in the education and professional development of medical staff. We want to contribute to building the Polish healthcare system and shaping its effectiveness. We have ambitious plans – in 2025 we will open the University of Medical Sciences.

Digital transformation

We are progressively moving to the cloud. Our data and systems will be stored there. At the same time, we must remember how important IT security is and take care of it. Artificial intelligence will be increasingly deployed and integrated into our processes, to make our work easier and improve the quality of our services.

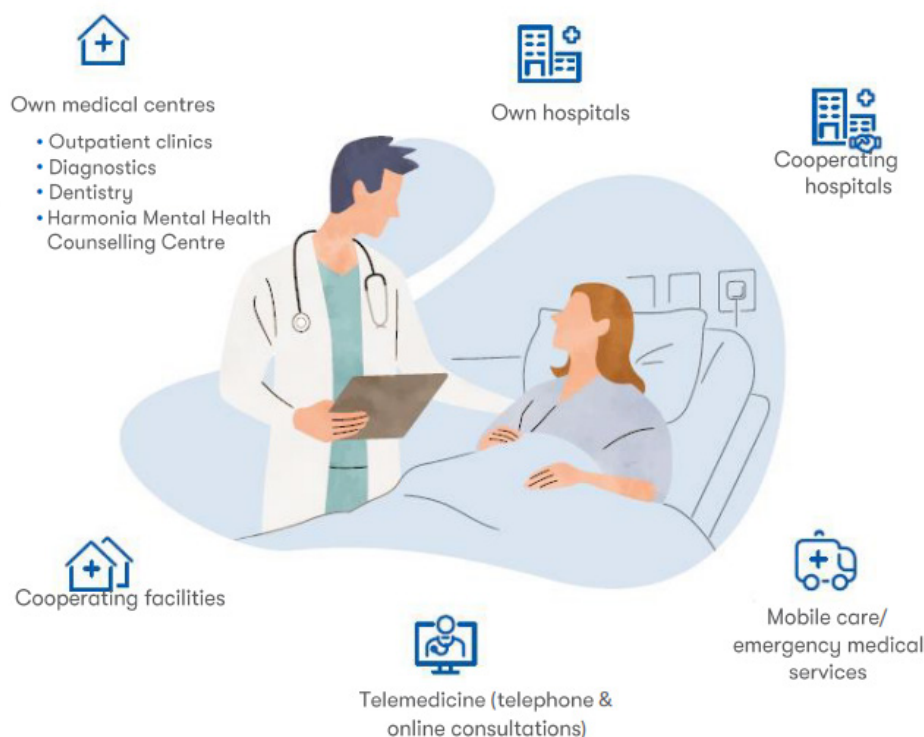
2-6

The patient is our top priority

Patients can benefit from a wide network of medical facilities located across Poland, as we continue to grow with patient accessibility in mind. Our medical team consists of highly qualified specialists from a range of fields, which enables us to provide patients with comprehensive healthcare tailored to their individual needs. The well-being of patients is the priority in our daily activities. They are at the centre of everything we do – from decisions on opening new facilities, through the choice of specialists, to the definition of available procedures and treatments.

Patient centricity – we never leave a patient without a solution.

Holistic patient care



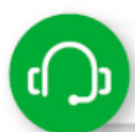
Convenient booking and access to a wide network of facilities



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



SMS with a link to booking/search tool for medicines

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

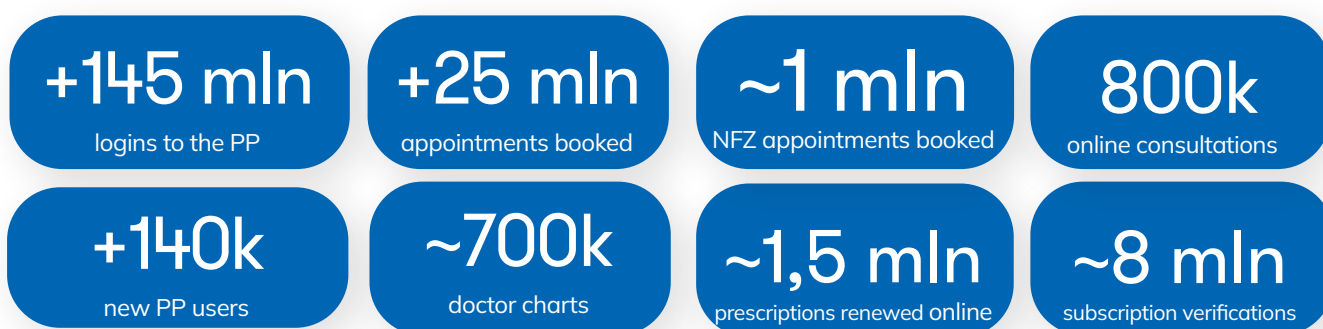


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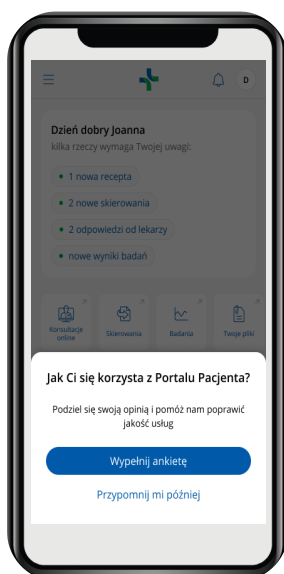
Patient Portal

In 2024, the Patient Portal was the main contact channel for 65% of patients, with a steady year-on-year growth of more than 10%. It is a place where patients can easily schedule and manage their appointments, and where they have access to more than 50 online functions – from e-referrals and test results, to medication booking, remote consultations with doctors, and diagnostic support.

2024 | The Patient Portal is now the main contact channel for patients with LUX MED

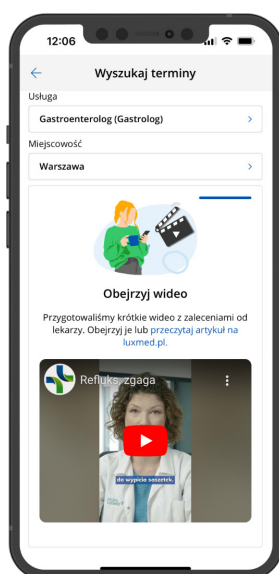


In 2024, we continued developing the digital product by introducing unique market solutions, including the possibility of viewing and downloading diagnostic images (such as X-rays, CT scans, MRIs, panoramic dental X-rays and others). As part of the 'Year of the Patient Portal' project, we carried out multi-channel communication and promotion activities, moving closer to the level of 80% of patients with an active Portal account.



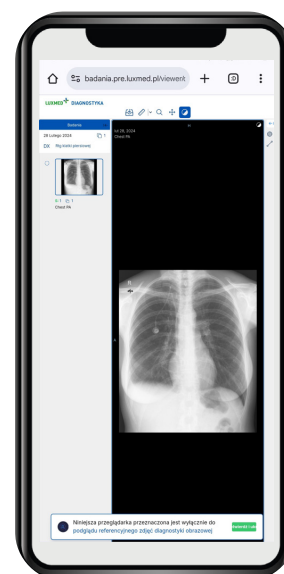
NPS SURVEY DEVELOPMENT

New touchpoints for a better understanding of the patient



NEEDS MANAGEMENT

Implementation of audio and video content



DIAGNOSTIC IMAGES ONLINE

Secure online access to X-ray, CT and MRI images

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



Bluea is our strategy to develop digital products and solutions that enable patients to take better care of their health.

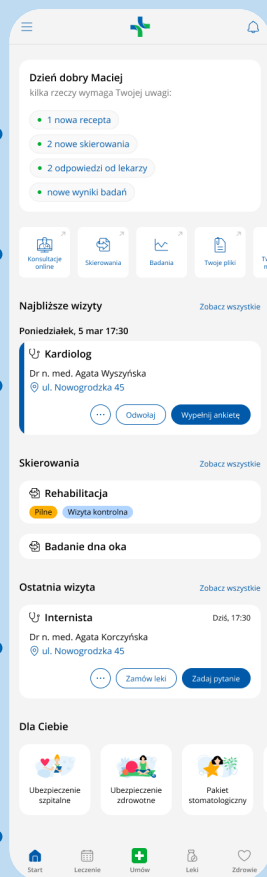
NOTIFICATIONS ABOUT IMPORTANT EVENTS

VIDEO/E-CHAT CONSULTATIONS

APPOINTMENT MANAGEMENT

MEDICATION RESERVATIONS WITH APTEGO

ONLINE PRESCRIPTION RENEWALS



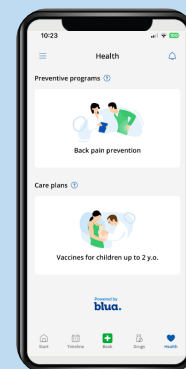
ONLINE ACCESS TO TEST RESULTS, CHECKING SUBSCRIPTION COVERAGE

PRE-HEALTH INTERVIEW QUESTIONNAIRE

ONLINE E-REFERRALS

POST-VISIT DOCTOR CHAT / ASK A DOCTOR

PREVENTIVE CARE PLANS, ONLINE CARE PLANS



Ernest

Wołkowycki-Dołęga

Director of the Digital Products Department



Since mid-2023, the LUX MED Group has been a member of the Business Accessibility Forum – a nationwide organisation bringing together leading Polish companies in dialogue with regulators and civil society on accessibility, including digital accessibility. This is also one of the elements of our ESG strategy.

We actively participate in developing guidelines for building accessible digital products. In 2024, we carried out a preliminary audit of our main digital products – the website, the eCommerce platform and the Patient Portal application. These meet some of the accessibility criteria, but we also see areas for further improvement, which are included in our action plan.

Through participation in industry organisations and tripartite dialogue, we aim to create digital products that are simply better – accessible to diverse user groups.

Our services

We strive to ensure that every patient feels heard, understood and properly cared for, whether receiving treatment in outpatient facilities or more specialised hospital care. Our patients can choose from a range of medical packages or purchase single visits. We also run insurance operations, which, alongside subscription, provide a new way of financing services.

Below is more information on the types of services we provide.

Comprehensive healthcare

From outpatient services to specialised and hospital treatment





LUX MED Group Medical Centres

More than 300 of our own facilities in several dozen Polish cities. We provide a wide range of services: medical consultations, primary healthcare, occupational medicine, laboratory tests, outpatient procedures, rehabilitation, and an extensive portfolio of vaccinations, health checks and preventive packages. Our patients benefit from consultations with doctors across many specialisations.

LUX MED Group Hospitals

We also operate a network of 16 of our own hospitals throughout Poland. Our patients benefit from inpatient care in oncology, general surgery, urology, gynaecology, proctology, cardiology, orthopaedics, ENT, ophthalmology, emergency medicine and many other areas. We provide hospital services under the NFZ, our Full Care Hospital Insurance, subscriptions and as fee-based services.

LUX MED Diagnostics

Nearly 40 specialist units in 20 cities. We specialise in examinations including magnetic resonance imaging (MRI), computed tomography (CT), mammography, ultrasound (USG) and X-ray. We also provide mammography screenings in mobile diagnostic units (mammobuses) as well as in stationary offices in selected locations.

LUX MED Dentistry

76 dental clinics employing experienced dentists and support medical staff. In 2024, we opened a facility with dental units adapted for patients in wheelchairs, patients with obesity, as well as treatment rooms for procedures under general anaesthesia and for young patients.

Harmonia Mental Health Clinics

Highly specialised psychiatric and psychological outpatient clinics. We help patients regain balance and are systematically expanding our mental health and personal development services. In 2024, we provided services in

seven clinics in Warsaw, Wrocław and Kraków, as well as remote services (online or by phone) across the country. We support both employees and employers through a wide portfolio of services and dedicated programmes, such as Harmonia in Business. The clinics offer psychological and psychiatric consultations, consultations for couples, families and children, as well as therapies, psychotherapy and diagnostic services.

Care and Rehabilitation Centre (formerly LUX MED Tabita)

A centre created with seniors requiring continuous care in mind. The Care and Rehabilitation Centre provides a solution for families unable to devote sufficient time to caring for their loved ones. It is also a helpful option to consider for short-term stays, for example when a caregiver is temporarily unavailable. We offer residential rehabilitation stays as well as day rehabilitation, including neurological, orthopaedic and restorative rehabilitation.

LUX MED Benefits (formerly Carrotspot)

The LUX MED Benefits platform is a convenient tool for managing processes: from subscription services, through benefits cafeteria and incentive programme design, to detailed analytics. It also enables management of the Company Social Benefits Fund (ZFŚS), the creation of surveys and questionnaires, and the setting and monitoring of job and development objectives.

ApteGo

An online platform where patients can easily check the availability of a given medicine at a specific pharmacy and reserve it. The platform is integrated with thousands of pharmacies across Poland.

LUX MED Insurance

This is an offering of group and individual health insurance. One of our flagship products is the LUX MED Hospital Insurance – Full Care, which enables the insured person to undergo inpatient treatment, with the entire process covered – from diagnostics, through procedures and emergency care, to rehabilitation. A key element of the insurance is Hospital Care Coordination throughout the treatment process.

In addition, we offer products such as: PROMED – individual health insurance, LUX MED Orthopaedic Care Hospital Insurance, LUX MED Orthopaedic Care Plus Hospital Insurance.

In 2024, we established a strategic partnership with Nationale-Nederlanden, resulting in a joint product: the Insurance Support Programme in Case of Illness.

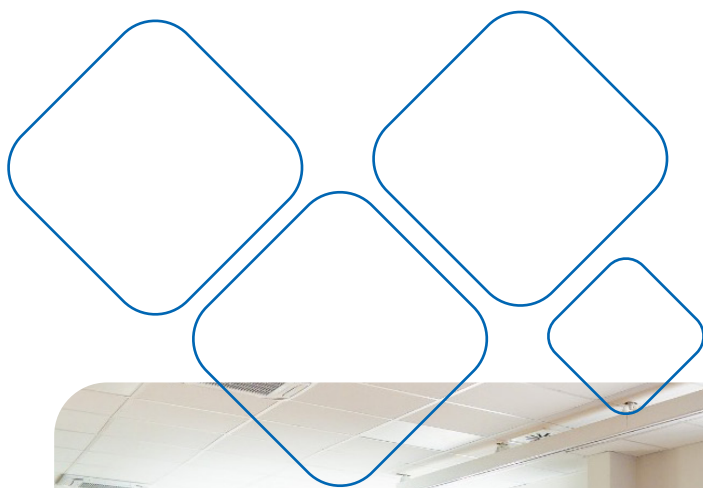


Stawomir Łopalewski

Managing Director
of LUX MED Insurance



Our patients are our key stakeholders, which is why we strive to provide them with comprehensive solutions that respond even better to their needs. To this end, we establish strategic partnerships with leading market players. An example of such cooperation is the long-term project launched in 2024 with Nationale-Nederlanden, which allows us to create greater value together and demonstrates our responsibility towards our customers.



Significant impacts, risks and opportunities

3-1, 3-2

At LUX MED Group, 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, underpinned 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. We expanded the scope of the materiality analysis to include the aspect of financial materiality. The details of this analysis were described in the 2023 Sustainability Report, while below we present its short summary along with the results. The resulting list of material topics also provided the foundation for preparing this year's Report.

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

Area	Topic	Identified risks
Environment	Waste and hazardous materials management	<ul style="list-style-type: none"> • 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	<ul style="list-style-type: none"> • 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	<ul style="list-style-type: none"> • 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	

We are continuing preparations to comply with the ESRS requirements, which were introduced into Polish law under the Act of 6 December 2024 amending the Accounting Act, the Act on Statutory Auditors, Audit Firms and Public Oversight, and certain other acts. At the end of 2024, we launched a Double Materiality Assessment in line with the new regulations. Work is continuing in 2025, and by the time of publishing this Report, we had completed the following actions:

1. Established a working group and initiated cooperation with an external consulting firm.
2. Conducted preliminary analyses of our internal regulations and procedures, and identified initial topics for assessment.
3. Held a workshop with representatives of all organisational areas key in the ESG context, during which the topics under consideration were discussed in terms of their materiality for our company's operations and our value chain.
4. Carried out a stakeholder survey covering the topics discussed during the workshop, in which stakeholders from the groups described in the [Stakeholder dialogue](#) chapter assessed the materiality of specific topics.

Completion of the Double Materiality Assessment, resulting in an updated list of material topics, is planned for the second half of 2025.

ESG risk management

2-25

Our organisation monitors identified risks, which are reviewed and updated on a systematic basis. Risk assessment takes into account both internal and external factors.

The LUX MED Group operates under a Risk Management Framework, which sets out the key elements of the risk management system, including cyclical risk assessments, linkages arising from applicable policies, and sources of risk information. The existing structure and policies define risk categories for different business areas and specify minimum requirements for control measures, which are supplemented by owners with additional measures to best mitigate the risk of occurrence.

The Risk & Compliance Department oversees the risk management system, raises awareness and maturity across the organisation, provides advice, and validates certain assumptions to ensure understanding of different types of risk, their causes and their impacts. It also maintains the organisation's risk register and analyses it in terms of linkages, dependencies and materiality, including in the area of sustainability.

Each identified risk is assigned an owner, and mitigation is carried out through control measures, which also have designated owners. Risks are identified across all areas, and their main categories are defined by Bupa policies applicable within the LUX MED Group. The Risk Assessment Matrix is based on a five-point scale of likelihood and impact. Risk owners assess risks on a cyclical basis or ad hoc, whenever an update is required – for example, when a new risk factor arises.

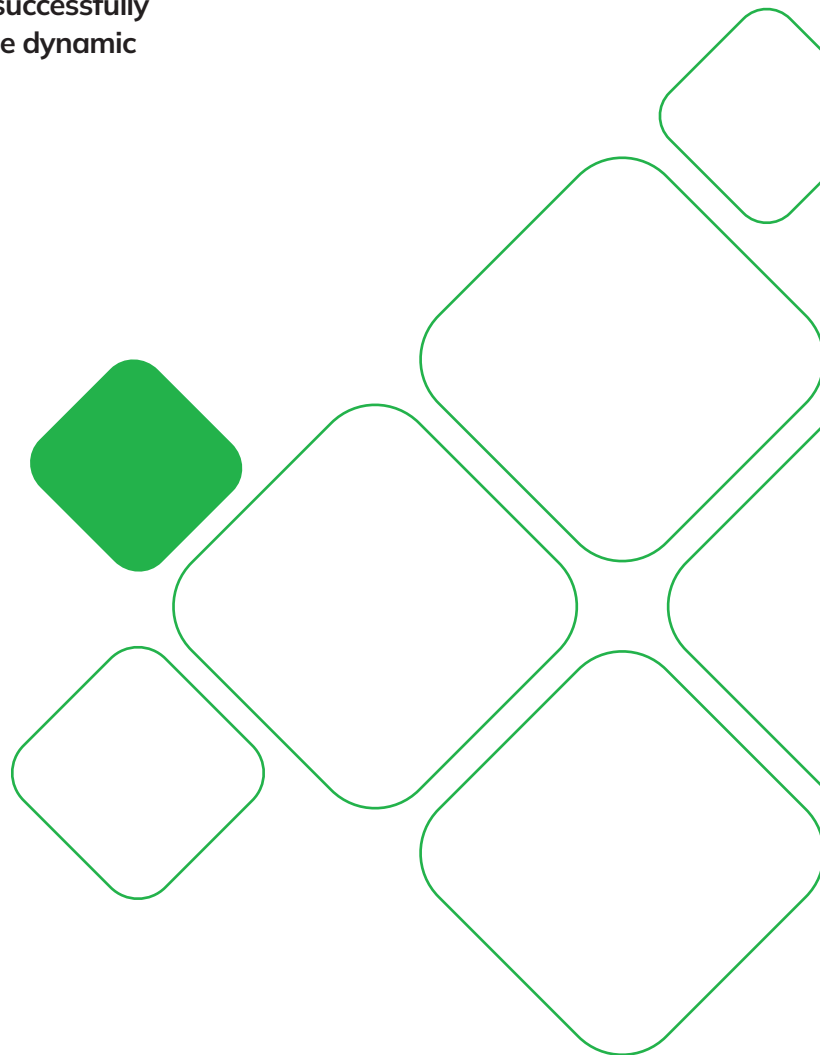
All organisational units of the LUX MED Group are covered by the risk management system. We continuously monitor risks across all locations where we operate, taking into account their potential impact on all persons working there as well as on patients.



Environment

There is no healthy person without a healthy environment

Our priority environmental objective is decarbonisation and achieving net zero by 2040. Aware of the ongoing climate change, we aim to further reduce the greenhouse gas emissions generated by our business in the coming years. We began monitoring these emissions in 2019 and have successfully reduced them in subsequent years – despite the dynamic growth of the company.



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. Energy consumption and greenhouse gas emissions in the LUX MED Group are linked to the provision of medical services in buildings. In our facilities and hospitals, energy is used to light rooms, power medical equipment and maintain appropriate indoor temperatures. In addition, hospitals operate 24/7, which increases energy demand.

As a healthcare provider, we recognise that our activities, while aimed at improving public health and well-being, also have certain environmental impacts. Energy use leads to greenhouse gas emissions that contribute to climate change. These emissions occur both directly, through the combustion of fossil fuels for heating or in our vehicles (so-called Scope 1 emissions), and indirectly, through

the consumption of purchased energy (so-called Scope 2 emissions). Faced with the growing challenges of climate change, we are taking intensive measures to minimise our environmental impact, while continuously improving the quality of our services.

Green future initiatives

Since 2019, we have been measuring our carbon footprint and implementing a decarbonisation plan. Our joint goal (within Bupa) is to achieve net zero Scope 1 and 2 CO₂ emissions by 2030, and net zero across all scopes by 2040. This target is consistent with, and has been officially approved by, the Science Based Targets initiative (SBTi), which supports the setting of emission reduction targets and business transformation.

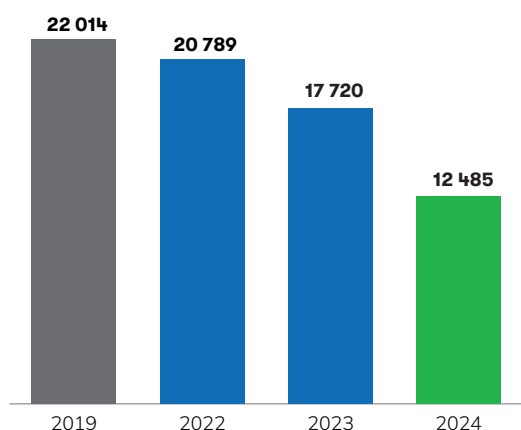
To reach the intended net zero level, each Bupa region has set its own reduction targets. In 2024, the LUX MED Group continued to deliver on the Sustainability Strategy for

2023–2025, adopted in 2023, which envisages a 14% reduction of Scope 1 and 2 CO₂ emissions compared to the base year (2019). This reflects the target set for the ELA (Europe & Latin America) region, to which we belong. At the operational level, we developed a plan that takes into account both the growth of emissions linked to the expansion of the Group and the measures aimed at reducing them. This plan was approved by the Finance Division Director and the Corporate Communications and Sustainable Development Director, both members of the Management Team.

Thanks to the strong determination and commitment of our teams, in 2024 we managed to reduce our carbon footprint by 43.3%, significantly exceeding our expectations and confirming the effectiveness of the original strategy goals.

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.

Chart 1. Scope 1 and 2 emissions [tCO₂e] – market-based method



In 2024, we introduced measures that are helping us achieve our reduction targets. Most importantly, we consistently increased the share of renewable energy in our organisation. As a result of the 10-year virtual power purchase agreement (vPPA) signed in 2024, by the end of the year more than 40% of our total energy consumption (thermal and electric) came from renewable sources – around 10 percentage points more than in the previous year.

In addition, we invested in two photovoltaic installations, and with a view to decarbonising thermal energy, we are piloting the use of heat pumps. We are also systematically replacing lighting with LED solutions. Business travel is an integral part of the work of many of our employees, which is why we are gradually modernising our fleet by switching to hybrid cars. Already 81% of our company vehicles are hybrids. All these measures enabled us to reduce greenhouse gas emissions by 9,529 tCO₂e compared to the base year (2019).



Joanna Węgrzynowska

ESG Manager, ESG Representative of the Management Board,
Corporate Communications and Sustainable Development Department



As an organisation aware of its impact on the natural environment, we are striving to achieve the ambitious goals set out in our Sustainability Strategy. Therefore, in July 2024 we signed a contract to purchase renewable electricity (vPPA). Under this agreement, R.Power S.A. will supply approximately 36 GWh of energy annually from photovoltaic farms to the grid. This cooperation will guarantee zero-emission electricity consumption for more than 300 of our own facilities. According to estimates, the transition to electricity from photovoltaics will allow us to reduce more than 8,600 tonnes of CO₂e.

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 has accounted for the largest share of our total energy consumption. For this reason, we are focusing on ensuring that an increasing proportion comes from renewable sources. The signed vPPA agreement will provide us with zero-emission electricity, while the next major challenge is the decarbonisation of heat energy.

Chart 2. Energy consumption [MWh]

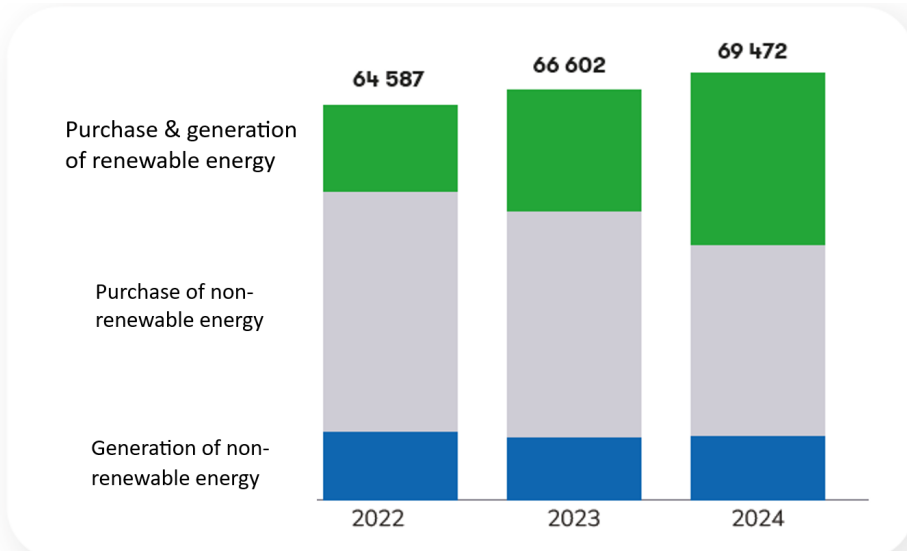
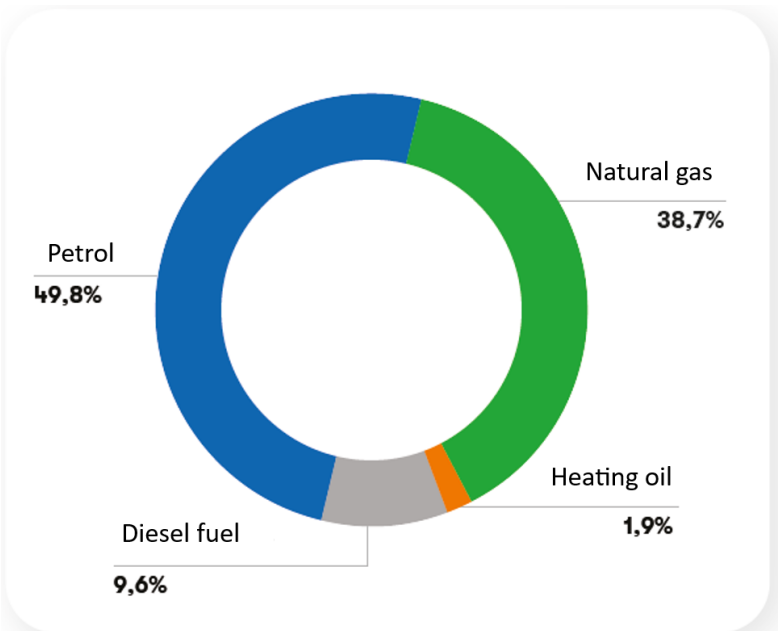


Chart 3. Total energy consumption from non-renewable resources in 2024



Among non-renewable resources, the largest share is gasoline, whose year-on-year increase in consumption is directly linked to more frequent business travel compared to during and immediately after the pandemic. The second largest share is natural gas, used for heating purposes, whose consumption increased by about 3% compared to 2023. The growing electricity consumption is directly related to the opening of new facilities and hospitals, which require power for a larger number of medical and non-medical equipment, as well as lighting. The total floor area of our properties increased by nearly 25,000 m² compared to the previous year and now amounts to approximately 277,000 m². This resulted in the energy intensity ratio remaining virtually unchanged (see Table 1.1). It amounted to 0.25, down nearly 6%, due to the gradual increase in the share of renewable energy in the purchased electricity.

Greenhouse gas emissions

305-1, 305-2, 305-3

Greenhouse gas emissions monitoring process at the LUX MED Group

Several teams are involved in the greenhouse gas emissions monitoring process at the LUX MED Group – representatives of the Investment and Administration Department, the Controlling, Planning and Analysis Department, the Procurement and Fleet Department, and the Corporate Communications and Sustainable Development Department. CO₂ emissions data are collected quarterly and reported in the internal system available across the entire Bupa Group, of which the LUX MED Group is a part. In addition to reporting the data necessary to calculate the carbon footprint, the system is also used to report which of our locations have been closed and which have been newly opened.

Each quarter, after the data are entered into the system, we verify them internally, analysing deviations and changes by facility and source of emissions. Each set of final quarterly data is approved by the Chief Financial Officer and the Director of the Controlling, Planning and Analysis Department. Once a year, the data are subject to external audit at Bupa Group level, including within the LUX MED Group.

An important element of the greenhouse gas emissions monitoring process is the so-called three-year planning, which takes into account the organisation's development plans in the context of CO₂ emissions. In this way we verify how the organisation's growth translates into our decarbonisation plans.

In accordance with the GHG Protocol guidelines, which form the basis of our emission calculations, for Scope 2 the calculation is carried out in parallel using two methods: the market-based and the location-based method. The first aims to reflect the conscious choice of energy supplier, and in this method we include the guarantees of origin purchased. The location-based

method presents results based on emission factors for specific locations, taking into account boundaries such as national ones. The calculation of this category is based on the emission factor for Poland.



Paulina Wiatr

Decarbonisation Specialist,
Investment and Administration
Department



The largest share of CO₂ emissions in the LUX MED Group comes from purchased and generated heat and electricity. We calculate the carbon footprint from these categories based on the consumption of all utilities in our medical facilities, offices and companies. Throughout the year we collect data on the consumption of electricity, heat, gas, cooling and other components, which – once entered into our internal reporting tool – are converted into the Group's collective carbon footprint. In addition to the above-mentioned categories, we also calculate the carbon footprint from, among others, anaesthetics, the car fleet and refrigerant leaks – in line with the GHG Protocol methodology. We monitor results on a quarterly basis and ensure that our decarbonisation measures effectively reduce emissions, in accordance with the defined reduction targets.

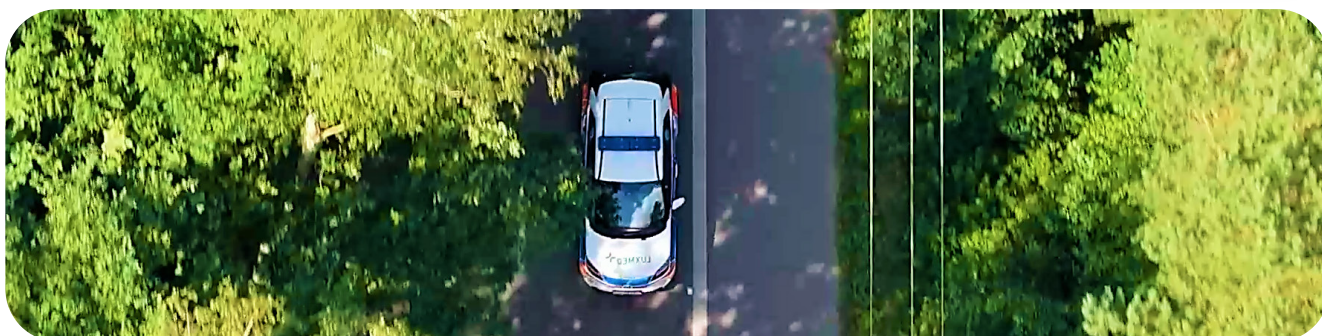


Chart 4. Market-based Scope 1 and 2 emissions 2024 vs. 2023 [tCO₂e]

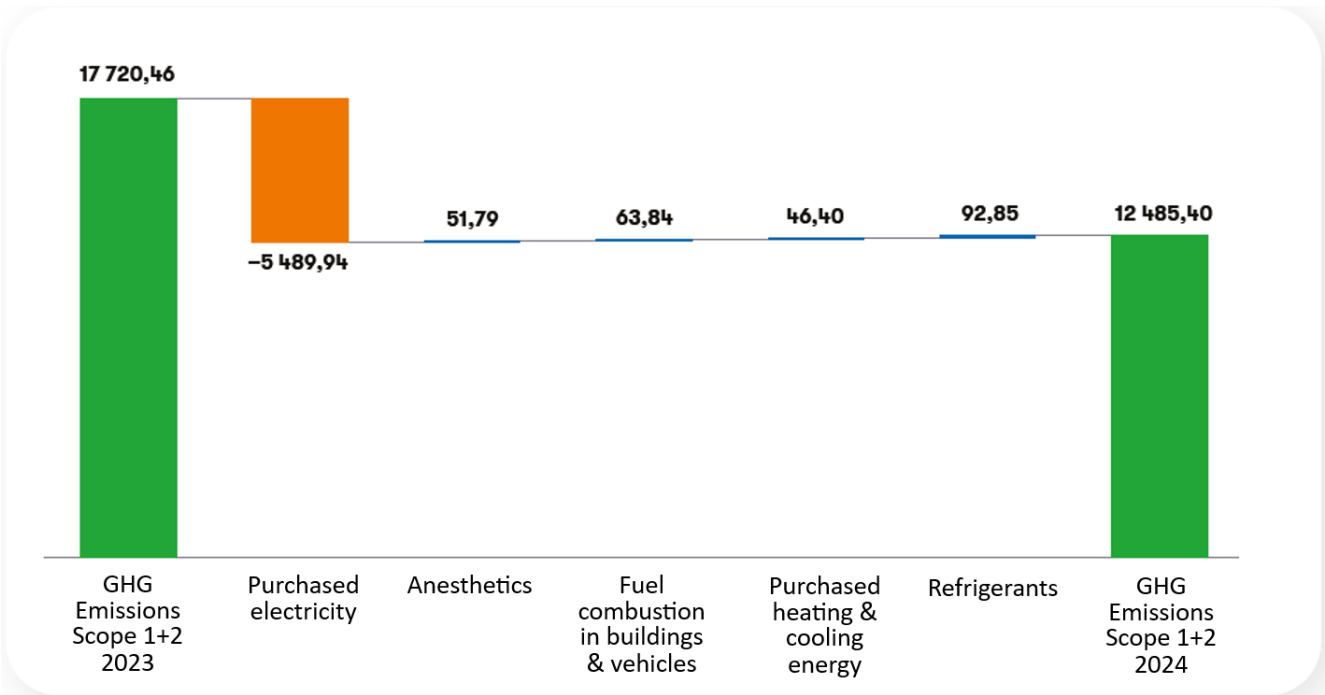
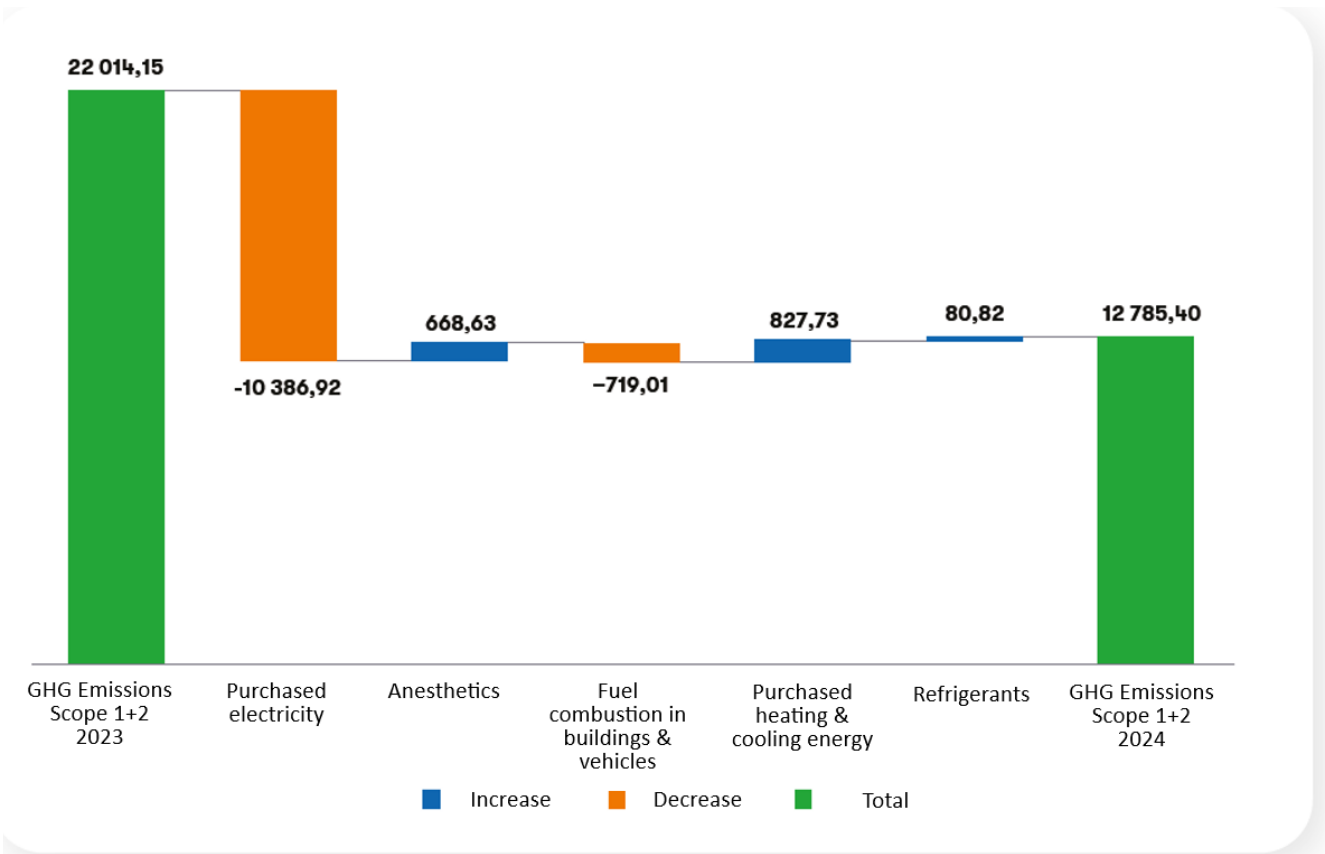


Chart 5. Market-based Scope 1 and 2 emissions 2024 vs. 2019 (base year) [tCO₂e]



Total Scope 1 and 2 (market-based) emissions in 2024 amounted to 12,485.40 tCO₂e, representing a decrease of 29.5% compared to the previous year and 43.3% compared to the base year. In 2024, Scope 1 emissions amounted to 3,639.46 tCO₂e, which represents an increase of nearly 6% compared to the previous year and an increase of 1% compared to the base year. In the reporting period, emissions related to the use of anaesthetics increased, which, apart from the addition of another hospital to the LUX MED Group, was mainly due to improved data collection and analysis processes and a more refined estimation methodology. In addition, the number of business trips increased, which during the pandemic and immediately afterwards had been heavily restricted, as well as the consumption of natural gas used for heating.

Scope 2 (location-based) greenhouse gas emissions amounted to 24,906.33 tCO₂e (a 3% year-on-year increase), reflecting higher electricity consumption. At the same time, Scope 2 (market-based) greenhouse gas emissions in 2024 amounted to 8,845.94 tCO₂e, i.e. 38% less than in 2023 and 52% less compared to 2019, which we achieve thanks to the use of renewable energy sources and the purchase of guarantees of origin.

As part of Bupa, we are working together on Scope 3 emission calculations. The data presented relate to emissions resulting from business travel by train and plane, energy consumption under Scopes 1 and 2, and transmission and distribution losses. We are working on calculating other material categories, which we plan to present in subsequent reporting cycles. Scope 3 emissions increased by 12% compared to 2023 and by 3% compared to the base year. The largest share of Scope 3 emissions is accounted for by transmission and distribution losses. All Scope 3 emission categories we calculate belong to the upstream value chain.



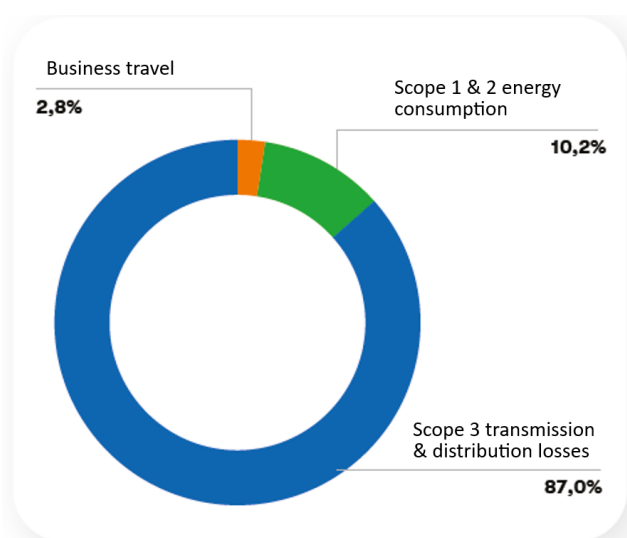
Maciej Kołek

Director of the Controlling, Planning and Analysis Department



In July 2024, we signed a vPPA agreement for the purchase of electricity. The next step in implementing the vPPA within the LUX MED Group was the operationalisation of the concluded vPPA agreement and the development of an intra-group settlement model. The project assumed the division of vPPA settlements relating to electricity between the central company and the other companies in the Group, the rules for transferring guarantees of origin and the process for managing any surplus guarantees of origin, as well as the identification of risks arising from the developed model in the business, accounting and tax areas.

Chart 6. Scope 3 emissions








Waste

306-1, 306-2, 3-3

A characteristic feature of the medical sector is the generation of waste arising from the provision of medical care and patient treatment. Many of these are classified as hazardous. This means that, due to their origin, chemical and biological composition and other properties, they may pose a threat to human life or health and to other living organisms, while improper handling generates a risk of environmental contamination. The LUX MED Group is aware of the scale and seriousness of the impact of waste on the environment, and therefore manages waste in compliance with legal regulations and a specially developed internal procedure, which takes into account the requirements for proper segregation, appropriate storage and transfer of waste to authorised contractors.

The waste management rules in LUX MED organisational units include:

 Organisation of waste storage areas	 Organisation of the waste storage and selective collection system	 Ensuring waste collection services at facilities
 Organisation of waste transfer to authorised contractors	 Monitoring the quantity and type of waste generated	 Reporting the quantity and type of waste generated

Supervision over the implementation and maintenance of the above procedure is exercised by the Investment and Administration Department and the Procurement and Fleet Department, and it applies to medical facilities, including dental clinics, aesthetic medicine centres, diagnostic laboratories and hospitals belonging to the LUX MED Group. Responsibility for collecting and monitoring waste data rests with the director or manager of a given unit, who ensures the proper course of the process and compliance with the applicable legal provisions and regulations in this area. The quantities of waste generated are recorded

on an ongoing basis, and every year we duly meet the obligation to submit a report on the quantity of waste generated and the method of its management to the competent institutions. Waste generated in the course of healthcare services constitutes a significant share of the waste generated by the LUX MED Group, which makes proper handling of such waste extremely important.

At present, no recycling methods are available for most medical waste. We apply the best available practices for the management of such waste. Hazardous waste is collected by specialised companies and subsequently disposed of with energy recovery.

Reduction of raw material consumption

In addition, we have set a strategic objective to introduce at least one scalable circular solution each year. In 2024, we set ourselves the goal of reducing paper consumption.

Due to the nature of our operations, paper consumption in our organisation is very high and results mainly from the creation and circulation of medical documentation. In the context of sustainable development, this issue was most frequently highlighted by our employees in the People Pulse survey. We therefore launched the Paperless initiative, consisting of a wide range of actions.

The first stage was to verify exactly how much paper we consume across the Group. As a reference point, we adopted the annual volume of paper purchased. We then mapped the sources of the highest consumption, based on data from internal printing registration systems. The implementation of 18 modern printers with a function enabling precise reporting of the number of pages printed by individual employees and teams proved helpful. The most important part of the project, which is ongoing, is the development and introduction of changes in the specific areas identified.

In 2024 we implemented the following measures:

- introduction of an electronic invoice circulation system, which in 2024 alone saved 66 reams of paper (33,000 A4 sheets)
- expansion of the functionality for internal import of files from diagnostic devices directly into the system, without the need for printing – which saved us over 800 reams of paper (400,000 A4 sheets)
- promotion of the Patient Portal, which provides electronic access to, among other things, recommendations and test results
- communication to doctors in outpatient clinics encouraging them to ask patients whether they wish to receive printed recommendations



Additional measures supporting circularity and the reduction of raw material consumption in our organisation:

- modernisation of 3 MRI scanners at LUX MED Diagnostics instead of full replacement – replacement of electronics with the latest AI-supported technology, while retaining still functional components such as the magnet, helium and casing
- reuse of old office furniture in a new location – across an area of 13,000 m² (according to estimates, such an approach can reduce emissions by up to 99% compared to manufacturing an entirely new set of office equipment)
- cooperation with the startup Ecobean – which processes the coffee grounds we provide from our headquarters to extract valuable raw materials for the production of, among other things, food, cosmetics and packaging



Buildings

In July 2024, after 14 years, we relocated our Headquarters from 21C Postępu Street to 2 Szturmowa Street in Warsaw. The new headquarters is located in the LAKESIDE office building, which has been awarded BREEAM Outstanding and Well Core™ Gold certification. These confirm compliance with the highest environmental standards, including energy efficiency and the adaptation of spaces for user comfort and wellbeing.



The applied solutions and technologies include:

- BMS system for efficient building automation control, enabling detailed energy and water readings to reduce excessive consumption
- Structural solutions reducing energy consumption by 10%
- CO₂ sensors controlling ventilation
- Lighting sensors and energy-efficient LED lighting
- High availability of daylight
- Low-flow water fixtures – saving over 58%
- Rainwater harvesting for plant irrigation
- Landscaping around the office designed in collaboration with a qualified ecologist to increase biodiversity
- Electric chargers and cyclist infrastructure



Robert Kalota

Director of the Investment and Administration Department



The new LUX MED Group office is an exceptional space that supports productivity and innovation, while also ensuring employee wellbeing. 'Healing nature' is the guiding theme of this project. The concept stems from care for the natural environment and is based on fostering contact with nature. For this reason, in work zones, meeting rooms and social areas we placed over 3,000 plants and 114 nature-inspired compositions. Moreover, when designing the new office we sought to minimise negative environmental impacts; therefore, in the new headquarters we paid close attention to the choice of materials and colour schemes and, notably, we reused over 90% of the furniture from the previous location. The 'Healing nature' office concept was highly appreciated by our employees, and the project itself was among the winners of the Property Design Awards 2024, of which we are very proud.

As a leader in the private healthcare sector, we set trends for our industry – including architectural ones. Therefore, in 2024 we developed a new standard for LUX MED Group facilities.

In its implementation, both at the design stage and in the choice of finishes, we used a wide range of available tools and modern solutions supporting the achievement of our overarching goals. The area on which we largely based the design of new facilities is neuroscience.

Neuroscience is an interdisciplinary field combining knowledge of neurobiology, psychology and design. These influence the brain, emotions, behaviour and human wellbeing. This is particularly important in the medical sector, as it supports patient recovery. They also proved effective in the concept of our office, which has become a valued benchmark for the market.

An important role in the design and implementation process was also played by biophilic design. This is an approach to design that seeks to introduce elements of nature into the architectural environment to support human health and wellbeing. In our facilities, one can see an increasing number of plants and references to

the natural colour scheme of material finishes, which is appreciated by both patients and employees.

We also made extensive use of sensory elements. Our inspiration was drawn directly from the natural environment. Evoking positive associations with nature reduces patient stress levels. Unconventional design elements arouse curiosity, inspire and remain in the user's memory.

The new standard will be gradually implemented in both new and existing LUX MED Group facilities. We want all our facilities to represent the highest standards in healthcare, providing patients with comprehensive, professional and modern medical care.

Sustainable solutions in LUX MED facilities

New facilities are designed according to neuroarchitecture guidelines to be as patient-friendly as possible

In our facilities, we are gradually implementing the following sustainable solutions:



Electricity from renewable sources

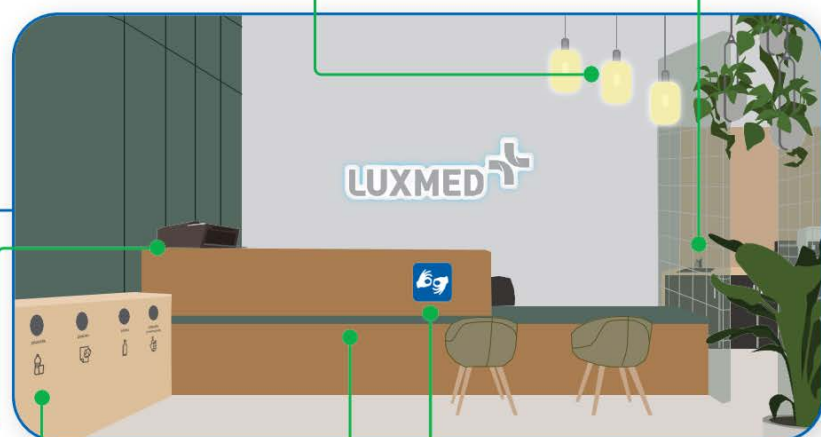
In 2024, we signed a 10-year vPPA for 36 GWh of solar energy, covering electricity needs across all our facilities.

17.4%, equivalent to 18,397,225 A4 sheets: total reduction in paper consumption in 2024 compared to 2023

Waste segregation

LED lighting

Tap aerators



Finishing materials from recycling

Polish Sign Language interpreting service

Internal regulations in the area of environment

To support the implementation of the objectives set out in the Sustainable Development Strategy, including those related to emission reduction, we introduced the Sustainable Development Policy. Our aim is to minimise as far as possible the risk of failing to achieve these objectives, which is why the policy contains provisions on continuous monitoring and supervision in this area, enabling a rapid response.

We also maintain the Environmental Management System, which forms one of the foundations of the Integrated Management System. Our Integrated Management System Policy, among other things, defines environmental objectives such as the protection of the natural environment, prevention of pollution through the reduction of greenhouse gas emissions, responsible management of raw materials and resources (such as water, electricity, heat and fuels), as well as proper handling of medical and non-medical waste. The scope of the Environmental Management System covers the activities of the company's headquarters at 2 Szturmowa Street in Warsaw and

the medical centre at 21C Postępu Street, including the provision of outpatient healthcare services in prevention, diagnostic imaging, treatment, occupational medicine and dentistry. In January 2024, we received a certificate issued by an independent, accredited certification body (DNV Business Assurance Poland), confirming the implementation of the Environmental Management System in line with ISO 14001:2015 requirements. In November 2024, we successfully completed an external audit confirming compliance with the requirements at the new headquarters location.



**Aleksander
Doch**

Management
Systems
Specialist,
Risk
and Compliance
Department



LUX MED, aware of the growing need to care for the environment, implemented in 2023 an environmental management system compliant with ISO 14001:2015. The aim of this initiative was to achieve the highest standards relating to environmental protection. The process began with an environmental audit, which made it possible to identify areas requiring improvement. Subsequently, we developed the Environmental Management Procedure at LUX MED and defined the environmental aspects that are significant from the perspective of LUX MED's operations. These include: medical waste management, energy consumption and fuel combustion. In 2024, we successfully passed the audit of the new LUX MED headquarters. The ISO 14001:2015 system is consistent with ESG objectives, supporting the company's sustainable development.

Society



Management of patient experience quality

Care for the quality of the patient experience motivates all decisions and actions undertaken in the LUX MED Group. Patient-centred medical care is characterised by a holistic approach to the patient's experience. At the LUX MED Group we focus not only on effective medical assistance, but also on the manner in which this assistance is delivered to patients.



Iwona Radko-Jarosińska

Director of Patient Experience Department



In order to provide patients with the best possible care, over the years we have developed a comprehensive system that enables us to study patients' needs, design optimal processes, monitor satisfaction, and respond to patients' feedback swiftly and appropriately.

Patient Experience Ecosystem at LUX MED Group

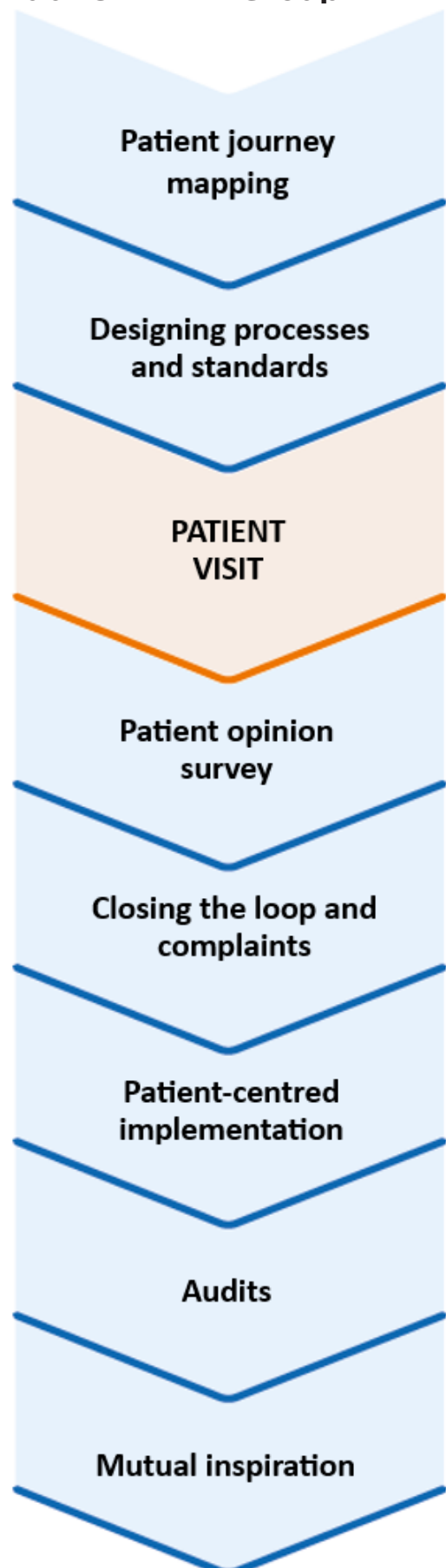
Stage	Before the visit		Visit			After the visit	
	Booking	Before the visit	Diagnostics	Consultation	Hospitalisation	I know what to do about my health	Feedback to LUX MED
Services	Helpline Reception Patient Portal	Initial Interview Self-care	Treatment Room Advanced Diagnostics	In-person Telephone E-chat Home Care Urgent Medical Care	Hospitalisation Emergency Department	E-prescription Ask a Doctor Preventive Programmes Test Results in the Patient Portal	Survey Closing the Loop Complaints Correction & Improvement
I need...	...to book an appointment ...to change the date ...to cancel an appointment ...to learn about available services and procedures ...to clarify questions and doubts	...to prepare for the visit so it is as effective as possible ...to provide information to the doctor ...to report symptoms while waiting for the visit or during mild disease progression	...fast access to basic diagnostics ...access to advanced diagnostics	...effective medical assistance ...care in an atmosphere of respect and empathy ...access to modern treatment methods ...availability of facilities ...support in serious and urgent cases		...clarification of any doubts after the visit ...convenient access to test results and medical documentation ...to order medication ...access to preventive programmes	...clarification of any doubts after the visit ...convenient access to test results and medical documentation ...to order medication ...access to preventive programmes
Patient Experience Excellence	 Patient Journey Mapping		 Operational and Medical Service Standards			 Patient Satisfaction Surveys Audits Pro-patient Implementations	

Patient Experience Improvement System at LUX MED Group

Patient Journey Mapping helps us design patient-friendly processes. It consists of a series of qualitative and quantitative studies that allow us to identify low- and high-rated touchpoints between patients and medical care within the LUX MED Group. Based on the mapping results, we establish recommendations for process and service improvements and develop new service-operational and operational-medical standards.

Another source of ongoing information on patient needs and satisfaction is survey research conducted at the most important touchpoints between patients and medical care in the LUX MED Group. The measure of patient satisfaction is the NPS®¹ (Net Promoter Score). It is calculated on the basis of responses to the question: Would you recommend LUX MED Group's medical care to your family and friends after the service you have just received? The scale ranges from 0 – definitely not to 10 – definitely yes. Depending on their answers, patients are divided into three groups: Detractors (scores 0–6), Passives (7–8) and Promoters (9–10). The NPS is the difference between the percentage of Promoters and the percentage of Detractors among all patients.

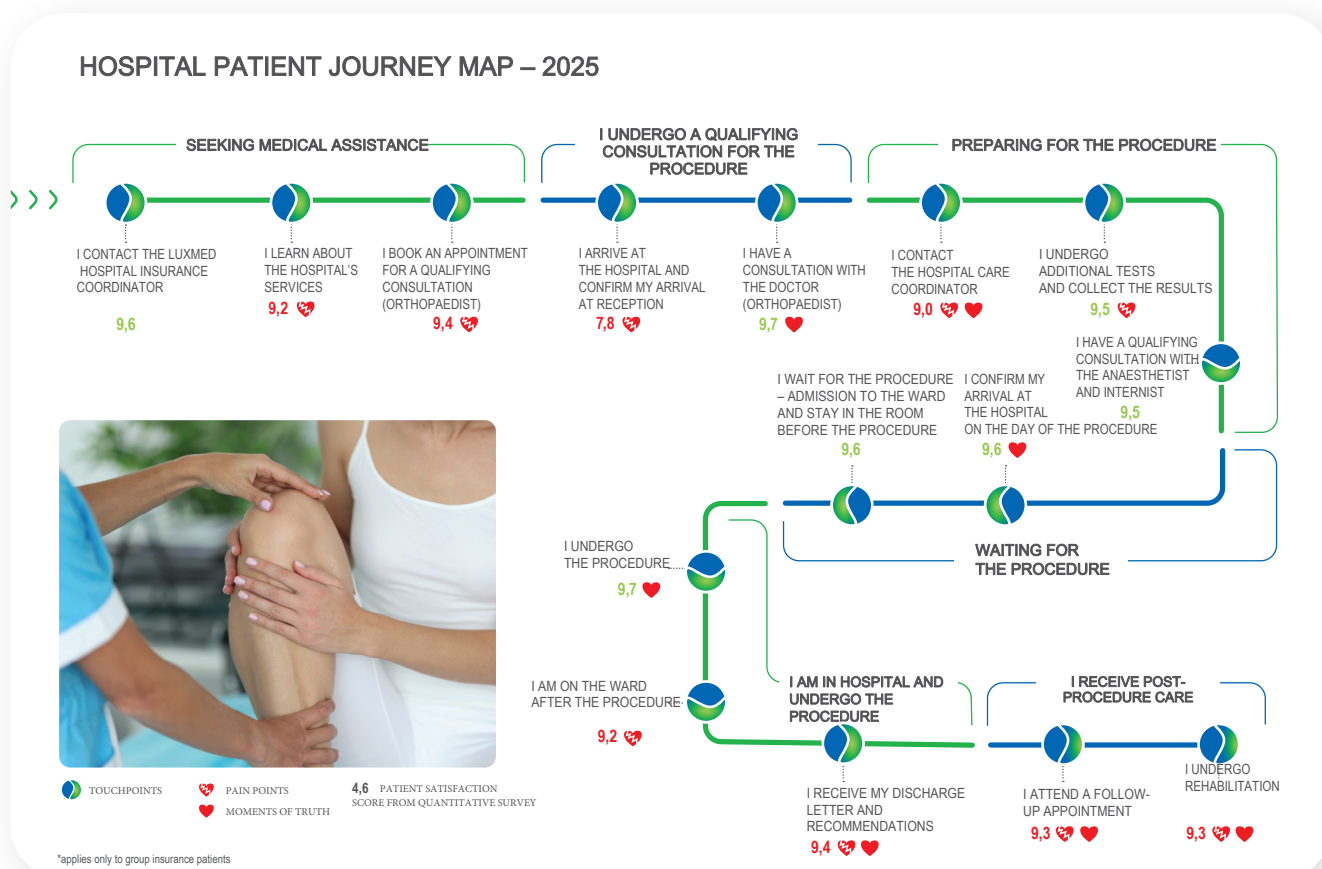
Patients' scores and comments are presented to employees in a scope appropriate to their role and function, via the world-class Medallia system. Based on this information, improvements for patients are implemented throughout the company. The results are also overseen by a team of auditors who support the enhancement of areas or processes with which patients are not yet fully satisfied.



¹ Net Promoter®, NPS®, NPS Prism® are registered trademarks of Bain & Company, Inc., NICE Systems, Inc., and Fred Reichheld. Net Promoter ScoreSM and Net Promoter SystemSM are service marks of Bain & Company, Inc., NICE Systems, Inc., and Fred Reichheld.

Patient Journey Mapping

Patient Journey Mapping is a comprehensive study of a specific group of patients using qualitative and quantitative techniques. Its aim is to identify touchpoints with LUX MED Group services where patients are highly or poorly satisfied, and to improve service or operational processes. In 2024, we created 5 Patient Journey Maps, one of which is presented below as an example:



Designing processes and standards

Thanks to our knowledge of patient needs, we can continuously improve our processes: refining service pathways and developing projects that change the way our services are delivered and make them more accessible.

To ensure high quality of care across all areas and facilities, we also create service-operational standards for administrative teams and operational-medical standards for medical staff. These standards are a set of rules for patient service from the formal, quality, image and communication perspective for our employees.

They provide a guide to service and a benchmark for quality.

On the basis of these standards, we prepare staff, services and infrastructure so that they best serve our patients. We pay particular attention to patients with special needs. In 2024, we implemented and updated a total of **80** standards for both medical and administrative employees.

Patient opinion surveys

At LUX MED Group we conduct three types of surveys, which give us a comprehensive picture of patients' opinions and perceptions.

Transactional studies - conducted continuously at the most important moments of patient contact with the LUX MED Group (so-called touchpoints), after a completed service/consultation – allow us to identify patients' needs at every stage of care and to monitor their perceptions and requirements on an ongoing basis.

Relational studies – conducted several times a year, they make it possible to assess satisfaction with overall care and patients' general impressions from a time perspective.

Ad hoc surveys – conducted in response to reported needs, they are used to test patients' opinions on new solutions.

Closing the Complaints loop

In 2024 we introduced many changes to the complaint handling process, focusing primarily on choosing the telephone channel of contact with patients whenever possible and ensuring the fastest and most effective assistance. These changes facilitate direct, empathetic contact and significantly accelerate the resolution of reported cases, which patients greatly appreciated. As a result of the implemented changes, patient satisfaction with the complaint handling process increased by 94% compared to the previous year. We contacted more **than 68,000 patients** following their surveys, as part of the closing-the-loop process (by telephone, in person at the facility or by e-mail).



**Justyna
Mościcka-Wieczorek**

Director of the Quality
Research and NPS Team



In 2024 we surveyed patient opinions at 22 touchpoints. We collected over 1.2 million questionnaires in transactional surveys, conducted 2 rounds of relational surveys and 40 ad hoc surveys. Based on the results of these studies, we introduce new solutions that allow us to provide patients with even better care.



Michał Wyporski

Director of the Complaint
Management Department



In our philosophy of enhancing the patient experience, special care is given to those who, while using our services, have encountered difficulties. Such patients are supported through two processes: closing the feedback loop and complaint handling. Within both processes, a LUX MED Group employee contacts the patient to assist with their case and to obtain additional information about their needs and perceptions. This contact occurs after a complaint has been submitted or after a satisfaction survey in which the patient has consented to be contacted by the LUX MED Group.

Pro-patient implementations

At the LUX MED Group, the entire employee community is involved in improving the patient experience. This is made possible through the use of a dedicated platform where employees post their ideas for improvements and descriptions of initiatives already implemented. Depending on the area in which employees work, submissions may cover both local initiatives close to patients in facilities, as well as large-scale, global projects and transformations.

This approach brings a number of benefits. Firstly, it enables the exchange of experiences and ideas among employees with diverse backgrounds. Secondly, it supports the design of effective solutions that address the real needs of patients. Finally, it gives employees a sense of influence over their environment and patients a tangible improvement employees submitted **427** implemented improvements.

Here are selected projects we implemented in 2024:



Specialist support for deaf patients

The possibility of using the services of a sign language interpreter.



Diagnostic imaging results available online

The possibility of collecting diagnostic imaging results and their descriptions via the Internet.



Referral for tests prior to a specialist visit

Launch of a functionality enabling automatic referral for relevant tests before an appointment with doctors in rare specialisations.



Inclusion of partner facilities in the Patient Portal

Offering services also in partner facilities to make it easier for patients to access care throughout Poland.



Telephone consultations across Poland

Offering patients teleconsultation appointments nationwide, without restriction to specific cities.



Booking of individual rehabilitation treatments

The possibility of booking individual rehabilitation sessions through the Patient Portal, to increase flexibility in choosing the location and timing of treatments.



Beata Piechota

Manager for Standardisation and Service Quality



The introduction of an online sign language interpreter in facilities providing services financed by the National Health Fund (NFZ) is regulated by applicable law. In 2024, however, LUX MED went beyond the regulatory obligation and made this solution available to all patients, including those receiving private outpatient or hospital care. Facilitating communication between deaf and hard-of-hearing people and medical staff is an expression of responsibility for their health. This initiative distinguishes the LUX MED Group from its competitors. In 2024, an average of over 100 patients across Poland used the online sign language interpreter each month.

Audits

To ensure patients receive the highest level of services, we continuously monitor their quality through Mystery Patient Audits and corridor audits. Facilities or areas selected for audits are chosen based on their NPS results, and we verify compliance with standards. For facilities or areas experiencing difficulties, we provide support and monitor their progress.

In 2024:

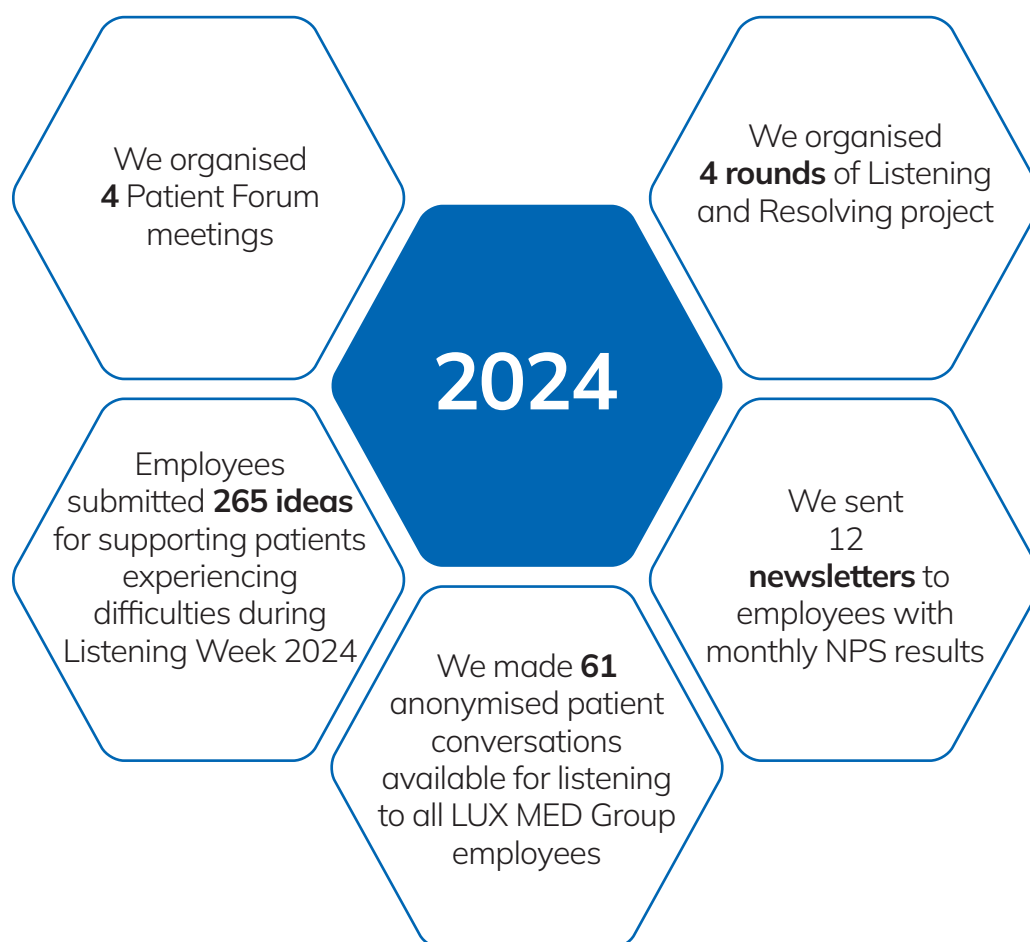
- We conducted **457** Mystery Patient Audits.
- As part of corridor audits, we visited **17 cities and 77 facilities**.
- Based on NPS analysis, we identified doctors with low scores and informed the Medical Centre Directors of the need to intensify improvement measures. Of the **76 emails** sent, we observed significant improvement in **40** cases. In the remaining cases, work is ongoing to identify new solutions.

Mutual inspiration and building a pro-patient culture at the LUX MED Group

To ensure the right direction of development, focused on enhancing the patient experience, cultivating a pro-patient culture within the company is essential. To inspire each other, we organise a number of events of various scales, during which we remind everyone of our mission and goals, draw inspiration from one another and celebrate successes. Once a quarter, we organise the Patient Forum – an online meeting open to all interested employees, where we share the most important implementations. Also on a quarterly basis, we hold Listening and Solving sessions, during which members of the senior

management team work on solutions to patient problems highlighted in authentic, anonymised conversations. Once a year, we also organise events such as Listening Week and Customer Experience Day, during which we encourage employees, in a light and engaging format, to listen to and read patient feedback. On a monthly and weekly cycle, we also communicate patient assessments in company-wide newsletters.





The highest quality of patient experience is our goal

Providing patients with the best medical care and excellent experiences is the LUX MED Group's priority. This is why a large part of our organisation's objectives is based on patient satisfaction indicators and the number of pro-patient improvements we implement each year – from the headquarters level to facilities across the entire LUX MED Group. The consequence of this approach is the company's development, directly oriented towards the wellbeing, comfort and safety of patients.



Aneta Skibińska

Director of the Standardisation, Quality of Service and NPS Department



We are effective: in 2024 we managed to improve our two strategic metrics – NPS reached 70.5, which means an increase of 5 percentage points compared to the previous year, and the number of implementations was 427, nearly 80 more than in the previous year.

Clinical safety management

Ongoing work on improving the quality and safety of care is our way of realising the vision of a patient-centred, or rather person-centred, approach. We manage clinical risks quickly, efficiently and effectively, monitoring compliance with legal regulations and Evidence-Based Medicine. These processes are supported by the implemented Clinical Governance Policy.

In our organisation, a clinical governance committee and subcommittees operate, reinforcing the culture of clinical leadership. All organisational units have a robust programme of management

controls and clinical audits. We have systems for identifying, assessing and controlling clinical risk and for testing the effectiveness of clinical risk management in the organisation. Moreover – and most importantly in our sector – we promote a culture of continuous learning and improvement of care quality. We draw conclusions from clinical incidents, complaints, documentation analyses and clinical indicators within a no-fault model.



Barbara Gad-Karpierz

Medical Director for Hospital Services,
Medical Division



Building a culture of clinical safety at LUX MED is based on the implementation of the Clinical Governance Policy, which aims to ensure high-quality healthcare and minimise the risk of medical errors. We focus on preventing medical errors, improving team communication and involving patients in the treatment process. The implementation of this policy ensures the systematic improvement of procedures, transparency in actions and accountability, which translates into increased patient safety and the effectiveness of healthcare delivery.

Certified quality management system in line with ISO 9001:2015

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.

Employment Structure

The medical sector is characterised by a high proportion of individuals working under civil law contracts, such as contracts of mandate or on the basis of self-employment.

To fully illustrate the employment structure in the LUX MED Group, we use indicators 2–7 (referring to employment under a contract of employment) and 2–8 (referring to other forms of cooperation).

2–7

As of 31 December 2024, the LUX MED Group employed 7,496 people under employment contracts. Women made up 83% of all employees, with 80% of them employed on a permanent contract. Men made up 17% of all employees, with 79% of them employed on a permanent contract. All employees were employed in Poland. Within the LUX MED Group, 88% of employees worked full-time (88% of women and 86% of men).

Detailed information on indicator 2–7 is presented in the tables attached to this report (Tables 2.1 and 2.2).

2–8

At the LUX MED Group we offer various forms of employment and cooperation, depending on the specifics of the position and the expectations of employees or contractors. Among those performing work who are not employees, 62% cooperate on the basis of sole proprietorship and 38% under contracts of mandate. These forms of employment are used mainly by medical personnel (doctors, nurses, other healthcare workers), as well as Patient Service and Call Centre staff. In addition, a small number of individuals cooperate on the basis of management contracts.

The proportion of individuals choosing forms of cooperation with the LUX MED Group other than an employment contract remained at a similar level to 2023 and amounted to around 74%.

Chart 7. Gender distribution of employment

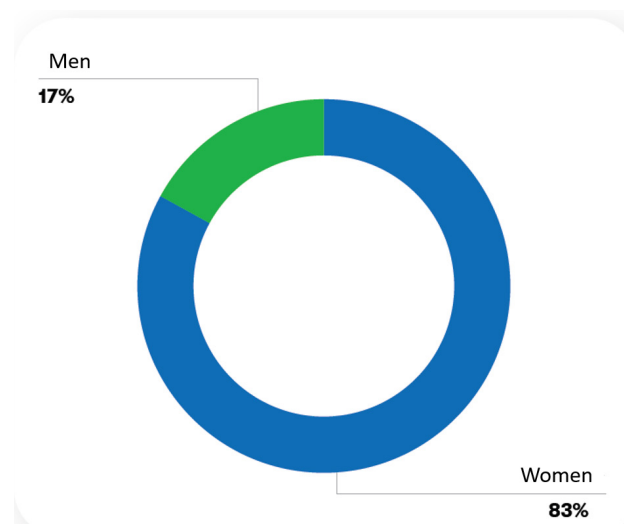
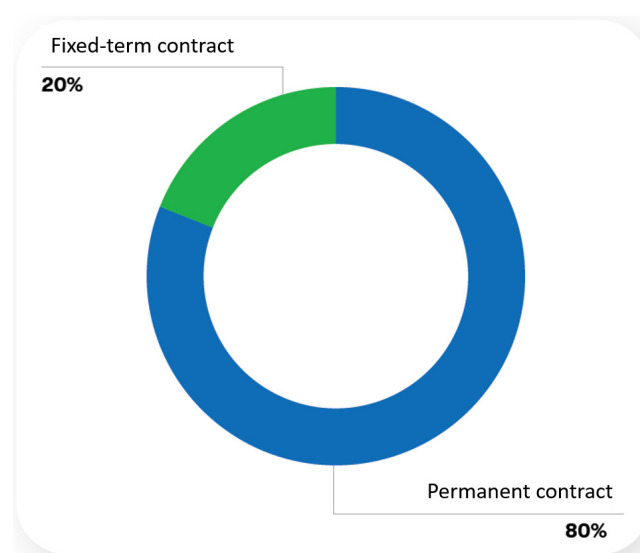


Chart 8. Distribution of employment by contract





Aldona Orłowski

Director of the Recruitment
and HR Business Partners Department



For every employer in the healthcare sector, recruitment is a challenge. It becomes particularly demanding in the context of an ageing society and growing health awareness. The demand for doctors and medical personnel continues to rise.

The LUX MED Group is constantly expanding, and our recruitment needs are steadily increasing. We consistently strive to attract new specialists, while encouraging those already working with us to increase the number of hours dedicated to our patients.

Our organisational culture is a strong asset. We build and strengthen relationships with our doctors. We endeavour to ensure they feel comfortable in the workplace. We provide them with access to modern equipment and medical standards. We give them the opportunity to continuously expand their knowledge. Our experts widely share the latest medical practices. By creating the best possible workplace, we encourage doctors to join the LUX MED Group. In 2024, we established cooperation with over 2,000 new doctors.



Working conditions

Respect for human rights

Respect for human rights is one of the fundamental responsibilities of the LUX MED Group. Within our organisation, internal regulations apply to specific areas of people management, which are in line with the Labour Code, the Universal Declaration of Human Rights and the International Labour Organization's standards on fundamental principles and rights at work.

The principles we follow are set out in [the LUX MED Group Code of Conduct](#). We comply with the prohibition of forced labour,

corporal punishment, and psychological or physical coercion. We do not employ persons under the age of 18. In accordance with legal requirements, we provide our employees with leave entitlements, as well as pension and disability benefits. We do not accept discrimination or violence and we ensure a friendly working environment for all, as described in more detail in the [Diversity](#) chapter.



In 2024 we began work on a comprehensive document entitled 'Human Rights Protection in the LUX MED Group', which defines the key principles of actions and regulations in force within our Group, directly or indirectly related to safeguarding human rights within the organisation and in relations with external partners. We created this document because we want to identify, prevent and address actual or potential human rights issues within our sphere of control and influence even more effectively.

Edyta Gawlik

Director of the Contracts, Remuneration and HR Process Automation Department

Occupational health and safety

403-1

Our goal is to ensure a healthy and safe working environment, which is why all LUX MED Group employees, regardless of the type of contract or place of duty, are covered by the occupational health and safety management system. This reflects our responsibility and commitment to the comfort and safety of every member of our team. The system is based on a thorough assessment and control of compliance with Polish legal requirements – primarily the Labour Code and other occupational health and safety regulations. In addition, we have implemented a comprehensive Wellbeing, Health and Safety Policy, which applies to all companies belonging to the Bupa Group as well as entities controlled by Bupa, i.e. where Bupa holds a majority stake exceeding 50%. The main aim of this policy is to safeguard the health and safety of employees, patients and all other individuals within our sphere of influence. We place particular emphasis on the early identification and effective elimination of potential health and safety risks and hazards in the workplace. This enables us to build an environment in which everyone feels safe and can perform their duties in supportive conditions. To ensure safety and compliance with the requirements of the medical sector, we have developed and implemented a range of internal standards, instructions and guidelines, tailored precisely to the specifics of our operations. These cover rules related to working with sharp instruments and medical products, as well as working under exposure to chemical, biological, physical and psychological factors.

403-2, 403-7

In striving to meet current legal requirements, our organisation participates in internal and external OHS audits. During audits, we review the technical condition of equipment and premises, which allows us to minimise the risk of occupational accidents and diseases. Given the specific risks in the medical sector, we regularly monitor and measure hazardous environmental factors in the workplace, using external companies with appropriate authorisations and qualifications. We analyse occupational accidents and near misses on an ongoing basis, while actively monitoring changes in legal requirements. The results of audits, analyses and studies allow us to adequately prepare employees and workplaces and to plan preventive actions to minimise potential risks. If working conditions do not meet occupational

health and safety standards and pose a direct threat to the health or life of an employee, or if such work may endanger others, the employee has the right to refrain from performing duties and must notify their supervisor. LUX MED Group employees are obliged to report any incidents or potential hazards that could lead to injuries or accidents. Reports can be made through the internal RIO (Organisation Incident Register) application.

Once a report is made, the OHS department analyses the situation and undertakes corrective or preventive action. In some cases, due to the complexity of the issue, consultations and joint actions are carried out with other areas such as the Medical Division, IT Infrastructure Department or the Procurement and Fleet Department, or advice is sought from external experts, enabling a comprehensive approach to problem-solving. Regular OHS training is also provided for employees, with particular emphasis on areas exposed to risks specific to the medical sector, e.g. working with biological or chemical agents. Another important aspect is risk management in our business relations, which is reflected in contracts requiring our business partners to comply with safety standards. In addition, we continuously identify and monitor risks in relations with suppliers, for example concerning the transport of medical waste.

403-3

In compliance with the Labour Code, all LUX MED Group companies provide occupational health examinations for employees. Without a certificate of fitness for work, an employee cannot be allowed to perform duties in a given position. Based on the Regulation of the Minister of Health and Social Care of 1 March 2023 (Dz.U. [Journal of Laws] 2023 item 607), LUX MED doctors provide preventive healthcare for employees.

We work with an occupational physician through workplace inspections, the physician's participation in OHS Committee meetings, as well as through consultancy and the issuing of opinions in accident proceedings when required.

To safeguard the wellbeing and health of our employees, we also run preventive initiatives based on analysis of their health status.

403-4

We engage our employees in consultations on occupational health and safety, as this is a key aspect of building a safe working environment.

Representatives of various professional groups actively participate in our organisation, ensuring better understanding of the challenges posed by legal requirements and effective identification of potential workplace hazards. Through the internal Intranet, we make available to employees all OHS documents, including instructions, guidelines, procedures, safety data sheets for hazardous substances and other documents that contribute to improving employee safety at work. Any changes and updates to OHS-related documents are promptly communicated to the employees directly concerned. This ensures transparency, up-to-date knowledge and enables every employee to comply with applicable standards and procedures. Potential accident situations and occupational accidents can also be reported through the RIO (Organisation Incident Register) application. In each facility an OHS coordinator is appointed, who is responsible for ongoing workplace health and safety and for reporting any issues or irregularities to the OHS Department.

In accordance with a Management Board Resolution and legal requirements, the OHS Committee meets once a quarter. The Committee is composed in equal numbers of employer representatives – including OHS staff and the physician providing preventive care – and employee representatives. In line with labour law, the Committee's responsibilities include:

- reviewing working conditions,
- periodic evaluation of OHS status,
- issuing opinions on measures taken by the employer to prevent occupational accidents and diseases,
- making recommendations to improve working conditions and cooperating with the employer in fulfilling their OHS responsibilities.

403-4

On their first day of work, every employee is required to complete an introductory OHS training. All employees working remotely or in hybrid mode must additionally complete a dedicated e-learning training module. Given the high risk of injuries in our company, we provide all employees – regardless of contract type – with the training 'Injuries – Risks and Prevention'. We also organise workshops for medical staff on appropriate procedures when working with sharp medical instruments.

403-4

In 2024, there were 62 accidents among employees and 70 accidents among contractors within the LUX MED Group. All incidents were classified as minor, most commonly involving injuries. Detailed information is presented in Table 2.6. ([Quantitative data in the social area.](#)).



Edyta Paduch

Head of the OHS Department



Occupational health and safety are our priority, but in the dynamically changing healthcare environment we continually face new challenges. The diversity of positions, the growing pace of work and the need to ensure safety for both employees and patients require constant improvement of procedures and raising awareness among teams. We invest in training, modern tools and a culture of openness to create a workplace that supports health and safety at every stage of our operations.

Remuneration policy

2-19, 2-20, 2-21

All employees receive adequate remuneration in accordance with Polish legislation. The lower threshold of adequate pay in the LUX MED Group has been set at the level of the statutory minimum wage in Poland. As of January 2024, the gross minimum wage amounted to PLN 4,242, and as of 1 July 2024 – PLN 4,300. Minimum wages for medical professions are regulated by the Act of 8 June 2017 on the method of determining the minimum basic salary of certain employees employed in healthcare entities.

In addition to basic salary, employees may receive discretionary awards, bonuses, commissions, as well as allowances: functional, overtime and night work. The LUX MED Group does not offer financial benefits such as severance payments, other than those arising from the provisions of Non-Compete Agreements.

The remuneration policy for Management Board Members and senior management in the LUX MED Group is consistent with Bupa's remuneration policy and is designed to support business growth that contributes to the Group's success. Management Board Members and senior executives are entitled to remuneration consisting of fixed and variable components, both short- and long-term. Remuneration and long-term bonuses for Management Board Members are linked, among other

things, to the achievement of ESG-related objectives (15% weighting in performance evaluation). These indicators include CO₂ emission reduction.

There are no additional pension or early retirement schemes for Management Board Members. In 2024, the annual pay ratio – defined as the ratio of the total annual remuneration of the highest-paid individual in the organisation to the median of the total annual remuneration of all employees – was 11.66 for the LUX MED Group. The ratio was calculated on the basis of annual pay data without further adjustments or modifications.

405-2

The LUX MED Group is in the process of job evaluation and grading, which means that it is currently not possible to calculate the pay ratio for women and men that would in effect reflect an adjusted gender pay gap.

Employee benefits



Dorota Sawicz

Human Resources Director



For years we have been consistently building a healthy organisational culture, taking care of working comfort and appreciating people who stay with us for many years. An expression of this commitment is the benefits package we provide not only to employees but also to contractors and their loved ones. We are expanding the scope of medical subscriptions and providing access to hospital insurance, which we fully finance. It is a tradition for us to celebrate 10-, 20- and 30-year work anniversaries. Both these and other initiatives contribute to a high employee engagement score of 85 out of 100 in the People Pulse survey, which we conduct to continuously improve our workplace.

We care for the health not only of our patients but also of our employees and contractors. All individuals employed within the LUX MED Group, regardless of the type of contract, have access to attractive benefits.

As a healthcare company, we want our employees and contractors to feel particularly well secured in terms of medical care. The medical packages offered provide access to, among other things: comprehensive specialist consultations, psychological and psychiatric consultations, consultations with professors, a wide range of diagnostic tests, outpatient procedures and maternity care.

This package may also cover family members and close relatives.

We also provide the opportunity to use the LUX MED Full Care Hospital Insurance as an employee benefit. All employees and contractors (including those not enrolled in the subscription scheme) are offered free influenza vaccinations and preferential conditions for other vaccinations.



In the event of serious health problems, employees and contractors can rely on support from the LUX MED Foundation named after Dr Joanna Perkowicz, which provides financial, material and organisational assistance.

**Viva
zdrowsi i
szczęśliwsi**

Employees and contractors of the LUX MED Group can also benefit from the wellbeing programme VIVA, launched in 2024, which is built around five pillars: mental, social, physical, environmental and benefits. The aim of the programme is to support healthy habits. In 2024, competitions with prizes were organised on the Carrotspot platform, as well as sports challenges (such as Healthy Cities and the Running League), a Benefits Day and webinars on prevention and diversity. An initiative focused on mental health was also launched, promoting a free helpline with psychologists, a Mental Health Day and workshops with a psychologist. Additionally, subsidies were provided for organised running event packages, with more than 160 packages awarded in 2024. The VIVA programme was recognised in the nationwide Dream Employer 2024 competition in the category 'Employee Wellbeing', winning an award in December 2024. The LUX MED Group also received Top Employer certification, joining the ranks of several dozen certified companies in Poland.



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 Full Care¹ Hospital Insurance

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 leaves and benefits guaranteed by law, such as parental leave or pension benefits. They 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 2024, 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.

Diversity

405-1

Between 1 January and 31 December 2024, the vast majority of our organisation's employees were women, accounting for 83% of total employment. The largest group of employees were aged 31–50, representing 58%. Detailed information on employee diversity is presented in the table included in the annexes to this report (Table 2.7).

The LUX MED Group operates under a Code of Conduct, which clearly defines our commitment to adhering to ethical principles in compliance with the law. Discrimination and intolerance in the workplace are not only contrary to Polish and international standards but also fundamentally incompatible with our own standards of ethics and responsibility. We believe that all employees,

regardless of their beliefs, ethnic origin, age, gender, sexual orientation or health status, should have equal career development opportunities and be treated in line with the standards we promote. We are committed to upholding these principles. We believe that such practice benefits both employees and the organisation as a whole, which gains engaged and skilled staff. In 2024, within our own workforce, employees with disabilities accounted for 2.93% of total employment, with the share among women at 2.99% and among men at 2.67%.

Percentage of employees with disabilities



We have adopted the 'Diverse Patients, Diverse Us' Strategy for 2024–2026, whose main mission is to build an inclusive culture within the LUX MED Group. As part of this Strategy, we create an open and friendly working environment, build employee awareness, provide support and equal opportunities, and ensure transparency in all our activities. In 2024, the LUX MED Group continued its efforts to promote diversity, equality and inclusion, which form the foundations of a supportive and welcoming workplace. In cooperation with external experts and organisations, we engage in educational initiatives that foster equality and counteract discrimination. Together with the TAKPełnosprawni Foundation, we created an accessibility zone at our headquarters during the Open Day, in which our volunteers actively participated. This initiative enabled employees to experience the challenges faced by people with disabilities, those who are neurodiverse and older individuals.



KPIs for 2024–2026

Raising employee awareness in the area of diversity

Creating an open and friendly working environment

Support for employees from minority groups

Employer brand open to diversity

Actions implemented in 2024

- Delivery of educational webinars on diversity and inclusion
- Launch of a programme supporting mental health
- Review of the onboarding process
- 'Open Day' at headquarters
- New office adapted to the needs of neurodiverse individuals
- Initiatives for employees exposed to high stress at work due to difficult situations in relations with patients
- Individual psychological consultations
- Inclusive communication language, diversification of images



Marta Kasiewicz

Manager of Employer Branding
and Employee Experience Team



For years, the LUX MED Group has been setting trends in the field of employee health and wellbeing, as evidenced by the title of Dream Employer 2024 in the Employee Wellbeing category – our third recognition in this area in recent years. The VIVA wellbeing and benefits programme reflects a modern approach to fostering healthy workplace habits, based on a system of reinforcing positive behaviours. A social pillar is also part of the programme, within which we undertake initiatives in the areas of diversity and inclusion, implementing the strategy 'Diverse Patients, Diverse Us'. Both our wellbeing and inclusion initiatives have been assessed by the Top Employer Institute as exceeding the benchmark of certified companies in Poland.

406-1

At LUX MED Group, there is a strict prohibition of all forms of discrimination and workplace bullying. Should any irregularities be identified, appropriate remedial measures are taken. In line with the applicable Code of Conduct, every employee and associate has the right to report undesirable workplace behaviour under the Speak Up Procedure, and in the case of employee-related breaches – to the Ethics Committee. We regularly inform our employees and associates about the possible courses of action in such situations, as we do not tolerate conduct that infringes the dignity and rights of employees. Details of the Speak Up Procedure and the Code of Conduct can be found in the [Ethics and Transparency](#) section.

In 2024, the Ethics Committee received a total of 43 reports concerning suspected workplace bullying or discrimination, none of which were substantiated. However, in eight cases the need for process improvements was identified, leading to the implementation of remedial plans and the issuing of recommendations for further action.

The reported figures cover all employee-related violations submitted to the Ethics Committee during the reporting period. Each report was examined with due seriousness, fairness, integrity and in full confidentiality. For every proceeding, minutes and final reports are prepared. If the Committee does not confirm an allegation but identifies areas requiring improvement, it provides the management of the relevant unit with appropriate recommendations and monitors their implementation at subsequent stages.

In addition to organising meetings and preparing minutes, depending on the nature of the case, the Ethics Committee also carries out further actions such as telephone interviews, email correspondence, analysis of the People Pulse survey results, exit interviews and anti-bullying questionnaires, as well as staff turnover analysis.

2-30

Within one of the LUX MED Group companies, Megamed Sp. z o.o., a collective agreement is in place, covering 186 employees – representing 51% of the company's workforce.

Development and training



404-1

In our organisation, the development of employees and the managerial cadre is a key element of our long-term growth strategy. We consistently support our people at every stage of their professional careers, offering a comprehensive and diverse range of development opportunities. We draw on best market practices, modern tools and formats, while also investing in bespoke programmes tailored to the needs of our organisation and its leaders. We invest in talent and prioritise the development of future-oriented skills. Our initiatives are built on two coherent competency development frameworks: the competency model and the leadership model. The competency model focuses on continuous improvement, goal orientation and relationship building.

It provides a framework for the expected behaviours and skills, enabling the effective development of employee and associate potential, as well as transparent and systematic talent management. The leadership model, in turn, responds to current market challenges and evolving expectations. It emphasises caring for people, inspiring them, driving change and achieving results. It also defines the key attitudes, roles and skills of leaders, encompassing

both traditional aspects of management and new challenges linked to digital transformation and organisational culture. The two models – competency and leadership – are closely interconnected and mutually reinforcing.

Our development offer encompasses a wide variety of learning formats – from in-person workshops and webinars, through managerial development programmes, to modern e-learning platforms. We also make use of diverse psychometric and diagnostic tools, as well as assessment methods. This enables flexible tailoring of development pathways to the individual needs and preferences of employees. We foster a culture of knowledge-sharing and openness to change, strengthening the adaptive skills of our workforce. Beyond the broad catalogue of training courses, we also offer personalised development paths based on competency analysis and employees' professional goals. We encourage and create conditions for expanding skills, while also providing space for experimentation, testing new solutions and proposing one's own initiatives. Our focus is on practical skills, underpinned by a strong theoretical foundation.

To ensure broad access to information about available opportunities, we actively communicate our development offer through multiple channels. In addition to traditional tools such as newsletters and emails, we also use modern communication solutions, including development recommendations, personalised notifications and in-app reminders.

Building a culture of continuous improvement – training for all 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 also have access to our e-learning platform. The LUXszkolenia platform is a space where employees can find all mandatory training courses as well as a wide selection of development programmes offered in various formats, ensuring that everyone can access content that is both relevant and engaging. Once a month, employees receive a training newsletter containing up-to-date information on available courses, recommended reading, recordings and short learning modules.

We also run a webinar series, Thursday – Time for Development, open to all employees. In this series, we invite experts from various fields to deliver inspiring and developmental sessions. Alongside the organised training offer, we remain responsive to the individual learning needs of our employees, providing support and co-funding for external training and courses, including postgraduate studies.

Caring leaders empower aspirations – training for the managerial cadre

In shaping our development offer, we take into account the challenges faced by the modern manager. Our managers are effective leaders and responsible, empathetic figures who build their teams on transparent principles, delegate tasks and set priorities skilfully, inspire others to act, and provide ongoing motivation – while themselves actively seeking feedback.

- We support employee development and opportunities for building a career within the organisation. Managers who are promoted internally and take on a leadership role for the first time may participate in the Operation LEADER – First Steps in the Role of Manager programme. This programme includes managerial onboarding within the LUX MED Group, as well as training

focused on managerial and interpersonal skills.

- For several years we have been running our proprietary programme for managers, Academy of the Effective Leader. The programme applies the LEAN MANAGEMENT methodology and addresses the most important issues influencing effective operational management.
- At LUX MED, we operate on a project-based model, which is why our offer regularly includes workshops to strengthen related skills – training in project management at different levels of advancement, change management training, and workshops for sponsors.
- We also implement mentoring and coaching programmes tailored to the needs of the managerial cadre.

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Mateusz Romiszewski

Director of the Development and Training Team,
HR Division



At LUX MED Group, we place strong emphasis on the continuous development of our employees, because it drives the growth of our organisation. We provide not only access to learning related to professional knowledge and strategic competencies, but also opportunities to develop skills connected with personal effectiveness and productivity. Through a wide range of development programmes – such as the managerial programmes ‘Operation Leader’ and ‘Academy of the Effective Leader’, as well as the Development Programmes in Operations and Sales – we support our employees in meeting everyday challenges. Numerous training and development platforms give employees broad access to unlimited knowledge. We believe that our new competency model, launched this year and based on continuous improvement through feedback, will further strengthen our agile organisational culture. In 2024, we also launched a series of inspiring webinars entitled ‘Thursday – Time for Development’, offering all interested employees the opportunity to take part in online meetings with invited guests. In these sessions, the latest knowledge is shared in an engaging and accessible way, covering areas such as personal effectiveness, agile learning, genAI, and other trends shaping our industry.

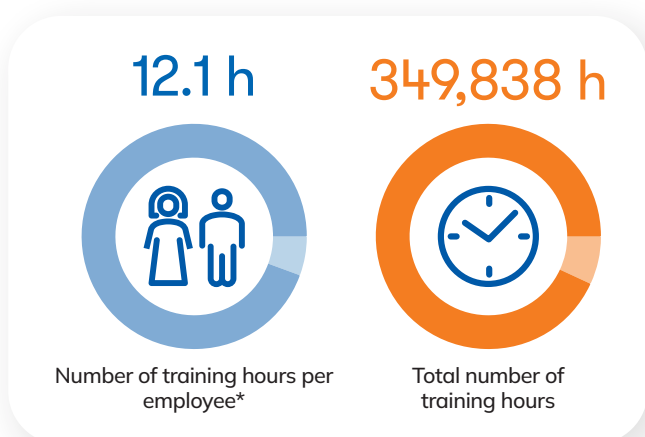
Patient at the centre of our attention – training for medical staff and patient service employees

We provide our patients with comprehensive, top-quality care and never leave them without a solution. For this reason, the qualifications of our medical teams and patient service staff are of paramount importance. Recognising the significance of regular advancement of specialist knowledge and the opportunity to exchange experiences with other healthcare experts, we regularly organise training sessions and conferences for this group of employees. We train medical personnel across all our business lines – the LUX MED Group Medical Centres and Hospitals. Newly recruited doctors take part in meetings and onboarding training specifically tailored to their needs, which are subject to regular evaluation and updates. In recurring meetings for staff, key aspects of doctors’ work are discussed – in 2024, more than 2,500 people participated in these sessions. Since the beginning of 2024, all our training courses have been accredited with points by the Regional Medical Chamber. Participants receive certificates confirming the number of points obtained,

which doctors are required to collect in accordance with applicable law. We also provide training for doctors in medical and medico-technical aspects. In 2024, the dedicated Physician Relations Team trained more than 1,000 people. We hold accreditation from the Centre for Postgraduate Medical Education for conducting specialist training in family medicine, occupational medicine, radiology, clinical oncology, orthopaedics, and oncological surgery. Each year, we organise the LUX MED Group Academy of Medicine. Lectures delivered by leading experts cover key fields of medicine, the latest diagnostic and treatment methods, as well as the legal aspects of everyday medical practice. Our medical teams also have access to soft skills workshops, focusing on building relationships and trust in patient interactions. Through the Medical Knowledge Base, we provide information on current standards, procedures, and the calendar of educational events.

401-1

Our efforts to continuously enhance the skills of our employees and encourage them to participate in training resulted in a total of 349,838 training hours in 2024. These included, for example, internal and external workshops, webinars, e-learning courses, conferences and coaching sessions. We are constantly expanding the offer available on our e-learning platform, encouraging employees to engage in training. The average number of training hours per employee in our organisation amounted to 12.1.



Detailed information on Indicator 404-1 is presented in the table included in the annex to this report (Table 2.5).

404-3

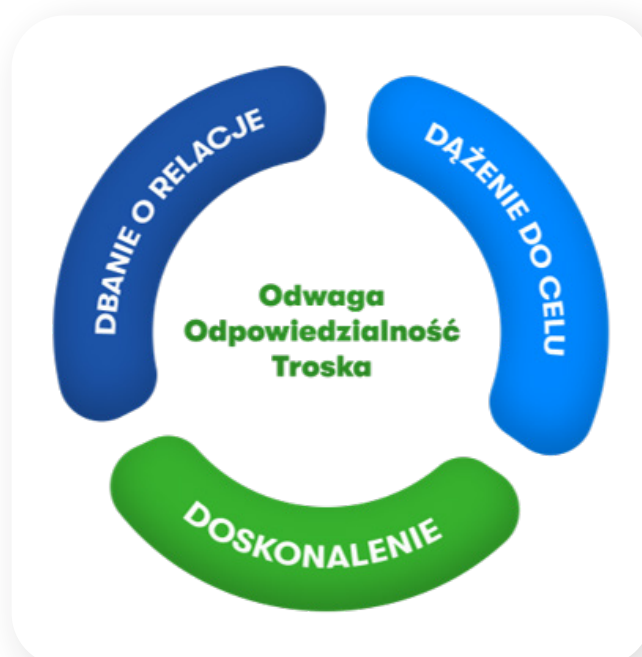


The complex organisational structure, combined with the fact that the majority of our personnel are medical professionals who spend a significant part of their time interacting with patients, means that as a Group we must approach performance assessment in a flexible and individualised manner.

In 2024, we worked on updating the competency model, with implementation planned for 2025. Accordingly, in this year's Report we present data only for employees who are subject to regular performance evaluations linked to goal achievement and who participate in the bonus system. This change in definition resulted in a decrease in the percentage of employees undergoing regular performance reviews and career development assessments compared to 2023, bringing the figure down to 51%. The new competency model provides that each employee will undergo at least one formal review of competencies and career development opportunities per year.

Information on Indicator 404-3 is presented in the table included in the annex to this Report (Table 2.6).

3D Competency Model



* When calculating Indicator 404-1, the number of employees included both employees and associates.

Health promotion and preventive healthcare

Healthy Cities 2024

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 fourth time in 2024. The programme combines the promotion of health among participants with encouraging them to adopt healthy habits in their daily lives. At the same time, it has a positive impact on the environment, urban spaces and society by:

- | | | | |
|---|---|---------------------------------|--|
| 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, | 4
supporting charitable organisations through the winning LUX MED Group teams. |
|---|---|---------------------------------|--|

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 2024 had three editions: a corporate edition, with 111 companies from across Poland registering; a municipal edition, involving residents of 66 cities with poviats rights; and a team edition, covering LUX MED Group employees, with 89 teams from the LUX MED Group taking part. The challenge was supported by a free app, available to all participants during the initiative via the AppStore and Google Play. In 2024, LUX MED Group planted one tree for each participant, resulting in a total of 15,286 trees being planted in the Wyszaków Forest District. The leading companies took patronage of a project to revitalise peatlands in Poland. The most active

cities received a combined budget of PLN 60,000, Which was allocated to socially beneficial initiatives designated by local governments. In addition, in the winning city first aid workshops were held for primary school pupils, with 475 students from seven schools participating. The most active LUX MED Group teams received a combined budget of PLN 30,000 to support selected charitable organisations.

The leading companies took patronage of a project to revitalise peatlands in Poland:

1st place

in the category up to 500 employees:

PROGRESS Polska Kancelaria Broderska Sp. z o.o. – took patronage of the peatland in Kampinos National Park.

1st place

in the category 501–5,000 employees:

Duna Polska S.A. (formerly Mota-Engil Central Europe S.A.) – took patronage of Bagna Wasilkowo (Wasilkowo Marshes) and Górniańskie Łąki (Górniańskie Meadows).

1st place

in the category over 5,001 employees:

Solidarność VWP – took patronage of the ecological site Przemkowskie Bagno (Przemków Bog).

Winning cities:

1st place: Jaworzno – PLN 30,000

2nd place: Jastrzębie-Zdrój
– PLN 20,000

3rd place: Sopot – PLN 10,000

Winning LUX MED Group Teams:

1st place: PLN 15,000

Fundacja 'Serca dla Maluszka' (Hearts for Little Ones Foundation)

2nd place: PLN 10,000

Fundacja 'Twarze Depresji' (Faces of Depression Foundation)

3rd place: PLN 5,000

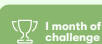
Stowarzyszenie 'Pracownia na rzecz Wszystkich Istot' (Workshop for All Beings Association)

20 | Healthy 24 | Cities



Goal: 6 000 steps every day

15286
participants



15 286 trees planted

41 hectares of revitalized wetlands under the patronage of the winning companies

90 000 PLN to support environmental and social initiatives for the winning cities and LUX MED teams

37 laps around the Earth
1,5 million kilometers

1,9 billion steps

111 companies

66 cities

89 LUX MED teams

Healthy Cities supports the Sustainable Development Goals



Partners:





Anna Kaniewska Tavares

Coordinator for Social Initiatives,
Corporate Communications
and Sustainable Development Department



I am delighted to witness the growth of the Healthy Cities challenge, which for the past four years has inspired thousands of people to take at least 6,000 steps a day for one month each year. Thanks to the Healthy Cities Polska app, participants can monitor their activity on a daily basis. We have created a space where city residents, company employees and LUX MED Group staff can look after their health while at the same time becoming involved in actions to protect our planet. We are proud to continue Healthy Cities by organising the fifth, jubilee edition of the challenge, constantly striving for even closer cooperation with cities and companies in building a healthier, more active and responsible world.

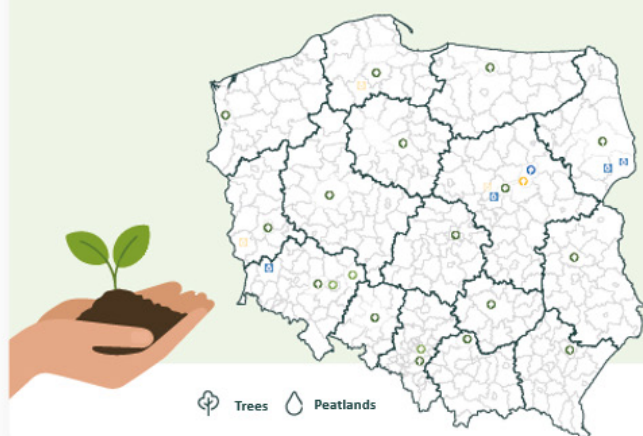
2025 | Healthy Cities

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Summary of editions to date

	Tree planting location	Number of trees planted	Area (ha)	Peatlands	Area (ha)
2021	Forest districts: Toruń, Oborniki Śląskie, Kobiór, Kielce, Trzebież, Miechów, Widuchowa, Zielona Góra, Lipsk, Dojlidy, Brzeziny, Jabłonna, Łęczyca, Lubartów, Konstantynów, Opole	375 000	50 ha		
2022	Forest districts: Siewierz (Śląskie Voivodeship), Oława and Oleśnica Śląska (Dolnośląskie Voivodeship)	80 000	9,2 ha		
2023	Forest districts: Wyszów (Tuchlin Forest District and Somianka Forest District)	10 500	2 ha	Goździk Pyszny (Kampinos National Park), Rosiaczka (Krzeslin Landscape Park), Chrobok (Bory Tucholskie)	17,4 ha
2024	Forest districts: Wyszów, Nowiny Forest District	15 286	2,4 ha	Peatlands in Kampinos National Park, Bagna Wasilkowo and Górniańskie Meadows, Przemkowskie Bóg	41 ha



Healthy Cities

supports the UN Sustainable Development Goals



480 k
trees planted



122 ha
of revitalized areas (trees and peatlands)



Trees Peatlands



Healthy Cities Index: where in Poland do the healthiest people live?

The third edition of the Healthy Cities Index was launched in 2024. 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 how Polish cities with poviats create conditions for healthy living for their residents. According to Statistics Poland (GUS), by the end of 2022 these cities were home to nearly 12.4 million people – almost one-third of the country's population.

Ensuring a good quality of life for residents is one of the most important responsibilities of local governments, including cities. It is worth noting that in many of the cities included in the study, the number of residents has been increasing. Between 2018 and 2022, Warsaw, Wrocław, Kraków, Gdańsk, Poznań and Rzeszów gained nearly 180,000 inhabitants. At the same time, some cities are losing population. Among the cities covered by the index, this applies in particular to Łódź, Bydgoszcz, Zabrze, Bytom, Radom, Katowice and Częstochowa.

The Healthy Cities Index provides a synthetic picture of how social, environmental, economic and policy factors in cities contribute to residents' health. The results highlight a significant diversity in the conditions created by cities, reflected across the individual areas of the index. The outcomes of our work may inspire local authorities to implement solutions aimed at improving residents' health and quality of life.



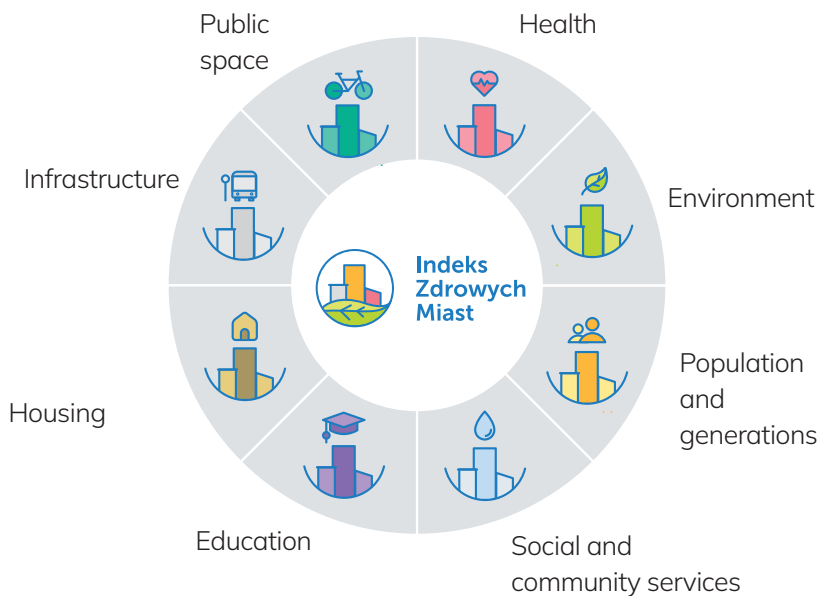
Methodology of the Healthy Cities Index

The methodology of the Healthy Cities Index was developed in 2022 and, in principle, has been maintained across all three editions of the index. It incorporates international experience and the practices of the World Health Organization (WHO) in implementing the Healthy Cities network, as well as selected other international experiences.

The Healthy Cities Index covers 66 cities with poviats rights in Poland. As part of the work on the index, indicators were selected across eight areas: health; population and generations; municipal and social services; education; housing; environment; infrastructure; and urban space.



Areas assessed in the Healthy Cities Index



Since 2024, the results of the Healthy Cities Index have been presented in two groups – large cities with more than 300,000 inhabitants, and cities with fewer than 300,000 inhabitants. Around half of the residents of the cities covered by the index live in the first group (6.06 million people), while approximately 6.24 million live in the second.

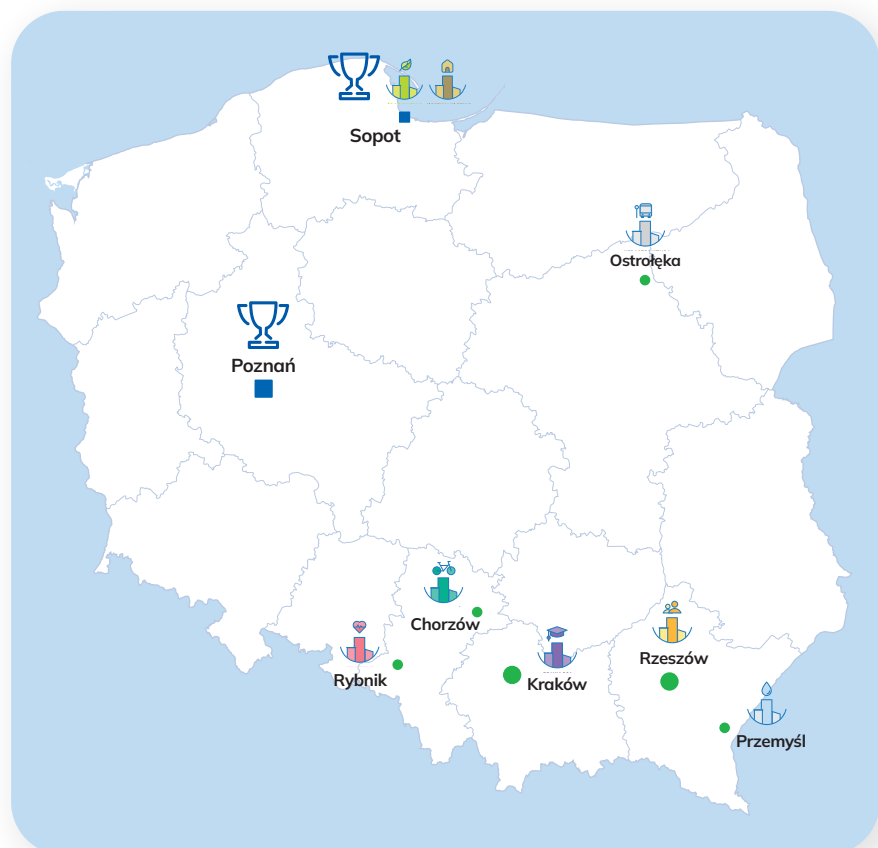
You can read the detailed results in the [Healthy Cities Index report](#).

Winning cities

A new feature introduced in this year's edition of the ranking is the division in the main category into cities with fewer than 300,000 inhabitants and those above this threshold. Among the large agglomerations, Poznań ranked as the healthiest city to live in. Sharing the podium alongside the capital of Greater Poland were Warsaw, which last year held first place, and Gdańsk in third position. Among the cities with fewer than 300,000 inhabitants, the winner was Sopot. Second place went to Gdynia, another city in the Tricity area, and third place to Rzeszów in the Subcarpathian region.

Rzeszów also leads in the population and generations category, while Sopot is the leader in environment and housing. Kraków continues to perform best in education, while Chorzów excels in urban space. Rybnik ranks highest in health management, and Ostrołęka in infrastructure. In the social and municipal services category, first place went to Przemyśl.

The winners in the individual categories were:





Agnieszka Chłóć-Domińczak, PhD,
Professor at the Warsaw School of Economics

Vice Rector for Research, SGH Warsaw School of Economics



The Healthy Cities Index provides a synthetic picture of how social, environmental, economic and policy factors in cities contribute to residents' health. We now have three editions of the Index behind us, and it continues to attract growing interest both among local authorities and among the residents themselves. The annual update and development of this unique report, covering one-third of Poland's population, make it possible to see how the conditions for healthy living and functioning are evolving across 66 cities with county rights. It is encouraging to note that the results of our work inspire authorities to implement solutions that support improvements in residents' health and quality of life.

Healthy Cities Congress

On 23–24 September 2024, the Warsaw School of Economics hosted the first edition of the Healthy Cities Congress: People – Business – Environment.

Creating urban spaces that are both healthy and liveable requires an understanding of the needs of modern cities and their residents. Already, more than 60% of Poland's population lives in cities. These spaces are centres of population and economic activity, yet they also demand appropriate adaptation measures to ensure sustainable development and a high quality of life for their inhabitants.

The transformation towards smart cities, green spaces, efficient transport systems and a sustainable economy is not only a necessity but also an inevitable path of

development for contemporary urban areas.

The Congress grew out of the Healthy Cities Index project. The programme was structured around eight key thematic tracks, reflecting the categories of the report: environment, health, population and generations, social and municipal services, education, housing, urban space, and infrastructure. The highlight of the event was the announcement of the results of the third edition of the Healthy Cities Index.

The Healthy Cities Index has also served as an inspiration for a new business-focused initiative – **the Healthy Companies Index**. Representatives of Polish business attending the Congress gathered at the Round Table to discuss the methodology for assessing companies in terms of their impact on employee health and the natural environment.



Professor Jerzy Hausner

Chairman of the Programme Council of OEES,
Founder of the GAP Foundation



During the first edition of the Healthy Cities Congress, we launched the Healthy Companies Index project. Its aim is to develop a research tool that provides a credible and transparent methodology for assessing Polish enterprises in terms of their impact on employee health and the natural environment. In the pilot study, addressed to several dozen companies of various sizes, issues to be examined include, among others: a safe working environment, employee wellbeing and health, access to medical care, healthy nutrition, and opportunities for sports and recreational activity. The Healthy Companies Index is designed to promote and distinguish companies that actively invest in creating healthy spaces and a supportive work environment.

Better quality of life in cities

The Healthy Cities Congress is addressed to representatives of local government, executive and legislative authorities, the business sector, as well as leaders of urban organisations, non-governmental organisations and residents. The Congress will continue in 2025.

The members of the Programme Council include:

- **Anna Rulkiewicz, PhD**, CEO of the LUX MED Group
- **Professor Jerzy Hausner**, Chairman of the Programme Council of OEES (Open Eyes Economy Summit), Founder of the GAP Foundation
- **Professor Piotr Wachowiak**, Rector of the SGH Warsaw School of Economics
- **Ewa Ewart**, Journalist and Film Director
- **Professor Agnieszka Chłoń-Domińczak, PhD**, Vice Rector for Research, SGH Warsaw School of Economics
- **Professor Zbigniew Gaciong**, Rector of the Medical University of Warsaw (2020–2024)
- **Natalia Hatałska**, CEO and Founder of infuture.institute – Institute for Future Studies
- **Maria Krawczyńska**, Management Board Member, Responsible Business Forum
- **Bernard Waśko, PhD**, Director of the National Institute of Public Health – National Institute of Hygiene
- **Maciej Witucki**, President of the Lewiatan Confederation (2019–2025)



Łukasz Niewola

Director of the Corporate Communications
and Sustainable Development Department



Fulfilling the mission of the LUX MED Group – to help people live longer, healthier and happier lives, while making the world a better place – we have for many years consistently developed the concept of Healthy Cities. In 2024, we organised the first Healthy Cities Congress, bringing together 1,300 participants, 100 speakers, 15 representatives of local governments, as well as Ministers and the Mayor of Warsaw. The Healthy Cities Congress was created in response to the growing need for dialogue and the development of concrete solutions to the challenges faced by modern cities. The aim of this joint debate between representatives of government, local authorities, business, NGOs and urban organisations is to inspire systemic action to improve the quality of life in our cities – in social, spatial, environmental and, ultimately, health dimensions.



Social engagement

3-3

At LUX MED Group, 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 is why we actively participate in a variety of campaigns and programmes that address the needs and expectations of our stakeholders. We support them by creating new jobs and opportunities for economic growth, as well as by providing assistance to people in need and implementing cultural initiatives. Over the past year, we have carried out numerous activities in the field of social support and charitable work.

Selected social initiatives

Umiem Pomóc [I Can Help]

In the last quarter of 2024, the LUX MED Group conducted the 12th edition of the 'Umiem Pomóc' [I Can Help] campaign. This edition involved 475 pupils from seven schools in Jaworzno, 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 7,650 pupils from cities across Poland, including Warsaw, Piaseczno, Kraków, Katowice, Wrocław, the Tricity, Poznań, Toruń, Rzeszów, Olsztyn, Szczecin, Świętochłowice, Białystok, and Jaworzno.



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PKOl and PKPar

The year 2024 was marked by a special partnership with the Polish Olympic Committee (PKOl) and the Polish Paralympic Committee (PKPar). The Games held in Paris saw our athletes win a total of 10 Olympic medals and 23 Paralympic medals. Our mission has been, and continues to be, to support the statutory objectives of PKOl and PKPar, with a focus on promoting the Olympic and Paralympic ideals. Recognising the significant and positive impact that physical activity has on our health, we consistently promote the spirit of sport across society, being present at events attended by these committees. Our representatives were also present in the French capital, where we actively supported all Polish athletes. It is of great importance to continuously provide athletes with comprehensive medical care, the support of experienced specialists, and access to modern medical infrastructure.



‘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.



‘Win Health’ Podcast

At the end of 2024, we launched a new communication format – the ‘Win Health’ podcast. The first season includes 24 episodes featuring conversations with outstanding athletes and figures from the world of medicine. Our studio guests have included Robert Korzeniowski, Joanna Jędrzejczyk, Paweł Nastula, Joanna Mazur, Karol Bielecki, and many others. The aim of the podcast is to promote physical activity as a key element of disease prevention and to showcase inspiring stories of individuals whose attitudes and achievements serve as motivation for others.

‘Ty też możesz. Wygrywaj zdrowie’ [You Can Do It Too. Win Health] Campaign

The beginning of 2024 saw the continuation of our campaign from previous years, promoting physical activity as an integral part of disease prevention. Through collaboration with Paralympians Adrian Castro and Róża Kozakowska, we encouraged people to take up sport regardless of the obstacles they may face. Their stories are a great source of inspiration and a testament to the fact that determination and hard work make it possible to achieve extraordinary things.

There is no better time for physical activity than NOW

Spring and summer encourage us all to be more active. This period proved exceptional also because the entire sporting world was focused on the Olympic and Paralympic Games. At LUX MED, we highlighted that there is no better moment than the present to be physically active. Our communication encouraged people to walk instead of taking public transport or driving, reminded them of the benefits of cycling, and promoted using the stairs instead of the lift, along with many other ways of incorporating sport into everyday life. We know that even small steps, taken with regularity, can lead to significant results – especially those with a positive impact on our health. Olympians were winning medals, and we were winning health.



Onkonawigator Programme

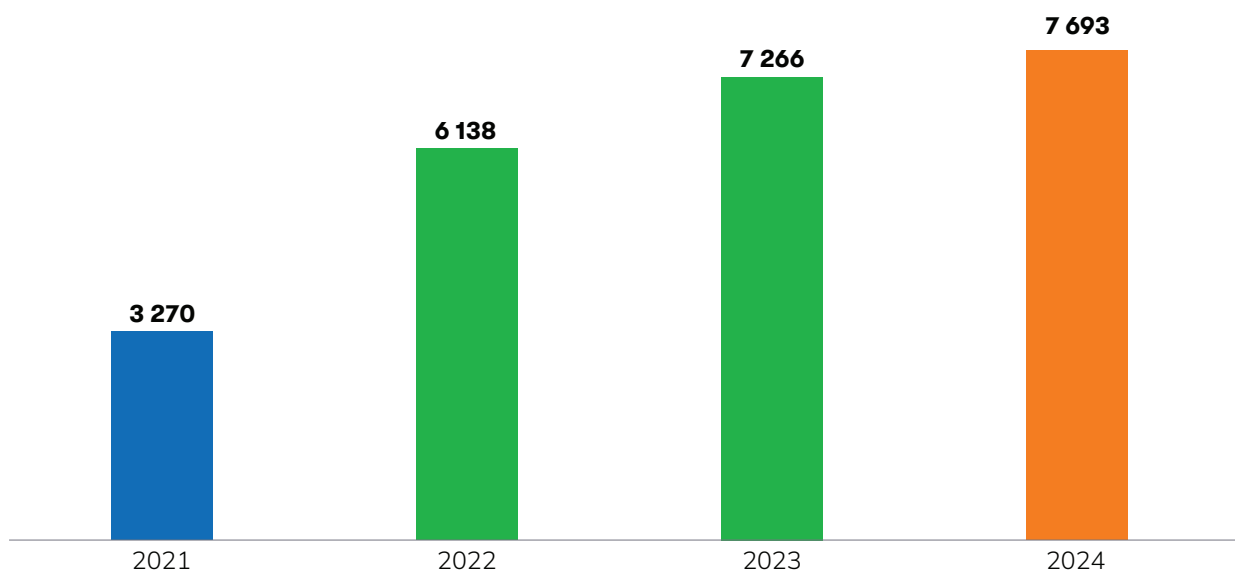
The Onkonawigator programme has been operating at the LUX MED Group continuously since 2013. Its purpose is to provide education and tangible support to patients at the stage of suspected cancer and diagnosis, as well as those already with a confirmed oncological condition. When a doctor suspects cancer in a patient, or when a patient presents test results indicative of such a diagnosis, a referral to the Onkonawigator programme is issued. From that moment, the patient is enrolled in the programme indefinitely. Within the framework of Onkonawigator, oncology advisers remain in contact with the patient to provide comprehensive and individualised support for the next necessary steps. The team of advisers 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. The programme operates nationwide, with advisers cooperating with oncology coordinators in all referral hospitals specialising in cancer diagnostics and treatment. The Onkonawigator team also works closely with the four LUX MED Oncology Hospitals in Warsaw. Based on modern infrastructure and a highly qualified medical staff, these facilities provide the highest standards of oncological care, both under the National Health Fund (NFZ) and on a commercial basis.

In 2024, the Onkonawigator programme supported nearly 8,000 patients.



Chart 9. Number of patients who benefited from the Onkonawigator Programme in 2021-2024



Dr Joanna Perkowicz LUX MED Foundation

The LUX MED Foundation, named after Dr Joanna Perkowicz, was established in 2016 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 CEO 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.

The LUX MED Foundation was registered as a Public Benefit Organisation in 2018. 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.



FUNDACJA LUX MED

IM. DR. JOANNY PERKOWICZ

Thanks to the Foundation, in 2024 support was provided to 22 employees, and since its inception more than 150 employees have received assistance.

Charity Principles

The LUX MED Group's Charity Principles provide a framework for our social engagement and set out the rules for granting support in three categories: Healthy Environment, Health and Wellbeing, and Diversity. All of this is designed to ensure that we pursue the Group's mission in a consistent way: 'We help people live longer, healthier, and happier lives while making the world a better place.'

In 2024, through the Charity Principles, we supported **nine organisations**, providing a total of **PLN 100,000** for the following projects:

UKS Jantar Gdynia – support for organising the National Junior and Senior Rhythmic Gymnastics Championships.

GoodLife Foundation – '240 – the Boundary of Life' programme: purchase of an AED for Primary School No. 8 in Katowice.

Stowarzyszenie Pomocy Dzieciom i Młodzieży 'Dom Aniołów Stróżów' (House of Guardian Angels Association) – 'Anielska PoMOC' (Angel Aid) project : individual and group psychological sessions.

Stowarzyszenie Serce Torunia (Heart of Toruń Association) – provision of medical equipment for Sercownia, a support centre for people experiencing homelessness.

Fundacja Na Ratunek Dzieciom z Chorobą Nowotworową (Rescue Children with Cancer Foundation) – purchase of a Sensory Box for the Department of Paediatrics, Oncology, Haematology and Diabetology at the Central Clinical Hospital of the Medical University of Łódź.

Fundacja Projekt Starsi (Project Seniors Foundation) – financial support for the helpline for older people.

Fundacja 'Twarze Depresji' (Faces of Depression Foundation) – funding a workshop entitled 'Teenagers, addiction to alcohol and drugs, and depression'.

Fundacja SMA (SMA Foundation) – co-financing of the 6th integration and therapeutic camp for families and patients with spinal muscular atrophy.



DOM ANIOŁÓW STRÓŻÓW
www♥anioly24♥pl



Support for flood victims

Following the floods that struck southern Poland in September 2024, we supported the damaged hospitals in Głucholązy and Nysa by providing essential equipment such as furniture, computers, dressings, medical products, disinfectants and surgical lamps. We also organised a water collection campaign.

In addition, we launched a free psychological support helpline for people affected by the floods.



In total, in 2024 we allocated more than PLN 4.2 million to support social initiatives.*

*The significant decrease in support for social initiatives in 2024 compared to 2023 is the result of a reduced need for assistance for Ukrainian citizens. In 2024, in response to the decline in the influx of refugees and the closure of many emergency support centres, the need for aid of this kind fell considerably.

Corporate governance



Internal regulations on corporate governance

2-23, 2-24

In the face of a rapidly changing regulatory environment and growing patient expectations, we recognise the importance of implementing and updating effective policies that respond to these challenges. These policies not only form the foundation for ensuring compliance with applicable legislation, but also play a key role in building trust among patients, employees and the wider community. At LUX MED Group, a number of policies are in force, and we are committed to their observance across our entire organisation, covering all employees and all of our activities.

Policies and internal regulations are approved by their local owners at the level of LUX MED Sp. z o.o. Each policy has its own local owner, who is responsible for ensuring compliance with its provisions, periodically reviewing the effectiveness of the actions required, and maintaining the document's relevance. Employees affected by new or updated internal regulations are informed of these obligations and are responsible for applying them in their daily work. Communication channels include the internal newsletter, information emails and the corporate intranet.

To support compliance with the adopted policies, we organise a wide range of training sessions for our employees. The training platform offers courses on ESG, environmental protection, anti-corruption procedures, the Speak Up procedure and incident reporting. In addition, as part of the onboarding process, new employees receive training on the company's principles, including ESG, and through the Culture Book. New companies joining the LUX MED Group take part in a process called 100-Day Integration, under which they are required to align their systems and practices with those in force across our organisation. Some processes require a longer period for full integration.

A table in the annexes presents other key internal regulations in the area of corporate governance. These are policies applicable throughout the LUX MED Group, introduced on the basis of Bupa policies.

Ethics and transparency

2-15

We are committed to ensuring transparency and integrity in all business transactions. We take our responsibility for identifying and managing conflicts of interest very seriously. Throughout the LUX MED Group, rules in this area are set out in the Conflict of Interest Prevention Policy.

In order to prevent and mitigate conflicts of interest, the Management Board of LUX MED Sp. z o.o. adopted a resolution on the principles of conflict of interest prevention, which was further updated in 2024 to reflect current realities. Under this resolution, the HR Division carries out an annual review of conflicts of interest, collecting information on potential or actual conflicts of interest from the management staff responsible for particular areas. This management staff is also obliged to report potential or identified conflicts on an ongoing basis. Any employee or associate of the LUX MED Group may also submit such a report independently. In addition, the HR Division may decide to file a report on its own initiative. The types of events subject to reporting include competitive, corrupt or nepotistic activities. Proper management of conflicts of interest is overseen by a designated Management Committee, which comprises all Members of the Management Board and the HR Division Director.

The LUX MED Group identifies possible solutions and preventive actions in the event of a conflict being disclosed, and also takes steps to raise managers' awareness of their responsibilities under the conflict of interest management process.

2-16, 2-26

We attach particular importance to integrity and transparency in business operations. To this end, we have introduced initiatives designed to create effective mechanisms for reporting and handling notifications concerning irregularities, breaches of law and behaviour contrary to the standards set out in the LUX MED Group Code of Conduct. The existing procedures have been aligned with the requirements of the Whistleblower Protection Act of 14 June 2024 (Journal of Laws, item 928). These measures are intended not only to guarantee protection for whistleblowers, but also to prevent any form of retaliation.



LUX MED Group has implemented the Speak Up Policy, referred to as the Whistleblowing and Follow-up Procedure. All employees and associates are required to familiarise themselves with it through mandatory training available on the e-learning platform. The Speak Up procedure provides four different reporting channels, enabling employees and other groups entitled under the Act to report breaches of law, internal regulations, and violations of the principles and values set out in the LUX MED Group Code of Conduct. Reports may be submitted anonymously or by name, depending on the whistleblower's preference. The reporting channels are as follows:

- online platform: bupa.com/luxmedspeakup,
- 24/7 helpline: 800 005 409,
- email: naruszenia@luxmed.pl,
- direct contact with the Speak Up Officer.

The register of reports is maintained in a system operated by an external provider – Navex.

Reports are reviewed by an objective, independent Investigation Team composed of staff from the Risk and Compliance Department and, where necessary, experts from various fields depending on the subject matter of the report.

In 2024, a total of 42 reports were submitted under the Speak Up procedure. Of these, 19 cases related to HR matters and were referred to the Ethics Committee, which is responsible for handling all employee-related irregularities.

The Ethics Committee was established to promote universally applicable ethical standards in employee relations, as well as to assess how these standards are perceived within the LUX MED Group and to recommend actions consistent with them.

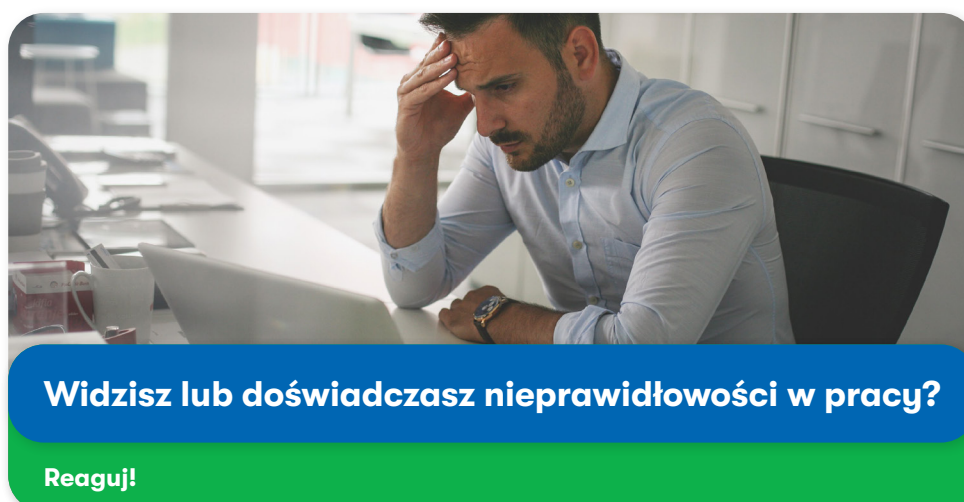
The purpose of the Committee's activities is to safeguard the interests of the LUX MED Group, as well as those of its employees, associates and patients/clients, against actions that are not compliant with labour law.

The role of the Committee is to raise awareness of universally applicable standards of workplace behaviour and employee relations, to oppose actions inconsistent with work ethics, and to provide appropriate recommendations in this area. The Committee is an autonomous and neutral body.

The Committee accepts submissions by email (komisja.etyczna@luxmed.pl), by phone to Committee Members, or in person to any Committee Member.

At the same time, the LUX MED Group operates a procedure for reporting and monitoring incidents in the Register of Organisational Incidents (RIO), in which operational incidents such as attempted fraud, abuse of authority or phishing can be reported under the abuse category.

At the quarterly meetings of the Risk & Compliance Committee, which includes, among others, Members of the Management Board, general information is presented on the number of reports submitted under the Speak Up procedure, referrals to the Ethics Committee, and the number of registered incidents.



417-2, 417-3

In 2024, no cases of non-compliance were identified with regulations or voluntary codes concerning product and service labelling, product information or marketing communication.

2-27

During the supervisory audits conducted in 2024, no significant instances of non-compliance with laws or other external and internal regulations were identified within the LUX MED Group.

206-1

In 2024, no incidents or proceedings concerning violations of antitrust regulations were recorded.

205-3

In 2024, no confirmed cases of corruption were identified. In addition, no legal proceedings in this area were conducted.

100%

submissions
to the Ethics Committee
reviewed within six months of receipt

0

reports concerning
human rights violations

Cooperation with organisations and associations

2-28

In 2024, we continued our cooperation with Polish and international organisations, engaging in a variety of initiatives. Active participation in these organisations is key to the development of the healthcare sector and to the achievement of sustainability goals. In addition, since 2024 we have been participating in a new initiative – Chapter Zero Poland, within the framework of the Responsible Business Forum. Below we present details of these organisations and associations.

Industry and business organisations

Business Accessibility Forum (BAF)

BAF

The Business Accessibility Forum is a partnership initiative established 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 align with the obligations under the European Accessibility Act. The LUX MED Group, together with other members, works on removing barriers to accessing digital resources, shares its experience in this area and promotes accessibility as a fundamental human right.

Polish Confederation Lewiatan



**Pracodawcy
dla Zdrowia**

Confederation
Lewiatan and
Employers for
Health – The CEO

of the LUX MED Group serves as Vice President of the Polish Confederation Lewiatan and as President of the Employers for Health Association within the organisation. The Polish Confederation Lewiatan is a business organisation that represents the interests of employers in Poland and the European Union, with the aim of supporting business development. Within the Polish Confederation Lewiatan, we are engaged in the work of 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. Comprising experts from various fields, the Group aims to improve the quality and safety of telemedicine services and to promote knowledge in this area. As part of its activities, the Telemedicine Working Group publishes numerous positions, recommendations and guidelines, which provide the basis for developing national guidance.

HL7



HL7 is an international non-profit organisation whose purpose is to develop and promote standards of interoperability in healthcare. The LUX MED Group is associated with it as a co-founder of the HL7 Poland Association. HL7 develops and maintains a range of standards, such as HL7 v2 Messaging, HL7 CDA and HL7 FHIR, which are used for the exchange of medical data. These standards are currently being implemented in Poland and form the foundation for systems such as 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 the Polish Chamber of Medical

Informatics (PIIM), an organisation that brings together various entities related to the healthcare sector, including medical software providers and experts in medical informatics. PIIM's activities focus on representing its members in initiatives related to standardisation and legislation in healthcare, including public consultations and the review of draft legislation. Additionally, the Chamber has a representative on the Interoperability Council.



The Chapter Zero Poland Roundtable at the Warsaw School of Economics was dedicated to the competitiveness of the Polish economy based on sustainable development.

Organisations Promoting the Principles of Sustainable Development

United Nations Global Compact



Global Compact
Network Poland

LUX MED Sp. z o.o. is a member of the United Nations Global Compact, the world's largest

initiative promoting sustainable development in business, which endorses the Ten Principles related to human rights, labour, environmental protection, and the fight against corruption. These principles are an integral part of LUX MED's organisational culture, business strategy and daily activities. 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.

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.

Responsible Business Forum



FORUM
ODPOWIEDZIALNEGO
BIZNESU

25
LAT

We also joined the Partnership Programme, the main initiative of the Responsible Business

Forum (FOB), the largest and most established organisation in Poland focused extensively on ESG, sustainable development, and corporate responsibility. The programme brings together leaders from various industries who, through their participation in the initiative, develop their ESG competencies and take joint action for sustainable business transformation.

Chapter Zero



Chapter
Zero Poland
The Directors' Climate Forum

In 2024, we also became a member of the Responsible Business Forum (FOB) – Chapter Zero Poland. Our CEO Anna Rulkiewicz

serves as a Member of the Programme Council, while Łukasz Niewola, Director of Corporate Communications and Sustainable Development Department, is a Member of the Steering Committee. Chapter Zero Poland is part of the Climate Governance Initiative, launched by the World Economic Forum, which aims to support the development of governance and supervisory board competences in the area of climate change mitigation.

Sports Organisations



Polish Olympic Committee

As the main medical partner of the Polish Olympic Committee (PKOl), 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 comprehensively manages the health of athletes preparing for the Paralympic Games.



Polish Handball Federation

In addition, we also act as the medical partner of the Polish Handball Federation (ZPRP). Our organisation comprehensively cares for the health of athletes, including national team players.



Paweł Masiukiewicz

Director of Marketing Communications
Department



Sport is part of the DNA of the LUX MED brand. For many years, we have been the main medical partner of the Polish Olympic and Paralympic Committees. We provide the best Polish athletes with comprehensive healthcare, support from experienced specialists and access to modern medical infrastructure. The LUX MED Group supports the statutory goals of the PKOl and the PKPar, in particular those concerning the development of the Polish Olympic and Paralympic Movement, the promotion of the Olympic and Paralympic ideals and the spread of sporting spirit throughout society. Building on this cooperation, we run the 'Win Health' campaigns, promoting sport and an active lifestyle.

Cooperation with universities

The LUX MED Group actively cooperates with universities and is engaged in medical education in Poland, believing that training future medical staff is one of the fundamental responsibilities of a responsible leader in the healthcare sector.

We cooperate with, i.a.:



Medical University of Warsaw



College of Engineering and Health in Warsaw



SGH Warsaw School of Economics



Cardinal Stefan Wyszyński University



Łazarski University



SWPS University



Powiśle University of Applied Sciences



Prof. Edmund Biernacki Medical Post-secondary School No 4



Medical University of Warsaw

As part of our cooperation with universities and schools, we organise training sessions for medical students and pupils, giving them the opportunity to acquire knowledge and skills in practice, use modern infrastructure and medical equipment, and benefit from the expertise of LUX MED specialists. An additional educational programme is the implementation of postgraduate internships and residency training at LUX MED. Beyond the experience gained in hospitals and outpatient clinics, and the knowledge delivered through courses included in the internship and specialisation programme, young doctors also participate in the **LUX MED Residency Programme**. During regular meetings, residents and interns have the chance to

deepen their knowledge in workshops with experts, present their own work, share interesting cases and, at the same time, build a supportive community.

In addition, the LUX MED Group operates the Medical Education Centre (CEM) – a unit established to provide specialised practical training for medical staff. In 2024, CEM delivered training to nearly 6,000 participants.

To strengthen our involvement in the education of medical staff in Poland even further, in 2024 we began preparations for opening our own university – the University of Medical Sciences.


MD, PhD Krzysztof Kurek

Member of the Management Board,
Medical Division



The strength of the University of Medical Sciences will lie not only in its extensive infrastructure, but also in its teaching staff, composed primarily of practitioners. We intend to place particular emphasis on the practical aspects of education and to showcase LUX MED as a place where one not only learns, but also begins and develops their professional career.

Already in 2022, some LUX MED facilities obtained accreditation from the Regional Medical Chamber in Warsaw, which formally integrated them into the system of medical vocational training. This made it possible to conduct the 13-month postgraduate internship required to obtain full licence to practise medicine.

Thanks to cooperation with many medical universities, more than 1,500 students of medicine, nursing, midwifery, dietetics, public health and physiotherapy have so far benefited from the LUX MED clinical base, including in the form of summer placements.

Studies at the University of Medical Sciences will allow students to learn in clinical settings, with the involvement of patients and the use of modern LUX MED infrastructure. An added value will be the support provided to students in taking up employment in healthcare both during and after their studies. LUX MED also plans to continue cooperation with graduates of the University of Medical Sciences in Warsaw.



**WYŻSZA SZKOŁA
NAUK MEDYCZNYCH**

Supply chain and supplier relations

308-1, 414-1

In 2024, we continued assessing suppliers in terms of ESG. 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 the event of a disagreement, the final decision rests with the Management Board and the Procurement and Fleet Department. In addition, at the end of each calendar year, the process of cyclical supplier risk assessment is repeated. At the end of 2024, we selected the first group of suppliers with whom we plan to agree by the end of 2026 on reducing Scope 3 emissions. Through a series of meetings, we encourage suppliers to set their own sustainability targets or strategies and to take action to reduce CO₂ emissions.

Also in 2024, we adopted and published the document [Sustainable Supply Chain Principles for LUX MED Suppliers](#), in which we inform all suppliers of the principles we adhere to and oblige them to comply with them.



For two years now, we have been verifying our IT suppliers in terms of alignment of their Net Zero goals with ours and with Bupa's. Currently, 2/3 of suppliers in this sector meet these requirements. Our target is for 71% of suppliers, like LUX MED, to pursue decarbonisation.

Dorota Baran

Head of Sustainable Procurement
and Procedures Team

Activities, value chain and other business relationships

LUX MED GROUP VALUE CHAIN				
	PROCUREMENT AND SUPPLIERS 1	MEDICAL AND INSURANCE SERVICES 2	SALES, CLIENT RELATIONS 3	PATIENT SERVICE AND FEEDBACK 4
IMPACT Economic Social Environmental	<ul style="list-style-type: none"> As a leader in medical services in Poland, we are an important client for several suppliers in Poland We require our key suppliers to meet high ESG standards (set out in the Sustainable Supply Chain Principles for LUX MED Suppliers). 	<ul style="list-style-type: none"> For over 30 years, we have been developing and our operations have an impact on Polish GDP Household spending on medical services accounts for around 7% of GDP (data: GUS). We employ 29,000 people, including 12,000 doctors and 8,000 other medical professionals. We are one of the largest employers in Poland, providing a stable source of employment and income; we maintain safe working environments for our employees, which translates into quality and safety of services. 	<ul style="list-style-type: none"> Medical subscriptions purchased by corporate and institutional clients for employees make healthcare easier to access, ensure faster return to work, efficiency and productivity, and translate into greater economic efficiency of enterprises and institutions. We take active measures to meet our clients' ESG requirements. 	<ul style="list-style-type: none"> We provide medical services to over 3 million patients across Poland (both under private healthcare and NFZ). As a leader in the private healthcare sector in Poland, we significantly influence the shape of medical care in our country. We also conduct preventive and health education programmes nationwide.
RISK	<ul style="list-style-type: none"> Risk of failing to prevent financial crime. Risk of incorrect third-party verification, resulting in exposure to financial crime or international sanctions, or lack of awareness of such sanctions. 	<ul style="list-style-type: none"> Risk of staff shortages in the Polish market. Risk of patients' dissatisfaction with the quality of care. Risk of failure to prevent medical errors 	<ul style="list-style-type: none"> Risk of corrupt practices in dealings with clients. Risk of losing corporate clients due to inadequate quality of services. Risk of ineffective marketing communication of offered products and services 	<ul style="list-style-type: none"> Risk of cybersecurity and data protection incidents. Risk of failing to meet patients' expectations regarding the scope of services.
RESPONSIBILITY	<ul style="list-style-type: none"> In the supplier selection process, we follow the Sustainable Supply Chain Principles for LUX MED Suppliers and the LUX MED Group Code of Conduct. Our contracts include anti-corruption, social and business sanctions clauses. 1/5 of our suppliers are domestic companies. 	<ul style="list-style-type: none"> We measure our emissions, report on them and implement a decarbonisation strategy. We are committed to achieving Net Zero by 2040. This commitment allows us to influence our suppliers of electricity, natural gas, water and other utilities. The healthcare sector generates medical waste, which we segregate, sort and dispose of in a safe way, while minimising our negative impact on the environment. 	<ul style="list-style-type: none"> We ensure responsible marketing communication, in line with medical ethics, scientific evidence and good practice We operate our Patient Portal, which we continuously develop to ensure patients can easily use our services. We regularly study and analyse the needs of our clients and patients to continuously shape our service offer. We are constantly raising the quality of our medical services. 	<ul style="list-style-type: none"> We listen to our patients by implementing hundreds of improvements each year, and maintain a high NPS score. We uphold the highest standards of medical care, providing comprehensive medical services across our centres, emergency care, and through contracted hospitals and partner clinics.

2-6

Payment practices

LUX MED Sp. z o.o. is the only company in the LUX MED Group with the status of a large enterprise within the meaning of the Act of 8 March 2013 on counteracting excessive payment delays in commercial transactions. Under the Act, payment deadlines in transactions where the creditor is a micro, small or medium-sized enterprise and the debtor is a large enterprise (so-called asymmetrical transaction) are 60 days. Our internal rules provide for a shorter period than the statutory payment period.

We primarily use three payment deadlines: 7, 14 and 30 days, especially in cooperation with micro, small and medium-sized enterprises. Selectively, in the case of large entities or long-term cooperation, the deadline is 60 days.

We exercise due diligence to ensure that obligations to suppliers are settled in accordance with the payment deadlines specified in the contracts. In 2024, 84% of liabilities were settled before or on the due date.

Privacy and data security

At LUX MED Group, we ensure the highest level of security for the data we process – whether relating to our employees, patients, clients or business partners. This is the main priority of the Information Security Team and the Data Privacy Team. Responsibility for delivering the highest quality and control in data security tasks lies with all employees of the LUX MED Group. Activities in this area are overseen by the Privacy and Information Security Committee, whose main tasks include:

Promoting a business culture and corporate structure that safeguard data security and ensure compliance with applicable law in this area



Analysing and advising on identifying potential risks, assessing them and managing them



Coordinating, monitoring, reviewing and reporting on GDPR-related projects and information security initiatives



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



Analysing and advising on the impact of business operations on data privacy and information security, including IT suppliers and service providers



Developing tasks related to privacy and information security



Preparing recommendations and designing training programmes on information security and privacy protection



Marzenna Miłek

Director of IT Risk and Compliance



We treat the security of our employees', patients', clients' and business partners' data as a priority, which is why we established the Privacy and Information Security Committee. Within its framework, we develop privacy and data security tasks, coordinate projects and initiatives, and analyse and identify potential risks to manage them appropriately. We also design data security and privacy training, which is mandatory for all employees. In this way, we nurture an organisational culture at LUX MED that is built on responsibility for all data and information entrusted to us.

Approach to privacy protection

At LUX MED Group, responsible and ethical management of personal data is one of the foundations of both our operational activity and our long-term development strategy. Privacy protection is an integral part of our mission – to deliver the highest quality healthcare services with full respect for fundamental human rights. We believe that public trust is built through transparency and accountability.

We have implemented a range of procedures and technologies that enable the secure collection, storage and processing of personal data, including medical and insurance confidentiality. We regularly carry out security audits (including compliance with ISO/IEC 27001:2013), staff training and IT system testing to identify and eliminate potential threats to data privacy. All LUX MED Group companies operate in line with unified standards, ensuring consistency, transparency and

full compliance with applicable laws. We regard our commitment to protecting personal data as part of our social responsibility and our contribution to sustainable development, where technology and ethics coexist in the service of patients' wellbeing.

Compliance is overseen by teams dedicated to privacy and information security, ensuring the highest standards of compliance in data processing. Our approach also responds to growing stakeholder expectations regarding digital corporate responsibility. In the context of rapidly developing medical technologies, including telemedicine, we continuously invest in infrastructure modernisation and in developing the competences of teams responsible for data protection and security.



Attorney Katarzyna Piszczewska

Deputy Director for Data Protection,
Data Protection Officer



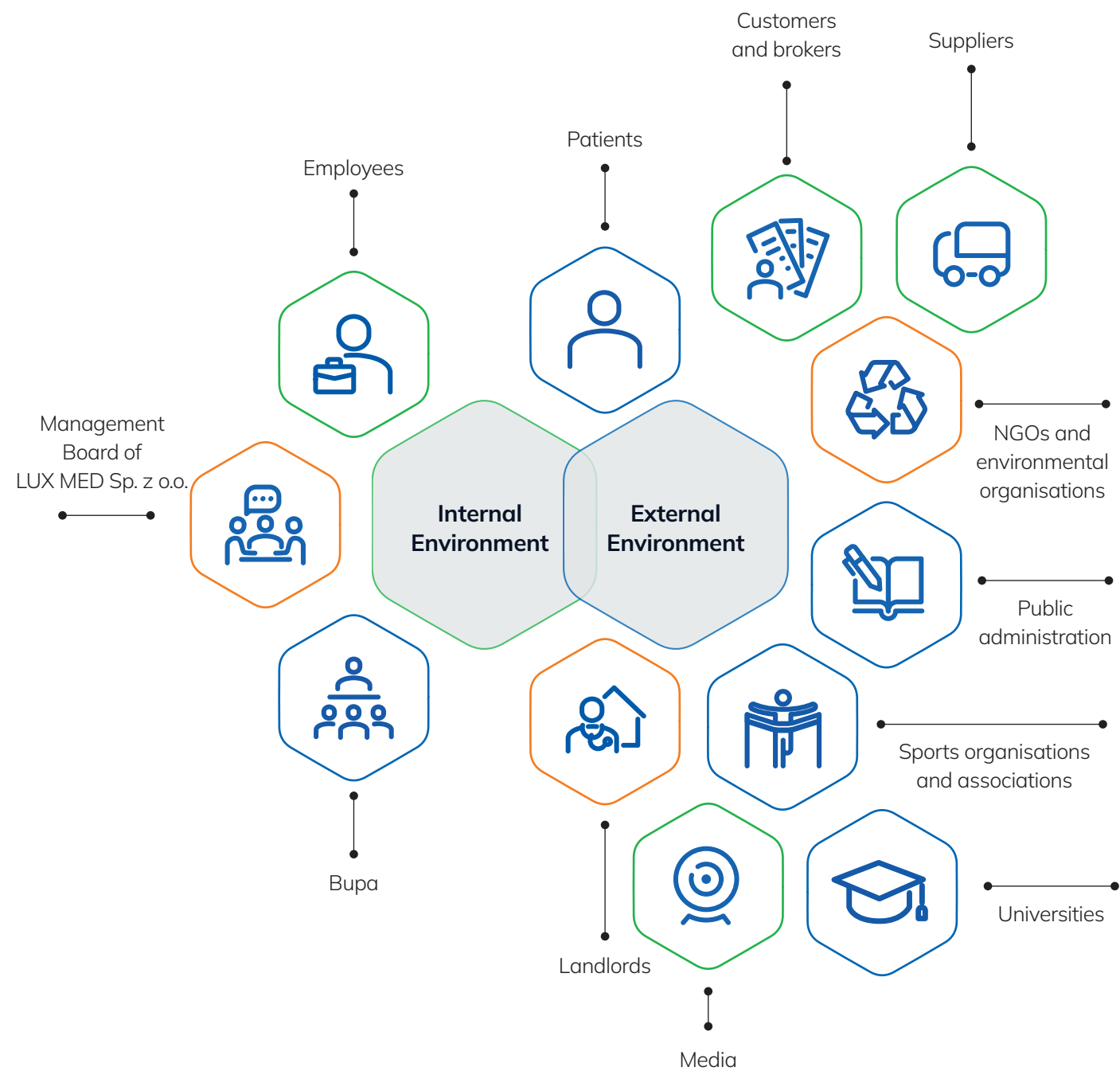
In the world of modern healthcare, the protection of personal data is not just a legal obligation – it is an expression of our deep respect for the privacy of every individual whose data has been entrusted to us. At LUX MED Group, we consistently develop a culture of responsibility for information – whether concerning employees, patients, insured persons or business partners.

Every day, we ensure that LUX MED Group's actions comply with legal requirements, including the provisions of the General Data Protection Regulation. We have introduced a cycle of training focused on practical challenges and current threats, enabling employees to act proactively, consciously and safely in carrying out their duties. We place strong emphasis on proper risk identification, assessment and the selection of appropriate mitigation measures, as well as improvements in data processing procedures. Believing that trust is built through transparency and professionalism, we continuously monitor our procedures and respond to changing regulatory requirements. Data protection is not a one-off action – it is a process embedded in the foundations of our management model.

Stakeholder dialogue

2-29

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



Stakeholder group	Method of dialogue	Purpose of dialogue
Internal Environment		
Employees	<ul style="list-style-type: none"> 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 Employee opinion surveys (People Pulse) twice a year Ability to report irregularities to the Ethics Committee through the Speak Up procedure and the RIO 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, Risk and Compliance Department newsletter Information materials in break rooms Printed materials: brochures, leaflets, posters Corporate events such as the Healthy Cities Congress, LUX MED Group Pearls, Academy of Medicine, and Customer Service Academy, where we also discuss ESG-related issues 	<p>LUX MED Group fosters appropriate working conditions, ensuring equal opportunities and promoting diversity.</p> <p>It guarantees a safe working environment (in terms of health and safety) for both its employees and those employed by contractors.</p> <p>It organises numerous training courses and focuses on recruiting and developing highly qualified staff, including doctors.</p>
Management Board of LUX MED Sp. z o.o.	<ul style="list-style-type: none"> 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. Promoting and supporting sustainability initiatives – participation in conferences, discussion panels, interviews Participation in ESG Committee meetings Participation in Charity Team meetings 	<p>The Group engages in dialogue to build relationships between the Management Board and both internal and external stakeholders. This dialogue is also an opportunity to include diverse needs, expectations and perspectives in the decision-making process, which is crucial for the sustainable development of the organisation.</p>
Bupa	<ul style="list-style-type: none"> Internal meetings with representatives from various areas within Bupa Town Hall meeting between the managerial staff and employees Meetings of Bupa companies operating within the same region (Market Unit) Reporting on the achievement of goals and projects implemented locally Communication via an 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 CO₂ emissions Reporting on the achievement of sustainable development goals 	<p>Collaboration with the owner supports monitoring LUX MED Group's progress in achieving its sustainable development goals. In addition, it provides a platform for sharing experiences, collaborating and developing strategies that will be consistent across the entire Bupa Group.</p>
External Environment		
Patients	<ul style="list-style-type: none"> Patient Portal app and website Helpline Social media Website Visit evaluations 'Close to Health' (Blisko zdrowia) magazine Mailings Marketing campaigns Printed materials Healthy Cities Polska app 	<p>The LUX MED Group engages in dialogue concerning the quality of services provided and patient satisfaction levels, as well as for health education and the promotion of preventive care. Additionally, it ensures the security of sensitive data.</p>

Stakeholder group	Method of dialogue	Purpose of dialogue
Customers and brokers	<ul style="list-style-type: none"> • 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 LUX MED Group promotes and shapes ethical behaviour and creates a transparent and responsible environment in business relations.
NGOs and environmental organisations	<ul style="list-style-type: none"> • Face-to-face meetings with NGOs • Joint projects in sustainable development and social engagement (e.g., Healthy Cities Index) • Industry conferences • Co-creating publications • Communication on social media • Press releases, joint media initiatives • Financial support for organisations under the Charity Principles 	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 administration	<ul style="list-style-type: none"> • 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. • Publication of the Healthy Cities Index and resulting meetings with city representatives • Organisation of the Healthy Cities Congress, which received patronage from several public administration entities and hosted their representatives. • Participation in industry associations, such as the Renewable Energy Council, Green Transformation Council at the Polish Confederation Lewiatan • Activity within the framework of Employers for Health 	The Group engages in dialogue to expand public access to healthcare, co-develop the healthcare system and collaborate with government authorities.
Media	<ul style="list-style-type: none"> • 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, X, Facebook, Instagram, YouTube 	The LUX MED Group establishes and maintains relationships to promote health and preventive healthcare. The expert support provided by LUX MED specialists helps to improve the quality of medical content in the media.
Landlords	<ul style="list-style-type: none"> • 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	<ul style="list-style-type: none"> • Distributing a survey to verify potential suppliers regarding the implementation of environmental and social actions • Sustainable Supply Chain Principles for LUX MED Suppliers • Verification of selected supplier groups concerning decarbonisation goals • Signing cooperation agreements that include anti-corruption and social responsibility clauses • Meetings with selected groups of suppliers to encourage them to take pro-environmental and pro-social actions, such as Healthy Cities. 	The Group establishes and maintains relations with suppliers in order to promote ethical business conduct and cooperation for the benefit of the environment and society.
Universities	<ul style="list-style-type: none"> • Cooperation in research and innovation • Organising internships for medical students • Lectures and seminars • Educational programmes • Consultations and advice • Co-hosting events 	The LUX MED Group actively engages in dialogue with medical universities and supports 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.

Stakeholder group	Method of dialogue	Purpose of dialogue
Sports organisations and associations	<ul style="list-style-type: none">• Meetings and workshops• Partner programmes, including regular medical support for athletes• Information campaigns• Participation in sports events• Financial support for sports organisations and federations under the Charity Principles	The LUX MED Group establishes and maintains dialogue and cooperation in order to promote a healthy lifestyle and provide ongoing medical support for athletes.

Appendices



2-2

List of Group entities and affiliated undertakings

Company name	Ownership structure
4DENT Sp. z o.o.	100% LUX MED Sp. z o.o.
Aptego Sp. z o.o.	100% LUX MED Sp. z o.o.
Centrum Edukacji Medycznej 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.
Centrum Medyczne OMEGA Sp. z o.o.	100% LUX MED Sp. z o.o.
Centrum Opieki Medycznej COMED Sp. z o.o. w likwidacji	100% LUX MED Sp. z o.o.
CITOMED Nieruchomości Sp. z o.o.	100% LUX MED Sp. z o.o.
ELBLĄSKA Sp. z o.o.	100% LUX MED Sp. z o.o.
MedPolonia Foundation	Founder: MED POLONIA Sp. z o.o.
Dr Joanna Perkowicz LUX MED Foundation	Founder: LUX MED Sp. z o.o.
HIFU Clinic Sp. z o.o.	100% LUX MED ONKOLOGIA Sp. z o.o.
LMG Försäkrings AB	100% LUX MED Sp. z o.o.
LMG Försäkrings AB Spółka Akcyjna Oddział w Polsce	
LUX MED BENEFIT Sp. z o.o.	100% LUX MED Sp. z o.o.
LUX-MED Investment S.A.	100% LUX MED Sp. z o.o.
Lux Med Onkologia Sp. z o.o.	100% LUX MED Sp. z o.o.
LUX MED Sp. z o.o.	100% Bupa Investments Overseas Limited
LUX MED SZPITAL GDAŃSK S.A.	91,97 % LUX MED Sp. z o.o.
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
MED POLONIA Sp. z o.o.	100% LUX MED Sp. z o.o.
Medika Usługi Medyczne Sp. z o.o.	100% LUX MED Sp. z o.o.
Mediss Dental Clinic Sp. z o.o.	100% LUX MED Sp. z o.o.
Medtour Sp. z o.o.	100% LUX MED Sp. z o.o.
MegaMed Sp. z o.o.	100% LUX MED Sp. z o.o.
Opole Dental Sp. z o. o.	100% LUX MED Sp. z o.o.
Orthos Szpital Wielospecjalistyczny Sp. z o.o.	100% LUX MED Sp. z o.o.
ORTOPEDICUM Sp. z o.o.	100% LUX MED Sp. z o.o.
Pory 78 Sp. z o.o.	100% LUX MED Sp. z o.o.
Projekt Uśmiech BIS Sp. z o.o.	100% LUX MED Sp. z o.o.
Silver Dental Clinic Sp. z o.o.	100% LUX MED Sp. z o.o.
SMART SMILE Sp. z o.o.	100% LUX MED Sp. z o.o.
Sport Medica S.A.	100% LUX MED Sp. z o.o.
Swissmed Nieruchomości Sp. z o.o.	100% Swissmed Centrum Zdrowia S.A.
Swissmed Opieka Sp. z o.o.	100% Swissmed Centrum Zdrowia S.A.
Szpital Św. Elżbiety Sp. z o.o.	100% Swissmed Centrum Zdrowia S.A.
Tomograf Sp. z o.o.	100% LUX MED Sp. z o.o.

As at 31 December 2024, the table reflected the following status. In 2025, by the time this Report was prepared (May 2025), the following changes had taken place:

- LUX MED Tabita Sp. z o.o. changed its name to LUX MED CENTRUM OPIEKI I REHABILITACJI Sp. z o.o.
- CENTRUM MEDYCZNE OMEGA Sp. z o.o. was incorporated into LUX MED Sp. z o.o.
- Centrum Opieki Medycznej COMED Sp. z o.o. in liquidation was dissolved
- HIFU Clinic Sp. z o.o. was merged with LUX MED Onkologia Sp. z o.o.
- LUX MED Sp. z o.o. acquired 100% of the shares in Medical Magnus Sp. z o.o.

Quantitative environmental data

302-1, 302-3

Table 1.1. Energy consumption by source and intensity

		2023	2024	Change [%]
Total energy consumption from non-renewable resources (MWh)	Natural gas	3,886.4	4,017.4	3.4
	Fuel oil	177.9	194.9	9.5
	Diesel	1,758.9	995.9	-43.4
	Petrol	4,272.4	5,172.2	21.1
	LPG	8.5	0.0	-100
	Total	10,104.2	10,380.4	2.7
Energy generation from renewable sources (MWh)	Solar	-	48.9	100
	Total	-	48.9	100.0
Purchased energy (MWh)	RES electricity	20,079.0	27,997.0	39.4
	Electricity	10,378.6	4,330.4	-58.3
	Heat energy	26,297.7	26,189.9	-0.4
	Cooling energy	210.5	525.9	149.9
	Total	56,965.8	59,043.2	3.6
Total energy consumption in the organisation (MWh)		67,069.9	69,472.5	3.6
Total energy consumption from non-renewable sources (MWh)		46,990.90	41,426.6	-11.8
Total energy consumption from renewable sources (MWh)		20,079.0	28,045.9	39.7
Energy intensity (MWh/m ²)*		0.27	0.25	-5.8

* 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 m², and in 2024: 277,078 m².

305-1, 305-2, 305-3

Table 1.2. Total direct and in indirect greenhouse gas emissions

	GHG emissions [tCO ₂ e]			2024 vs 2023		2024 vs 2019	
	Base year 2019	2023	2024	Change [tCO ₂ e]	Change [%]	Change [tCO ₂ e]	Change [%]
Direct Scope 1 emissions	3,609.0	3,431.0	3,639.5	208.5	6.1%	30.44	0.8%
Indirect Scope 2 emissions (location-based)	21,283.2	24,246.9	24,906.3	659.5	2.7%	3,623.13	17.0%
Indirect Scope 2 emissions (market-based)	18,405.1	14,289.5	8,845.9	-5,443.5	-38.1%	-9,559.19	-51.9%
Total emissions – Scope 1 and 2 (location-based)	24,892.2	27,677.9	28,545.8	867.9	3.1%	3,653.6	14.7%
Total emissions – Scope 1 and 2 (market-based)	22,014.2	17,720.5	12,485.4	-5,235.1	-29.5%	-9,528.8	-43.3%
Indirect Scope 3 emissions	4,875.8	4,492.7	5,017.0	524.3	11.7%	141.2	2.9%
Total (location-based)	29,768.0	32,170.6	33,562.8	1,392.2	4.3%	3,794.8	12.7%
Total (market-based)	26,889.9	22,213.2	17,502.4	-4,710.8	-21.2%	-9,387.6	-34.9%

305-1, 305-2, 305-4

Table 1.3. GHG emissions by source

		GHG emissions [tCO ₂ e]			2024 vs 2023		2024 vs 2019	
	Emission source	Base year 2019	2023	2024	Change [tCO ₂ e]	Change [%]	Change [tCO ₂ e]	Change [%]
Direct Scope 1 emissions	Fuel consumption for heating and/or cooling	926.4	761.7	817.9	56.3	7.4%	-108.5	-11.7%
	Fuel consumption in vehicles	1,984.5	1,366.4	1,373.9	7.6	0.6%	-610.6	-30.8%
	Refrigerants	206.2	194.2	287.1	92.9	47.8%	80.8	39.2%
	Anesthetics	491.9	1,108.7	1,160.5	51.8	4.7%	668.6	135.9%
Indirect Scope 2 emissions (location-based)	From electricity generation	16,680.0	18,862.4	19,475.5	613.1	3.3%	2,795.4	16.8%
	From heating and cooling generation	4,603.2	5,384.5	5,430.9	46.4	0.9%	827.7	18.0%
Indirect Scope 2 emissions (market-based)	From electricity generation	13,802.0	8,905.0	3,415.1	-5,489.9	-61.7%	-10,386.9	-75.3%
	From heating and cooling generation	4,603.2	5,384.5	5,430.9	46.4	0.9%	827.8	18.0%
Indirect Scope 3 emissions	Scope 1 and 2 energy consumption	598.1	492.8	511.7	18.9	3.8%	-86.4	-14.4%
	Transmission and distribution losses 3	4,108.6	3,892.3	4,367.1	474.8	12.2%	258.5	6.3%
	Business travel	169.1	107.6	138.2	30.6	28.4%	-30.9	-18.3%
Total emissions – Scope 1 and 2 (location-based) and Scope 3		29,768.0	32,170.6	33,562.8	1,392.2	4.3%	3,794.8	12.7%
Total emissions – Scope 1 and 2 (market-based) and Scope 3		26,889.9	22,213.2	17,502.4	-4,710.8	-21.2%	-9,387.6	-34.9%
Energy intensity index (tCO₂e/m²)*		0.09	0.07	0.05	-0.02	-35.6%	-0.02	-48.8

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 CO₂ emissions to the atmosphere, contributing to an increase in Scope 1 emissions.

* Intensity is measured as the ratio of total greenhouse gas emissions in Scope 1 and 2 (in tCO₂e, market-based) to the total surface area of all properties in square meters. Surface area in 2022: 236,044 m², in 2023: 251,962 m², and in 2024: 277,078 m².

306-3

Table 1.4. Waste

Type of waste	Waste generated (Mg)	
	2023	2024
Packaging waste; sorbents, wiping cloths, filter materials, and protective clothing not included in other categories	0.43	0.81
Waste from construction, renovation and dismantling of buildings and road infrastructure (including soil and earth from contaminated sites)	0.90	1.86
Medical and veterinary waste (excluding kitchen and restaurant waste not related to health or veterinary care)	351.80	364.82
Waste not included in other groups	17.29	24.71
Total	370.42	392.20

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.

The data pertains to waste generated in LUX MED Sp. z o.o.

Quantitative social data

2-7

Table 2.1. Employees on fixed-term and open-ended employment contracts

	Employees on employment contracts					
	2023			2024		
	Women	Men	Total	Women	Men	Total
Fixed-term	1,061	215	1,276	1,212	277	1,489
Open-ended	4,555	907	5,462	4,974	1,033	6,007
Total	5,616	1,122	6,738	6,186	1,310	7,496

2-7

Table 2.2. Employees on employment contracts by working hours

	Employees on employment contracts					
	2023			2024		
	Women	Men	Total	Women	Men	Total
Full-time	5,061	989	6,050	5,455	1,126	6,581
Part-time	555	133	688	731	184	915
Total	5,616	1,122	6,738	6,186	1,310	7,496

2-8

Table 2.3. Other data on persons cooperating with the LUX MED Group

	Persons performing work who are not employees	
	2023	2024
Total	18,950	21,413

The data was compiled taking into account the number of persons, regardless of their working hours. The table presents the status at the end of the reporting period (as at 31 December 2023 and 31 December 2024).

403-9

Table 2.4. Number of accidents in the LUX MED Group

	2023	2024
Accidents among employees		
Minor accidents	52	62
Serious accidents	–	–
Fatal accidents	–	–
Collective accidents	–	–
Total number of accidents	52	62
Workplace accident rate*	5.4	4.5
Main type of accidents recorded: injuries from medical instruments		
Accidents among non-employees		
Minor accidents	69	70
Serious accidents	–	–
Fatal accidents	–	–
Collective accidents	–	–
Total number of accidents	69	70
Main type of accidents recorded: injuries from medical instruments		

In 2024, numerous preventive and corrective measures were implemented, including training, updating procedures, introducing new personal protective equipment, meetings with medical management, and replacing toxic preparations with less harmful alternatives.

*The indicator was calculated as the number of accidents divided by the number of hours worked and multiplied by 1,000,000.

404-1

Table 2.5. Average hours of training in the LUX MED Group

Average hours of training per employee* by employment structure						
	2023			2024		
	Total number of training hours	Total number of employees in the organisation	Average number of training hours per employee	Total number of training hours	Total number of employees in the organisation	Average number of training hours per employee
Senior management	10,308	250	41.2	1,163	77	15.1
Other employees	164,484	25,438	6.5	348,675	28,832	12.1
In total, employees at all levels	174,792	25,688	6.8	349,838	28,909	12.1

The difference in values for senior management compared to 2023 results from the fact that in 2024 a narrower definition of senior management was adopted, including members of the Management Board of LUX MED Sp. z o. o., directors and managers reporting to the Management Board, and members of the management boards of subsidiaries.

* In the table, employees and associates are referred to collectively as employees.

404-3

Table 2.6. Percentage of employees* under regular performance and career development reviews

	Percentage of employees* under regular performance and career reviews					
	2023			2024		
	Total number of employees under regular reviews	Total number of employees in the organisation	Percentage of employees under regular performance and career development reviews	Total number of employees under regular reviews	Total number of employees in the organisation	Percentage of employees under regular performance and career development reviews
Senior management	250	250	100%	55	55	100%
Management	–	–	–	992	992	100%
Other employees	25,438	25,438	100%	2,791	6,449	43%
In total, employees at all levels	25,688	25,688	100%	3,841	7,496	51%

Differences in results between 2023 and 2024 are due to a change in methodology. In 2024, the report includes only those individuals who are subject to regular performance reviews linked to goal achievement and covered by the bonus system. Senior management is 100% covered by goal-achievement discussions. In 2024, work was undertaken to update the organisation's competency model, and preparations were made for its implementation in 2025. Under the new framework, every employee will undergo at least one formal review per year, assessing work quality, competencies, and career development opportunities.

Senior management – includes Members of the Management Board of LUX MED Sp. z o.o., directors and managers reporting directly to the Board, as well as management board members of subsidiaries.

Management – individuals managing at least one other person, not classified as senior management.

* Data for 2024 cover employees only, while 2023 figures include associates as well.

405-1

Table 2.7. Diversity among employees at the LUX MED Group by gender, age group and job level

2024	Percentage of employees by age and gender		
	Women	Men	Total
<30 years	19%	4%	23%
31–50 years	48%	11%	58%
>50 years	16%	3%	19%
Total by gender	83%	17%	100%

Data per:		Number of people		2023		2024	
				W	M	W	M
Senior management	quantitative			19	18	28	27
	percentage			51	49	51	49
>51 years	quantitative			5	5	12	11
	percentage			50	50	52	48
31–50 years	quantitative			14	13	16	16
	percentage			52	48	50	50
<30 years	quantitative			0	0	0	0
	percentage			0	0	0	0
Management	quantitative			716	159	812	180
	percentage			82	18	82	18
>51 years	quantitative			174	33	197	36
	percentage			84	16	85	15
31–50 years	quantitative			509	118	564	127
	percentage			81	19	82	18
<30 years	quantitative			33	8	51	17
	percentage			80	20	75	25
Employees	quantitative			4,881	945	5,344	1,102
	percentage			84	16	83	17
>51 years	quantitative			936	133	994	160
	percentage			88	12	86	14
31–50 years	quantitative			2,696	555	3,013	647
	percentage			83	17	82	18
<30 years	quantitative			1,249	257	1,337	295
	percentage			83	17	82	18
In total, employees at all organisational levels, including:	quantitative			5,616	1,122	6,186	1,310
	percentage			83	17	83	17
>51 years	quantitative			936	133	1,204	207
	percentage			88	12	85	15
31–50 years	quantitative			2,696	555	3,594	791
	percentage			83	17	82	18
<30 years	quantitative			1,249	257	1,388	312
	percentage			83	17	82	18

GRI Index

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GRI Standards/Other Sources	Disclosure	Possible reference to ESRS	Page in Report
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	404-3 Percentage of employees receiving regular performance and career development reviews	ESRS S1-13	67, 108
Material topic: Diversity and Inclusive Culture			
GRI 405: Diversity and equal opportunity	405-1 Diversity of governance bodies and employees	ESRS 2 GOV-1; ESRS S1-6, S1-9, S1-12	61, 108
	405-2 Ratio of basic salary and remuneration of women to men		58
GRI 406: Non-discrimination	406-1 Incidents of discrimination and corrective actions taken	ESRS S1-17	63
Material topic: Business ethics and transparency			
GRI 205: Non-corruption	205-3 Confirmed incidents of corruption and actions taken	ESRS G1-4	86
GRI 206: Anti-competitive behaviour	206-1 Legal actions for anti-competitive behaviour, anti-trust, and monopoly practices	N/A	86
Material topic: Supply chain and supplier relations			
GRI 308: Supplier environmental assessment	308-1 Suppliers that were screened using environmental criteria		92
GRI 414: Social assessment in the supply chain	414-1 Suppliers that were screened using social criteria		92
Material topic: Privacy and data security			
GRI 418: Customer privacy	418-1 Incidents of data security and privacy breaches	N/A	

List of policies in force within the LUX MED Group

Policy name	Policy objective	Key provisions
Brand & Reputation Management Policy	To ensure the development, promotion and protection of the LUX MED Group's brand and reputation through the consistent use of brand identity (visually and tonally) and coherent, effective communication, both external and internal.	<ul style="list-style-type: none"> a) Safeguarding the brand and reputation (in processes of change to existing and introduction of new products, in marketing and advertising campaigns, announcement of partnerships, mergers and acquisitions, recruitment processes, consumer matters, etc.) b) External communication and relations (including communication with the media, social media communication, representing the company externally or entering into partnerships on behalf of the company – such actions must be undertaken in consultation with and with the approval of the external communications department). c) Crisis communication (additionally governed by the Procedure: Crisis Communication Management in the LUX MED Group). d) Use of the brand (both in internal and external communication).
Capital Management Policy	To establish clear principles under which the LUX MED Group ensures that it manages its capital as efficiently as possible, while maintaining sufficient capital to protect the interests of its clients and meet the expectations of regulators, rating agencies and other key stakeholders.	<ul style="list-style-type: none"> a) Insurance companies are required to comply with capital requirements, identify and review risks, determine the Solvency Intervention Ladder ratio and report it quarterly, as well as report any actions that may affect liquidity. b) Other companies should, among other things, maintain positive equity and comply with capital requirements, monitor cash flows and conduct quarterly reviews of capital and liquidity-related risks.
Clinical Governance Policy	To define the LUX MED Group's approach to maintaining and continuously improving clinical governance and clinical risk management, in order to make the Group the most patient/client-oriented organisation. Clinical governance is understood as 'a systematic approach to implementing, maintaining and continuously improving the quality and safety of the services we provide and contract'.	<ul style="list-style-type: none"> a) Clear guidelines on leadership (clinical oversight, clinical governance committees and subcommittees). b) Guidelines regarding the qualifications of staff providing care and clinical treatment, including information on training, access to continuous professional development, and systems for managing, monitoring and assessing staff performance and staffing levels in line with patient needs and regulatory requirements. c) Provisions regarding legal compliance, safety, clinical compliance assurance, quality improvement, clinical risk management and cooperation with third party providers.

Policy name	Policy objective	Key provisions
Conflicts of Interest Policy	A conflict of interest may affect the ability of the LUX MED Group and its employees to act fairly and transparently, and may harm one or more of our clients. This policy sets out the principles of managing the risk arising from ineffective identification and management of conflicts of interest.	<ul style="list-style-type: none"> a) Control principles and tools b) Establishment of the Conflicts of Interest Management Committee c) Identification and analysis of the risk of actual conflicts of interest d) Implementation of tools aimed at preventing conflicts of interest e) Employee training on the Conflicts of Interest Policy
Financial Crime Risk Policy	To define the requirements for managing the risk of financial crime within the organisation, such as sanctions, external and internal fraud, corruption, facilitation of third-party tax evasion, money laundering and sanctions breaches.	<p>Five main pillars of the policy:</p> <ul style="list-style-type: none"> a) Tone from the top (management must actively promote and raise awareness of the Financial Crime Risk Policy) b) Governance and resources (ensuring that each entity has sufficient, competent and appropriate experience to effectively manage the Financial Crime Risk Policy) c) Risk assessment (assigning risk to each category of financial crime) d) Control framework (designing, implementing and documenting controls) e) Incident management (recording and maintaining statistics of potential financial crimes)
Financial Reporting Control Policy	To establish clear principles for maintaining a robust financial control environment across the LUX MED Group, in order to prevent and protect against material misstatements in financial information (including internal management information and externally reported information), and to safeguard the organisation against financial losses and reputational damage resulting from errors and fraud.	<p>The policy addresses the following categories of risks:</p> <ul style="list-style-type: none"> a) Misstatement of financial information or regulatory reporting b) Non-compliance with International Financial Reporting Standards c) Misstatement of management information d) Misappropriation of cash <p>Key requirements of the policy include:</p> <ul style="list-style-type: none"> a) Financial control environment and Internal Control over Financial Reporting (ICFR) b) Compliance with Technical Accounting Policies c) Model risk management

Policy name	Policy objective	Key provisions
Information Security Policy	To define the requirements for managing information security, including personal data of our employees, patients, clients, suppliers, business partners and other business information.	<p>The policy addresses the following categories of risks:</p> <ul style="list-style-type: none"> a) Unavailability of services or information b) Data leakage / exfiltration c) Information / data manipulation <p>Policy Requirements:</p> <ul style="list-style-type: none"> a) The LUX MED Group must effectively manage risks in the area of Information Security. b) The LUX MED Group must protect information using appropriate techniques, business processes and technologies (the policy includes a list of standards). c) To safeguard information, the LUX MED Group must implement appropriate technical controls (the policy includes a list of measures).
Insurance Risk Policy	To define the principles of effective management of insurance risk in the insurance business of the LUX MED Group.	<p>This policy contributes to ensuring consistent, efficient and effective practices across Bupa's insurance business units.</p> <p>Key requirements of the policy include:</p> <ul style="list-style-type: none"> a) Application of proportionality and materiality b) Identification and classification of insurance risk c) Monitoring, assessment and management of insurance risk d) Supporting standards
Legal Policy	To explain the position and responsibilities established for managing legal risk and to set out the key principles to be followed to ensure that the organisation is protected from excessive legal risk and its potential consequences, and that it conducts its activities responsibly and lawfully.	<p>This policy defines key requirements for managing the following legal risks:</p> <ul style="list-style-type: none"> a) Legislative risk b) Contractual risk c) Non contractual rights risk d) Non contractual obligations risk e) Risk of disputes (litigation or non-litigation)
M&A, Strategic Partnerships and JV Enterprise Policy	To ensure a structured approach and robust management standards in the assessment of acquisition targets, business area divestment processes and the establishment of appropriate approval processes, as well as to ensure consistency and quality across all stages of transactions, while adhering to the relevant decision-making and review mechanisms, ensuring that the LUX MED Group uses its resources efficiently.	<p>Mandatory requirements of the policy include:</p> <ul style="list-style-type: none"> a) Planning (a thorough assessment and due diligence of strategic / joint venture partners must be carried out, as well as a clear definition of the intended purpose and scope of the partnership / venture) b) Confirmations (to be implemented in line with the guidelines on M&A management and approvals) c) Minimum requirements d) Post-acquisition and integration activities e) Documentation f) Monitoring and reporting

Policy name	Policy objective	Key provisions
Operational Resilience Policy	To define how the LUX MED Group maintains operational resilience, understood as the ability to anticipate, prepare for, respond to and adapt to gradual changes and sudden operational disruptions.	<p>The aim of this policy is to protect clients, patients, employees, partners and society at large, safeguard the LUX MED Group's reputation, demonstrate commitment to meeting regulatory expectations and support long-term stability, commercial position and the ability to achieve strategic objectives.</p> <p>Internal and external events that may cause significant operational disruptions include:</p> <ul style="list-style-type: none"> a) Natural disasters, climate change and specific weather phenomena b) Utility outages and supply chain failures c) Technological failures d) Accidental or malicious security breaches, including cybersecurity breaches e) Political instability, social unrest, acts of terrorism f) Disease outbreaks and pandemics g) Failures of control mechanisms or systems <p>The policy sets out procedures to be followed in the event of such incidents.</p>
Property Policy	To ensure proper management of the property portfolio and the processes necessary to integrate new assets into the LUX MED Group, whether through lease or acquisition. Additionally, to ensure a safe environment where all property-related risks are appropriately identified and managed, meeting legal and regulatory requirements and ensuring proper functioning of infrastructure, as well as to establish an orderly, transparent and controlled process for construction, renovation or adaptation of properties and their commissioning.	<p>The policy requirements relate to:</p> <ul style="list-style-type: none"> a) Rules on purchase and sale, including mergers and acquisitions of property, joint ventures b) Property management c) Construction and capital projects d) Strategic objectives
Privacy Policy	To maintain the trust of patients/clients/employees of the LUX MED Group by ensuring the responsible and secure processing of personal data.	<p>This policy defines the principles for handling personal data, particularly special category data, relating to our patients (and their family members), policyholders, suppliers, business partners, app users and LUX MED Group employees.</p> <p>Key principles and requirements of the policy concern: processing of personal data and transparency of its use, scope, retention period and security of data, data protection and risk management, control mechanisms, monitoring and implementation of legal changes, regular training for individuals involved in personal data protection.</p>

Policy name	Policy objective	Key provisions
Regulatory Compliance & Conduct Risk Policy	To define high-level requirements for managing regulatory compliance and conduct risk. To establish clear accountability for regulatory risk and to set requirements that support open, transparent and constructive relationships with regulators.	<ul style="list-style-type: none"> a) Defines high-level requirements for managing regulatory compliance and risks arising from client relationships b) Clearly assigns accountability for compliance with regulatory requirements and conduct risk c) Ensures a high standard of requirements to support open, transparent and constructive relationships with regulators d) Sets requirements for managing conduct risk in insurance business activities and in cases where the entity is the payer for claims e) Emphasises the key role of compliance leadership f) Ensures active involvement of management in managing regulatory and conduct risk g) Establishes responsibility for all employees to fulfil their role in accordance with regulatory and internal organisational requirements h) Regulatory relationship management – a dedicated person in each entity i) Conduct risk – clients must receive appropriate information and support that meets their needs
Risk Management Police	To establish a consistent and systematic approach to identifying, assessing, managing, monitoring and reporting risk, and to ensure a decision-making process within defined risk appetites.	<p>Effective risk management ensures that patients, clients, employees of the LUX MED Group, as well as its reputation, finances and regulatory relationships, are protected from the impact of potential risks.</p> <p>The policy covers the following areas:</p> <ul style="list-style-type: none"> a) Appropriate oversight b) Culture and responsibilities c) Risk appetite d) Risk management framework structure e) Internal control system f) Incident management g) Monitoring and reporting
Subsidiary Governance Policy	To establish corporate governance standards that must be applied in all subsidiaries. Requires the Organisation to apply robust governance frameworks to reduce legal and regulatory risk. Contributes to promoting a culture of good governance across all services and activities of the Organisation.	<p>Requirements arising from the policy:</p> <ul style="list-style-type: none"> a) Reporting all changes in positions within subsidiaries b) Documented and functioning rules for managing subsidiaries c) Obligation to keep minutes of all Management Board meetings <p>All employees are required to familiarise themselves with the Policy Set, support local procedures and ensure compliance with both general and role-specific requirements.</p>

Policy name	Policy objective	Key provisions
Suppliers Policy	To ensure effective processes for supplier selection, contracting and management throughout the supplier lifecycle, enabling proper risk management related to suppliers.	<ul style="list-style-type: none"> a) Addresses risks related to 'improper contracting' and 'non-performance by suppliers' b) Employees of LUX MED Group involved in supplier selection must be able to demonstrate compliance with this policy and other procurement procedures. <p>Includes details on:</p> <ul style="list-style-type: none"> a) Supplier repository b) Supplier segmentation c) Outsourcing of services d) Supplier selection process e) Supplier due diligence process f) Supplier sustainability/ESG requirements g) Contracting h) Supplier management i) Payments and related handling j) Monitoring and reporting
Tax Policy	To define roles and responsibilities in managing tax risk and to establish the core principles to protect the LUX MED Group from adverse tax consequences.	<p>The Group is obliged to comply responsibly with tax law, ensuring that taxes are paid in the jurisdictions in which it operates, in line with applicable law and practice.</p> <p>Policy Requirements:</p> <ul style="list-style-type: none"> a) Identification, assessment and control of tax risk b) Fulfilment of tax obligations c) Tax advisory d) Cooperation with tax authorities, audits and proceedings e) Monitoring.
Technology Management Policy	The purpose of this policy is to define the requirements for technology management within the Organisation.	<p>These requirements apply not only to the systems and solutions managed by the IT and Projects Division, but also to those overseen by other organisational units of the LUX MED Group.</p> <p>Key requirements of the policy include:</p> <ul style="list-style-type: none"> a) Asset management b) Incident management c) Problem management d) Change management e) Configuration management f) Technological resilience and flexibility g) Data backups h) IT systems capacity management i) Employee education and awareness j) Application development.

Policy name	Policy objective	Key provisions
Treasury Policy	The aim of this policy is to limit exposure to liquidity risk, counterparty risk related to investments, and interest rate risk to acceptable levels, in line with the defined risk appetite.	<ul style="list-style-type: none"> a) The company should primarily finance itself through internal loans. b) Any external financing requires the approval of the LUX MED Chief Financial Officer, in particular leasing agreements and factoring. c) The company is obliged to monitor its liquidity. d) The company must invest its cash in safe instruments to minimise the risk of fraud or loss of funds. e) ESG (Environmental, Social and Governance) issues and climate impact must be considered in every investment decision. f) Investments related to the tobacco industry, arms production, and thermal coal are prohibited. g) Derivative instruments are prohibited. h) Currency or interest rate speculation is prohibited. i) All payments require dual authorisation.
Speak Up Policy	<p>The Speak Up Policy enables the reporting of irregularities through a free helpline and a dedicated online whistleblowing platform.</p> <p>Reports may be made by persons who have reasonable suspicion of an irregularity concerning any individual or entity supplying goods or providing services to the LUX MED Group. The Speak Up Policy allows authorised persons to report irregularities confidentially and anonymously. The Speak Up Policy forms the basis for the Procedure: Reporting breaches of law and taking follow-up actions (Speak Up).</p>	<p>Policy requirements:</p> <ul style="list-style-type: none"> a) Building awareness and trust (informing about the Speak Up Policy at the stage of employment and during its course, instructing how to make a report and how reports are managed) b) Assigning appropriate resources (duties of the Speak Up Officer and additional persons with relevant competences) c) Speak up, listen and take action (appropriate management of the reporting process) d) Protection and support (for whistleblowers) e) Compliance with law and internal regulations (processes must comply with applicable laws, regulations and professional standards) f) Maintaining appropriate registers (appropriate digital registers of all reports and proceedings – ensuring full confidentiality) g) Monitoring and reporting

Policy name	Policy objective	Key provisions
Wellbeing, Health and Safety Policy	Caring for the comfort, health and safety of our employees, patients, clients, guests and other persons directly affected by our activities is a key element in achieving our goals.	<ul style="list-style-type: none"> a) Leadership and employee engagement (setting wellbeing, health and safety objectives, engaging the Management Board and management team, involving employees in the process to express their views on the wellbeing, health and safety management system) b) Planning (identifying hazards, risk assessment, assessment of legal requirements) c) Support and action (developing, implementing and monitoring control and critical measures relating to wellbeing, health and safety management and ensuring appropriate reporting, determining resources for their implementation) d) Effectiveness assessment (internal control) e) Improvement (identifying non-conformities and opportunities to improve the wellbeing, health and safety management system).
Sustainability Policy	This Policy highlights the responsibility of the LUX MED Group for contributing to the achievement of the Sustainability Strategy objectives and supports its implementation by addressing risks related to achieving the plans. It also sets out the general expectations regarding the way of operating and the requirements for ensuring compliance.	<ul style="list-style-type: none"> a) An implementation plan for the Sustainability Strategy is required, which properly defines local priorities and objectives and introduces appropriate processes, procedures and systems to identify, monitor and reduce the organisation's and its activities' impact on the environment. b) The LUX MED Group is obliged to verify and monitor material environmental, social and governance issues. c) Governance rules must be established and implemented to monitor and ensure the delivery of the Sustainability Strategy, and persons responsible for its implementation must be appointed. d) The LUX MED Group must accurately measure, report and track progress in achieving the objectives, and the ESG Team is required to cooperate with relevant teams across the company to ensure proper data collection.

Policy name	Policy objective	Key provisions
People Enterprise Policy	The aim of this Policy is to protect employees from unfavourable treatment as a result of HR practices, ensure effective workforce planning and fulfilment of staffing requirements, maintain a suitably qualified and competent workforce, and sustain a positive organisational culture.	<ul style="list-style-type: none"> a) Appropriate management of resources and employee turnover is necessary, as well as implementing effective employment planning methods and processes. Employee verification and evaluation must be documented, and individuals appointed to director and/or senior manager positions must be assessed to ensure their suitability in line with local legal or regulatory requirements. b) Training must be provided to support employees in performing their tasks according to required standards, and succession plans must be in place for each position identified as critical. c) Employment rules, practices, contracts and collective agreements must comply with the LUX MED Group Code of Conduct and values. Employee wellbeing must be supported, health and safety management continuously improved, and employees' personal data collected and processed in accordance with data protection principles. d) All employees should be regularly invited to take part in the People Pulse survey. Managers should act on feedback received. Employment practices must be non-discriminatory and foster inclusion. An appropriate action plan supporting social inclusion is required.
Solvency II Reporting Policy	To establish a framework ensuring compliance with the Solvency II Directive (2009/138/EC of the European Parliament) and to define the requirements and principles regarding the management of Solvency II data quality.	<ul style="list-style-type: none"> a) Defining roles and responsibilities for reporting in accordance with legal requirements. b) Regulatory reporting must be prepared in line with methodological documentation as well as process and control documentation, in order to ensure the accuracy, completeness, adequacy, and quality of data. c) Controls must be designed and implemented appropriately to the size and nature of reporting, and control evidence must be retained. d) Materiality, validation of individual components of regulatory reporting, expert assessments, and data quality must comply with Solvency II standards. e) Risks exceeding the defined threshold must be reported.

Contact

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We encourage you to share any feedback, observations or questions you might have after reading our report.



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