Sustainability Report

2025

GRUPA LUXMED

Jesteśmy częścią Bupa

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A Few Words from the CEO

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Dear Readers,

We present to you the summary of the year 2025 – a period of intensive development, key investments, and further strengthening our position as an organisation responsibly meeting the health needs of patients. The past months were a time of dynamic changes for the LUX MED Group, carried out with the goal of increasing access to medical services, raising the quality of care, and building a modern healthcare system.

In 2025, we opened 23 new medical centres and one new hospital for our patients, consistently expanding our presence across Poland. At the same time, we opened 137 new outpatient doctor's offices, launched 20 rehabilitation stations, and equipped our diagnostic centres with three new MRI scanners. We also continued the modernization of medical spaces, creating interiors inspired by nature and designed according to neuroscience principles to support patient comfort and well-being.

One of the most important events of the year was the inauguration of the Higher School of Medical Sciences, which began operating in October 2025. The university launched its first degree programs: Nursing, Physiotherapy, Quality Management in Healthcare, and Modern Management in Healthcare. For us, this is a significant step toward actively supporting the development of medical personnel in Poland.

The past year also brought the expansion of our medical offering. We introduced genetic counselling and the ‘My Genetic Health’ programme, which includes DNA testing packages that allow identifying predispositions to selected diseases, including cancer, as well as supporting the selection of effective and safe therapies. We believe that personalized medicine will play an increasingly prominent role in effective prevention and treatment.

An important element of the LUX MED Group's development was also acquisitions and the expansion of specialized services. In April, we acquired Medical Magnus Clinic in Łódź – a multi-specialty medical centre offering comprehensive hospital, outpatient, and diagnostic care. Two dental entities also joined the Group – A2 Clinic and Dentika. At the same time, we opened four new dental centres, bringing the total number of dental units at our disposal to 462 by the end of the year.

We also significantly developed the area of mental health. Completing the acquisition of 7 facilities from the Mental Path network and launching 4 new clinics allowed us to double our psychiatric-psychological care offering and respond even more broadly to the growing needs of patients in this area.

In 2025, we also continued our efforts towards energy transition and reducing the environmental impact of our operations. In June, photovoltaic farms covered by a vPPA contract began operation, enabling the entirety of the LUX MED Group's energy demand to be covered by electricity from zero-emission sources.

We continuously promote a healthy lifestyle and physical activity. The anniversary 5th edition of the Healthy Cities challenge engaged thousands of participants and yielded tangible environmental results – over 17,000 trees were planted, 6 hectares of peatlands were revitalized, and funds were allocated to support local ecological initiatives. This year, we also carried out the fourth edition of the Healthy Cities Index and the second edition of the Healthy Cities Congress: People – Business – Environment, creating a space to discuss the quality of life and health of residents in Polish cities.

We attach great importance to supporting sports and physical activity. In 2025, we became the exclusive Medical Partner of the Polish Athletics Association and the Main Medical Partner of the Polish Sports Association for the Disabled 'START'. We also continued our cooperation with the Polish Olympic Committee, the Polish Paralympic Committee, and the 'Maraton Warszawski' (Warsaw Marathon) Foundation.

The past year was also important for the development of the health insurance segment. The Polish Financial Supervision Authority granted LUX MED Ubezpieczenia Towarzystwo Ubezpieczeń i Reasekuracji S.A. a license to conduct insurance and reinsurance operations in Poland. This is a significant step that strengthens our capacity for further growth in this field.

It is also particularly worth highlighting that in December 2025, LUX MED Onkologia obtained accredited status by decision of the Minister of Health. This accreditation confirms the highest standards of quality and safety in care for oncology patients.

The year 2025 was a time of further growth, investment, and building a modern, responsible medical organization. I would like to thank all employees, partners, and patients for their trust and shared commitment to creating a healthcare system that meets the challenges of the future in line with the principles of sustainable development.

I hope you find this report insightful.

Anna Rulkiewicz
CEO
The LUX MED Group

The LUX MED Group ESG Strategy

As the LUX MED Group, in 2023 we adopted a Sustainability Strategy for 2023–2025, focused on three pillars: planetary health (environmental aspect), societal health (social responsibility aspect), and organisational health (corporate governance aspect). Below are the specific goals within each pillar, alongside the actions taken to achieve them in 2025:

Health of the Planet

STRATEGIC GOALS

- 14% reduction in Scope 1 and 2 CO_2 emissions by 2025*
- Implementation of at least one scalable circular solution annually

ACTIONS TAKEN IN 2025

- In 2025, Scope 1 and 2 emissions were reduced by 57.9% compared to the 2019 baseline year, and by 25.8% compared to 2024.
- In 2025, we carried out the Paperless project, monitoring paper consumption, and implemented a pilot project across 10 selected LUX MED medical facilities aimed at reducing print volume.

Health of the Society

STRATEGIC GOALS

- People Pulse survey score at a minimum level of 80
- Direct health prevention initiatives to a total of 2 million people
- Patient NPS® at a minimum level of 64

ACTIONS TAKEN IN 2025

- Maintained high employee engagement — score of 85/100 in the People Pulse survey.
- Directed our health prevention initiatives to over 2 million people.
- Our goal for 2025 was to achieve an NPS score of 75 — we met this, reaching 75.2.

Health of the Organisation

STRATEGIC GOALS

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

ACTIONS TAKEN IN 2025

- In 2025, 98% of reports to the Ethics Committee were reviewed within 3 months of receipt. For one report, due to its complex nature, the process was extended and completed before the six-month mark.
- ESG risk assessment is performed on an ongoing basis, giving us even better control over this area across the organisation.
- We implemented the document in 2024 and share it with our suppliers upon establishing cooperation.

* Goal set for the entire Bupa Market Unit (Europe & Latin America).

We have begun implementing our new ESG Strategy for 2026–2027. Our goals are:

Improving access to healthcare

UN Sustainable Development Goals

STRATEGIC GOALS FOR 2026–2027

- Implementation of the **Mental Care** mental health application within 2 years
- Directing health prevention initiatives to **2 million people annually**
- Patient NPS® at a level of **77 in 2026** and **78 in 2027**

Healthier and more inclusive communities

STRATEGIC GOALS FOR 2026–2027

- Positive social impact of the **Healthy Cities c**ampaign reaching **200,000 people** within two years
- Continuation of the **Healthy Cities Index** and the **Healthy Cities Congress**
- People Pulse survey results – target by the end of 2027:
  Engagement index: **min. 85/100**
  Inclusivity index: **min. 85/100**

Human health and environmental health

STRATEGIC GOALS FOR 2026–2027

- GHG Emissions (Scope 1 and 2) – **maintaining emissions** at an unchanged level despite business growth
- GHG Emissions (Scope 3) – **calculation of Scope 3 emissions** across all material categories for the LUX MED Group
- Training on the LUX MED Group ESG strategy for the **100** largest suppliers by turnover by the end of 2027

Responsible and transparent leadership

STRATEGIC GOALS FOR 2026–2027

- **Mandatory training** – completed by **95% of employees** by the end of 2027
- Ensuring an annual **development review and competency feedback** for **90%** of non-medical employees and associates by the end of 2027
- Implementation of annual **OHS** self-audits in at least 50% of medical facilities

General Information

Basis of Preparation

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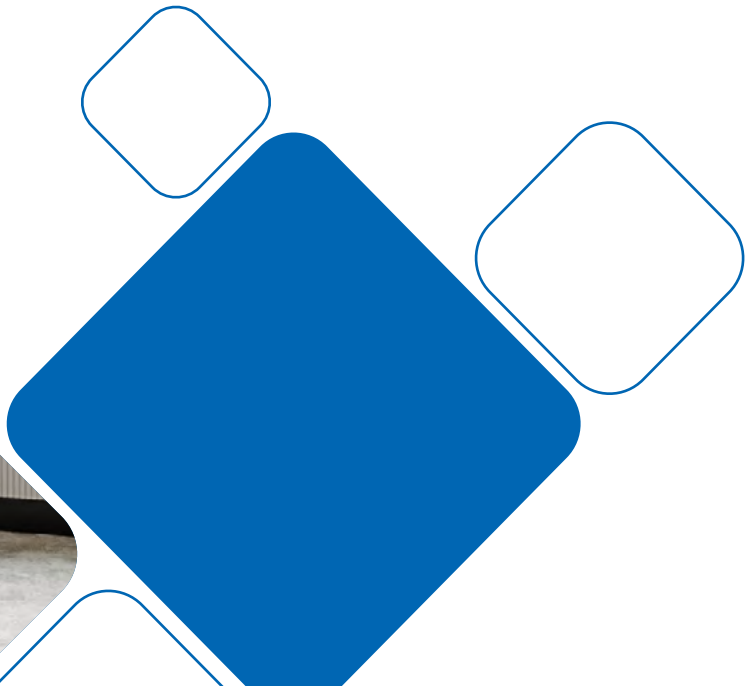
We prepared this report based on the non-financial reporting standards developed by the GRI Universal Standard, which have been in effect since 2021. Previous editions of our report were also based on the requirements of this document. The reporting scope is consistent with the consolidation scope used in the LUX MED Group's consolidated financial statements for 2025.

The sustainability report covers the period from 01 January 2025 to 31 December 2025, and the information and indicators refer to the LUX MED Group, unless stated otherwise in the text. This publication is the fourth ESG report of the LUX MED Group – the first was published in 2023, and since then we have been publishing subsequent reports on an annual basis.



Material Impacts, Risks, and Opportunities

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At the LUX MED Group, we strive to align our strategy with stakeholder expectations and ensure transparency in sustainability. The materiality assessment conducted in 2022 according to GRI standards served as the foundation for our ESG Strategy for 2023–2025 as well as our Sustainability Reports for 2023 and 2024.

In order to achieve full compliance with ESRS (European Sustainability Reporting Standards) requirements in the future, we expanded our analysis in 2023 to include the financial aspect. Details of this analysis can be found in the Sustainability Report for 2023 and for 2024, and its results are presented below. The list of material topics was also used in preparing the current report.

Area	Topic	Identified Risks
Environment	Waste and hazardous materials management	• Risk of insufficient mitigation of the impact of adverse climate change on patients and employees • Risk of failure to implement the company's strategy to combat climate change
	Energy consumption and greenhouse gas emissions	
Society	Shaping healthcare accessibility	• Risk of limited medical staff resources on the Polish market
	Data privacy and security	• Risk regarding cybersecurity and data protection
	Quality and safety of care	• Risk of failing to provide appropriate oversight over treatment quality • Risk of failing to meet patient expectations regarding the offered care model
	Responsible marketing communication	• Risk of inappropriate marketing communication regarding offered products and services
	Labor policies	• Risk of decreased employee engagement
	Employee health and safety	• Risk of non-compliance with labour rights • Risk of occupational accidents and occupational diseases
	Climate change and its impact on population health	• Risk of undertaking social initiatives that do not meet the needs of the communities they are targeted at
	Social environment and charitable activities, social engagement	
	Employee education and training	• Risk of employees failing to complete mandatory training and lack of professional skills enhancement
	Diversity and inclusive culture	
Governance	Sustainable supply chains	• Risk of failure to prevent financial crimes • Risk of improper third-party screening for financial crime risks and international sanctions compliance, as well as lack of awareness regarding sanctions
	Business ethics and transparency	• Risks associated with maintaining an ethical corporate culture that supports sustainable development • Risk of non-compliance with regulatory environment requirements affecting organisational operations

About the LUX MED Group

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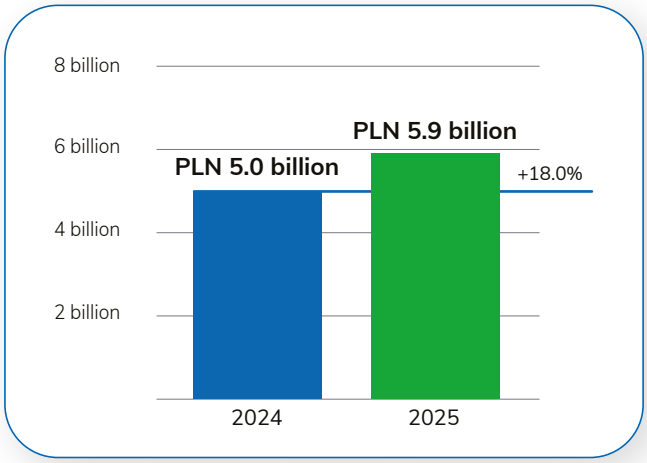
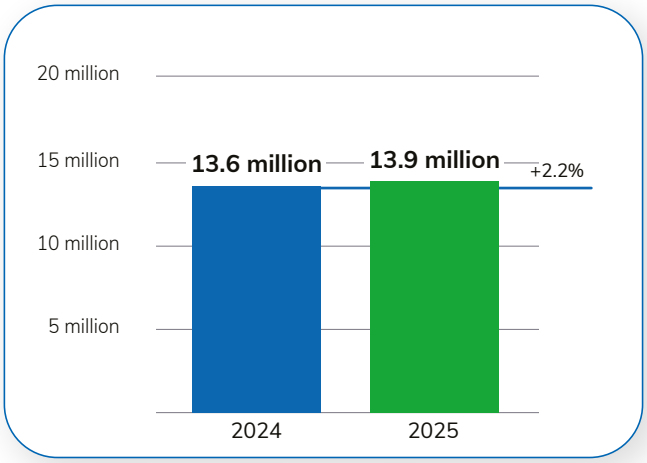
The LUX MED Group is a market leader in private healthcare services in Poland and part of Bupa, an international healthcare insurer and provider. The company has been providing services in Poland for over 30 years and offers comprehensive care: outpatient, hospital, diagnostic, rehabilitation, dental, psychological, and long-term care for over 3 million patients. They have over 300 public and workplace medical centres at their disposal, including 16 hospitals and approximately 3,000 partner clinics. The LUX MED Group employs nearly 30,000 people, including over 12,000 doctors and 8,000 other healthcare professionals. In its daily operations, the group is guided by sustainability principles, undertaking numerous social and environmental initiatives. The LUX MED Group is the Main Medical Partner of the Polish Olympic Committee and the Main Medical Partner of the Polish Paralympic Committee.

Revenues:



Services provided in own centres:



Summary of key results for 2025

300 medical centres	**Nearly 30,000** employees	**Over 3 million** patients
Approx. 3,000 partner facilities	**Higher School of Medical Sciences**	**Patient NPS at 75.2**

2025 in Light of Key Events

For the LUX MED Group, 2025 was a year filled with challenges and breakthrough moments that significantly impacted the development of the organisation. Here are the most important ones — deserving special recognition:

We provided patients with 23 new facilities and 1 hospital to offer our services in an even broader scope.

In June, photovoltaic farms covered by a vPPA contract began operating. The zero-emission electricity generated by them covers 100% of the entire LUX MED Group's energy demand.

We organized the jubilee 5th edition of the Healthy Cities pro-health challenge, planting 17,051 new trees, revitalizing 6 hectares of peatlands, and allocating PLN 110,000 to support selected environmental initiatives. Furthermore, we conducted the 4th edition of the Healthy Cities Index and the second edition of the Healthy Cities Congress: People – Business – Environment.

In October, the Higher School of Medical Sciences began operation. The first degree programs launched are Nursing, Physiotherapy, Quality Management in Healthcare, and Modern Management in Healthcare.

We became the exclusive Medical Partner of the Polish Athletics Association and the Main Medical Partner of the Polish Sports Association for the Disabled 'START'. At the same time, we remained the main medical partner of the Polish Olympic Committee and the Polish Paralympic Committee, as well as the medical partner of the 'Maraton Warszawski' (Warsaw Marathon) Foundation.

In December 2025, by decision of the Minister of Health, LUX MED Onkologia (Szamocka Hospital, Fieldorfa Hospital, St. Vincent Hospital, St. Elizabeth Hospital) obtained accredited status. The accreditation confirms the high quality of health services provided and patient care safety.

We introduced genetic counselling and the option to perform a genetic testing package to our offering. The 'My Genetic Health' program involves DNA analysis to indicate predispositions to certain diseases including cancer, the efficacy and safety of using selected drugs, and comprehensive support in precision health management.

We opened 20 new rehabilitation stations, purchased 3 new MRI scanners for diagnostic facilities, and throughout 2025 we opened a total of 137 outpatient doctor's offices. We are also continuing the design transformation of our facilities — in line with neuroscience, we create nature-inspired interiors aimed at supporting patient well-being during visits.

The Polish Financial Supervision Authority unanimously granted LUX MED Ubezpieczenia Towarzystwo Ubezpieczeń i Reasekuracji S.A. a license to conduct insurance and reinsurance activities in Poland. This is a breakthrough moment for the LUX MED Group, significantly supporting the further development of the health insurance segment on the Polish market.

In April, we acquired Medical Magnus Clinic headquartered in Łódź. It is a multi-specialty medical centre providing patients with care in orthopaedics, traumatology, neurosurgery, neurology, general surgery, vascular surgery, plastic surgery, urology, chemotherapy and rehabilitation, supplemented by comprehensive outpatient care and diagnostic imaging.

Two entities from the dental sector joined the Group: A2 Clinic from Lower Silesia and Dentika from Mazovia. We also opened 4 new dental facilities. As a result, by the end of 2025, we had 462 dental units at our disposal.

In November, we finalized the acquisition of a network of 7 Mental Path mental health clinics operating in five cities: Warsaw (2 facilities), Kraków (2 facilities), Katowice, Sopot, and Rzeszów. This acquisition and the opening of 4 new clinics allowed us to double our psychiatric-psychological care offering.

Awards and Distinctions

Grand ESG 2025
Runner-up in the Best ESG Implementation Communication category for the 'Healthy Cities' project

Person of the Year – Grand ESG 2025
for Anna Rulkiewicz

Title of 'Creator of Health 2025
for Anna Rulkiewicz

ESG Ranking – Responsible Management
Runner-up in the Pharma and Medicine category

Service Quality Star 2025

JAKOŚĆ OBSŁUGI 2025

Top Brand 2025
in the Medical Care category

TOP MARKA 2025

Top Employer 2025 and 2026

Poland's Best Employers 2025
Winner in the Healthcare and Social Assistance category

Mobile Trends Awards 2024
Main award in the category 'Pro-Social / CSR Initiatives in Mobile' for the Healthy Cities Poland app

Power of Attraction
Grand prix in the category 'Building Positive Employee Experiences'

SIŁA PRZYCIĄGANIA 2023

Product of the Year 2024
for the Insurance Disease Support Program, in partnership with Nationale-Nederlanden

Mission, Vision, and Values

Mission

Helping people live longer, healthier, happier lives and making a better world.

Our mission is of immense value to us and is reflected in our daily work. We know that each of us, regardless of the department or area in which we work, contributes to its fulfilment. We are proud to belong to Bupa, a global provider of healthcare and insurance services.

We continue our efforts towards excellence in healthcare, promoting social responsibility and managing environmental issues to build a sustainable future for our patients, employees, and communities.

Vision

We listen to our patients, we care for each of them.

In every area of our organisation, we focus on understanding patient needs and feedback. We are always guided by their best interest, as they entrust us with their health.

Based on more than 1.5 million pieces of feedback annually, we design projects and implement initiatives aimed at improving the quality of our services.

Values

Courage
We seize opportunities and create new solutions.

Care
We act with empathy and respect.

Responsibility
We take responsibility for our decisions and actions.

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

Strategy, Business Model, and Value Chain

In 2025, due to our affiliation with Bupa, we adopted the Savannah27 Strategy, planned for implementation over the next three years. The strategy aligns with our Mission, Vision, and Values.

Summary of the Savannah27 Strategy Implementation in 2025

Quality

We refine service quality and improve the experiences of our patients. Our goal for 2025 was to achieve an NPS score of 75 – we met this, reaching 75.2. The goal for 2026 is an NPS score of 77, while maintaining high employee engagement (85/100 in the People Pulse survey).

Patients

We aim to serve 5 million patients by the end of 2027. We care about helping them live longer, healthier lives; hence, in 2025, we conducted health prevention education and expanded our product offering to include options such as genetic testing.

Growth and Development

Growth and development constitute LUX MED's DNA. On one hand, it means opening new facilities; on the other, consistently increasing our revenues. Strategic partnerships are key to reaching Customers with our hospital insurance on a broad scale. Following successful partnerships with Allianz, Nationale-Nederlanden, and Pru, we plan further collaborations in the coming years. We make every effort to ensure our growth is as sustainable as possible and aligned with our ESG strategy goals.

Medical Staff Education

Our response to the medical workforce shortage was opening the Higher School of Medical Sciences in 2025. We believe that staff educated in a modern way, with hands-on vocational training within the LUX MED network, will support Poland's entire healthcare sector. We also conducted numerous training sessions for our medical staff and organized nationwide conferences for doctors.

Digital Transformation

We are successfully migrating our data and systems to the cloud. The year 2025 was also focused on laying the foundations for the safe use of artificial intelligence, as well as advancing projects in AI and automation. We recognize that AI is not a short-term project, but a fundamental pillar of our digital transformation journey.

Our Services

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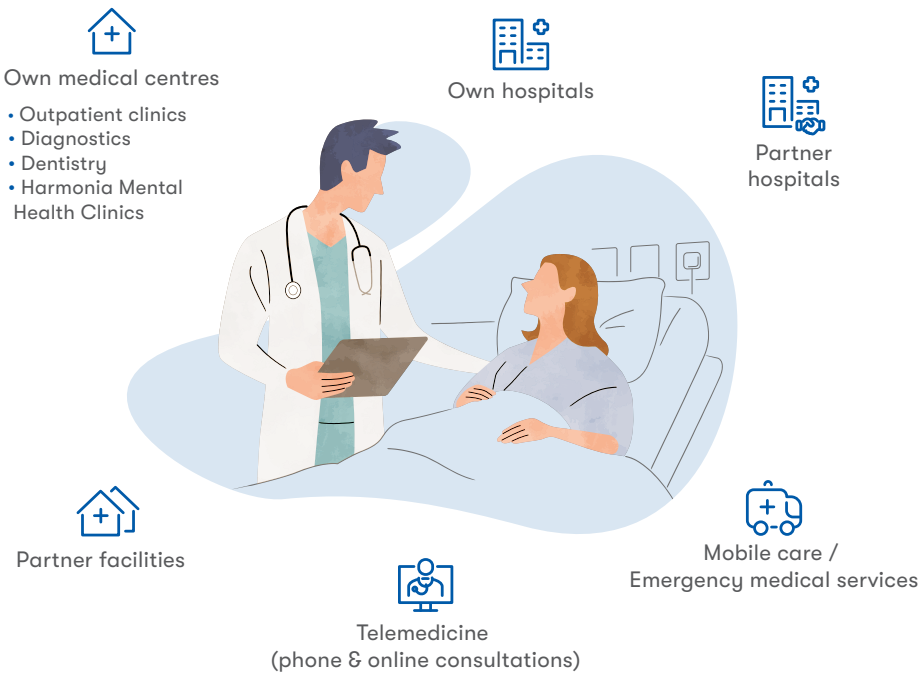
Our goal is to ensure every patient feels heard, understood, and supported with appropriate care. Patients can choose from a wide range of medical packages or purchase individual visits as needed. We also offer insurance products, which, alongside subscription plans, serve as an additional financing option for healthcare services.

Whether individual or corporate, our clients care about health and understand its value. LUX MED Group's ambition is not only to tailor services to existing needs, but also to advise and suggest optimal solutions that ensure longer, healthier, and happier lives.

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

Holistic Care for Patients



Access to a broad network of facilities and convenient booking options via:

- Patient Portal
- Centre Reception Desk
- Call Centre
- E-market / Website

Comprehensive Care

Long-term Care:

LUXMED CENTRUM OPIEKI I REHABILITACJI

Start-up:

LUXMED BENEFITY

Training:

CENTRUM EDUKACJI MEDYCZNEJ
GRUPA LUXMED

University:

WYŻSZA SZKOŁA NAUK MEDYCZNYCH

Insurance:

LUXMED UBEZPIECZENIA

Diagnostics:

LUXMED DIAGNOSTYKA

LUX MED Group Medical Centres

Over 300 owned facilities across several dozen cities in Poland. We offer a wide range of services, including medical consultations, primary healthcare, occupational medicine, laboratory tests, outpatient procedures, rehabilitation, various vaccinations, health check-ups, and preventive packages. Patients can access consultations from multi-specialty doctors.

LUX MED Group Hospitals

We have 16 owned hospitals across Poland. We offer our patients hospital care spanning fields such as oncology, general surgery, urology, gynaecology, proctology, cardiology, orthopaedics, ENT (laryngology), ophthalmology, and emergency care. We provide services covered by the National Health Fund (NFZ), through our LUX MED Full Care Hospital Insurance (LUX MED Pełna Opieka), and on a fee-for-service basis.

LUX MED Diagnostyka

Our network includes nearly 40 specialized diagnostic centres located in 20 cities. We offer comprehensive diagnostic tests, including MRI, CT scans, mammography, ultrasound, and X-ray. We also conduct mammography screenings in mobile units (mammobuses) and stationary facilities in selected locations.

ApteGo

An online platform enabling patients to easily check medicine availability at selected pharmacies and reserve them. It is integrated with thousands of operating pharmacies across Poland.

LUX MED Stomatologia

The network covers 65 dental facilities. In 2025, we implemented integrated solutions for patients, including treatment plans and a new dental diagram.

HARMONIA Poradnia Zdrowia Psychicznego

Psychiatric-psychological clinics offering comprehensive support in mental health and personal development, including psychological and psychiatric consultations, therapy for couples, families, and children, psychotherapies, and diagnostics. In 2025, we provided inpatient care in 10 facilities alongside remote consultations across Poland. The offer also includes specialized programs dedicated to employers, such as Harmonia in Business.

Centrum Opieki i Rehabilitacji

The Care and Rehabilitation Centre is a facility for seniors requiring continuous care. It offers long-term and short-term stays, residential rehabilitation stays, day rehabilitation, and specialized rehabilitation (including neurological and orthopedic care), as well as restorative stays.

LUX MED Benefity

The Carrotspot platform from LUX MED Benefity allows convenient management of subscriptions, benefits, incentive schemes, analytics, the Social Benefits Fund (ZFŚS), goals, and surveys.

On 27 August 2025, the Polish Financial Supervision Authority, at the request of LUX MED Sp. z o.o. and LUX MED Investment S.A., unanimously authorised LUX MED Ubezpieczenia Towarzystwo Ubezpieczeń i Reasekuracji S.A. to conduct insurance and reinsurance activities.

The flagship product of the LUX MED Ubezpieczenia TUiR S.A. offer will be hospital insurance based on a unique solution in the form of hospital treatment and its coordination. Treatment will be possible in 16 of the LUX MED Group's own hospitals, as well as in partner hospitals throughout Poland. In addition to hospital insurance, the company will also offer outpatient insurance, travel medical expenses insurance and other insurance products. Obtaining the insurance licence is a milestone in our development. Insurance is one of the fastest-growing business lines within the Group. The establishment of the new company, LUX MED Ubezpieczenia Towarzystwo Ubezpieczeń i Reasekuracji S.A., will allow us to accelerate further and pursue our next ambitious goals.

The LUX MED Group's Insurance Business

Since 2011, LMG Försäkrings AB S.A. Branch in Poland has also operated within the LUX MED Group. The company offers health insurance for both business and individual customers. One of its key products is LUX MED Full Care Hospital Insurance, providing comprehensive hospital treatment – from diagnostics, through procedures, to rehabilitation. Patients are supported by Hospital Care Coordinators, who guide them through the treatment process and help with formalities. The LUX MED Full Care Hospital Insurance offer is available for both group and individual customers. As part of the business partnerships it establishes, the company also cooperates with other insurers. The result of this cooperation is joint products. With Nationale-Nederlanden it offers the Insurance Illness Support Programme, with Allianz the 'Hospital Treatment in Poland' product, and with Prudential Polska the 'Your Hospitalisation' insurance.

Wyższa Szkoła Nauk Medycznych

This is a modern university that began educating future medical specialists in October 2025 in Warsaw. Its current offer includes 5-year full-time master's studies in Physiotherapy and first-cycle studies in Nursing. The launch of a Paramedic Studies programme is also planned. The university has also introduced new postgraduate studies: Modern Healthcare Management and Quality Management in Healthcare.

Its aim is to prepare students to work in the dynamically developing healthcare sector. Studies at the WSNM (Higher School of Medical Sciences) enable students to train in clinical conditions, with the participation of patients, using LUX MED's modern infrastructure. Classes are conducted by experienced academic staff and practitioners. Added value will also come from supporting students in taking up employment in healthcare during and after their studies, as LUX MED anticipates continued cooperation with graduates of the Higher School of Medical Sciences.

Krzysztof Kurek MD PhD

Medical Director and Member of the Management Board of LUX MED, and Rector of the Higher School of Medical Sciences

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An asset of the Higher School of Medical Sciences is not only its rich infrastructure, but also its teaching staff, made up primarily of practitioners. We want to place particular emphasis on the practical aspects of education, to show LUX MED as a place where one not only learns, but also begins and continues a professional career.

Patient Portal

In 2025, the Patient Portal remains the main point of contact for our patients. More than 2 million users perform thousands of interactions with their care process every day. More than 50 functions available 24/7 make it possible to manage one's health, including: simple booking of services, completing the preliminary medical interview, viewing test results (including CT, MRI, X-ray), online consultations, contacting the doctor after a visit, prescription renewal and ordering medicines at the pharmacy. As part of the ongoing improvement of the Patient Portal, in 2025 we updated the presentation of treatment history and added two-factor login (MFA).

The Patient Portal is now the main channel of contact between the patient and LUX MED.

+158 m logins to the Patient Portal

+28 m booked visits

~1,4 m NFZ visits booked

900 k online consultations

+405 k new Patient Portal users

~720 k chats with doctors

~1.6 m prescriptions renewed online

~10 m subscription verifications

Patient Portal powered by Blua – more than 50 functions available online

Blua is the strategy under which we develop digital products and solutions that enable patients to better look after their health.

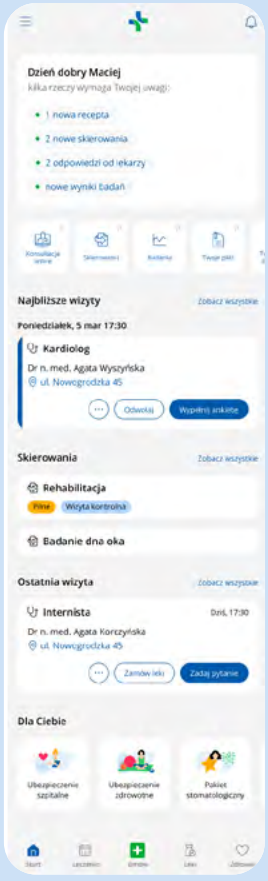
NOTIFICATIONS OF THE MOST IMPORTANT EVENTS

VIDEO/CHAT TELECONSULTATIONS

VISIT MANAGEMENT

BOOKING MEDICATIONS AT APTEGO

ONLINE PRESCRIPTION RENEWAL



ONLINE TEST RESULTS, CHECKING THE SCOPE OF THE SUBSCRIPTION

PRELIMINARY MEDICAL INTERVIEW QUESTIONNAIRE

E-REFERRALS ONLINE

CHAT WITH THE DOCTOR AFTER THE VISIT / ASK THE DOCTOR

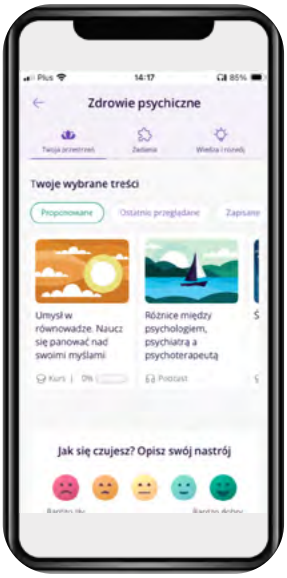
PREVENTIVE PLANS, ONLINE CARE PLANS

New Products

Mobile apps

In 2025 we continued to develop our Patients' digital experience. We launched a new Patient Portal function, LUX MED MentalCare, and a new First Aid application. **MentalCare** is a tool supporting mental health, which we made available as part of our offer in order to increase access to modern prevention and education tools. The solution was developed in cooperation with mental health specialists. The platform offers e.g. courses, podcasts, articles, psychological tests and a mood diary.

LUX MED First Aid is an application whose aim is to increase public health and safety through education, the provision of life-saving tools, and building readiness to administer first aid. It offers a set of functions supporting the user in emergency situations such as: cardiac arrest, choking, road traffic accidents, injuries, poisoning and haemorrhage. The user can make use of interactive step-by-step instructions, activate a metronome setting the rhythm of CPR (cardiopulmonary resuscitation) chest compressions, quickly connect to the emergency number, and also locate the nearest AED points, pharmacies and LUX MED facilities.



MENTAL HEALTH PLATFORM

FIRST AID

Mobile prevention zone

At the end of 2025 we created Poland's first mobile occupational medicine consulting room, the Mobile Prevention Zone, equipped with modern medical equipment.

The Mobile Prevention Zone was created with employers in mind who want to:

- efficiently carry out initial, periodic and follow-up medical examinations,
- limit production downtime and employee absences,
- take care of their team's health in a modern and responsible way.

We come to customers, and carry out examinations on the company's premises or at a designated location. This means the customer saves time and costs, and examinations are carried out in a comfortable and safe manner.

My Genetic Health

We have introduced a new service to the LUX MED offer that is changing the approach to health. The My Genetic Health programme is an analysis of the genome from our DNA, which makes it possible to identify predispositions to developing certain conditions (including cancers, cardiovascular and metabolic diseases), the efficacy and safety of the use of selected medicines, and comprehensive support in the precise management of health. The service responds to the growing needs of customers seeking personalised healthcare based on modern diagnostics.

The test is performed using NGS (next-generation sequencing) and comprises reading the full genome sequence (WGS – Whole Genome Sequencing). As part of the programme, more than 300 genes and 9 polygenic risk scores are analysed, relating to predispositions and elevated risk of both cancerous and non-cancerous diseases (including assessment of the risk of breast cancer, prostate cancer, hypertension and type 2 diabetes). As part of the service, genes associated with conditions for which preventive action can be taken are analysed. Patients also receive information on the safety and efficacy of the use of selected medicines, and information on characteristics of the body, including, for instance, control of the response to hunger, preference for sweet taste, tendency to weight gain and obesity, short-sightedness (myopia), and pain sensitivity.

The programme includes a medical consultation with a discussion of the results and personalised medical recommendations, preparation of a preventive screening plan, psychological support for people at high risk of monogenic diseases, and help in coordinating further diagnostics – should this prove necessary.

Participation in the My Genetic Health programme can provide information that is important not only for the patient's health but also for that of their family, e.g. when planning to have children, or where a detected variant is hereditary in nature.

More information: https://www.luxmed.pl/dla-pacjenta/uslugi/moje-zdrowie-genetyczne

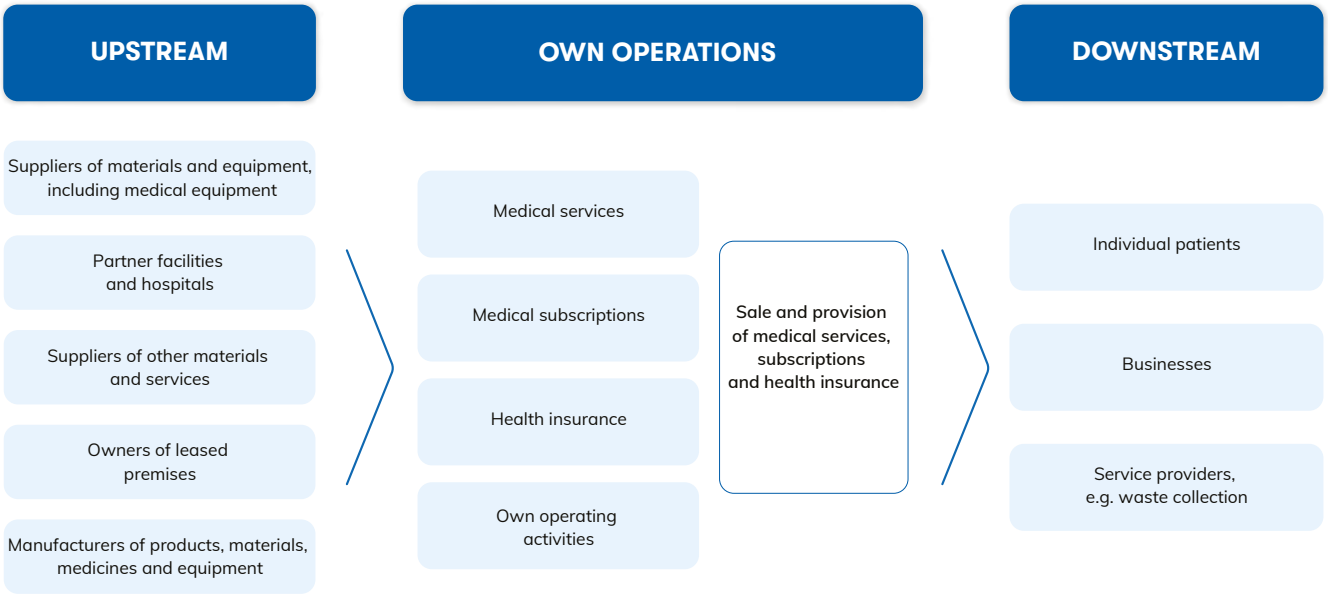
Patrycja Mikutaniec
Director of Sales Projects, Sales Strategy Department

My Genetic Health is another step towards the medicine of the future – personalised, predictive and responsible, which not only responds to patients' needs but anticipates them. By investing in genetic testing, we are investing in a healthier society – we are reducing the future burden on the healthcare system and building long-term value for patients, customers and the whole ecosystem. In 2025 we moved from concept to full-scale implementation of the My Genetic Health programme – building, from the ground up, a complete patient pathway: from qualification and sample collection, through advanced genome analysis, to the report, medical consultation, medical plan and personalised prevention plan, which translate genetic knowledge into concrete preventive and health decisions.

Value Chain and Stakeholders

2-6

We have developed our value chain based on the requirements of the ESRS and the EFRAG guidelines relating to the value chain. We present it in the diagram below:



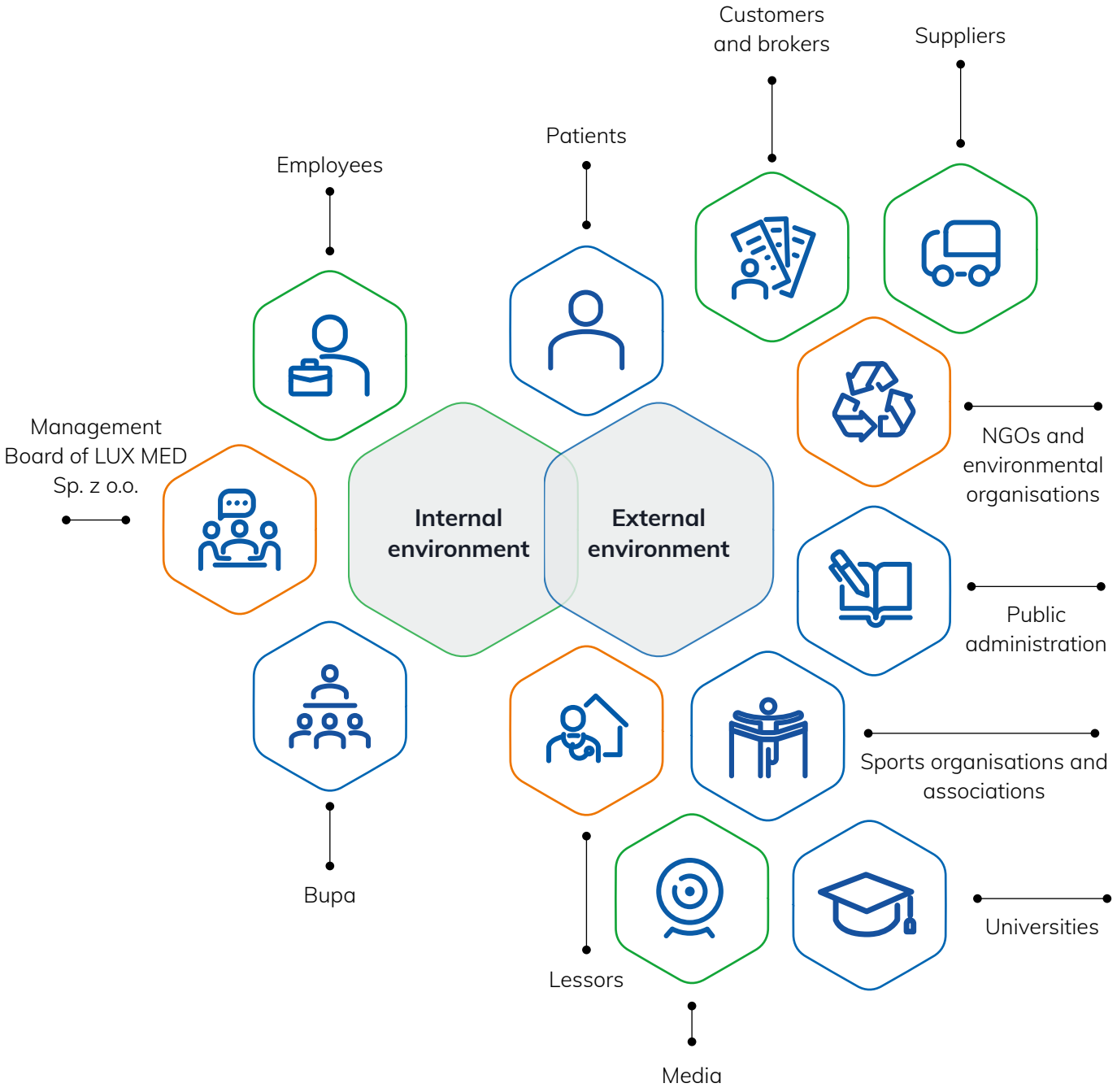
Our offer is dedicated to:

- **Individual customers and micro-businesses** – individuals or those running their own business, whom we reach through remote and traditional channels, aiming to match our product offer to their particular needs and requirements. Individual customers can make use of a subscription or insurance offer in various variants, supplementing it with individually or bundled services paid for on a one-off basis.
- **SME-sector customers** – a dynamically growing group of customers, among whom awareness of health needs is now no less than in large corporations. SME-sector customers expect an easily configurable offer that responds to everyday challenges, from occupational medicine examinations to the most extensive preventive activities, relating for instance to mental health.
- **Corporate customers** – in particular those for whom employee wellbeing is of the highest value. These are customers for whom the selection of a health offer constitutes a significant element of personnel policy and requires the medical service provider to take particular care in selecting the proposed solutions. We design product proposals in close cooperation with the customer, adapting solutions to specific needs – including offering tailor-made preventive activities, providing medical care in the workplace, or providing advice on wellbeing in the broad sense. The offer for the corporate customer therefore comprises flexible and extensive subscription or insurance programmes, supplemented with additional services selected to individual needs.

Dialogue with Stakeholders

2-29

Openness, honesty and mutual respect in dialogue with stakeholders form the basis for building trust, both within the organisation and beyond it. As part of the materiality analysis, we identified the most important stakeholder groups, listed below. We continuously monitor and improve our communication channels and methods of interaction, in order to best respond to the needs of those around us.



Stakeholder group	Stakeholder engagement approach	Purpose of dialogue
Internal environment		
Employees and associates	• Regular chats with the CEO of the LUX MED Group • Management Board meetings with employees at head office and in the Regions • Management staff meetings, internal meetings • Annual People Pulse employee opinion surveys • The option of reporting irregularities to the Ethics Committee and under the Speak Up procedure • Employee intranet – LUXtranet • Email communication from the Management Board and the management of individual organisational units regarding important events and projects • Internal thematic newsletters, e.g. the LUX MED Group newsletter, IT News, HR News, the Procurement Department newsletter, Risk & Compliance News • Information materials in staff rooms • Printed materials: brochures, leaflets, posters • Company events such as the Healthy Cities Congress or the LUX MED Group Pearls, at which ESG-related issues are also raised	We make sure that everyone employed within the LUX MED Group has access to information, out of concern for safety, fair treatment, equal opportunities and development opportunities. Feedback from employees and associates is equally important to us. Their engagement allows us to continuously improve internal processes and working conditions.
Management Board of LUX MED Sp. z o.o.	• Meetings with employees – Town Halls, chats, visits to the Regions • Meetings with management staff – strategy presentations • Email communication with LUX MED Group employees • Oversight of policies concerning e.g. ethical conduct, risk and compliance, and security • Oversight of the Ethics Committee's activities • Promoting and supporting actions for sustainable development – participation in conferences, discussion panels, interviews • Participation in ESG Committee meetings	We take care to build relationships and the flow of information between the Management Board and all stakeholders – both inside and outside the organisation. Such dialogue makes it possible to take into account a broad spectrum of needs and expectations when making decisions, which supports the company's sustained development.
Owner – Bupa (British United Provident Association Limited)	• Internal meetings with representatives of individual areas within Bupa • Town Halls with employees • Meetings of Bupa companies operating within one region (Market Unit) • Reporting on the achievement of objectives (including quarterly CO_2 emissions reporting) and locally implemented projects • Communication via the internal Workvivo platform • Implementation of Bupa policies and Strategy • Monitoring and reporting of risks • Applying for and reporting on funds from the Group Investment Fund	Cooperation with the owner enables effective monitoring of LUX MED Group's achievement of sustainable development goals. It also provides the basis for developing uniform strategies for action, ensuring consistency in how the whole Bupa Group operates
External environment		
Patients	• Patient Portal • Helpline • Social media • Website • Visit evaluation • 'Blisko Zdrowia' (Close to Health) magazine • Mailings • Marketing campaigns • Printed materials • Healthy Cities	We educate patients and provide them with reliable information about the services we offer, so that they can consciously look after their health. We collect information on the quality of, and satisfaction with, our services in order to continuously raise standards and never leave patients without a solution.
Customers and brokers	• Involving customers in ESG-area projects (e.g. Healthy Cities) • Providing potential customers with information on ESG indicators • Customer satisfaction and loyalty surveys · Social media communication channels • Trade and national press • Conferences, trade fairs • Broker Academy • Direct meetings with customers	We promote ethical conduct, transparency and responsibility in business.

Stakeholder group	Stakeholder engagement approach	Purpose of dialogue
NGOs and environmental organisations	• Direct meetings with NGOs • Joint projects in the area of sustainable development and community engagement (e.g. the Healthy Cities Index) • Industry conferences • Publications • Social media communication • Press releases, joint media initiatives • Activity within industry associations and organisations, e.g. the Renewable Energy Council, the Clean Air Council, the Green Transformation Council at the Lewiatan Confederation, Employers for Health	We cooperate with organisations in order to better understand the impact of climate change and environmental conditions on human health, and to jointly develop methods of managing the associated risks.
Public administration	• Cooperation with public institutions, ensuring compliance with all legal obligations, including environmental reporting (BDO, KOBiZE, CRO) • Joint presence of LUX MED and public administration representatives at national and industry congresses discussing health from both perspectives (public and private), e.g. the Economic Forum in Karpacz, the Healthcare Market Forum • Organisation of the Healthy Cities Congress, which has been held under the patronage of several public administration bodies and hosted their representatives	We ensure compliance with regulatory requirements and cooperate with the state in creating the healthcare system and increasing access to healthcare.
Media	• Press releases • Responding to journalists' questions • Interviews and commentary from LUX MED Group experts • Organisation of press conferences • Meetings at LUX MED Group's internal events • Meetings at industry events, congresses and national conferences • Social media: LinkedIn, X, Facebook, Instagram, YouTube	We actively build and maintain relationships in order to promote health and carry out activities related to preventive healthcare.
Lessors	• Meetings of the Administration and Investment Department team with lessors • Negotiation of green energy agreements	We hold discussions with lessees/lessors to ensure access to energy sourced from renewable sources.
Suppliers	• Initial and periodic supplier assessments • Sustainable supply chain principles for LUX MED Group suppliers • Meetings with suppliers regarding their decarbonisation targets • Entering into cooperation agreements that include anti-corruption and social-responsibility clauses	We take action to establish and maintain business relationships with suppliers who act in accordance with our ethical principles, in order to promote health, preventive healthcare and ethical conduct in business.
Universities	• Cooperation on research and innovation • Lectures and seminars • Educational programmes • Consultation and advisory services • Co-organisation of events	We cooperate with medical universities and engage in medical education, recognising the development of medical staff as a significant duty of a leader in the healthcare industry.
Sports organisations and associations	• Meetings and workshops • Partnership programmes • Information campaigns • Participation in sporting events	We engage in dialogue and develop cooperation in the area of promoting a healthy lifestyle and providing comprehensive medical support for athletes.

Governance Structure

2-9, 2-11

As at 31 December 2025, the Management Board of LUX MED Sp. z o.o. comprised six members: one woman (17%) and five men (83%). The President of the Management Board, Anna Rulkiewicz, also serves as Chief Executive Officer of LMG Försäkrings AB, whose branch operates in Poland under the LUX MED Ubezpieczenia brand. Detailed information presenting the experience and competencies of the members of management is available on the LUX MED Group website.

Within LUX MED Sp. z o.o. there operates a Management Team, comprising the Management Board and the Senior Management Team. Thanks to appropriate experience and competencies within their respective areas, the Management Team actively supports the implementation of the strategy. It comprises thirteen people in total, including five women (38%) and eight men (62%).

Anna Rulkiewicz
CEO, President of the Management Board

Michał Rybak
Vice-President of the Management Board for Operations

Dr n. med. 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 for Finance

Marta Bartosiewicz
Director, Marketing and Online Sales Division

Dorota Sawicz
Director, HR Division

Iwona Radko-Jarosińska
Director, Patient Experience Department

Adriana Żuber-Samborska
Director, Legal and Data Protection Department

Łukasz Niewola
Director, Corporate Communications and Sustainable Development Department

Kacper Ostrowski
Director of Strategy and Transformation

Sandip Godbole
Director of Risk and Compliance

Justyna Domienik-Karłowicz*
Director of Science, Chairperson of the LUX MED Group Scientific Council

* Joined the Management Team in January 2026.

2-10, 2-18

The appointment of Management Board members and of the directors and CEOs of subsidiaries reporting directly to the Management Board takes place in accordance with the internal Fit and Proper Person Policy standard. This standard sets out the principles for the proportionate assessment of the qualifications of all employees, appropriate to the scope of responsibility assigned to a given position. Its application assures the Board of the Bupa Group (the owner of the LUX MED Group), customers, suppliers and supervisory authorities that people holding positions on the Management Board and in director-level roles possess the appropriate competencies, as well as the ethical and professional qualifications, to enable them to perform their duties effectively. The standard applies across the whole of the LUX MED Group and covers all employees. In addition, candidates for managerial positions reporting to Members of the Management Board are verified against the LexisNexis database.

2-17

The Management Team develops its competencies in the area of sustainable development by participating in training courses and programmes. In 2025 these were:

- The 'Counteracting Greenwashing in the Organisation' training course conducted by EY, in which all members of the Management Team took part;
- The INSEAD 'AI for Business' programme, addressing e.g. the ethical and responsible implementation of AI within the organisation, in which two Members of the Management Board took part.

LUX MED Scientific Council

The Scientific Council acts as an expert advisory body that supports the development of the quality of medical care, as well as the scientific and educational directions of the LUX MED Group. It comprises 57 eminent professors and habilitated doctors of medical science, possessing extensive professional experience and a significant body of scientific work. The Chairperson of the Scientific Council is Prof. Justyna Domienik-Karłowicz MD PhD. The full list of Council members can be found at https://www.luxmed.pl/o-nas/rada-naukowa.

Tasks of the LUX MED Scientific Council

- **Monitoring new trends and achievements in medicine: T**he Scientific Council tracks the latest scientific and technological advances, which makes it possible to adapt LUX MED Group's offer to the latest standards.
- **Education and training:** Council members take part in developing educational programmes for medical staff and in training sessions, forums and conferences organised by the LUX MED Group Medical Education Centre.
- **Support for research and innovation:** The Scientific Council is involved in supporting and developing clinical research within the LUX MED Group, as well as the implementation of new technologies and digital tools.
- **Substantive advisory support:** The Scientific Council provides expert support in the area of medical development strategy and clinical and scientific matters, providing opinions on clinical, scientific and medical situations, thereby ensuring the highest quality of services provided by the LUX MED Group.

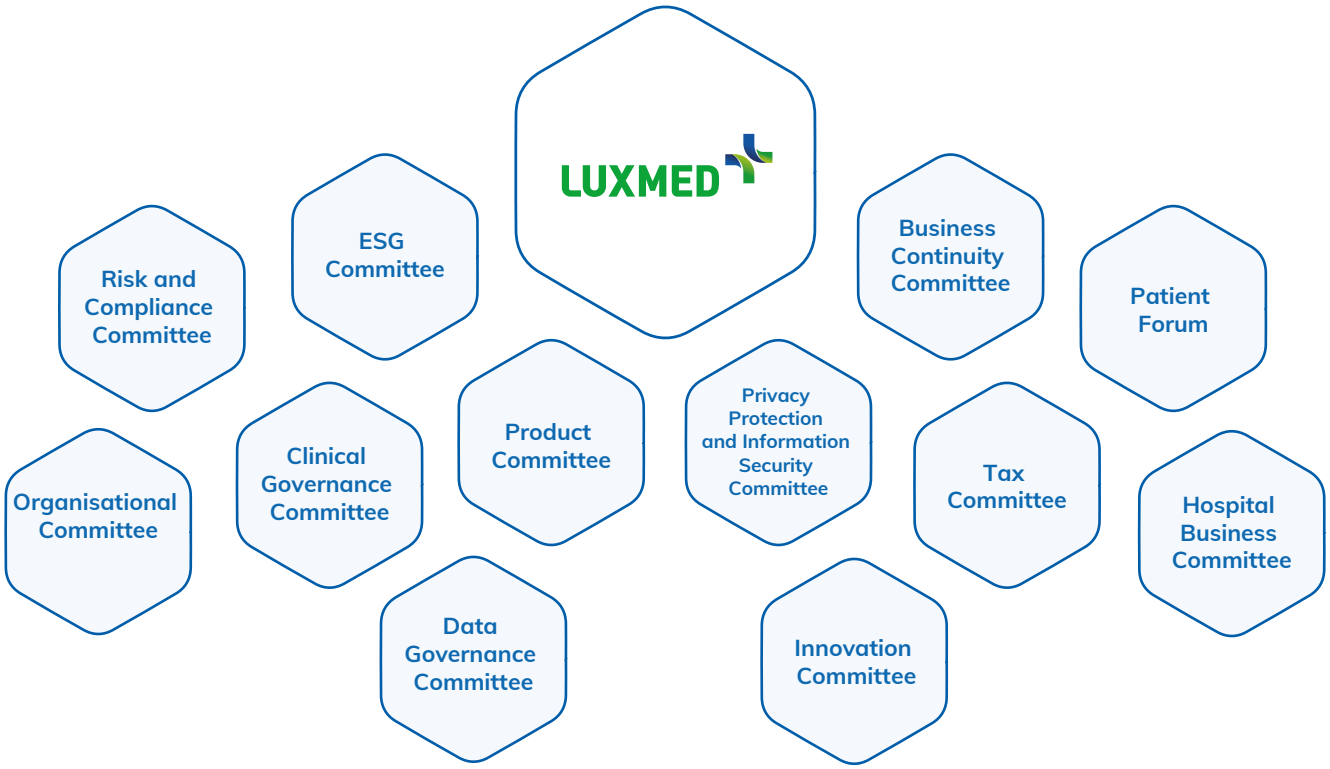
An expression of social responsibility is the organisation of free scientific forums with the participation of members of the LUX MED Scientific Council, which bring together a large group of representatives of the medical community from across Poland. They constitute an important platform for the exchange of knowledge, clinical experience and current recommendations based on established standards of practice, contributing to raising the quality of healthcare and developing the professional competencies of participants.

In 2025 the following were held: the Obesity Treatment Forum, the Paediatric Rheumatology Forum, and the Ophthalmology Forum.

Committees

2-10, 2-18

Standing committees operate within LUX MED Sp. z o.o., responsible for overseeing the smooth functioning of our organisation:



Committees are established on the basis of an order or resolution of the Management Board, and their members are appointed by the Management Board. Objectives, operating principles, tasks and the scope of responsibility are defined for each committee. Local functional committees may be established within subsidiaries, reporting to the central committees. Where necessary, people from outside the permanent membership may be invited to meetings. In the event of changes to the membership or scope of tasks of a committee, appropriate updating orders and information notices are prepared.

Management of the Sustainable Development Area

2-12, 2-13, 2-14

The ESG Committee performs an advisory and oversight function in matters relating to sustainable development. It is chaired by the President of the Management Board, and its membership comprises selected Members of the Management Board and representatives of the company's most important areas. The Committee meets as needed, at least once every 6 months, to discuss progress in the area of sustainable development and ESG reporting.

The Management Board is involved in the materiality analysis process and approves the Sustainability Reports.

Within the Corporate Communications and Sustainable Development Department there operates an ESG Team, chaired by the Head of ESG, who also serves as the Management Board's ESG Representative. This team is responsible for developing and implementing the ESG Strategy, coordinating ongoing ESG activities, sustainability reporting, and meeting regulatory requirements.

Reporting of greenhouse gas emissions falls within the remit of the Director of Corporate Communications and Sustainable Development, and the Director of the Finance Division, who analyse and approve the management data in this area on a quarterly basis.

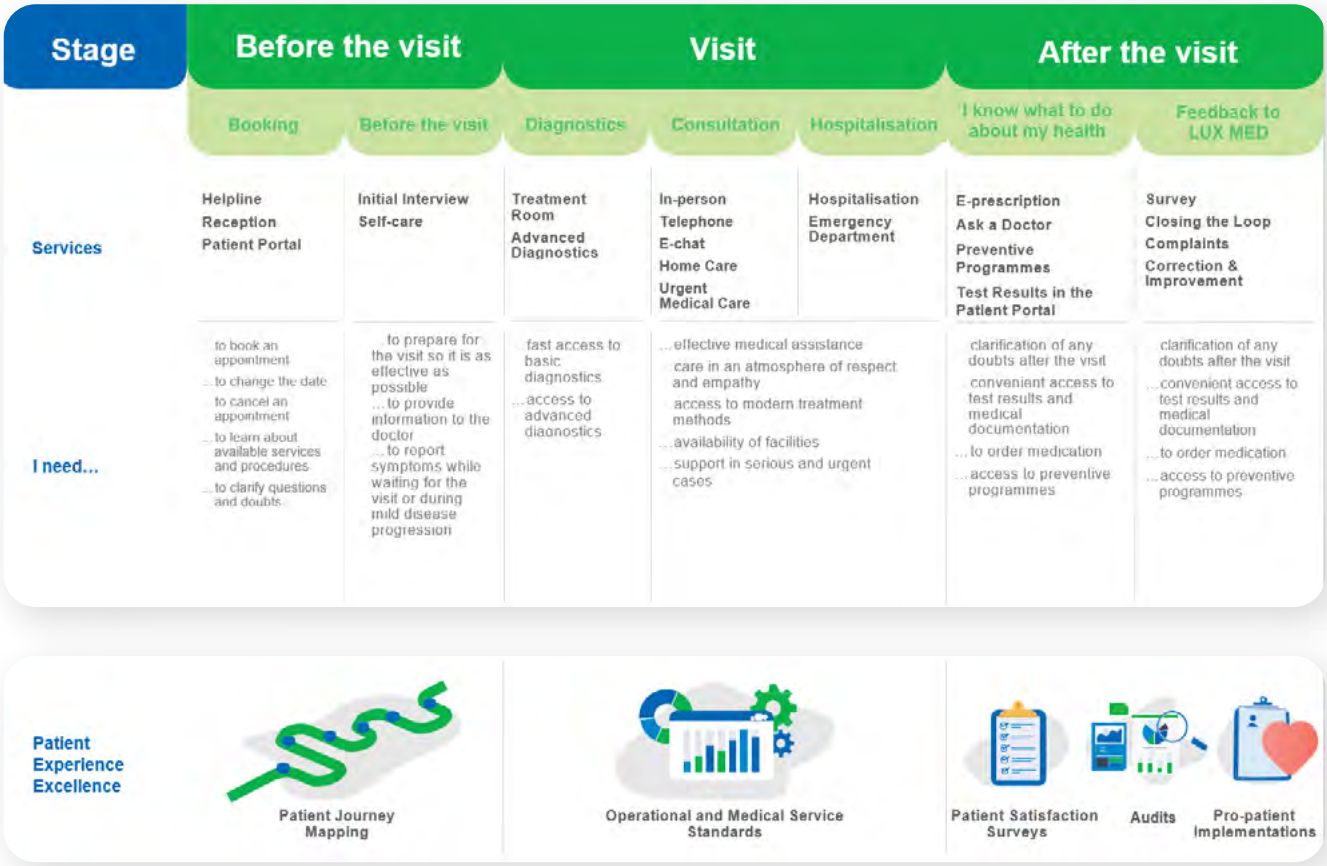
In addition, an ESG Group operates, made up of representatives of key organisational units. The purpose of the Group's meetings is to improve communication and increase the effectiveness of cross-functional ESG-related activities, as well as to support the development and implementation of the ESG Strategy. The results of its work are presented at meetings of the ESG Committee.

Patients

Managing the Quality of Patient Experience

Managing the quality of patient experience at the LUX MED Group is based on the systematic study of patient experiences and the consistent implementation of conclusions drawn from their feedback. In order to effectively improve the patient experience, we have created a coherent ecosystem of interlinked activities, carried out in parallel at all levels of the organisation. Their aim is the development of patient-centred care, understood as the totality of experiences encompassing e.g. the treatment process, the way care is organised, the quality of service, the accessibility of infrastructure, and contact with medical and non-medical staff. Studies of patient experience and improvement activities provide important decision-making support for developing teams' competencies, optimising processes and developing services, enabling patients to have convenient access to care at every stage of treatment.

The LUX MED Group Patient Experience Ecosystem



The Patient Experience Improvement System

The patient experience management system is focused on identifying patients' needs, designing patient-friendly processes, ongoing satisfaction monitoring, and rapid and adequate responses to reported comments. An important element of designing patient experience is Patient Journey Mapping, based on qualitative and quantitative research. This makes it possible to identify the key touchpoints between patients and LUX MED Group's medical care – both those rated highly and those requiring further improvement. Based on the mapping results, we formulate recommendations for process and service changes and develop service-operational and operational-medical standards.

A source of ongoing knowledge about patients' needs and satisfaction is also provided by survey research carried out at the most important touchpoints. The key measure of satisfaction is the NPS®[1] (Net Promoter Score) indicator, based on patients' answers to the question about their willingness to recommend LUX MED Group's services. This indicator represents the difference between the percentage of Promoters and Detractors among respondents. Survey results, including patient ratings and comments, are made available to employees on an ongoing basis via the Medallia system, which enables a rapid response to reported issues and, if the patient consents, additional direct contact. On the basis of the information obtained, we implement concrete changes and improvements that respond to patients' real needs and support the development of comfortable, effective and modern medical care. A team of auditors also takes part in the process of improving patient experience, monitoring areas requiring further quality-related action.

The Highest Quality of Patient Experience Is Our Goal

LUX MED Group's highest priority is to ensure patients feel comfortable and have access to medical care of the highest standard. Confirmation of this approach is the linking of the organisation's key development goals to patient satisfaction indicators and to the number of patient-focused improvements implemented each year – both at head-office level and at facilities across the whole Group. We are continuously raising the bar, striving for excellence and placing patients' wellbeing, safety and comfort at the centre of our activities.

Our efforts are bringing measurable results – in 2025 we improved two strategic measures:

- **NPS – 75.2** (4.7 points more than in 2024);
- **patient-focused initiatives implemented – 605** (178 more than in 2024).

Iwona Radko-Jarosińska
Director, Patient Experience Department

Every patient opinion matters to us, because behind each one is a specific story and a real need. We listen carefully, analyse, and translate these voices into action — from improvements in day-to-day service to better care coordination in more complex situations. We want patients to feel that they are being guided through the care system in a clear, empathetic and safe way.

1. Net Promoter®, NPS®, and 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.

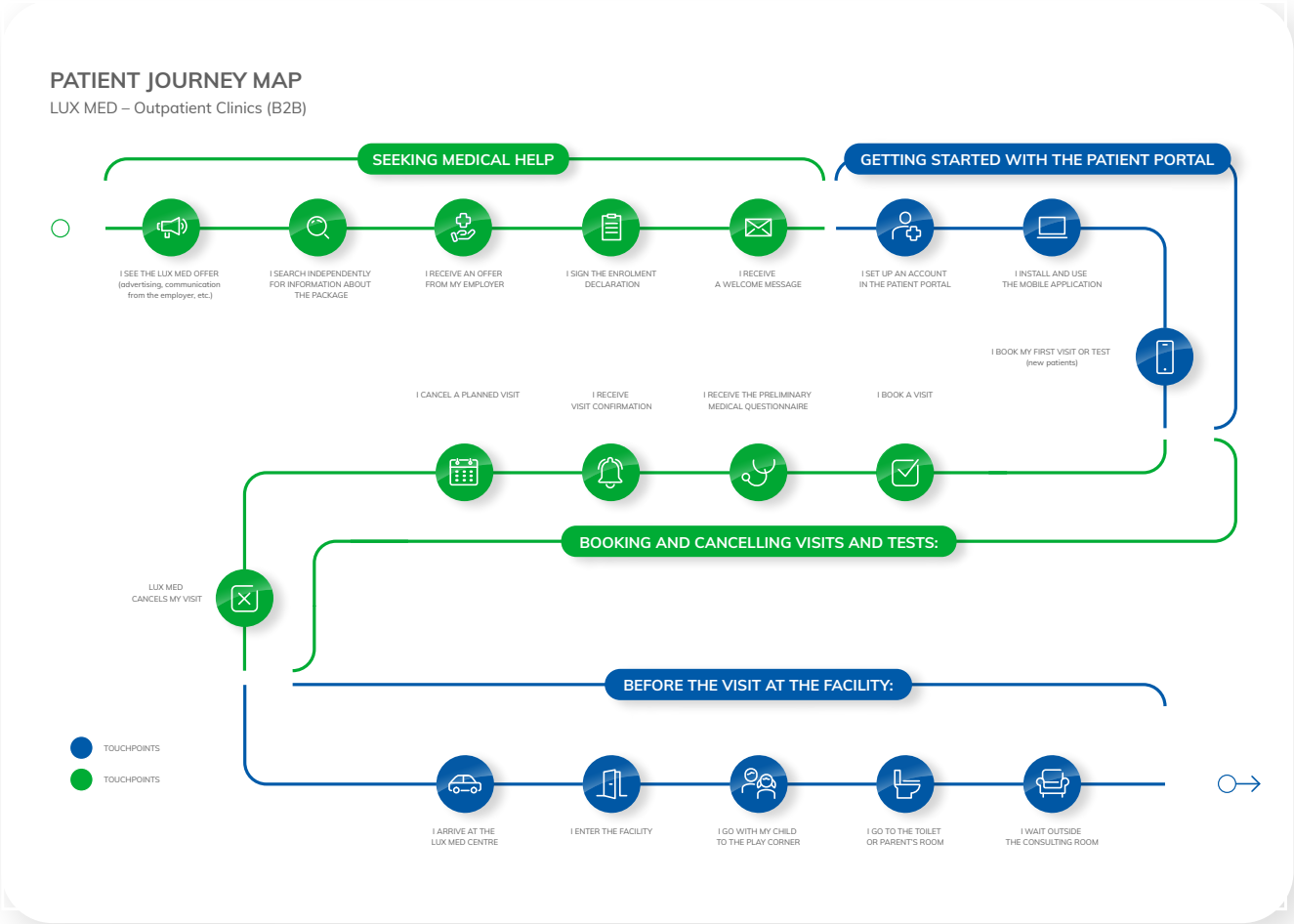
Improving Processes and Standards

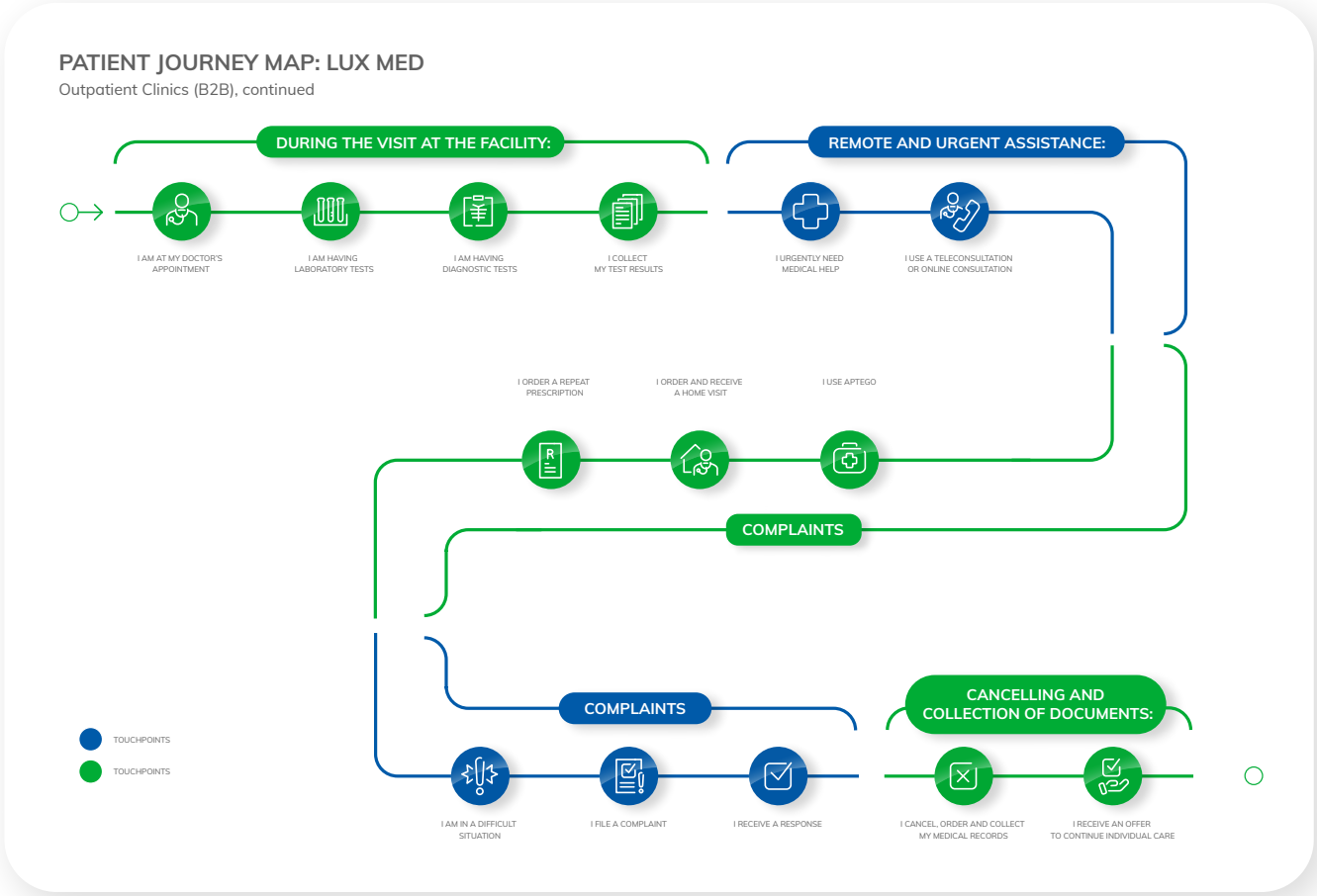
Patient Journey Mapping

Patient Journey Mapping is a comprehensive study of a selected group of patients, carried out using qualitative and quantitative methods. It makes it possible to identify the touchpoints related to the LUX MED Group's services with which patients are particularly satisfied or dissatisfied, and then to implement improvements in service and operational processes.

In 2025:

- We implemented and updated 77 standards for medical and administrative staff;
- We created nine Patient Journey Maps.





Designing Processes and Standards

Thanks to a good understanding of patients' needs, we can continuously improve our processes, streamline service pathways and introduce solutions that improve the way services are provided and make it easier for patients to access them.

To ensure a high quality of care in all areas and facilities, we create service-operational standards for administrative teams and operational-medical standards for medical staff. These standards define the principles of patient service in formal, qualitative, image-related and communication terms, providing guidelines for action and a point of reference for the quality of care provided.

On this basis we prepare staff, organise services and adapt infrastructure to respond as well as possible to patients' needs. We devote a great deal of attention to improvements for people with special needs: we develop activities supporting the service of deaf and hard-of-hearing people, and we create facilities and consulting rooms adapted to the needs of people with mobility impairments or for blind people.

Aleksandra Wiraszka
Manager for Standardisation and Quality of Service

In 2025 we expanded our cooperation with the Polish Association of the Deaf, so that a sign-language interpreter would be available at all facilities and in all business lines of the LUX MED Group. All our patients can use this solution, regardless of their treatment and financing pathway. Ensuring communication between deaf and hard-of-hearing people and medical staff is an expression of care and responsibility for their health. This action distinguishes the LUX MED Group from its competitors. In 2025, the online sign-language interpreter was used monthly by more than 100 patients from across Poland.

Audits

To ensure patients receive services of the highest standard, we continuously monitor their quality through **mystery patient audits and corridor audits.** We select healthcare centres and areas for audit on the basis of their NPS results, and check compliance with standards there. We provide support to facilities or areas experiencing difficulties, and monitor their progress.

In 2025:

- We carried out 505 mystery patient audits (a 10% increase compared to 2024);
- As part of corridor audits, we visited 17 cities and 90 centres (almost 17% more facilities visited than the year before);
- On the basis of NPS analysis, we identified doctors with low scores and reported to the Directors of Medical Centres the need to intensify efforts to improve patient experience.

Patient Feedback

The Patient Experience Improvement System

On the basis of journey maps and data from patients, we are continuously developing our research. We carry out four types of survey research, which allow us to obtain a full picture of patients' opinions and feelings:

- **Transactional surveys** – conducted continuously, at key points of contact between the patient and the LUX MED Group (so-called touchpoints), immediately after a completed service or consultation. They enable ongoing identification of patients' needs at every stage of care and real-time monitoring of their feelings.
- **Relational surveys** – carried out several times a year, they allow us to assess satisfaction with overall care and to look at patient experience from a longer-term perspective.
- **Benchmarking surveys** – conducted on a panel of respondents from an independent research company commissioned by the LUX MED Group, they allow us to understand how our services are perceived compared with other private and public healthcare providers.
- **Ad hoc surveys** – carried out in response to identified needs, they enable testing of patient opinions on new solutions or changes to services.

Since the end of 2025 we have been sending surveys covering as many as **31 touchpoints,** at which we have collected more than **1.5 million surveys.** In addition, we carried out **more than 60 ad hoc studies.** The continuous development of our research allows us to learn about patients' feelings across an ever-broader range of experiences.

Justyna Mościcka
Director Quality and NPS Research Team

Thanks to various quantitative and qualitative surveys, we gain multiple perspectives and a broad picture of the propensity to recommend our services. We find out what a patient experienced at a given moment, as well as what has stayed in their memory over a longer period of time. Through this research we better understand our position in the medical services market. It shows us where we can compete, which strengths are most valued by patients, and which bother them the most. Patients are the best consultancy firm, which is why we decided long ago to listen to them, draw conclusions, and act. This strategy is bringing us excellent results.

Closing the Loop and Complaints

As part of our patient experience improvement strategy, we pay particular attention to situations in which difficulties have arisen in using LUX MED Group's services. Handling of such cases is carried out through two key processes: closing the feedback loop, and the complaints-handling procedure. In both areas, LUX MED Group representatives contact the patient in order to provide support and obtain additional information about their needs and opinions. This contact takes place after a complaint has been filed or a satisfaction survey completed, provided consent has been given for such communication.

The changes to our approach to complaints that we implemented in 2023 have led to a significant, and more importantly, lasting improvement in the satisfaction levels of patients who have filed complaints. The new communication formula and the whole organisation's strong focus on resolving the problems of patients who find themselves in a complaint situation are delivering excellent results, allowing us to achieve ever-higher satisfaction indicators year on year. However, we are not stopping there – we actively listen to the voice of patients, draw lessons from mistakes, implement improvements, and build a culture of responsibility for the experience of Detractor patients across the whole organisation. Because by far the best way to manage a complaint is to prevent it from arising in the first place.

In 2025, we contacted more than **75,000 patients** after their surveys as part of the loop-closing process (by telephone, in person at the facility, or by email).

Michał Wyporski
Director, Complaints Management Department

Effective management of Detractors' experience is a dynamic process that must keep pace with, and even anticipate, the expectations of patients who have filed complaints. The wow effect triggered by excellent service yesterday will make less of an impression today, will be more routine tomorrow, and will become a matter of indifference within a week. That is why at LUX MED we are constantly looking for new ways to positively influence the experience of detractor patients, and continuously refining our already proven methods of action.

Patient-centric Implementations

Working for our patients, every day we think about solutions that could improve their experience. We use a dedicated internal platform on which employees publish their improvement proposals and examples of implemented initiatives. Submissions cover local actions, carried out at facilities close to the patient, as well as wide-ranging projects and transformations of a strategic nature. This solution enables the exchange of knowledge and ideas between employees with diverse experience, supports the creation of effective solutions responding to patients' needs, and gives employees a sense of influence over their surroundings.

The largest patient-focused initiatives implemented in 2025:

- **Care Optimisation 2.0** – we equipped medical and treatment-room consulting rooms in individual specialisms with excellent-quality medical equipment and changed the organisation of visits, so that patients can benefit from the most comprehensive possible diagnostic and treatment process.

Aneta Skibińska
Director,
Service Quality Standardisation and NPS Department

"The 'Optimisation 2.0' project comprises actions aimed at raising the quality and convenience of medical care. Patients expect effective help and rapid diagnosis. Thanks to the changes introduced, a patient who goes to an orthopaedist or internist can make use of a screening ultrasound examination without the need to book two separate visits. This solution allows for faster and more precise diagnostics. The artificial intelligence used in the ultrasound machines helps to quickly and effectively detect neoplastic changes in the thyroid and breast, but also to diagnose other changes, in order to implement effective treatment. We have also implemented similar improvements in, among other areas, dermatology and neurology, expanding the equipment of consulting rooms with new diagnostic devices.

- **The option of renewing NFZ (National Health Fund) prescriptions via the Patient Portal** – we have extended the prescription-renewal functionality via the Patient Portal, which is convenient and popular with patients, without the need for a visit to the facility, to cover NFZ prescriptions as well.
- **New Group Customer Portal application** – enables the HR departments of our corporate customers to easily manage group policies.
- **Implementation of medical documentation templates** – speeds up the completion of necessary documents, reducing the burden on doctors during visits and leaving more time for contact with the patient.
- **A programme automatically processing standard cost-reimbursement applications** – speeds up the reimbursement of visit costs to the patient.
- **We are implementing AI-based software at further LUX MED Diagnostyka facilities** – the programme makes it possible to shorten the time a patient spends inside the MRI scanner and to minimise the stress associated with the examination, which is particularly burdensome for children, elderly people or people with claustrophobia.

Mutual Inspiration and Building a Patient-Focused Culture within the LUX MED Group

To ensure the right direction of development, focused on improving patient experience, it is essential to build and maintain a patient-focused culture across the whole organisation. To this end, we regularly – on a monthly and weekly cycle – communicate patient satisfaction results in company-wide newsletters, reinforcing a culture of openness to feedback. We also organise various events that inspire, remind us of our mission and objectives, and allow us to celebrate shared successes.

Once a quarter, the **Patient Forum** is held – an open online meeting for all interested employees, during which we present the most important implementations. On a quarterly basis we also carry out the **Listening and Solving** initiative, under which management staff develop solutions to problems reported by patients, based on genuine, anonymised interviews.

Every year we organise events such as **Listening Week** and **Customer Experience Day,** which, in an engaging format, encourage employees to familiarise themselves with patients' opinions. In 2025, Customer Experience Day had an exceptionally wide reach – we organised preventive health campaigns for patients in the 5 largest cities in Poland, handed out Health Diaries, and gave thanks and gifts to the people who have used LUX MED's care for the longest.

Clinical Safety Management

Monika Tomaszewska PhD (Health Sciences)
Director, Clinical Governance and Medical Projects Department

Clinical health and safety are our priorities. We provide comprehensive medical and organisational support, responding to the needs of patients and customers. Our actions are carried out in accordance with a safety culture based on Clinical Governance, a systemic approach to patient risk and safety, the organisation of preventive activities and monitoring of health-related quality, and the building of a safety culture and interdisciplinary cooperation within medical facilities. ESG and clinical governance policy are strongly interlinked.

Clinical governance:

- in the S dimension, it protects the patient;
- in the G dimension, it strengthens oversight and transparency; it also indirectly affects
- E (e.g. safe disposal of medical waste).

We treat clinical governance as a pillar of the organisation's sustainable development, directly supporting long-term value for patients, employees, partners and investors. We are consistently developing our Clinical Governance model, the aim of which is to ensure the highest standards of quality of care, patient safety, and compliance with applicable legal regulations and the principles of Evidence-Based Medicine (EBM). Our Clinical Governance Policy is based on a systemic approach to the identification, assessment and mitigation of clinical risk. The Clinical Governance Committee and Sub-committees operating within the organisation provide substantive oversight, support a culture of clinical leadership, and strengthen accountability for quality at all levels of the organisational structure.

Across all operating units we have implemented a consistent system of management control and clinical audits. We monitor key quality and safety indicators, analyse adverse events, complaints and medical documentation, and the effectiveness of actions taken is subject to regular verification. The clinical risk management process is integrated with the compliance system and corporate risk management. An important element of our organisational culture is the no-fault model, which supports transparency, open communication and systemic learning based on incident analyses. We promote a culture of continuous improvement, in which conclusions from analyses translate into the updating of procedures, the standardisation of clinical practices, and the development of staff competencies.

Implementation of the Clinical Governance Policy contributes to:

- minimising the risk of medical incidents;
- increasing patient safety;
- increasing the efficiency of clinical processes;
- building stakeholder trust;
- reducing reputational and regulatory risks.

Research and Development

We do not leave patients without a solution in situations where standard treatment pathways are insufficient or require expansion with new treatment options. That is why, on a pilot basis, we are verifying the possibility of providing our patients with access to modern therapies through clinical trials in the field of neurology, while maintaining ethical and quality requirements and regulatory compliance. This action is aimed at broadening real treatment options and supporting continuity of care, particularly in complex and clinically difficult cases.

At the same time, we observe and analyse the solutions used in the industry, including in the field of oncology, where participation in clinical trials constitutes a significant element in increasing patients' access to innovative medical technologies. We use the conclusions from these practices to build standards and a target model of cooperation, which will make it possible, in a scalable and transparent way, to support patients' access to next-generation therapies, while maintaining high standards of safety and quality of care.

In 2025, LUX MED Onkologia and the Medical Education Centre jointly organised a conference with live demonstration surgery assisted by a surgical robot in gynaecological oncology. At St. Elizabeth's Hospital, doctors from LUX MED Onkologia and from the Hospital Universitari de Bellvitge in Barcelona performed the **first surgery in Poland for endometrial (uterine corpus) cancer involving two gynaecological oncologists working simultaneously on separate consoles of the surgical robot.** The event was free for participants and brought together a large group of medical specialists from across Poland.

Jarosław Minkowski MD PhD
Managing Director, LUX MED Diagnostyka

99

Innovations in diagnostic imaging within the LUX MED Group are focused on a real improvement in the quality and accessibility of healthcare. We invest in modern technologies, artificial intelligence and process automation in order to shorten diagnostic time, increase the precision of examinations, and at the same time minimise the burden on patients and on the environment.

Employees

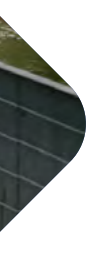
HR blisko ludzi.
Zdrowie, prawa pracy i dobre praktyki - nowe perspektywy dla HR
LUXMED

GRUPA LUXMED

Healthy Cities

Employment Structure

The medical industry, in which the LUX MED Group operates, is characterised by a wide diversity of forms of cooperation. Alongside classic employment contracts, civil-law contracts are also used, as well as cooperation within the framework of sole-trader self-employment (so-called B2B). This employment model results from the need for flexibility – both on the part of the employer and of medical specialists, who often combine work at several facilities or run their own practice.
As the LUX MED Group, we fit in with the trends observed in the market – the proportion of people cooperating with the LUX MED Group under forms of cooperation other than an employment contract has remained at a similar level for years, and in 2025 stood at 72%.



2-7

People employed under an employment contract make up a smaller proportion – as at 31 December 2025, we employed 8,078 people in this way. Women made up 82% of all employees, of whom 80% were on contracts of indefinite duration. Men made up 18% of employees, of whom 79% were on contracts of indefinite duration. All of these people were employed in Poland. 87% of employees worked full-time (88% among women and 86% among men).

Table 1. Employees employed under fixed-term and indefinite-term employment contracts, full-time and part-time, as at 31.12.2025

	Employed under employment contracts					
	2024			2025		
	Women	Men	Total	Women	Men	Total
Fixed-term	1,212	277	1,489	1,294	303	1,597
Indefinite-term	4,974	1,033	6,007	5,315	1,166	6,481
Total	**6,186**	**1,310**	**7,496**	**6,609**	**1,469**	**8,078**

Table 2. Employees employed under employment contracts, full-time and part-time, as at 31.12.2025

	Employed under employment contracts					
	2024			2025		
	Women	Men	Total	Women	Men	Total
Full-time	5,455	1,126	6,581	5,792	1,257	7,049
Part-time	731	184	915	817	212	1,029
Total	**6,186**	**1,310**	**7,496**	**6,609**	**1,469**	**8,078**

2-8

Within the LUX MED Group, various forms of employment and cooperation operate, adapted to the nature of the position and the preferences of the people performing the work. Among people who are not payroll employees, the dominant form of cooperation remains sole-trader self-employment, used by 61% of associates, while 39% perform work under a contract of mandate. These forms of employment are most often used by representatives of medical staff – doctors, nurses and other specialists – as well as people employed in Patient Service and the Call Centre. In addition, a small number of individuals cooperate under management contracts. The proportion of people choosing forms of cooperation other than an employment contract in 2025 remained at a level similar to the previous year, at around 72% of all people engaged.

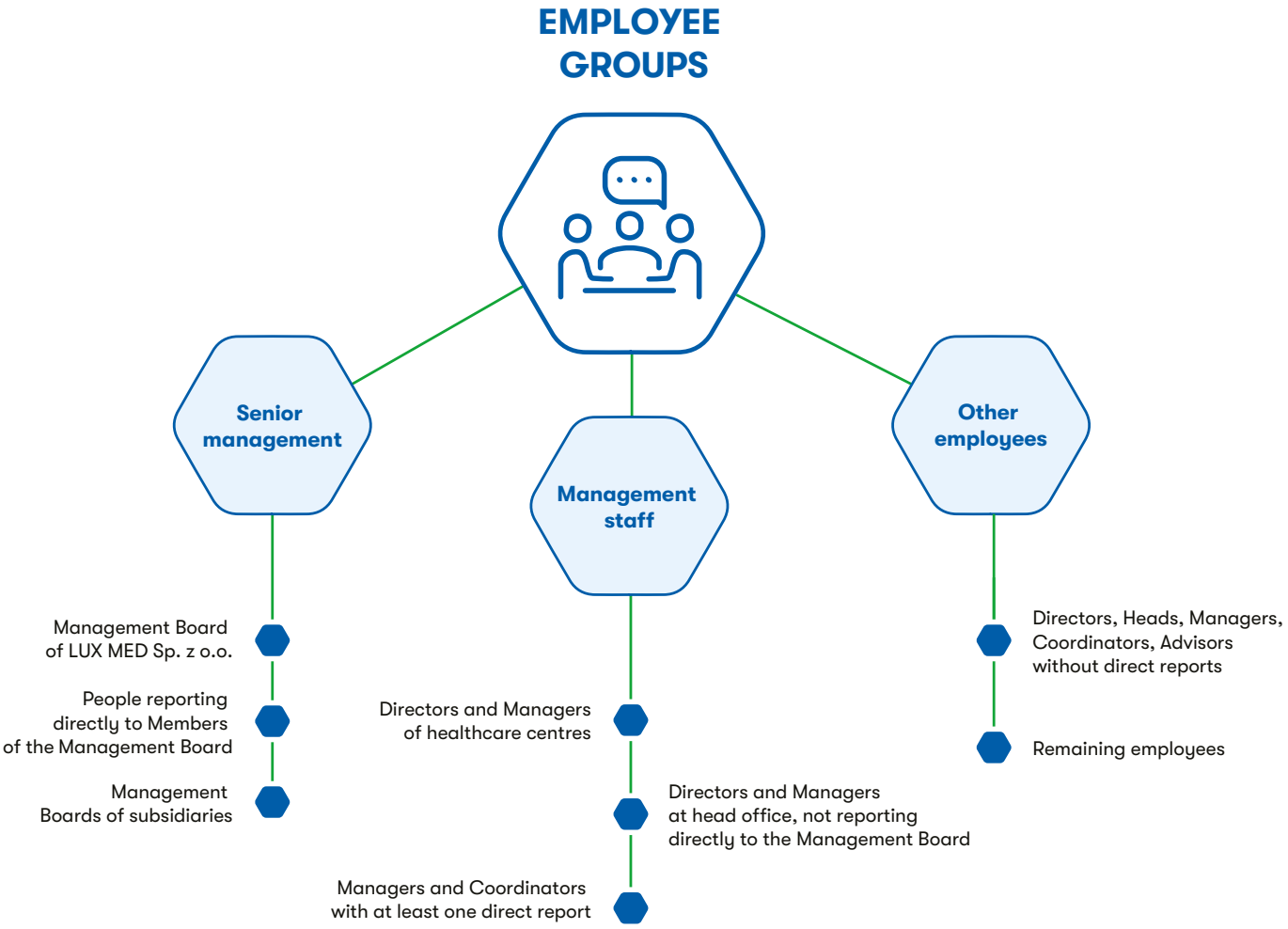
Table 3. People cooperating with the LUX MED Group as at 31.12.2025

	People performing work who are not employees	
	2024	2025
Total	**21,413**	**20,844**

The figures presented in this and subsequent tables in the Employees section do not include data for Dentika sp. z o.o., which joined the LUX MED Group at the end of 2025.

Employee Groups

Wherever figures are given in the Employees section of this report broken down by employee group, they cover people employed under all types of contract, in accordance with the following definitions:



Working Conditions

Occupational Health and Safety

Occupational Health and Safety Management System

403-1

Respect for human rights and employee rights is among the fundamental responsibilities of the LUX MED Group. Our organisation's policies, internal regulations and rules of conduct are consistent with the Labour Code, the Universal Declaration of Human Rights, and the International Labour Organization's standards regarding fundamental principles and rights at work. The principles that guide us are set out in the LUX MED Group Code of Conduct. In addition, in 2025 we adopted a comprehensive document, Protection of Human Rights within the LUX MED Group, which summarises our most important commitments and internal regulations in this area.

We observe the prohibition of forced labour, corporal punishment, and psychological and physical coercion. We do not employ people under 18 years of age. In accordance with the regulations, we provide our employees with leave, pension and disability entitlements. We do not tolerate discrimination or violence, and we take care to provide a friendly working environment for everyone.

Hazard Identification, Risk Assessment and Incident Investigation

403-2, 403-7

Processes operate within the organisation to ensure the systematic identification of work-related hazards and the assessment of occupational risk across all areas of activity. These include, in particular:

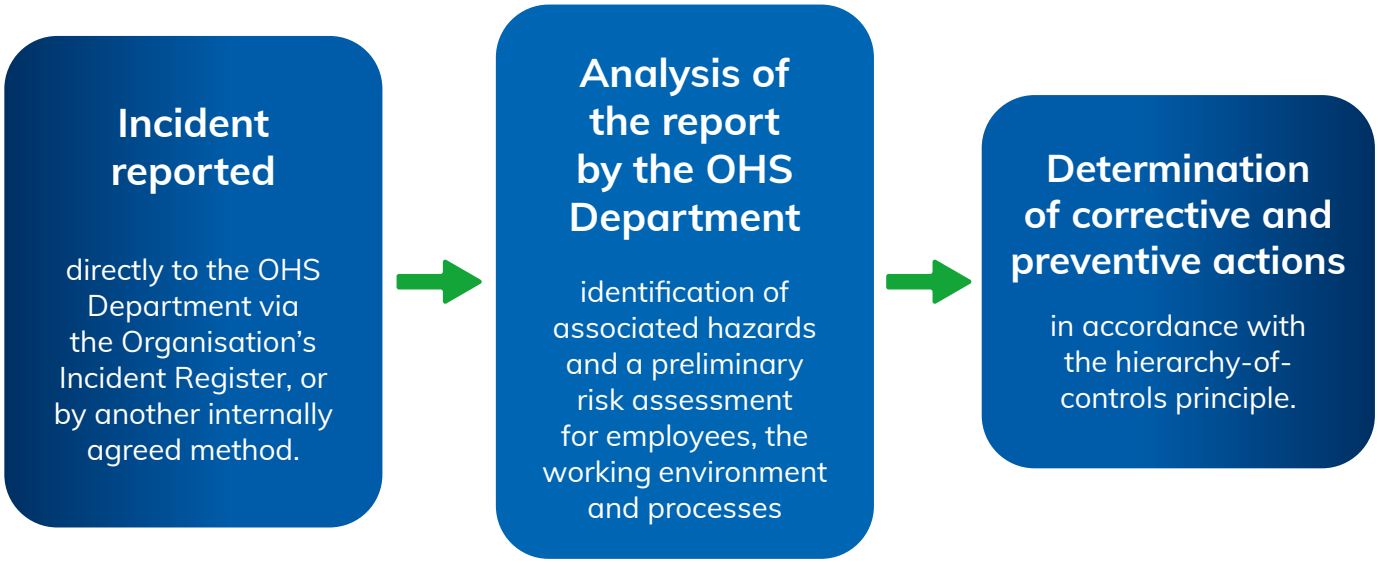
- regular occupational health and safety (OHS) audits (internal and external);
- measurement of harmful factors in the working environment and monitoring of employee exposure (including through the use of individual and environmental dosimetry);
- analysis of accidents at work and near-miss incidents, together with the implementation of corrective and preventive actions;
- maintaining a register of occupational diseases and suspected occupational diseases, and trend analysis;
- technical inspections and servicing of machinery, equipment and installations
- ongoing monitoring of changes in OHS regulations and their implementation;
- periodic updating of occupational risk assessments;
- risk assessment for new job positions, together with the implementation of appropriate preventive measures.

In risk management we apply the hierarchy of controls – from eliminating hazards, through reducing them by means of technical and organisational solutions, to personal protective equipment as a last resort.

To ensure a high quality of processes relating to hazard identification, risk assessment and the implementation of control measures, we apply the following principles and solutions:

- We employ occupational health and safety staff holding qualifications and authorisations in accordance with applicable legal regulations, and we regularly raise their competencies through industry training and participation in certified courses.
- We cooperate with accredited external companies, which carry out environmental measurements and testing of harmful factors, thereby ensuring compliance with applicable technical standards and accreditation requirements.
- We use servicing companies and suppliers holding the appropriate authorisations for technical inspections, repairs and servicing of machinery, equipment and installations, in accordance with technical supervision requirements and relevant standards.
- We use only certified materials, collective and personal protective equipment, and technical solutions meeting the relevant standards and legal requirements.
- We ensure competent operational oversight – dedicated OHS coordinators, appointed and trained by the OHS service, operate within LUX MED medical centres, monitoring working conditions on an ongoing basis, enforcing the application of procedures, and supporting hazard identification.
- We regularly verify OHS processes and monitor their compliance with legal regulations, standards and industry guidelines, which enables their continuous improvement.

A structured process for investigating work-related incidents operates within the LUX MED Group, covering both accidents and near-miss events:



In the case of reports of accidents at work or near-miss events, the OHS Department cooperates with various organisational units, including, for instance, operations, investment and procurement departments. This approach makes it possible to effectively identify and eliminate the causes of an event and to prevent recurrence.

The results of hazard-identification and risk-assessment processes are systematically used to monitor and continuously improve the OHS management system. On the basis of OHS audits carried out, analyses of accidents and near-miss events, results of environmental measurements of harmful factors in the working environment, and reported occupational diseases, occupational risk assessment cards are prepared, including cards assessing the risk of exposure to chemical and biological agents. The risk assessment cards indicate preventive and protective measures aimed at eliminating or minimising identified hazards. Registers and cards of measurements of factors harmful to health are drawn up, enabling ongoing monitoring of the state of the working environment. In the case of accidents at work and near-miss events, preventive action cards are created, which help prevent similar situations in the future.

Thanks to these actions, the OHS system is continuously updated and improved based on real data from workplaces, which makes it possible to minimise occupational risk, increase employee safety, and maintain compliance with legal requirements.

In 2025 we trained 198 OHS coordinators, carried out 78 consultation visits and more than 70 OHS audits, and performed more than 420 environmental measurements with no exceedances of standards. We implemented infrastructural and preventive measures, including replacing approximately 700 damaged chairs, or chairs not meeting legal requirements, at 75 medical facilities. As part of the ‘Your Rescue Card – Take It on the Road’ project, employees with company vehicles received rescue cards and stickers containing a diagram of the vehicle with key safety features. The project supports rapid and effective assistance in road traffic accidents, shortening rescue response time and increasing the safety of casualties.

Occupational Medicine

403-3

As part of fulfilling the obligations arising from the provisions of the Labour Code, all companies belonging to the LUX MED Group provide employees with access to occupational medicine examinations. An employee may begin work at a given position only after obtaining a positive medical certificate confirming fitness to perform it. In accordance with the Regulation of the Minister of Health and Social Welfare of 1 March 2023 (Journal of Laws 2023, item 607), LUX MED doctors exercise preventive healthcare over employees. Cooperation with the occupational medicine doctor includes e.g. reviews of work stations, participation in OHS Committee meetings, advisory services, and the issuing of opinions as part of post-accident proceedings, where such a need arises. In addition, out of concern for employees' health and wellbeing, preventive activities are organised, based on an analysis of their state of health.

Employee Engagement, Consultation and Communication on OHS

403-4

At the LUX MED Group, occupational health and safety is a shared matter – employees and people employed under civil-law contracts actively participate in the creation, implementation and evaluation of the OHS Management System. Every preparation and update of an occupational risk assessment is consulted with the people working in the given position, and their participation is documented.

Current OHS documents, including instructions, procedures, guidelines, results of environmental measurements, current safety data sheets for chemical substances and mixtures, and others, are made available on an ongoing basis in electronic and paper form, and communication takes place by email, internal systems, or directly during training sessions and meetings. Anyone can report comments and hazards through the available tools or directly to their supervisors, OHS coordinators or the OHS Department, which enables the rapid implementation of corrective and preventive actions. Within LUX MED facilities, OHS coordinators, selected from among medical and non-medical staff, working closely with the OHS Department and management staff, look after occupational safety, initiating preventive and corrective actions.

Meetings of management staff devoted to responsibility for OHS, accident analysis, and improving the ergonomics and safety of work stations are organised and conducted by the OHS Department. They support the development of a culture of engagement and care for working conditions. The basis for these actions is provided by formal OHS structures, headed by the OHS Committee, operating in accordance with legal regulations and a Management Board resolution. Management engagement, consultation and communication with employees in the area of OHS enable the effective identification of hazards and the taking of corrective action. In subsidiaries where the statutory conditions for establishing a formal OHS Committee are not met, alternative forms of consultation operate, guaranteeing that the voice of employees and their safety are always a priority.

OHS Training

403-5

The company runs a comprehensive OHS training programme, tailored to the specific nature of the work of medical and non-medical staff. The training covers both general hazards and those specific to the medical industry, including contact with biological material, chemical substances and sharp instruments. In 2025 the update of the '3,2,1 OHS Start' training was completed, in an interactive format, dedicated to people working under civil-law contracts and available on an e-learning platform, divided into pathways for medical and non-medical staff. For management staff, training projects were carried out: 'Operation Leader', devoted to managers' OHS responsibilities, and 'Safe Leadership', comprising meetings with management staff in hospitals, outpatient clinics and dental facilities. Training topics included, for instance, the consequences of allowing employees without current OHS training to work, accident analysis – with particular attention to injuries from sharp instruments – and obligations relating to the conclusion of post-exposure agreements. In 2025, the OHS Department at LUX MED organised training for staff of medical facilities in 10 Polish cities on the operation and storage of medical gas cylinders, delivered by external experts. In 2025, training for OHS coordinators was also organised, in which 198 employees from across Poland took part. As part of preventive activities, educational materials were developed and distributed to medical facilities in the form of posters showing methods of safe work with needles.

Thanks to these actions, the LUX MED Group is systematically increasing risk awareness, reducing accidents at work, and developing a safety culture.

403-9

In 2025, 82 accidents occurred among employees within the LUX MED Group, and 70 accidents among associates. All incidents were classified as minor, most often of an injury nature.

Table 4. Number of accidents within the LUX MED Group

	2024		2025	
	Accidents among employees	Accidents among non-employees	Accidents among employees	Accidents among non-employees
Minor accidents	62	70	82	70
Severe accidents	–	–	–	–
Fatal accidents	–	–	–	–
Collective accidents	–	–	–	–
Total number of accidents	62	70	62	70
Accident-at-work rate*	4,5	n/a	4,5	n/a
Main type of recorded accidents: injuries from medical instruments.				

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

Remuneration Policy

2-19, 2-20

All employees receive adequate remuneration, in accordance with the regulations in force in Poland. The lower threshold of adequate pay within the LUX MED Group has been set at the level of the minimum wage in force in Poland. From January 2025, the minimum gross wage for work was PLN 4,666. Minimum wages for medical professions are regulated by the Act on the Method of Determining the Minimum Basic Salary of Certain Employees Employed in Medical Entities of 8 June 2017.

The remuneration policy applicable to Members of the Management Board and senior management staff within the LUX MED Group is consistent with the principles adopted by Bupa. Its main aim is to support the development of the business, which translates into the success of the whole Group. The Group also makes use of salary reports provided by an external advisory firm, which is one of the elements influencing the setting of Management Board members' remuneration. People holding management functions are entitled to remuneration comprising a fixed and a variable component, taking into account both a short-term and a long-term perspective. The LUX MED Group does not apply so-called clawback clauses; however, the policy allows for payments in connection with the termination of a contract (payments arising from non-competition clause provisions in contracts). The LUX MED Group does not operate additional pension programmes or early-retirement schemes for Members of the Management Board.

Remuneration and long-term bonuses for Members of the Management Board and selected directors depend e.g. on the achievement of sustainable-development-related objectives (15% weighting in performance evaluation). These indicators include CO_2 emissions reduction.

2-30

In one of LUX MED Group's companies – Megamed Sp. z o.o. – trade unions operate, to which 97 people belong, representing 54% of that company's employees. In addition, 143 people, i.e. 79% of those employed at that company, are covered by Company Collective Labour Agreements.

Additional Benefits

401-2

We offer people employed within the LUX MED Group a range of solutions that strengthen motivation, both financial and non-financial in nature. Benefits that we fund in full, in part, or co-finance include, for instance:

Medical subscription

Employees have access to specialist healthcare, and can also extend the scope of services to their family members. We also co-finance medical care for associates, depending on the number of hours worked in a given month.

LUX MED Full Care Hospital Insurance

Access to private hospital care in more than 100 hospitals, including 16 of LUX MED Group's own hospitals, throughout the country.

Life insurance

Protection in emergency life situations for employees and their families.

Free foreign-language learning

Access to a platform for learning English, German, Spanish, French and Italian.

Gifts marking 10, 20 and 30 years of employment with our company

Sports pass

We offer access to sports facilities and activities throughout the country.

Reimbursement of education costs

Financial support for employees' individual development needs.

Co-financing of sports initiatives

Our employees can take part free of charge in marathons and half-marathons, for which we cover the entry fee. We also offer the opportunity to join sports activities or our football team.

Financial, material and organisational support

People in a difficult health situation can count on support from the Dr Joanna Perkowicz LUX MED Foundation.

Employee Health and Wellbeing

403-6

The LUX MED Group provides employees with broad and easy access to medical services, both under mandatory benefits and additional perks. As part of the package, employees can make use of medical care at the Group's own facilities, covering medical consultations, diagnostic tests and specialist medical procedures. In addition, employees are covered by hospital insurance and life insurance, which provide support in acute health situations.

In response to employees' current needs, we changed our benefits package: we introduced new scopes for medical care packages and a new group life insurance. We conducted a broad information campaign about these changes, thanks to which employees could learn about all the new benefits and advantages. Using the services is made easier by the **Carrotspot** platform, which enables registration and gathers all information on benefits in one place. Employees also have access to information materials explaining the scope of available benefits and procedures, as well as to the **Benefit Book** – a guide to all the benefits offered within the organisation.

We regularly organise Benefit Days – online events at which we present current benefits and answer employees' questions. In 2025, 2 such company-wide events were held, attended by 1,689 people. We also promoted benefits during in-person events at the Contact Centres in Warsaw and Białystok, meeting directly with employees.

For almost 15 years, the LUX MED Group has been carrying out activities to support employee wellbeing as part of the **VIVA Every Day** wellbeing-and-benefits programme. The programme supports employees in developing healthy habits across five wellbeing pillars:

- mental health;
- physical health;
- social health;
- environmental health;
- medical benefits.

The VIVA programme not only inspires employees to adopt healthy habits, but also strengthens motivation to maintain them through various initiatives and a system of rewards, including vouchers awarded at selected events. In addition, we introduced a 'healthy habit randomizer', which each day suggests small, practical activities to employees that support health and wellbeing.

In 2025 we continued the largest mental health project in LUX MED Group's history, under which:

- We organised 60 workshops in the workplace for more than 710 employees;
- We certified 32 people in Psychological First Aid;
- We held nationwide Mental Health Days, in which 1,909 people took part.

From Monday to Friday, employees could also make use of the mental health support helpline, i.e. free access to a psychologist from the Harmonia Mental Health Clinic. The Impulse for Mental Health initiative is funded from the resources of the Dr Joanna Perkowicz LUX MED Foundation.

In 2025 the VIVA programme also included numerous themed events, including:

- **Appreciation Day** – a celebration of a culture of recognition and mutual support at work, with the 'We Appreciate and We Care' online event, competitions, and the giving of kudos (appreciation cards);
- **Benefit Days** – online events presenting current benefits and answering employees' questions;
- **Running League** – an annual challenge in which we rewarded the best runners across the company, concluding with a ceremonial gala for the presentation of trophies and prizes;
- **Culture Week** – an initiative celebrating organisational values such as courage, responsibility and care.

During the year we also celebrated other occasions, including Women's Day and Men's Day, and Cancer Prevention Day. Thanks to these initiatives, employees can voluntarily take part in activities supporting mental and physical wellbeing, develop healthy habits, and increase awareness of preventive healthcare.

We also bring our employees together through the ŁączyMY (WEconnect) employee networks. In 2025, four networks were in operation: sport, mental health, parenthood, and neurodiversity. The networks bring together a total of 470 employees and provide a space for exchanging experiences, mutual support and competency development. As part of these initiatives, we organise informal meetings with experts and workshops, and we co-finance sporting initiatives. In 2025 we handed out 123 starter packs for running events.

Running League Final at LUX MED Head Office

The **VIVA Every Day** programme was recognised with the main award in the **Dream Employer 2025** competition, in the Employee Wellbeing category.

Diversity

We believe that every employee – regardless of beliefs, ethnic origin, age, gender, sexual orientation or state of health – should have equal opportunities for professional development and be treated in accordance with the values we promote. We are convinced that working in a diverse team brings benefits both to employees and to the organisation as a whole, supporting engagement and enriching competencies.

Since 2024 we have been implementing the **'Diverse Patients, Diverse Us'** Strategy for 2024–2026, the overarching aim of which is to develop an inclusive culture in the workplace. As part of the Strategy, we are building an open and supportive professional environment, increasing employees' awareness of diversity, taking action to equalise opportunities, and ensuring transparency in all areas of the organisation's operations.

1. **Raising employee awareness of diversity** – through educational activities, information campaigns and meetings with experts, we increase employees' knowledge and sensitivity regarding diversity and inclusion;
2. **Creating an open and friendly working environment** – we develop an organisational culture based on respect, psychological safety, and openness to diverse perspectives;
3. **Support for employees from minority groups** – we carry out initiatives supporting equal opportunities and responding to the needs of different groups of employees;
4. **An employer brand open to diversity** – we strengthen the organisation's image as an employer promoting equality, inclusion and respect for diversity.

In 2025, the LUX MED Group continued its activities for diversity, equality and inclusion (DEI), which form the foundation for building a safe and supportive working environment. In cooperation with external experts and organisations, we carried out educational initiatives promoting equality and counteracting discrimination.

During the year we organised educational webinars for Neurodiversity Week and International Day of Persons with Disabilities, inviting experts who shared knowledge and experience in building more inclusive workplaces.

An important element of these activities was also educational meetings for managers, devoted e.g. to employing and creating an inclusive working environment for people with disabilities and transgender people.

Our DEI practices were positively assessed in the Top Employers Institute audit – in 2025, for the second year running, we obtained Top Employer certification. In addition, in cooperation with the Top Employers Institute, we organised the 'Neurodiversity in the Workplace' conference, during which we shared our experiences and good practices with representatives of HR departments in Poland.

405-1

In the period from 1 January to 31 December 2025, women made up the dominant part of our organisation's workforce – their share of employment was 82%. The most numerous age group among employees was people aged 31 to 50, who made up 59% of all staff.

Table 5. Diversity among LUX MED Group employees

2025	Percentage of employees by age and gender (2025)		
	Women	Men	Total
<30 years	18 %	4 %	22 %
31–50 years	48 %	11 %	59 %
>50 years	16 %	3 %	19 %
Overall by gender	**82 %**	**18 %**	**100 %**

Breakdown by employee group and age (number of people and % within group)		2024		2025	
		F	M	F	M
Senior management	Volume	**28**	**27**	**26**	**20**
	Percentage	**51**	**49**	**57**	**43**
>51 years	Volume	12	11	12	7
	Percentage	52	48	63	37
31–50 years	Volume	16	16	14	13
	Percentage	50	50	52	48
<30 years	Volume	0	0	0	0
	Percentage	0	0	0	0
Management staff	Volume	**812**	**180**	**842**	**202**
	Percentage	**82**	**18**	**81**	**19**
>51 years	Volume	197	36	214	46
	Percentage	85	15	82	18
31–50 years	Volume	564	127	573	134
	Percentage	82	18	81	19
<30 years	Volume	51	17	55	22
	Percentage	75	25	71	29
Employees	Volume	**5 344**	**1 102**	**5 741**	**1 247**
	Percentage	**83**	**17**	**82**	**18**
>51 years	Volume	994	160	1 078	196
	Percentage	86	14	85	15
31–50 years	Volume	3 013	647	3 252	729
	Percentage	82	18	82	18
<30 years	Volume	1 337	295	1 411	322
	Percentage	82	18	81	19
Total, all employees, including:	Volume	**6 186**	**1 310**	**6 609**	**1 469**
	Percentage	**83**	**17**	**82**	**18**
>51 years	Volume	1 204	207	1 304	249
	Percentage	85	15	84	16
31–50 years	Volume	3 594	791	3 839	876
	Percentage	82	18	81	19
<30 years	Volume	1 388	312	1 466	344
	Percentage	82	18	81	19

Counteracting Discrimination

At the LUX MED Group, any form of discrimination and/or bullying/mobbing is strictly prohibited. Where irregularities are detected, appropriate corrective action is taken. In accordance with the Code of Conduct, every employee and associate has the option of reporting undesirable behaviour in the workplace through the Speak Up Procedure, and, in the case of employment-related violations, to the Ethics Committee.

We regularly inform our team about the available procedures for such situations, since we do not tolerate behaviour that violates the dignity and rights of people employed within the Group. Detailed information on the Speak Up Procedure and the Code of Conduct can be found in the Ethics and Transparency chapter.

In 2025, the Ethics Committee received 36 reports concerning suspected bullying or discrimination, of which 29 had already been considered and closed in 2025. None of them was confirmed; however, in 9 cases a need for process improvement was identified, on the basis of which corrective actions were implemented and appropriate recommendations issued.

All reports of an employment-violation nature received during the period were thoroughly analysed while maintaining confidentiality, reliability and fairness. Each proceeding concludes with the preparation of a record and a final report.

If the Committee does not confirm the allegations, but identifies areas requiring improvement, it passes appropriate recommendations to the unit's management, monitoring their implementation.

Depending on the nature of the case, the Ethics Committee also carries out additional actions, such as telephone interviews, email correspondence, analysis of People Pulse survey results, exit interviews, anti-bullying surveys, and staff turnover analysis.

In 2025, additional action was taken in the form of pilot workshops for part of the management staff on the legal regulations relating to bullying and discrimination, and on details of the Ethics Committee's work. We make every effort, both during and after proceedings, to protect the interests of both the reporting person and the person to whom the report relates, in order to avoid potential stigmatisation should the allegations contained in the report prove unfounded.

Education and Training

404-1

At the LUX MED Group, employee development is one of the most important elements of the ESG strategy in the 'Society' area and a foundation of our competitive advantage. We support development in a systemic, consistent and strongly business-oriented way, creating an environment in which learning becomes a natural part of work rather than a separate event.

We base our approach on the **3D Competency Model,** which defines work standards and supports talent management, and on the **Leadership Model,** which responds to market challenges and expectations of leaders. Both models form a coherent system enabling the effective management of competencies and the achievement of strategic objectives. We support an attitude of openness to innovation, knowledge-sharing and testing new solutions. We organise development initiatives focused on practice, the exchange of experience, and the development of competencies for the ethical and responsible use of technology. We also take care to ensure transparency and safety in training processes. As a result, our employees adapt more quickly to change, build new competencies, and are better prepared to meet the needs of Patients and the organisation.

Training for All Employees

At the LUX MED Group we believe that development is a strategic choice and an investment in the future. That is why we offer training for all employees, supporting them at every stage of their career.

We provide a full development ecosystem – from mandatory and induction training to advanced specialist, tool-based and managerial programmes. We systematically support employee development by offering a variety of educational programmes, workshops, webinars and access to e-learning. Individual Development Plans (IDPs) help personalise development pathways and tailor them to the needs of the employee and the company.

We design short, practical and easily accessible forms of learning. We focus on online learning, micro-formats, on-demand knowledge, and a variety of educational platforms that allow us to build a culture of continuous development and strengthen the business competencies that are key to modern healthcare.

The EDUHUB platform and external tools allow employees to learn from any location, at any time, and in an engaging format, exactly when they need it. We supplement this with regular 'Thursday – Time for Development' webinars and thematic workshops.

As part of Bupa, we offer broad access to LinkedIn Learning resources. The subject matter covers business and IT courses, personal development, communication, team management and digital skills. We consciously develop competencies whose importance is growing in modern organisations – creativity, empathy, collaboration, critical thinking, resilience to change, and the ability to work with technology. The AI Management programme and educational initiatives in the field of digital tools and automation allow employees to make effective use of technology in their daily work, strengthening their productivity and comfort.

Every month we publish a training newsletter with current information and educational materials. The offer also includes tool-based workshops (Excel, Word, PowerPoint, OneNote), language courses (5 languages online), first-aid training, and IT and Agile development programmes, led by internal Scrum Masters and Agile coaches.

We support individual training needs and co-finance education, identifying development priorities through Individual Development Plans. We carry out succession planning, identify talent, and prepare the organisation for generational change. We co-create the Bupa Move On mobility programme, enabling the exchange of experience in an international environment.

Training for Management Staff

We systematically invest in the development of leadership competencies. The development offer for management staff is comprehensive and consistent with the organisation's values and with current challenges and trends. Our approach is based on empathy, dialogue and responsible leadership, which supports team engagement and the building of a culture based on trust. Managers act transparently, communicate in the spirit of non-violent communication, and build a culture of cooperation. We carry out mentoring and coaching processes tailored to the individual needs of management staff.

Our managers actively participate in Bupa's global development programmes. These initiatives enable the exchange of knowledge and experience with leaders from different countries and access to high-quality training content supporting the development of leadership and management competencies. Thanks to this, our leaders benefit from the latest global trends and together build a coherent, modern management culture within the Bupa Group.

GRUPA LUXMED Jesteśmy częścią Bupa | OPERACJA LIDER

A programme supporting the development of new leaders, offering induction and training in management and social competencies.

GRUPA LUXMED Jesteśmy częścią Bupa | PROJECT MANAGEMENT

Workshops for managers on project and change management, and training on team dynamics; workshops are also organised for sponsors.

The use of LEAN methodology for systemic process improvement.

An advanced Lean Six Sigma Green Belt programme addressing the needs of managers responsible for operations.

A cafeteria-style programme offering training in e.g. negotiation, communication, feedback and other current development topics.

A programme promoting the combination of business responsibility with care for people.

Training for Medical Staff and Patient Service Staff

We provide our patients with full care of the highest standard and never leave them without a solution, which is why the qualifications of our medical teams and patient service staff are so important to us. Knowing how important it is to regularly deepen specialist knowledge and to enable the exchange of experience with other healthcare experts, we regularly organise training and conferences for this group of employees, covering all business lines – from outpatient clinics to hospitals. Newly employed doctors take part in appropriately profiled induction training. The Medical Education Centre runs practical courses for medical staff. Every year the Medicine Academy and the Patient Service Departments (DOP) Academy are held, promoting the highest standards of service. Employees of the Patient Service Departments and the Contact Centre have access to development workshops building service-related competencies and to training on mental wellbeing. Medical teams benefit from soft-skills workshops, and medical managers are supported in developing management competencies. Medical staff have access to a continuously updated Medical Knowledge Base. Patient feedback influences the direction of development activities.

For medical staff, development is focused primarily on raising clinical competencies, implementing new medical procedures, and improving diagnostic and therapeutic skills. A significant part of this process takes place within clinical practice, teamwork, interdisciplinary consultations and the implementation of new medical technologies in day-to-day work with patients, which we do not count in training hours. In our activities we combine formal education, practical competencies and technological development. A development model designed in this way allows us to build the organisation's readiness for future challenges and to effectively support the provision of high-quality patient care and the accessibility of medical services.

Number of Training Hours

In 2025 we delivered 355,829 hours of training, covering all professional groups (an average of approximately 12 hours per person), including 241,147 hours for non-medical staff (approximately 28 hours each) and 114,683 hours for medical staff (approximately 9 hours each).

In 2025, an average of

28

hours of training

fell to each non-medical employee.

Table 6. Average number of training hours within the LUX MED Group

Average number of training hours per employee*, by employment structure						
	2024[2]			2025		
	Total training hours	Total employed by the organisation	Average hours per employee	Total training hours	Total employed by the organisation	Average hours per employee
Senior management	1,163	77	15.1	918	77	11.9
Other employees	258,409	28,897	8.9	354,911	28,845	12.3
Total, employees at all levels of the structure	259,572	28,909	9.0	355,829	28,922	12.3

[2] We corrected data reported for 2024. The error was the consequence of the incorrect inclusion of data from one of the companies.

Performance Reviews and Development Appraisals

404-3

Owing to the complex organisational structure and the specific nature of the work of medical staff, who spend most of their time on direct patient care, as the LUX MED Group we apply an individual and flexible approach to assessing work effectiveness.

The 3D Competency Model forms the foundation of an integrated approach to employee development and to building an organisational culture based on responsibility, cooperation and continuous improvement. In 2025 we launched the Model in four business divisions as part of a process pilot, covering both the development of competency standards and the launch of a new format of Development Appraisals.

The 3D Competency Model describes the expected behaviours and skills common to all employees, regardless of position, as well as competencies specific to individual roles. It consists of three dimensions (3D):

The 3D Competency Model

1. **Me – individual competencies** covering attitudes and behaviours supporting personal effectiveness, self-development and responsibility
2. **Me and the Team – collaboration competencies** defining how employees work together within the organisation, build relationships, communicate and support others
3. **Me in the Organisation – business and strategic competencies** indicating how employees deliver LUX MED's objectives, make decisions, and are accountable for quality and business development

Alongside the introduction of the 3D Model in the pilot divisions, a **new Development Appraisals** process was launched. This is a cyclical, structured dialogue between manager and employee, which enables:

- **Standardisation of competency expectations** – shared criteria and a consistent language have enabled more objective and transparent HR decisions (recruitment, development, succession);
- **Strengthening a development culture** – employees have gained clarity about their direction of development, and managers a tool for conducting regular, high-quality development dialogue;
- **Building responsibility and engagement** – the process has increased employees' awareness of their own role, influence and development opportunities;
- **Development of future-focused competencies** – the model supports the development of skills that are key to a modern medical organisation: collaboration, innovation, responsibility, and high quality of patient service;
- **Strengthening the 'S – Social' aspects of ESG** – through the professionalisation of development processes, attention to equal opportunities, and the creation of a transparent working environment.

The pilot carried out in 2025 provides the basis for the gradual, broad implementation of the 3D Model in further areas of the organisation in subsequent years.

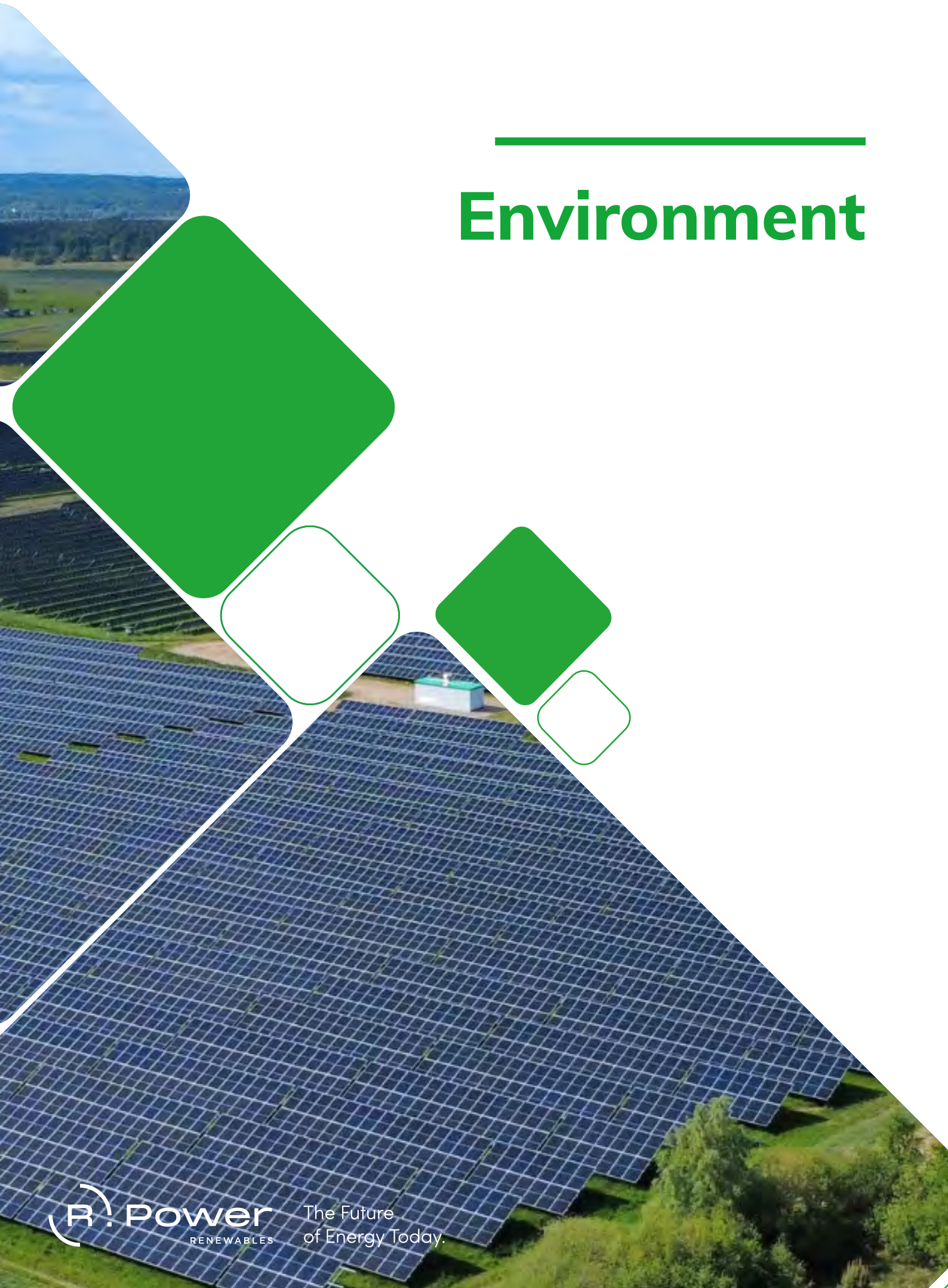
Table 7. Percentage of employees covered by regular performance reviews and development appraisals

Percentage of Employees Covered by Regular Performance Reviews and Development Appraisals						
	2024			2025		
	Percentage of employees covered by regular performance reviews and development appraisals	Total no. of employees	Percentage	Percentage of employees covered by regular performance reviews and development appraisals	Total no. of employees	Percentage
Senior management	55	55	100%	46	46	100%
Management staff	992	992	100%	476	1,044	46%
Other employees	2,791	6,449	43%	2,451	6,988	35%
Total, all employees	3,841	7,496	51%	2,973	8,087	37%

The differences in the results presented between 2024 and 2025 arise from a change in methodology. In the 2024 report, only those people who were subject to regular reviews linked to the achievement of objectives and were covered by the bonus system were included. Management staff were covered by conversations on the achievement of objectives at a rate of 100%. In 2024, work was carried out to update the organisation's competency model and to prepare for the implementation of the model in 2025. Under the plan, every employee will undergo a formalised review of competencies and development opportunities within their role at least once a year. In 2025, development conversations based on the competency model were undertaken by people from 4 selected Divisions, as part of the pilot of the process within the organisation, and were accordingly included in the results for 2025.

Lider wspiera
Wybieraj świadomie
Bądź odpowiedzialny
Dziel się wiedzą
Model
3D
goodhabitz
Zaangażuj się!

Environment



R! Power RENEWABLES The Future of Energy Today.

Initiatives for a Green Future

Our ambition is to achieve net-zero greenhouse gas emissions by 2040 through consistent decarbonisation. Aware of the growing effects of climate change, we plan to systematically reduce the emissions associated with our operations. We began the process of monitoring them in 2019, and have since successfully reduced them – despite the company's intensive growth.

Energy consumption and greenhouse gas emissions within the LUX MED Group are directly linked to the operation of our medical facilities. Energy is used primarily for lighting premises, powering medical equipment, and ensuring thermal comfort. Demand for energy is particularly high in hospitals, owing to their round-the-clock operation.

As an entity operating in the healthcare sector, we are aware that our activities – although aimed at improving health and quality of life – carry a certain impact on the natural environment. Energy consumption results in greenhouse gas emissions, which contribute to climate change. These emissions are both direct (Scope 1), arising from the combustion of fossil fuels in heating systems and vehicles, and indirect (Scope 2), associated with the use of electricity and heat purchased from external suppliers.

Faced with growing climate challenges, we are taking decisive action to reduce our environmental impact, while continuously striving to simultaneously raise the quality of the services we provide. The health of people and whole communities is closely linked to the state of the natural environment, which is why reducing greenhouse gas emissions and implementing solutions that support sustainable development in the healthcare sector is very important to us.

Reduction in Scope 1 and 2 emissions (market-based):

–57.9%

compared to 2019

Since 2019 we have been calculating our carbon footprint and implementing a decarbonisation strategy. Together with the Bupa Group, of which we are part, we have the ambition to achieve net-zero Scope 1 and 2 greenhouse gas emissions by 2030, and full climate neutrality across all scopes by 2040. Our targets (Scope 1&2 at –46% by 2030, and –63% by 2034 for Scope 3) have been officially approved by the Science Based Targets initiative (SBTi), which supports companies in setting ambitious, scientifically grounded emission-reduction targets and in transforming their operations.

100%

of electricity from renewable sources

In 2025, photovoltaic farms began operating, generating zero-emission energy that covers the demand of all facilities belonging to the LUX MED Group – in accordance with the 10-year vPPA (virtual Power Purchase Agreement) signed in 2024. The purchase of energy from photovoltaics supports the realisation of our ambition to achieve zero emissions by 2040.

86% of the fleet

is hybrid and electric vehicles

We are replacing vehicles with low-emission ones and monitoring changes in the automotive market. In 2025 we purchased 159 hybrid vehicles, including five PHEVs (Plug-in Hybrid Electric Vehicles), combining a combustion engine and an electric motor, offering fuel savings and the ability to drive emission-free over short distances.

Energy Consumption

302-1, 302-3

In our operations we use various forms of energy – electricity, heat, and energy from fuel combustion, both in vehicles and for heating purposes. Since 2025 we no longer use cooling energy, since we use only electricity for cooling. Over the past three years, purchased energy has had the largest share of total energy consumption, which is why we are focusing on increasing the proportion sourced from renewables. The vPPA agreement we have entered into enables us to use zero-emission electricity, and the next significant step will be the decarbonisation of heat energy sources.

Increased demand for electricity is a result of opening new facilities and hospitals, which entails the need to power a greater number of medical and non-medical devices, as well as lighting and cooling systems. The usable floor area of our properties increased by almost 13,200 m² compared with the previous year, now reaching approximately 292,000 m².

Table 8. Energy consumption by source, and energy intensity

		2024	2025	Change [%]
Energy production from non-renewable raw materials (MWh)	Natural gas	4,017.0	4,497.4	+12%
	Heating oil	195.0	593.8	+204%
	Diesel oil	995.9	956.6	-4%
	Petrol	5,172.0	5,921.4	+14%
	Propane	131.9	142.4	+8%
Energy production from renewable sources (MWh)	Solar energy	48.9	164.1	+236%
Purchased energy (MWh)	Electricity from RES (renewable energy sources)	27,997.0	34,132.0	+22%
	Electricity from the grid	4,330.0	0.0	-100%
	Other consumption of energy in mobile sources	2.3	17.2	634%
	Heat energy	26,190.0	26,044.9	-1%
	Cooling energy	526.0	0.0	-100%
Total energy consumption within the organisation (MWh)		**69,606.0**	**72,469.8**	**+4%**
Total energy consumption from non-renewable sources (MWh)		**41,560.1**	**38,173.7**	**-8%**
Total energy consumption from renewable sources (MWh)		**28,045.9**	**34,296.1**	**+22%**
Energy intensity (MWh/m²)*		**0.250**	**0.248**	**-1%**

* Intensity is measured as the ratio of total energy consumption (MWh) to the total floor area of all properties in square metres. Floor area in 2024: 291,998.70 m²... [2024: 278,802.85 m²; 2025: 291,998.70 m²].

Among the non-renewable raw materials consumed, petrol invariably has the largest share (approx. 50%, similar to 2024). This results from the organisation's dynamic growth and our employees' participation in numerous events. We are making every effort to decarbonise our fleet and are gradually replacing combustion vehicles with hybrid and electric ones. The second most commonly used fuel is natural gas, used mainly for heating – its consumption increased by approximately 12% compared with 2024, maintaining a similar share of our total raw material consumption, at 37%. The increase in heating oil consumption results from two new facilities beginning to use it – in Szymanów and Ostrów Mazowiecka. At the Szymanów facility, the boiler was used only temporarily, until the electrical installation reached full functionality, so heating oil will no longer be used at this facility in subsequent years.

Chart 2: Total Energy Consumption [MWh]

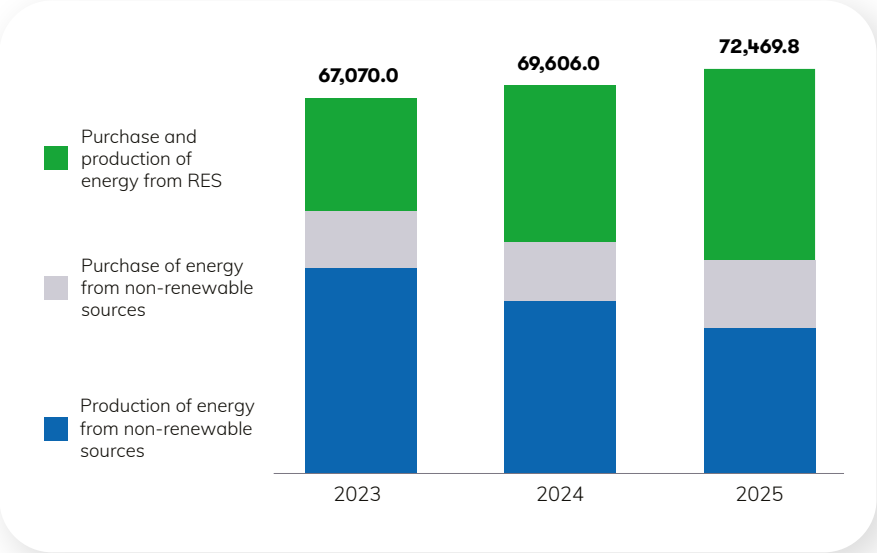
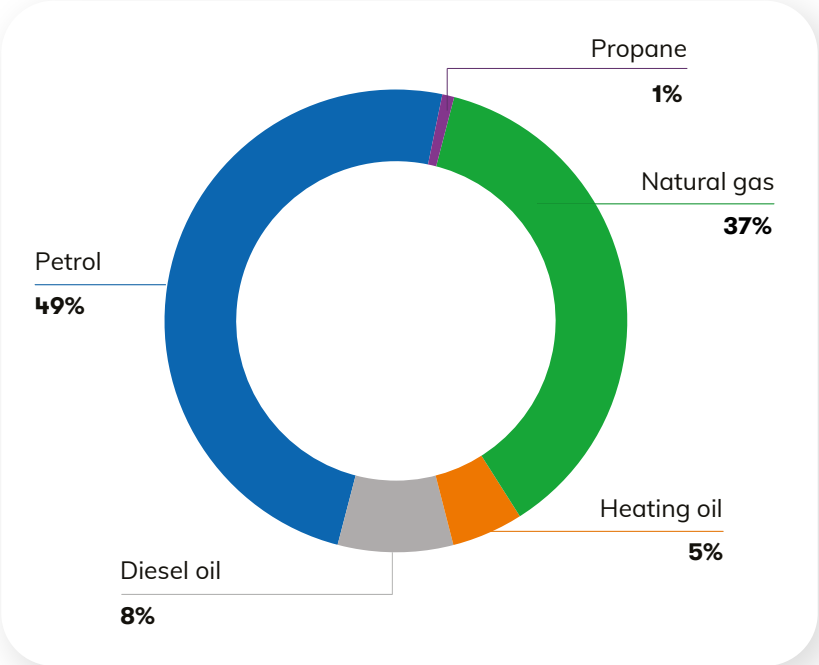


Chart 3: Total Energy Production from Non-Renewable Raw Materials in 2025



In 2025 we completely moved away from purchasing non-renewable electricity from the grid. In addition, we recorded a 236% increase in our own solar energy production, owing to the inclusion in the figures of production from the companies Medical Magnus Sp. z o.o. and Orthos Szpital Wielospecjalistyczny Sp. z o.o.

Greenhouse Gas Emissions

305-1, 305-2, 305-3, 305-4

Emissions Monitoring Process at the LUX MED Group

At the LUX MED Group, the greenhouse gas emissions monitoring process is carried out in cooperation with several teams: 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. CO_2 emissions data is collected quarterly and entered into an internal reporting system available to the whole Bupa Group, to which LUX MED belongs. Besides the information necessary to calculate the carbon footprint, the system also takes into account changes in locations – both new openings and facility closures, and changes (increases) in the floor area of facilities themselves.

Each time data is entered, it undergoes internal verification, including an analysis of deviations and changes in the context of emission sources and individual organisational units. Final quarterly data is approved by the Member of the Management Board for Finance and the Director of the Controlling, Planning and Analysis Department. Once a year, the data is subject to external audit across the whole Bupa Group.

An important element of the process is three-year planning, which takes into account the organisation's growth in the context of CO_2 emissions. This makes it possible to assess how expansion affects the achievement of decarbonisation targets.

In accordance with GHG Protocol guidelines, Scope 2 emission calculations are carried out in parallel using two methods: market-based, taking into account the choice of energy supplier and guarantees of origin, and location-based, based on local emission factors – for Poland, the national emissions factor is applied.

The LUX MED Group uses the SpheraCloud Corporate Sustainability software for recording, monitoring and analysing emissions. Since 2025, within the Bupa Group, we have also been using Oracle for more detailed data analysis. All gases have been accounted for based on IEA data – 2021 Emission Factors Database, © OECD/IEA 2021. No biogenic greenhouse gas emissions were identified. We adopt 2019 as the base year, in accordance with the assumption used in setting Bupa's SBTi-approved targets, as this is the most representative year owing to the absence of any COVID-19 pandemic impact. The data covers all properties. The market-based method was calculated on the basis of: https://www.aib-net.org/facts/european-residual-mix (factor set name (AIB) – PL – residual mix). Where purchased energy is covered by Guarantees of Origin, the emission factor applied is 0. In our calculations we strive to follow best practice and are improving our datacollection process, obtaining data of ever-better quality.

Chart 1: Scope 1 and 2 Emissions [tCO_2e] – Market-Based Method

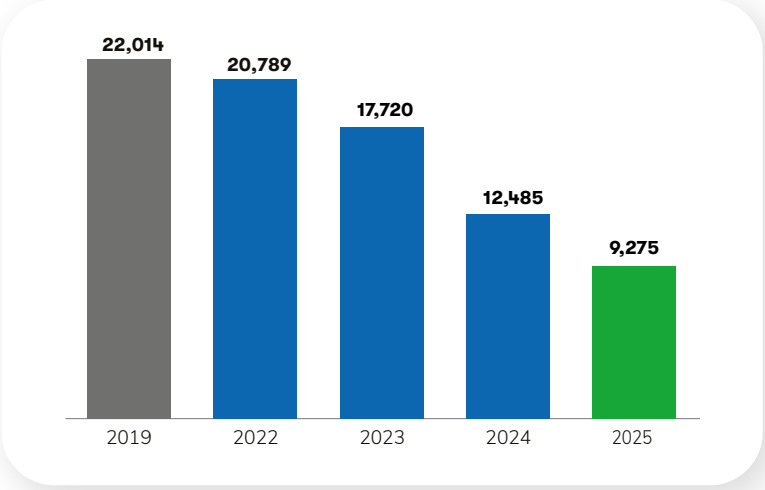


Table 9. Total direct and indirect greenhouse gas emissions

	Greenhouse gas emissions [tCO2e]			2025 vs. 2024		2025 vs. 2019	
	2019 base year	2024	2025	2025 vs. 2024 change [tCO2e]	2025 vs. 2024 change [%]	2025 vs. 2019 change [tCO2e]	2025 vs. 2019 change [%]
Direct Scope 1 emissions	3,609.0	3,639.5	4,032.7	393.2	11%	423.7	12%
Indirect Scope 2 emissions (locationbased)	21,283.2	24,906.3	22,957.1	–1,949.2	-8%	1,673.9	8%
Indirect Scope 2 emissions (marketbased)	18,405.1	8,845.9	5,242.6	–3,603.3	-41%	–13,162.5	-72%
Total Scope 1 and 2 emissions (locationbased)	24,892.2	28,545.8	26,989.7	–1,556.1	-5%	2,097.5	8%
Total Scope 1 and 2 emissions (marketbased)	22,014.1	12,485.4	9,275.3	–3,210.2	-26%	–12,738.8	-58%
Indirect Scope 3 emissions	4,875.8	5,017.0	5,452.8	435.8	9%	577.0	12%
Total (location-based)	**29,768.0**	**33,562.8**	**32,442.5**	**–1,120.3**	**-3%**	**2,674.5**	**9%**
Total (market-based)	**26,889.9**	**17,502.4**	**14,728.0**	**–2,774.4**	**-16%**	**–12,161.9**	**-45%**

Renata Rzadkiewicz

Director, Medical Centres Administration Department, Investment and Administration Department

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With such a large and geographically dispersed portfolio of locations, it is essential to systematically monitor emissions and translate the data into concrete operational decisions. Every infrastructure modernisation, change in energy management or optimisation of floor space has a real impact on our carbon footprint. That is why we treat emissions data not merely as a reporting obligation, but as a tool supporting the conscious, responsible and long-term management of our network of facilities.

Table 10. Greenhouse gas emissions by source

	Greenhouse gas emissions [tCO_2e]				2025 vs. 2024		2025 vs. 2019	
	Emission source	**2019 base year**	**2024**	**2025**	**Change [tCO_2e]**	**Change [%]**	**Change [tCO_2e]**	**Change [%]**
Direct Scope 1 emissions	Fuel consumption for heating and/or cooling purposes	926.4	817.9	1,017.7	199.8	24%	91,3	10%
	Fuel consumption in vehicles	1,984.5	1,373.9	1,532.2	158.3	12%	-452,3	-23%
	Refrigerants	206.2	287.1	325.5	38.4	13%	119.3	58%
	Anaesthetic gases	491.9	1,160.5	1,157.2	–3.3	0%	665.3	135%
Indirect Scope 2 emissions (location-based)	Related to electricity generation	16,680.0	19,475.4	17,714.5	–1,760.9	-9%	1,034.5	6%
	Related to heat and cooling generation	4,603.2	5,430.9	5,242.6	–188.3	-3%	639.4	14%
Indirect Scope 2 emissions (market-based)	Related to electricity generation	13,802.0	3,415.1	0.0	–3,415.1	-100%	–13,802.0	-100%
	Related to heat and cooling generation	4,603.2	5,430.9	5,242.6	–188.3	-3%	639.4	14%
Indirect Scope 3 emissions	From Scope 1 and 2 energy consumption	598.1	511.7	594.8	83.1	16%	–3.3	-1%
	Transmission and distribution losses	4,108.6	4,367.1	4,531.9	164.8	4%	423.3	10%
	Business travel	169.1	138.2	326.0	187.8	136%	156.9	93%
Total Scope 1, 2 (location-based) and 3 emissions		**29,768.0**	**33,562.8**	**32,442.5**	**–1,120.3**	**-3%**	**2,674.5**	**9%**
Total Scope 1, 2 (market-based) and 3 emissions		**26,889.9**	**17,502.4**	**14,728.0**	**–2,774.4**	**-16%**	**–12,161.9**	**-45%**
Emission intensity ratio (tCO_2e/m^2)*		**n/a**	**0.06**	**0.05**	**–0.01**	**-20%**	**-**	**-**

* The LUX MED Group uses the SpheraCloud Corporate Sustainability software for recording, monitoring and analysing emissions. Intensity is measured as the ratio of total Scope 1 and 2 greenhouse gas emissions (in tCO_2e, market-based) to the floor area of all properties in square metres. Floor area in 2024: 278,802.85 m^2; in 2025: 291,998.70 m^2.

Waste

306-1, 306-2

The medical sector is characterised by the generation of waste related to the treatment process and the provision of healthcare, much of which is classified as hazardous waste. Owing to its source, chemical and biological composition, and other properties, it can pose a risk to human health, animal health, and the natural environment. Improper management of this type of waste carries a risk of environmental contamination.

We are aware of the impact that waste can have on the environment, which is why we manage it in accordance with applicable legal regulations and internal procedure. This document sets out the principles for proper segregation, safe storage, and transfer of waste to entities holding the appropriate permits.

The principles of waste management within LUX MED's organisational units cover:

Organisation of the waste storage location	Organisation of the storage and selective collection system for waste	Ensuring that facilities are equipped for waste collection
Organisation of waste transfer to authorised recipients	Checks on the quantity and type of waste generated	Reporting on the quantity and type of waste generated

Responsibility for implementing and maintaining the waste management procedure lies with the Investment and Administration Department and the Procurement and Fleet Department. This procedure covers all medical facilities belonging to LUX MED sp. z o.o. – including medical centres, dental surgeries, diagnostic laboratories and hospitals. The obligation to collect and monitor waste data rests with the directors or managers of individual units, who oversee the correct conduct of the process and compliance with applicable legal regulations. In the case of offices, waste management is regulated under lease agreements, and the agreed rules of conduct are consistent with legal requirements.

The quantities and types of waste generated are systematically recorded, and every year we fulfil, in a timely manner, the obligation to submit a report on the quantity of waste generated and how it is managed to the relevant institutions. Medical waste constitutes the predominant share of the total quantity of waste generated by LUX MED Group, which is why proper handling of it is of key importance.

Currently, most medical waste is not recycled owing to its particular nature. At the LUX MED Group we apply the most effective available solutions for its management. Hazardous waste is collected by specialised companies, which then subject it to a disposal process with energy recovery.

Table 11. Waste

	Waste generated (Mg)		
	LUX MED Sp. z o.o.		The LUX MED Group
Type of waste	**2024**	**2025**	**2025**
Packaging waste; sorbents, wiping cloths, filter materials and protective clothing not included in other groups	0.81	0.60	17.64
Waste from construction, renovation and demolition of buildings and road infrastructure (including soil and earth from contaminated sites)	1.86	0.29	2.47
Medical and veterinary waste (excluding kitchen and restaurant waste not related to healthcare or veterinary care)	364.82	391.04	585.71
Waste not included in other groups	24.71	11.10	16.43
Total	**392.2**	**403.03**	**622.25**

Waste categories were adopted depending on their source of generation, in accordance with the Regulation on the Waste Catalogue. The data concerns only non-municipal waste subject to mandatory recording, generated by customers and employees of medical facilities. Data was collected on the basis of the BDO (waste database) register.

In this year's report, for the first time we are publishing data on the mass of waste across the whole of the LUX MED Group, not only LUX MED Sp. z o.o. For organisational reasons, the 2025 data covers all companies, with the exception of companies merged into LUX MED Sp. z o.o. through acquisition during 2025.

Effective Resource Management

To reduce the consumption of raw materials within our organisation, we are running the Single Use Items project, the aim of which is to replace single-use products with reusable ones, or with ones made from more environmentally friendly materials – wherever this is operationally possible and safe. In 2025 we carried out regular, quarterly monitoring and analysis of procurement data in order to plan actions, as well as market analysis for the availability of more environmentally friendly alternatives, taking into account their functional properties, availability, and potential environmental impact.

In 2025 we selected two products for which we planned reduction actions: single-use trays and medicine cups. Compared with 2024, we reduced our purchases of these by 5% and 20% respectively. In 2026 we plan to select two further products for reduction. In addition, in 2025 we almost completely eliminated single-use plastic cups in favour of paper cups. In the structure of purchases, paper cups accounted for 96%, while plastic cups accounted for only 4%.

In 2025 we continued our efforts to reduce paper consumption. We improved the collection of scattered data, spoke with employees from various areas of the organisation, and analysed new opportunities. We carried out a pilot at 10 facilities, in which we reminded doctors of the option of issuing post-visit recommendations via the Patient Portal instead of printing them. The best result, at one facility, was a 74% reduction in the number of printed recommendations per visit compared with the same period a year earlier.

In the first quarter of 2025 we carried out the pilot 'Paperless' project at 10 selected LUX MED medical facilities. For one month at each location, between February and April, we introduced wobblers into doctors' consulting rooms encouraging them not to print recommendations if it was not necessary. Our aim was to reduce paper consumption and promote more sustainable practices in the day-to-day operation of facilities.

The results achieved confirmed the effectiveness of simple educational and communication measures. At most facilities we observed a year-on-year decline in the average number of printed recommendations per visit, with the exception of ultrasound examinations.

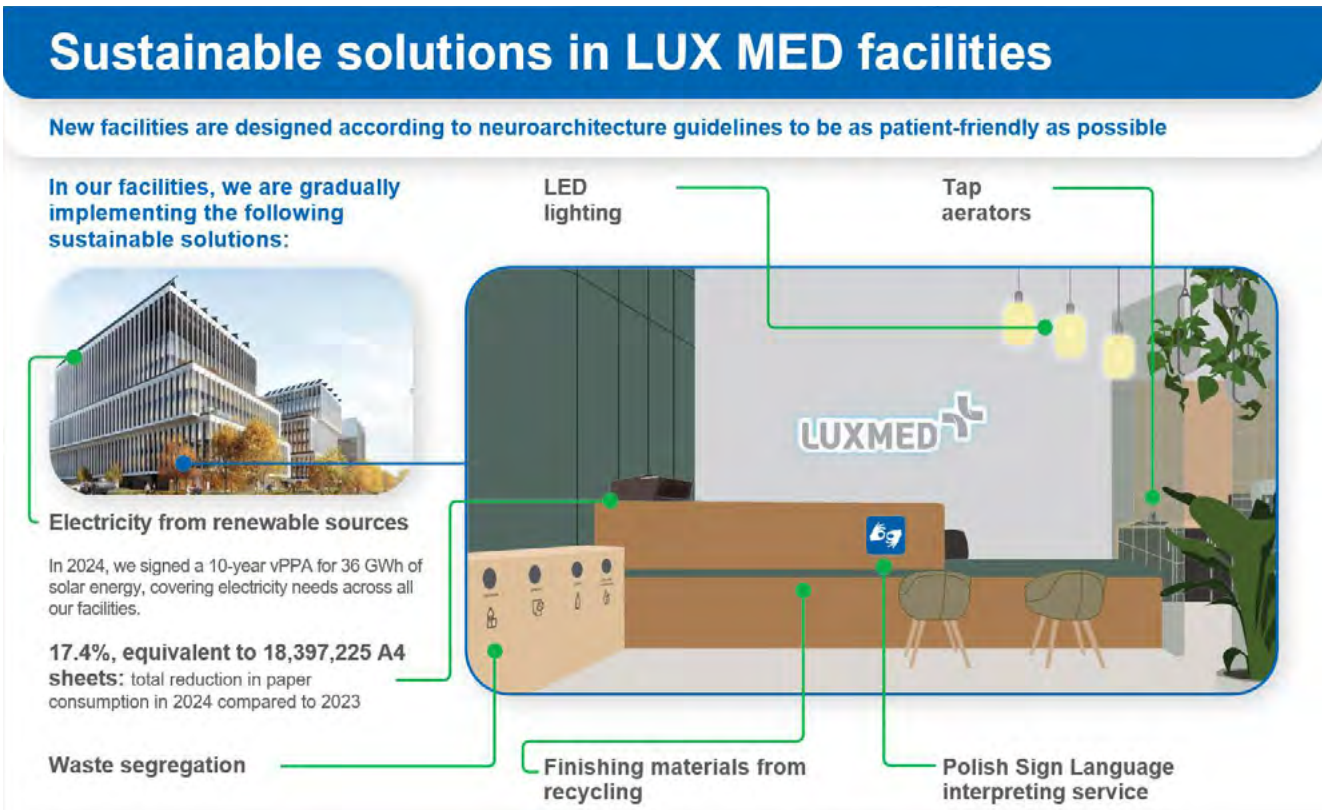
Importantly, at some locations the effect was also sustained over the longer term. The best results by the end of 2025 were achieved at the following facilities: Warsaw Przyokopowa (–25%), Wrocław Wołowska (–30%), and Warsaw DPD on 1 Sierpnia Street (–74%).

In subsequent stages we plan to improve ongoing monitoring and analysis of printing-related data, which will allow us to set KPIs for medical facilities. This project also forms part of the development of a circular economy strategy, comprising an audit of raw material consumption, analysis of possible actions, and the creation of a strategy with concrete targets.

Buildings

Decarbonisation of buildings – projects completed, planned energy effects, and next steps.

We have carried out key decarbonisation projects in Warsaw hospitals, focusing on the modernisation of heating systems and improving the energy efficiency of buildings. At the facility on Szernera Street, we modernised the heating substation, including replacement of the installation, in particular the fitting of modern valves, thermostats and partial automation, which made it possible to reduce heat energy consumption. At the hospital on Fieldorfa Street, we commissioned a heat pump installation as the primary heating source, which made it possible to reduce the operation of the heating substation to approximately 10% of its original use, dedicated solely to domestic hot water (DHW) needs, significantly lowering demand for energy from conventional sources. At St. Elizabeth's Hospital, we were preparing an educational campaign and the modernisation of the heat management system, based on advanced automation, thanks to which we plan to achieve optimisation of central heating and DHW parameters. The planned actions are intended to enable an annual CO_2 emissions reduction of around 11%. After completion of the project at St. Elizabeth's Hospital, we have planned the gradual rollout of proven solutions at further facilities.



LUXMED

Society

BLOK: GOSPODARKA I ZDROWIE
Panel
Waga problemu: jak walczyć z chorobą otyłościową w miastach?

Health Promotion and Preventive Healthcare

We run modern preventive programmes that support employee health and build a culture of wellbeing within organisations. Our activities are carried out directly at company premises and during corporate events, and cover a wide range of health and educational services.

The objectives of our activities are:

1. Empowering patients
2. Supporting preventive activities;
3. Health education;
4. Promoting responsible self-care and primary prevention.

We believe that the key features of prevention are increasing awareness of self-care and promoting responsible care for one's own health. To this end:

- We publish articles and tips on looking after one's health;
- On our YouTube channel we publish educational video materials on e.g. self-care, physical activity and preparing for medical examinations;
- We run quarterly educational campaigns – each campaign is based on a specific theme, often related to seasonality, e.g. a guide for Parents, 'Healthy Back to School';
- We produce the 'Winning Health' podcast, to which we invite experts from various fields to talk about medicine, psychology and physical activity;
- We run the 'Health with LUX MED; patient education programme, under which we hold regular meetings with specialists and Q&A sessions. In 2025, 1,000 participants took part in the programme;
- We publish educational materials, available at preventive health events and at our centres.

Preventive Campaigns for Corporate Customers

1.8 million patients
in total covered by preventive activities

More than **1 200** preventive campaigns for more than **400 companies**

Flu vaccinations:
more than 127,000 people

Screening tests:
more than 350,000 tests

Webinars, seminars, workshops, consultations, basic examinations:
more than 400,000 people

Since 2025, as part of our preventive activities, we have offered the option of using the Mobile Preventive Health and Occupational Medicine Consulting Room, which makes it possible to carry out preventive campaigns anywhere in Poland, to the same standard, in accordance with sanitary requirements.

Self-Care

As part of the Self-Care project, we focus on educating patients in primary prevention and conscious health care. Its aim is to provide reliable, understandable knowledge that helps people make everyday decisions affecting their state of health.

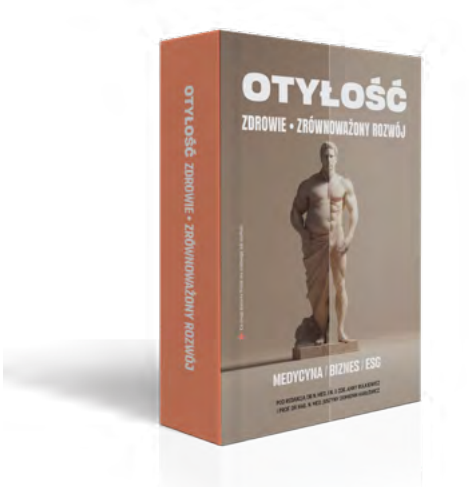
We produced a series of video materials devoted to the most important areas of preventive healthcare. Topics included, for instance, interpreting complete blood count results, the importance of diet and physical activity in preventing lifestyle diseases, cancer prevention for women and men, and the role of sleep and recovery in maintaining health. We prepared the materials in the form of accessible, short recordings based on the medical knowledge and experience of LUX MED specialists. In total, more than 15 videos were produced, which have been viewed more than 600,000 times. The project constitutes an important element of educational activities aimed at patients and supports the building of greater health awareness within society.

NFZ Preventive Programmes

In many of our activities we cooperate with the National Health Fund (NFZ). At our medical facilities we carry out examinations under free preventive programmes, such as 'My Health – Health Check-up for Adults' or the Cardiovascular Disease Prevention Programme. In 2025, under agreements with the NFZ, we carried out more than 260,000 preventive services, including tests and vaccinations, for approximately 30,000 patients.

Obesity Prevention

According to the World Health Organization (WHO), 890 million adults are currently living with obesity, and more than 2.5 billion people are overweight. To counteract this progressive phenomenon, a systemic approach and cooperation between many institutions is needed, which is why in 2025 we joined the Partnership for Obesity Prevention and Treatment.



In 2025, the book 'Obesity. Health. Sustainable Development' was also published. The publication was prepared by 47 authors, including doctors, economists and ESG experts, edited by Anna Rulkiewicz (Doctor of Medical Sciences and Health Sciences), CEO of the LUX MED Group, and Professor Justyna Domienik-Karłowicz MD PhD, Chair of the LUX MED Scientific Council and President of the LUX MED Group Medical Education Centre. This is a book that not only provides a diagnosis, but also sets out a plan of action and presents concrete solutions.

The key to lasting results is comprehensive, coordinated and long-term treatment that genuinely supports lifestyle change. To this end we developed the Obesity Prevention and Treatment Programme, to provide patients with individually tailored support in treating obesity as a disease and preventing its development in people who are overweight. In 2025, the pilot of this project covered 100 of our employees.

Harmonia: Your Safe Haven

2025 was a breakthrough year for the Harmonia Mental Health Clinics. Thanks to the opening of further clinics and the acquisition of the Mental Path network, we tripled the number of facilities, enabling us to look after an ever-greater number of patients even better.

Our activities in the field of mental health became an inspiration for our owner, Bupa, resulting in the creation of the Mindplace brand, which is now being developed across Bupa Group companies worldwide.

We have also created, and continue to develop, our own video podcast, 'Harmonia – Your Safe Haven'. Its aim is to popularise reliable knowledge about mental health and to provide practical tips supporting mental wellbeing. Experts – doctors, psychologists and psychotherapists – discuss topics related to emotions, stress, relationships and ways of coping with everyday challenges. Episodes of the podcast are published on YouTube and Spotify. In 2025 there were 10 episodes, and we are continuing the project in 2026.

In 2025 we also implemented a new Patient Portal functionality: MentalCare. We designed this tool to educate both people who are at the beginning of their personal development journey and want to learn more about mental health, and those who are already in treatment or therapy. MentalCare offers functionalities helpful for looking after wellbeing: hundreds of educational materials in the form of courses, videos, podcasts and articles, psychological tests, and a tab with exercises/tasks.

Healthy Cities

'There is no healthy person without a healthy environment' – in the spirit of this motto we have now carried out the Healthy Cities programme for the fifth time. This initiative combines the promotion of a healthy lifestyle with care for the environment – it encourages participants to adopt health-promoting habits in their daily lives and to take a minimum of 6,000 steps a day, while also supporting positive change in urban spaces, local communities, and the regeneration of natural resources. The Healthy Cities programme comprises:

1
Carrying out health-promoting and pro-environmental initiatives among winning cities;

2
Revitalisation of peatlands under the patronage of winning companies and the LUX MED Group;

3
Planting new trees;

4
Support for charitable organisations by winning LUX MED Group teams.

Healthy Cities: An Anniversary Edition with a Record Number of Participants

More than 17,000 participants, 136 companies and **67 cities** took part in the 5th edition of the challenge. Together, participants took more than 3.6 billion steps, setting a new challenge record. This figure corresponds to a distance of 2.5 million kilometres, or approximately **63 laps around the Earth.**

Winning Companies and Cities

The three winning companies – ART-COM Sp. z o.o., DUNA POLSKA S.A. and Solidarność w VWP – received the main award, for the greatest engagement of their employees, in the form of patronage over peatlands in the Biebrza National Park. Thanks to LUX MED Group's cooperation with UNEP/GRID-Warszawa and the Re:Generation programme, a total of 6 hectares were regenerated as part of active peatland conservation, and 268 ha were covered by the indirect impact of conservation measures.

Beyond the step count, engagement and a genuine desire to change one's surroundings for the better were extremely important in the competition. It was thanks to the determination of residents that the cities of **Jaworzno, Chełm** and **Wałbrzych** made the podium of this year's edition of Healthy Cities and received prizes of PLN 30,000, PLN 20,000 and PLN 10,000 respectively, which they allocated to planting and pro-environmental projects in their communities.

In addition, **Warsaw,** which engaged the largest number of participants (1,501 people) received a special award: first-aid training as part of the 13th edition of the 'I Know How to Help' programme organised by the LUX MED Group Rescue Academy. 485 pupils from 10 selected primary schools took part.

The cities of **Łódź** and **Wrocław,** which also attracted an impressive number of participants, each received PLN 10,000 to be used for environmental activities in their city.

As part of the 5th edition of the challenge, the LUX MED Group also supported revitalisation work at the **Royal Łazienki Park in Warsaw.** Planned works included, for instance, the renewal of the Modernist Garden in its Geometric section – reconstruction of rose plantings, replenishment of lilac shrubs, and improvement of irrigation for the slopes of the Southern Lower Palace Pond.

Five Actions with Operation Clean River

To mark the anniversary edition of the Healthy Cities challenge, the LUX MED Group, in cooperation with **Operation Clean River,** also organised five water-body clean-up campaigns, held in Katowice, Wrocław, Kraków, Gdańsk and Warsaw. Volunteers – 110 LUX MED Group employees and city residents – collected 401 bags of rubbish and bulky waste, amounting in total to more than 5.5 tonnes of waste. In accordance with LUX MED Group's pledge, one tree was planted for every participant. In November 2025, in cooperation with the State Forests, more than 17,000 new trees were planted in the Jabłonna Forest District – exactly as many as there were participants in the anniversary challenge.

LUX MED Teams Support Foundations

The most active LUX MED Group teams received a total budget of PLN 30,000 to support a chosen environmental organisation.

1st place:
PLN 15,000

Fundacja Pszczoła Musi Być (The Bee Must Exist Foundation) – for a pollinator hotel.

2nd place:
PLN 10,000

Fundacja Łąka (The Meadow Foundation) for a demonstration orchard with a flower meadow, serving educational purposes.

3rd place:
PLN 5,000

Foundation for the Development of the Warsaw 'Panda' Zoological Garden – to support the Warsaw Zoo, with particular attention to the welfare needs of grey seals.

Social impact of the 5th edition of the Healthy Cities challenge

Summary of all previous editions of the Healthy Cities challenge

Healthy Cities Index

Another edition of the report showing where life in Poland is healthiest

In 2025, during the 2nd Healthy Cities Congress, held at Ujazdów Castle in Warsaw, the fourth edition of the Healthy Cities Index was launched. The publication was again produced in cooperation with the Warsaw School of Economics (SGH), the Foundation for Public Governance and Administration, and the Open Eyes Economy Summit (OEES).

The Index is an analysis of the activities of 66 cities with powiat (county) status in Poland, which, according to the Central Statistical Office (GUS), were home to almost 12.25 million residents in 2024 – nearly a third of Poland's population.

The Healthy Cities Index allows for a synthetic view of how the social, environmental and economic environment, and city policies, are conducive to residents' health. The results point to considerable diversity in the conditions created by cities, which is reflected in the individual areas covered by the index (8 sectoral categories: health; population and generational structure; municipal and social services; education; housing; environment; infrastructure; and public space).

The results of the Healthy Cities Index are presented in two groups – large cities, with more than 300,000 residents, and cities with fewer than 300,000 residents. The first group is home to around half of the residents of the cities covered by the index (6.06 million people), and the second group to around 6.24 million people.

Detailed results are available in the Healthy Cities Index 2025 report.

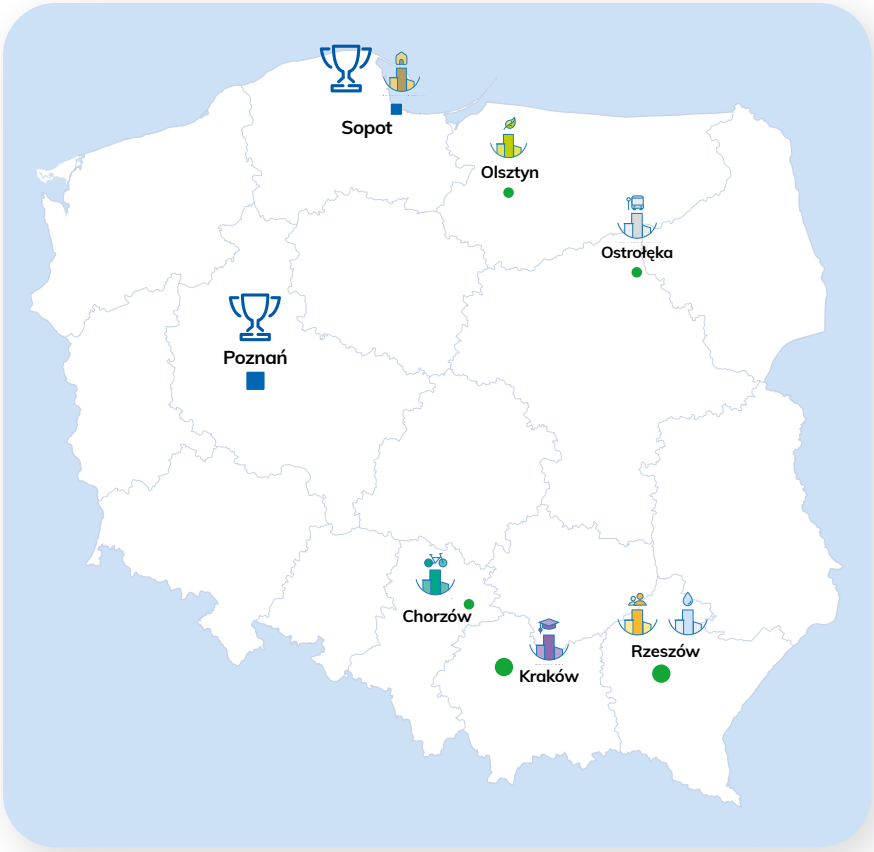
Healthy Cities Index leader – cities with more than 300,000 residents: Poznań

Healthy Cities Index leader – cities with fewer than 300,000 residents: Sopot

Category leaders:

- Health – Poznań
- Population and generations – Rzeszów
- Municipal and social services – Rzeszów
- Education – Kraków
- Housing – Sopot
- Environment – Olsztyn
- Infrastructure – Ostrołęka
- Public space – Chorzów

The winners in individual categories were:



Healthy Cities Congress

On 30 September 2025, the second edition of the Healthy Cities Congress was held at Ujazdów Castle in Warsaw – an event co-organised by the LUX MED Group, the Warsaw School of Economics (SGH), and the Open Eyes Economy movement.

The start of the Healthy Cities Congress was preceded by numerous meetings of the Congress Programme Council, whose members included, among others: Anna Rulkiewicz (Doctor of Medical Sciences and Health Sciences), CEO of LUX MED; Professor Jerzy Hausner, Chair of OEES; Piotr Wachowiak PhD (habil.), Rector of SGH Warsaw; Agnieszka Chłoń-Domińczak PhD (habil.), Vice-Rector of SGH Warsaw; Bernard Waśko PhD, Director of the National Institute of Public Health; Professor Zbigniew Gaciong, Rector of the Medical University of Warsaw for the 2020–2024 term; Karolina Adamska-Woźniak, Managing Director of the Foundation for Public Governance and Administration; and Professor Jolanta Żyśko, Vice-Rector for Development and Promotion at the Academy of Physical Education (AWF) in Warsaw. The Council oversaw the substantive content and programme of the event.

https://www.zdrowemiasta.pl/

The event brought together almost 1,500 registered participants (both in person and online) and more than 100 speakers. Honorary Patronage was confirmed by 4 ministries: Health; Education; Climate and Environment; and Sport and Tourism. The Congress also obtained 9 institutional patrons and 10 media patrons. It is worth noting that participation in the event was completely free of charge for all participants. The event will continue in 2026.

Healthy Companies Index

During the first edition of the Healthy Cities Congress we launched the Healthy Companies Index project. Its aim was to develop a research tool serving as a credible and transparent methodology for assessing Polish enterprises in terms of their impact on employee health and the natural environment. The Healthy Companies Index is intended to promote and recognise companies that actively invest effort in creating healthy spaces and a friendly working environment. It is worth emphasising that the purpose of developing the Healthy Companies Index is not to create a ranking of companies, but to provide interested enterprises with reliable, analytical knowledge enabling them to carry out a comparative and in-depth self-assessment.

During the 2025 Healthy Cities Congress, the results of the pilot were presented, in which 27 companies of various sizes took part. The organisations were analysed across three key areas: health, employee wellbeing and environmental impact, and impact on the local community. The Index is available on the Healthy Cities Congress website. A further edition of this report is planned for 2026.

Social Engagement

Within the LUX MED Group we do not limit ourselves to providing medical services alone – we actively strive to have a positive impact on the communities in which we operate. That is why we engage in numerous initiatives and campaigns that respond to the real needs of those around us.

Rescue Academy

In 2025, the LUX MED Group Rescue Academy celebrated its 15th anniversary. Since its establishment in 2010, its aim has been to strengthen the safety of patients, employees and customers by developing competencies in first aid and responding to life-threatening situations. The initiative is an important element in fulfilling LUX MED Group's mission and actively contributes to improving health and safety within society.

Since its inception, the Academy has focused on preparing employees to act quickly and effectively in emergency situations, particularly in the case of sudden cardiac arrest – one of the leading causes of death in Europe. Training programmes are conducted in accordance with current European Resuscitation Council guidelines and combine theoretical knowledge with practice based on realistic medical scenarios. Participants acquire practical skills, including performing cardiopulmonary resuscitation, operating an AED defibrillator, and responding to anaphylaxis, stroke or myocardial infarction.

The Academy's team is also involved in building systemic solutions to increase safety at LUX MED Group facilities. These include, for instance, the 'LUX MED AED binder', containing clear protocols for the most common emergency conditions, a set of educational posters presenting protocols for sudden cardiac arrest in adults and children and for anaphylaxis, and increasing the availability of AED defibrillators by placing them in easily accessible and appropriately marked locations.

The Academy also develops modern educational tools. Thanks to the involvement of experts, a free and publicly available 'First Aid' mobile application was created, providing quick access to practical guidance on handling emergencies – from burns and frostbite to poisoning or electric shock – as well as information on emergency numbers and LUX MED Group medical facilities. In addition, the application includes a knowledge base and a competency test. Content is presented in text and image form, facilitating rapid action in critical situations.

The 'LUX MED First Aid' application is a project of high social value, genuinely increasing readiness to respond in life-threatening situations and strengthening LUX MED's role as a leader in health education.

More than 61,000 employees

Almost 71,000 LUX MED Group customers

15 years of the Rescue Academy

13 editions of the 'I Know How to Help' programme – more than 8,000 pupils trained from across Poland: Warsaw, Piaseczno, Kraków, Katowice, Wrocław, the Tricity, Poznań, Toruń, Rzeszów, Olsztyn, Szczecin, Świętochłowice, Białystok, and Jaworzno.

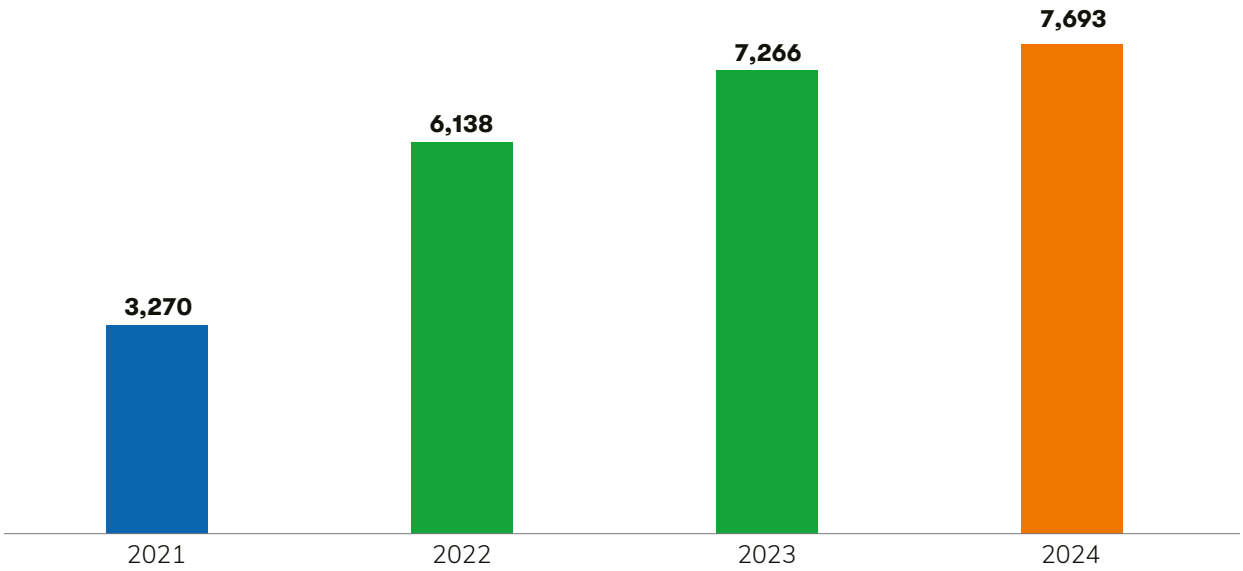
Onkonawigator (Oncology Navigator)

Onkonawigator is a unique, long-running, free project covering the whole of Poland. Under the programme, patients with a suspected or diagnosed cancer receive indefinite support from oncology advisors, who coordinate diagnostic and treatment pathways.

An Onkonawigator referral shortens the time to diagnosis and treatment. The patient receives care, advice and coordination simultaneously. The support of a qualified advisor enables the patient to consciously enter the NFZ (National Health Fund) system and to be properly directed onto a fast track for oncology diagnostics and treatment at a reference centre. An additional benefit is the possibility of receiving psychological support.

The Onkonawigator programme is available to all patients, even those without a LUX MED Group subscription. The condition is the issuing of an Onkonawigator referral, or contacting us, e.g. at the email address: onkokoordynator@luxmed.pl.

Chart 9. Number of Patients Who Used the Onkonawigator Programme, 2021–2024



Our Other Initiatives

In 2025 we were a strategic partner of two Medonet initiatives – the sixth edition of the National Health Test 2025 and the first edition of the National Mental Health Test 2025.

The National Health Test is an annual survey, summarised in a report, that analyses the health of Poles, taking into account morbidity, lifestyle and use of medical care. The initiative provides data and educates society, and participants receive their Health Index and recommendations from Medonet experts after completing the survey.

The National Mental Health Test, meanwhile, is an element of preventive activities in the field of mental health. After completing the questionnaire, participants received personalised recommendations to help them better look after their mental health and to learn their Mental Wellbeing Index. The anonymous survey made it possible to collect data used to develop the first National Mental Health Test Report.

Akcja Słońce (Sunshine Campaign)

Also with oncology patients in mind, in 2025 we joined Akcja Słońce (the Sunshine Campaign), run in cooperation with the Świadomi Życia (Conscious of Life) Foundation. The initiative was created by Joanna Borkowska – an oncology patient active within the Świadomi Życia Foundation. 'Akcja Słońce' is based on a simple but meaningful gesture – wearing a symbolic yellow sun sticker. People marked with this symbol declare their openness to contact and their readiness to offer support: conversation, guidance, or small everyday help.

Patients with an oncological diagnosis are supported by volunteers – other patients who are undergoing or have completed treatment, as well as students of medical disciplines. The aim of the initiative is to create a hospital space in which, alongside oncological diagnostics and treatment, the aspect of presence, conversation and empathy is emphasised. This is intended to help, in particular, people beginning therapy and those experiencing a crisis during treatment who need additional support.

Wygrywaj Zdrowie (Win Your Health)

The 'Win Your Health' programme is an educational and social initiative whose aim is to promote physical activity as a fundamental element of preventive healthcare. In 2025, the main element of the programme was the **'It's More Than Movement'** campaign, devoted to counteracting lifestyle diseases such as diabetes, obesity and cardiovascular disease.

The campaign's communication focused on simple, achievable changes to everyday habits. We showed that regular movement does not have to mean intensive training. Small decisions made every day are enough: choosing the stairs instead of the lift, walking instead of driving, or cycling more often.

As part of the campaign, a series of educational materials was prepared, including e-books devoted to the diseases mentioned above. The publications explained the mechanisms behind their development and showed how physical activity can support preventive healthcare. The materials were downloaded more than 67,000 times. The campaign had a presence both online and in urban spaces. A dedicated mural was created in the centre of Warsaw, and an open sporting event was organised at the Warsaw Breweries (Browary Warszawskie), with the participation of Paralympian Bartłomiej Mróz, who led activities and encouraged participants to be active through a game of badminton.

An integral part of the project was also the **'Win Your Health'** podcast series, devoted to the role of movement in a healthy lifestyle. In conversations with invited guests from the worlds of sport, medicine and business, topics related to physical activity, motivation, preparing for sporting competitions, and ways of coping with challenges on the way to achieving one's goals were discussed. In 2025, 29 episodes were produced, with guests including Anna Rulkiewicz, Karol Bielecki, Robert Korzeniowski, Paweł Nastula, Joanna Jędrzejczyk and Zoja Skubis. The podcast achieved a total of almost 2 million plays on YouTube and Spotify.

Charitable Activities

Charitable-Giving Principles

LUX MED Group's Charitable-Giving Principles organise LUX MED Group's areas of community engagement and set out the rules for awarding support in three categories: Healthy Environment, Health and Wellbeing, and Diversity. All this is designed to deliver, in a coherent way, the Group's mission: 'We help people live longer, healthier and happier lives, and we make the world a better place.'

In 2025, through the Charitable-Giving Principles, we supported 11 foundations, contributing a total of PLN 200,000 to the following projects:

Fundacja Maio – Specialist training for candidates to become foster parents, and psychological and workshop-based support for foster families already operating.

Fundacja Bezpieczni.eu – 'Rescuer in the Danger Zone' training.

Fundacja Na Ratunek Dzieciom z Chorobą Nowotworową – European Oncology Games for Children and Young People.

Fundacja Dziecięca Fantazja – The 21st 'Evening of Dreams' at the Zoo – the largest event of its kind in Poland, for 500 sick and suffering children.

Fundacja Projekt Starsi – Financial support for a helpline for elderly people.

Fundacja Ocalenie – Professionalisation of volunteering at the Ocalenie Foundation as a tool for social integration and counteracting the exclusion of people with a migration and refugee background.

Stowarzyszenie Na Tak – Supporting the wellbeing of pupils with disabilities through the use of a hoist in rehabilitation, and improving working conditions for rehabilitation teachers.

Stowarzyszenie Polska Misja Medyczna – 'Simple steps, real help – support effectively and with empathy.'

Fundacja 64 POLA – The Synerise National Schools and Kindergartens Chess Championship.

Dzieło Pomocy św. Ojca Pio – Psychiatric, psychological and psychotherapeutic support for people experiencing a homelessness crisis and people in poverty.

Fundacja 'Stand with Ukraine' – Renovation and furnishing of a patient ward and bathroom in the children's department of the Sakhnovshchyna Central Municipal Non-Commercial Enterprise Hospital (Kharkiv Oblast, Ukraine)..

Support for Employees in Difficult Situations through the Dr Joanna Perkowicz LUX MED Foundation

The Dr Joanna Perkowicz LUX MED Foundation was established in 2016 to support employees and associates of the LUX MED Group and their families. Its aim is to provide help to people who, because of illness, an accident or a deterioration in their state of health, find themselves in a difficult life situation.

The inspiration for creating the Foundation was the concern for patients that guided Dr Joanna Perkowicz-Szulczyk for many years – long-serving Medical Director of LUX MED and advisor to the President on Patient Safety and Hospital Care. The Foundation's patron always placed emphasis on the high quality of medical care, seeking innovative solutions to support treatment.

The Foundation offers broad support – from organising the treatment process, through help with contacting specialists, to financing medicines, medical services, procedures and operations. In 2018, the LUX MED Foundation obtained the status of a Public Benefit Organisation, thanks to which it can be supported by donating 1.5% of income tax. It is enough to enter KRS number 0000 653 262 in the relevant field of one's individual tax return (PIT form). Donations can also be made to account number 40 1020 1026 0000 1702 0282 7806.

In total, in 2025 we allocated PLN 2.5 million to support community initiatives.

Best of Bupa Award in the Courage Category for Major Tomasz Nowak MD

Dr Tomasz Nowak, an orthopaedist at ORTHOS Hospital and a Major in the 1st Brzeg Sapper Regiment, won the prestigious Best of Bupa Awards 2025 in the Courage category. The award was given for his heroic conduct during the 2024 floods, which affected, for instance, residents of Lower Silesia and the Opole region. The disaster destroyed homes, roads, crops and infrastructure, leaving many people without help.

In these dramatic circumstances, Dr Tomasz Nowak, risking his own health, rescued residents of the flooded towns, swam to homes cut off from the outside world, provided medical assistance, secured people's belongings, rescued people and animals, and led evacuations. Together with Senior Warrant Officer Krzysztof Bień, who provided safety cover as a diver, our orthopaedist, wearing a diving suit and carrying a waterproof medical container, reached those in need. One such case was a resident of Wronów, who required immediate surgical intervention after an extensive elbow joint injury. Dr Nowak provided him with assistance 'in field conditions', and subsequently swam back to the patient regularly to monitor his condition and change his dressings.

Corporate Governance

Policy Commitments and Implementation

2-23, 2-24

Operating within Bupa's global standards, we have implemented a set of policies covering key risk and sustainability areas. These policies form the foundation of corporate governance and include, among others: the Sustainable Development Policy, the Risk Management Policy, the Speak Up Policy, the Privacy Protection Policy, the Information Security Policy, the Employee Wellbeing, Health and Safety Policy, and the Supplier Cooperation Policy. Each policy has a local owner responsible for its implementation, monitoring the effectiveness of actions taken, and updating the document. Policies are adopted by the Management Board and apply to all employees and all of the organisation's activities. A list of policies, together with a summary of their scope, is provided in the Appendix.

In addition to Policies, a range of regulations, procedures and other internal regulations operate within the organisation, describing in more detail the rules of conduct for selected areas, including: procedures relating to the safety and quality of services provided, the Code of Conduct, the Sustainable Supply Chain Principles, the Charitable-Giving Principles, the Counterparty Verification Procedure, and the Anti-Corruption Procedure. Internal regulations are approved by local owners and have assigned responsible persons who ensure compliance, regularly assess the effectiveness of required actions, and update the documents. Employees covered by new or amended regulations are informed of their obligations and are required to implement them in their day-to-day work.

Implementation of commitments arising from the Policies takes place e.g. through:

- Onboarding of new employees – during which they learn the rules and culture prevailing within our organisation (including matters relating to sustainable development) and all regulations that apply to them;
- Reporting and oversight – in accordance with Bupa's guidelines, the LUX MED Group measures, reports and tracks progress in achieving sustainable development goals, including greenhouse gas emissions, and ensures compliance with regulatory requirements and global standards;
- Monitoring and control – periodic verification of the implementation of activities, risk assessments, internal and external audits, and the application of control mechanisms in business processes. In the case of suppliers, a two-phase assessment process is applied (before entering into cooperation, and subsequent periodic reviews), and relationships with high-risk entities require additional approval;
- Post-acquisition integration of new companies – new companies joining the LUX MED Group take part in a process called '100-Day Integration', under which they are required to integrate their systems and rules of conduct with those in force within our organisation
- Internal communication – newsletters, information emails, intranet;
- Training – available on the e-learning platform, covering e.g. environmental protection, anti-corruption procedures, Speak Up, incident reporting, and risk management.

Acting in accordance with the principles of responsible business conduct, we implement commitments in our relationships with partners, suppliers and cooperating entities e.g. through:

- Requiring suppliers to comply with the Sustainable Supply Chain Principles;
- A supplier assessment and verification process;
- Contractual clauses – agreements with business partners include e.g. provisions relating to compliance with ethical principles, confidentiality, and anti-corruption measures;
- Escalation and violation-reporting mechanisms – employees and partners have access to the Speak Up procedure, enabling them to report irregularities safely and confidentially;
- Engaging stakeholders in the pursuit of ESG objectives, e.g. meetings with suppliers on reducing their greenhouse gas emissions, or activating communities in relation to preventive healthcare.

Reporting Irregularities and Managing Negative Impact

2-23, 2-24

A Code of Conduct operates within the LUX MED Group, which sets out the values that guide our activities, ethical norms, and standards of business conduct for employees and counterparties. Where doubts arise regarding particular conduct, or an irregularity is noticed, all internal and external stakeholders of the LUX MED Group can make use of the Speak Up procedure, in accordance with the Whistleblower Protection Act. Reports can be made anonymously or by name, and are considered by an independent Investigation Team, made up of employees of the Risk and Compliance Department and, where necessary, experts in various fields.

Reports can be made:

- via the platform available at www.bupa.com/luxmedspeakup;
- directly to the Speak Up Officer;
- by telephone, via the 24/7 helpline on 800-005-409; or
- by email to naruszenia@luxmed.pl.

In addition, in employment-related matters, it is possible to report violations to the Ethics Committee (its activities are described in more detail in the Counteracting Discrimination section), and, in the case of concerns about the quality of the services we offer, patients have access to the complaints process and NPS surveys.

Stakeholders are involved in the design and improvement of mechanisms through consultation, the option to anonymously submit comments in People Pulse surveys, and ongoing information about changes to procedures via the intranet, newsletters and training. The effectiveness of control mechanisms is monitored through audits of the implementation of corrective actions, analysis of feedback from People Pulse surveys, a register of reports in the Navex system, and incidents in the Organisation's Incident Register (known as RIO), where operational incidents such as attempted fraud, theft, exceeding of authority, or phishing can be reported.

Information on reports from whistleblowers, as well as data concerning cases of fraud, corruption, sanctions imposed, FinCrime incidents, conflicts of interest, and completed training in the above areas, is passed to the Management Board quarterly as part of Risk and Compliance Committee meetings, in the form of tables (management information) with itemised data. In addition, a summary table is prepared at the end of the year, containing all incidents and violations reported in the given calendar year.

We are committed to cooperating with regulatory authorities and to applying dispute-resolution mechanisms in order to ensure access to remedies. The type of corrective action depends on the nature and scale of the negative impact and may include: an apology, return or rehabilitation, financial or non-financial compensation, changes to team structure or working rules, additional training, and, in extreme cases, personnel changes. In business relationships, decisions are made depending on the possibility of remedying negative effects. Possible solutions include: continuing cooperation with the implementation of corrective actions, temporary suspension, or termination of the relationship if the effects cannot be mitigated.

In addition to complaint mechanisms, the organisation applies periodic ESG risk analyses and internal and external audits, as well as control activities to prevent or mitigate effects. The Risk and Compliance Department oversees the risk management system, supporting the growth of organisational awareness and maturity. This unit provides advisory services, verifies key assumptions, and ensures proper understanding of various risk categories, their sources and consequences. It also maintains a risk register, analysing it for dependencies, links and materiality of risks, taking sustainable development aspects into account as well.

Every identified risk has an assigned owner, and control activities are aimed at minimising it – these are also carried out by designated individuals. The risk identification process is conducted independently of functional area, while the main risk categories are defined in accordance with Bupa policies in force within the LUX MED Group. The Risk Assessment Matrix is based on a five-point scale for assessing probability and impact; risk owners assess risks periodically or ad hoc, where new risk factors arise requiring an update. The impact of risk materialisation is assessed through the lens of four areas of consequence: social, financial, reputational, and regulatory.

Ethics and Transparency

Conflicts of Interest

2-15

We are committed to ensuring transparency and integrity in all business transactions. Accordingly, we take very seriously our responsibility for identifying and managing conflicts of interest. To prevent conflicts of interest and mitigate their effects, the Management Board of LUX MED Sp. z o.o. and the Management Boards of some subsidiaries have adopted a Resolution on conflict-of-interest prevention principles. Under this Resolution, the HR Division carries out an annual update of conflicts of interest, gathering information on potential or actual conflicts of interest from the management staff responsible for managing the given area (each manager is required to make a statement regarding their subordinate team). In addition, this staff is required to report potential or disclosed conflicts on an ongoing basis. Regardless of the actions indicated, a report can also be made by any person employed within the LUX MED Group, and by the HR Division (e.g. during document verification at the time of hiring).

Events of a competitive, corrupt or nepotistic nature are subject to reporting. Proper management of conflicts of interest is overseen by a dedicated Management Committee. All Members of the Management Board sit on this Committee. Where a conflict is disclosed, possible solutions and remedial actions are indicated.

As part of the training activities carried out, every person employed within the LUX MED Group must undergo mandatory training on preventing conflicts of interest. In addition, activities are carried out to raise management staff's awareness of the obligations arising from the conflict-of-interest management process.

Following the annual update, the HR Division analyses reported conflicts and, where necessary, issues appropriate recommendations in this regard. On the basis of these activities, a report is drawn up, which is approved by the Conflict of Interest Management Committee. Conflicts of interest are disclosed to stakeholders.

Regulatory Compliance

417-2, 417-3

In 2025, no cases of non-compliance with regulations or voluntary codes concerning the labelling of products and services, information about them, or marketing communications were identified.

2-27

As part of the regulatory authority inspections carried out at the LUX MED Group in 2025, no significant cases of non-compliance with the law or with other external and internal regulations of the organisation were identified.

206-1

In 2025, no events or proceedings concerning breaches of antitrust regulations were recorded.

205-3

In 2025, no confirmed cases of corruption were identified. In addition, no legal proceedings were conducted in this area.

Preparation for CSRD-Compliant Reporting

In 2024 and 2025 we undertook preparatory activities in order to meet the requirements of the Corporate Sustainability Reporting Directive (CSRD). With the support of external consultants, we carried out a double materiality analysis, a gap analysis against ESRS indicator requirements, and preparation for reporting in accordance with the ESRS, including disclosure in accordance with the EU Taxonomy.

Owing to the implementation of the 'Omnibus' package, which pushed back the reporting obligation to 2027, and our wish to standardise reporting across the whole Bupa Group, we decided to continue reporting in accordance with the GRI methodology, while monitoring CSRD requirements.

Cooperation with Organisations and Associations

2-28

In 2025 we continued our cooperation with national and international organisations, undertaking numerous initiatives. Active engagement in these organisations plays an important role in the development of the medical sector and the achievement of sustainable development goals. Since 2024 we have also been taking part in the new Chapter Zero Poland project, run as part of the Responsible Business Forum.

Industry and Business Organisations

Telemedyczna Grupa Robocza

The Telemedicine Working Group, co-founded by the LUX MED Group, has been actively supporting the development of telemedicine in Poland since 2015. The organisation brings together experts from various fields and focuses on raising the quality and safety of telemedicine services, as well as popularising knowledge in this area. As part of its activities, it prepares positions, recommendations and guidelines that form the foundation for developing national standards.

Konfederacja Lewiatan

The CEO of the LUX MED Group serves as Vice-President of Konfederacja Lewiatan and President of the Employers for Health Association within this organisation. Konfederacja Lewiatan is a business organisation representing the interests of Polish employers, both nationally and at the level of the European Union, whose task is to support business development. As part of the Confederation's activities, we actively participate in the work of the Green Transformation Council, the Renewable Energy Sources Council, and the Clean Air Council.

HL7

HL7 is an international non-profit organisation developing interoperability standards in healthcare. LUX MED co-founded the Polish HL7 Association. Standards such as HL7 v2 Messaging, CDA and FHIR enable the exchange of medical data and the implementation of e-prescriptions, e-referrals and electronic medical records in Poland.

Business Accessibility Forum (BAF)

The Business Accessibility Forum is a partnership created by the Widzialni Foundation, Allegro, Microsoft Polska, Orange Polska and Santander Bank Polska. The Forum acts as a platform enabling dialogue and the exchange of experience regarding compliance with the requirements of the European Accessibility Act. The LUX MED Group cooperates with other members on identifying and eliminating barriers to accessing digital resources, sharing expert knowledge and promoting accessibility as a fundamental human right.

Polish Chamber of Medical Informatics (PIIM)

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 medical sector, including medical software providers and experts in the field of medical informatics. PIIM's activities focus on representing its members in initiatives relating to standardisation and legislation in healthcare, including public consultations and providing opinions on draft legal acts. In addition, the Chamber has its own representative on the Interoperability Council.

Organisations Promoting Sustainable Development Principles

United Nations Global Compact

LUX MED Sp. z o.o. is a member of the United Nations Global Compact – the largest global initiative promoting sustainable development in the business sector. The company's membership confirms its commitment to implementing the Ten Principles relating to human rights, labour standards, environmental protection and anti-corruption, which are an integral part of LUX MED's strategy, organisational culture and everyday practices. Membership of the UN Global Compact also entails a commitment to implementing the Sustainable Development Goals set out by the United Nations as part of the 2030 Agenda.

Partnership for Obesity Prevention and Treatment

In 2025, the LUX MED Group joined the Partnership for Obesity Prevention and Treatment. As part of this initiative, mechanisms for information exchange and cooperation will be developed between public administration, the scientific community, the business sector and social organisations. The Partnership for Obesity Prevention and Treatment launched the STOP OBESITY social campaign on 4 March, World Obesity Day, during a press conference. The LUX MED Group was represented by Marek Solecki, Head of the Health Education Department. The Partnership's founding institutions are the Institute of Healthcare Management at Łazarski University and the Polish Society for the Treatment of Obesity.

Responsible Business Forum

In addition, we joined the Partnership Programme, a key initiative of the Responsible Business Forum (FOB) – the largest and longest-running organisation in Poland comprehensively addressing ESG, sustainable development and business responsibility. The programme brings together leaders representing various sectors of the economy, enabling them to develop ESG competencies and undertake joint action for the sustainable transformation of business.

Re:Generacja UNEP GRID

For 3 years we have been an ecosystem partner in the Re:Generacja UNEP GRID programme. As part of the projects, protective actions were carried out on ecologically valuable peatlands located within national parks, landscape parks and forest complexes. In total we provided support to more than 64 ha of peatlands, and the indirect impact of our conservation activities additionally covered an area of 268 ha.

As part of the initiative we included e.g.:

- Fragrant clove pink (Dianthus superbus) in Kampinos National Park;
- Sundew (Drosera) in Krzesiny Landscape Park;
- Reindeer lichen (Cladonia rangiferina) in the Tuchola Forest area – 17.4 ha in total.

We also provided conservation cover to peatlands in Kampinos National Park, including the Wasilków Bog and Górniańskie Łąki (meadows), as well as the Przemkowskie Bagno (bog), with a total area of 41 ha.

An important element of our activities was also the peatlands located in Biebrza National Park, covering an area of 6 ha, with the conservation measures we applied having an indirect effect on a significantly larger area.

Chapter Zero

In 2024 we also joined the FOB – Chapter Zero Poland initiative. Anna Rulkiewicz (CEO) became a Member of the Programme Council, and Łukasz Niewola, Director of the Corporate Communications and Sustainable Development Department, joined the Steering Committee. Chapter Zero Poland is part of the Climate Governance Initiative created by the World Economic Forum, and aims to support the development of the competencies of company management boards and supervisory boards in the area of combating climate change.

Sports Organisations

The LUX MED Group supports the spirit of sport and Olympic ideals, caring for the best Polish athletes as Main Medical Partner of the **Polish Olympic Committee and the Polish Paralympic Committee.** We are also Medical Partner of the Polish Handball Association, and, since 2025, exclusive Medical Partner of the **Polish Athletics Association** and Main Medical Partner of the **Polish Disabled Sports Association 'Start'.** An important element of this cooperation is providing athletes with comprehensive medical care, support from experienced specialists, and access to modern medical infrastructure.

Polski Komitet Olimpijski

Polski Komitet Paralimpijski

Związek Piłki Ręcznej w Polsce

Polski Związek Lekkiej Atletyki

Polski Związek Sportu Niepełnosprawnych "Start"

As the leader of private healthcare, we are aware of how great and positive an impact physical activity has on our health. We continuously spread the spirit of sport within society, being present at events in which the committees and sports associations mentioned above take part. In 2025 we took part in a total of 29 sporting events, including: the 26th Olympic Picnic, Paralympic Picnics, the 71st Janusz Kusociński Memorial, the 101st PZLA Polish Athletics Championships, the 5th Orlen Paralympic Run, and matches of the Polish men's and women's national teams as part of World and European Championship qualifiers.

We continue our long-standing cooperation with the **Warsaw Marathon Foundation,** serving in 2025 as Medical Partner of two key running events in Poland – the 19th Warsaw Half Marathon and the 47th Warsaw Marathon. As part of the partnership, we provided comprehensive medical cover for race participants, including the presence of paramedic teams and first-aid points along the routes, so that all competitors could focus on their results, confident that their health was in good hands. We consider sport to be an integral part of caring for health and wellbeing, which is why we are also passionately involved in running events that attract both professionals and amateurs.

Cooperation with Universities

The LUX MED Group cooperates with universities and supports medical education, recognising the training of staff as a key duty of a leader in healthcare.

For instance, we cooperate with:

- Medical University of Warsaw
- University of Engineering and Health in Warsaw
- Warsaw School of Economics (SGH)
- Cardinal Stefan Wyszyński University
- Łazarski University
- SWPS University
- Powiśle College
- Edmund Biernacki Medical Vocational School No. 4
- Medical University of Gdańsk

In cooperation with universities and schools, we organise practical training for students of medical disciplines and pupils. This enables participants to gain knowledge in real-world conditions, make use of modern infrastructure and equipment, and draw on the experience of LUX MED Group specialists. We also offer educational programmes such as postgraduate internships and residencies. Young doctors, regardless of their placements at hospitals or outpatient clinics and courses included in the programme, take part in the LUX MED Residency Programme. During regular meetings, residents and interns deepen their knowledge at workshops with experts, present their own work, share interesting cases, and build a mutually supportive community. The LUX MED Group also operates a Medical Education Centre, which conducts specialist practical training for medical staff; in 2025 it trained almost 6,000 people.

Additionally, in that same year we began work on opening our own university – the Higher School of Medical Sciences – in order to engage even more strongly in the education of future healthcare workers.

Supplier Relationship Management

308-1, 414-1

Suppliers[1] play a key role in ensuring the smooth functioning of the LUX MED Group. It is thanks to their engagement and professionalism that it is possible to maintain a high quality of medical services, the availability of necessary resources, and the implementation of innovative solutions. The LUX MED Group treats cooperation with suppliers as a partnership based on trust, responsibility and shared values.

In 2024 we implemented the document 'Sustainable Supply Chain Principles for LUX MED Group Suppliers', under which we inform all suppliers of the principles we uphold and require them to comply with them. In addition, a Supplier Cooperation Policy (Suppliers Policy) operates within the LUX MED Group, which is described in the Appendix, in the List of Policies in Force within the LUX MED Group, in this report.

The LUX MED Group values relationships with suppliers who share our commitment to:

1. Acting in accordance with the law;
2. Protecting and respecting human rights;
3. Reducing negative environmental impact and managing climate risk;
4. Conducting business responsibly;
5. Contributing to the sustainable development of communities.

In return, the LUX MED Group commits to:

- treating suppliers fairly, without favouring suppliers based on company size;
- cooperating with suppliers to support their social, environmental and ethical practices;
- ensuring compliance with responsible business standards in the supply chain across its operations.

[1]We define suppliers as those counterparties who meet the procedural criteria for a supplier, in accordance with the Suppliers Policy. We classify counterparties according to business, regulatory and reputational materiality, and their impact on patients, the environment and society.

Supplier Assessment

As the LUX MED Group, we assess our suppliers against environmental and social criteria, in accordance with the criteria set out in the applicable policies in this area. The supplier assessment process takes place in two phases – at the tender stage, and periodically during the course of cooperation. During initial selection, we examine a given bidder's impact on the business, and assess their level of risk in the areas of confidentiality, information security, the environment, modern slavery, and outsourcing. We analyse the results obtained and store them in internal resources. If a bidder achieves the required number of points, they are classified as meeting the required criteria, with whom cooperation can be undertaken, or as a conditional supplier, with whom cooperation is possible under specific market circumstances or dependent on a business decision.

Establishing a business relationship with a high-risk supplier requires additional approval from the relevant substantive departments. In the event of a difference of opinion, the final decision rests with the Management Board and the Procurement and Fleet Department. In addition, the cyclical supplier risk-level assessment process is repeated at the end of each calendar year. Since the end of 2025, we have been assessing our suppliers via the OneTrust platform, which helps to carry out supplier segmentation more efficiently and in a more automated way. In 2025 we continued meetings with suppliers regarding their education and the undertaking of actions in the area of sustainable development and decarbonisation. Careful selection in choosing the Group's suppliers is a complex process, because we want to provide the highest possible quality of services, which are also environmentally sustainable.

In 2025 we continued meetings with IT-industry suppliers regarding the reduction of Scope 3 emissions. Through a series of meetings we encourage suppliers to set a sustainable development target or strategy and to undertake actions to reduce CO_2 emissions.

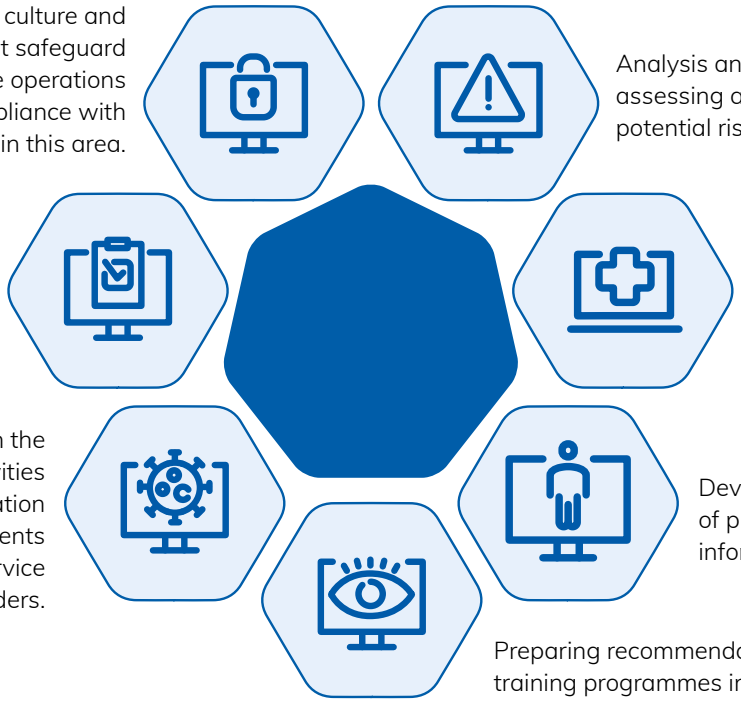
In 2025,
we assessed

100%

of new suppliers on their environmental and social performance

Privacy and Data Security

Within the LUX MED Group we take care to ensure the highest level of security for the data we process, whether belonging to our employees, patients, customers, or business partners. This is a top priority for the Information Security Team, the Cybersecurity Department, and the Data Privacy Team. Every employee contributes to achieving the goal of the highest quality and control of tasks carried out in the area of data security within our organisation. Activities in this area are overseen by the established Privacy and Information Security Committee, whose main tasks are:



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

Analysis and advice on identifying, assessing and managing potential risks.

Coordination, monitoring, providing opinions on, and reporting on GDPR projects and information security initiatives.

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

Analysis and advice on the impact of business activities on privacy and information security, and requirements relating to IT or service providers.

Developing tasks in the area of privacy protection and information security.

Preparing recommendations and designing training programmes in the area of information security and privacy protection.

Paweł Dłużewski,

Director, IT Management Department,
Chief Information Security Officer (CISO)

"At the LUX MED Group we place the highest importance on information security and data protection. The Cybersecurity Department monitors and responds around the clock, and our managers treat cybersecurity as an integral part of management. Thanks to the actions we take every day, our employees, patients, customers and business partners can be confident about the security of their data. Our employees are required to take part in numerous training sessions in the area of security and data protection, because we know that people are the first line of defence against cyberattacks. This allows us to build an organisational culture based not only on trust, but also on the solid foundation of a professional approach to cybersecurity.

Privacy Protection Principles

Within the LUX MED Group, our activities remain in full compliance with applicable regulations, including personal data protection legislation, as well as best market practice. We systematically improve our processes for identifying and assessing risks and implement adequate remedial measures, applying 'privacy by design' and 'privacy by default' approaches at all stages of service design and delivery. We pay particular attention to analysing the impact of new business and technological initiatives on data privacy.

We develop and maintain an advanced privacy protection system, comprising both organisational and technological solutions. These solutions ensure the secure collection, storage and processing of data, including special category data, such as medical data. We regularly carry out compliance audits, system testing and control activities, which allow us to identify and mitigate potential threats on an ongoing basis.

The LUX MED Group companies operate on the basis of uniform data protection standards, which guarantees consistency of approach, high quality of processes, and compliance with applicable legal regulations. The correctness of these activities is overseen by dedicated privacy protection and information security teams, which monitor compliance and support the organisation in adapting to changing regulatory and technological requirements.

In response to growing stakeholder expectations regarding digital responsibility and the development of modern medical technologies, we consistently invest in the modernisation of infrastructure and the development of our teams' competencies. We treat the protection of personal data as an important element of our social responsibility and a contribution to building a safe, sustainable healthcare system in which technology supports, rather than infringes, human privacy.

Katarzyna Pisarzewska

Advocate, Deputy Director for Data Protection, Data Protection Officer

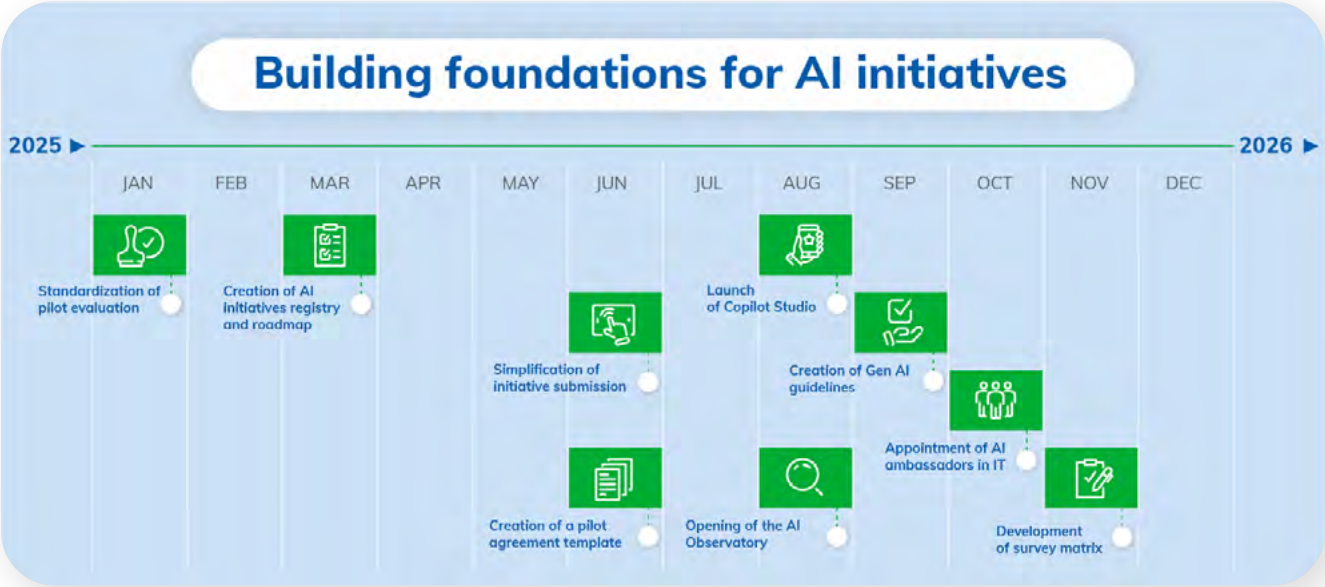
In the dynamically developing environment of modern healthcare, the protection of personal data remains not only a legal obligation, but above all an expression of responsibility and respect towards every person who entrusts us with their data. Within the LUX MED Group we treat privacy as one of the foundations of trust – a key element of our relationships with patients, insured persons, employees, customers and business partners.

Responsible and ethical management of personal data is one of the pillars of our operational activities and long-term development strategy. Privacy protection is an integral element of our mission to provide medical services of the highest quality, with respect for patients' rights and ethical principles. We believe that lasting trust is built through transparency, reliability and consistent action. In the reporting period, we placed particular emphasis on further strengthening employee awareness of data protection and cybersecurity. We analyse current challenges, including the growing scale of digital threats and the development of remote services, such as telemedicine or AI-supported tools. Thanks to this, our employees act in a more conscious, proactive and responsible manner.

Innovation and New Technologies

2025 marks a new era of innovation at LUX MED. We laid the foundations for AI initiatives, focusing on building a working culture that makes use of artificial intelligence while maintaining the highest data security standards, in particular for data relating to our patients. The use of publicly available generative AI for business purposes is described in the newly implemented guidelines – the Principles for the Use of Generative AI for Business Purposes. At the same time, we adopted and began implementing the Responsible AI Standard within the organisation, which sets out the framework for the responsible design, deployment and oversight of AI solutions.

Oversight of the whole process is provided by the newly established Innovation Committee. We also organised training sessions and webinars for employees on AI topics, at both basic and advanced levels, which we describe in more detail in the Education and Training chapter. AI-based solutions have ceased to be an experiment. They have become an integral part of our day-to-day operations – effectively supporting digital transformation and strengthening the company's competitiveness.



AI LAB

In 2025 we established the AI LAB team, operating within the structure of the IT Development Department (DRI). The team's work aims to support the implementation of AI across the whole organisation. It operates in three areas: carrying out projects and pilots, advising on the choice of AI solutions, and developing standards for the safe and ethical use of AI.

We support our bold innovators through the Innovation Centre. As part of the fast-track process created within it, a Business Owner can test an idea within 2 sprints (i.e. 4 weeks) and decide whether it is worth developing further or should be abandoned.

Our activities are delivering their first real-world implementations:

4 pilot projects

1. **Zowie AI chat in the Patient Portal** (January)
2. **AI Chat for the Contact Centre** (March)
3. **AI analytics for the Contact Centre** (July)
4. **KEMTAI – AI Physiotherapy** (August)

6 implementations

1. **Rayscape chest X-ray analysis** (January)
2. **Gleamer bone X-ray analysis** (March)
3. **Copilot in MS Office 365** (June)
4. **Zowie AI chat in the Patient Portal** (December)
5. **Copilot Boteusz** (December)
6. **Genomic report summarisation** (December)

8 in progress

1. **Patient medical-history summarisation**
2. **Skryba AI** (note from doctor's visit)
3. **Copilot Onboarding Chat** (pilot)
4. **Process Discovery Agent**
5. **Copilot Exclusions Analysis Agent**
6. **Copilot Quotation Agent**
7. **E-dermatology** (pilot)
8. **8. Infermedica** (pilot)

1. We implemented a solution for automatically summarising genomic reports, shortening analysis time from hours to minutes. AI-generated summaries have already been tested on 11 reports, and the results obtained are very promising. Producing a report of up to 7 pages, containing only the most valuable information, takes the AI 3 minutes, instead of the 40 minutes a doctor needs for the task.
2. We launched a medical data anonymisation process, which ensures compliance with legal requirements and opens the way to scalable use of AI.
3. We prepared a pilot for summarising patients' health history, demonstrating the potential to support doctors in decision-making.
4. We launched Copilot Chat, providing a secure working environment within the corporate environment, accessible directly from Office 365, and we began a pilot of extended Microsoft 365 Copilot licences.
5. We began work on AI agents based on Microsoft Copilot, which automate business processes and increase productivity.
6. We established the AI Ambassadors network and the AI Guild, to develop competencies in the area of LLMs (large language models) and support teams in the practical use of AI tools. This is a step towards the conscious and effective use of the technology of the future.

Cooperation with Start-ups

2025 also brought us excellent examples of how cooperation with start-ups can help us offer ever-higher quality and safety in our services.

After intensive searching and presentations of solutions in the area of temperature monitoring in cooling equipment intended for storing medicinal products requiring maintenance of the cold chain, LUX MED MAVIT Hospital in Warsaw at Podleśna 61 Street decided to run a pilot. We signed our first commercial agreement, which will cover 2 MAVIT hospitals (in Warsaw and Katowice) and the MAVIT Ophthalmology Centre in Warsaw at Migdałowa 4 Street.

This year we took part in the Carpathian Start-up Fest, Google x Emerging Founders, and, as a Partner, in PFR Future of Health. We strengthened our contacts with start-ups and new investors in the MedTech/DeepTech sector, and with organisations supporting them. We referred promising start-ups for assessment of the business rationale for cooperation with our entities.

Integrated Management System

An Integrated Management System operates within LUX MED sp. z o.o., comprising: a Quality Management System, an Information Security Management System, and an Environmental Management System. Its details are described in the Integrated Management System Policy. The individual management systems are implemented at head office and at selected medical facilities belonging to LUX MED sp. z o.o., as well as at certain subsidiaries. All certified units are regularly subject to external audits, aimed at confirming compliance with standards. Systematic internal audits are also carried out, the results of which translate into corrective, remedial and preventive actions serving continuous improvement.

Quality Management System, Compliant with ISO 9001:2015

We first obtained ISO 9001 certification in 2008. Its scope currently covers the provision of outpatient health services in the areas of: preventive healthcare, diagnostic imaging, endoscopic diagnostics, treatment, primary care (POZ), rehabilitation, occupational medicine, dentistry, psychiatric care and addiction treatment, and the carrying out of imaging examinations for clinical programmes, as well as the provision of medical services in the areas of: multi-specialty hospital care, pre-hospital outpatient clinic services in orthopaedics, ophthalmology, laryngology, surgery, rehabilitation and physiotherapy, and retail sale of medical aids and orthopaedic devices. Confirmation of the high rating of our quality activities is provided by patient satisfaction survey results.

This system is implemented at our head office and at 82 facilities (medical centres, diagnostics, dentistry and the hospital in Toruń), as well as at the following companies: Centrum Medyczne MAVIT Sp. z o.o., Medical Magnus Sp. z o.o., Tomograf Sp. z o.o., and Medika Usługi Medyczne Sp. z o.o.

Information Security Management System, Compliant with ISO/IEC 27001:2022

Since 2007 we have maintained an Information Security Management System certified as compliant with ISO 27001, guaranteeing that facility management systems meet the highest standards and international norms, as confirmed by annual independent audits. The certification covers not only the IT system, but also people, processes and technology.

The international ISO 27001 standard is regarded as one of the most important in the field of cybersecurity. This standard applies to every organisation, regardless of its size and industry, and contains important guidelines for the planning, implementation, control and optimisation of information security. This is particularly important for us given that some of the information processed by the company is highly sensitive, including patients' medical and personal data.

This system is implemented at our head office and at 53 facilities (medical centres, diagnostics and dentistry), and at Medical Magnus Sp. z o.o.

Environmental Management System, Compliant with ISO 14001:2015

The Environmental Management Procedure operates within the Environmental Management System at LUX MED, setting out e.g. the principles for measuring and reporting greenhouse gas emissions, waste management, environmental requirements for suppliers, and the method of documenting the ESG Committee's activities. Employees of LUX MED Sp. z o.o. units with ISO 14001:2015 certification are subject to mandatory environmental protection training on the training platform.

We have maintained ISO 14001 certification since the beginning of 2024. In 2025 we successfully passed an external audit at our headquarters and obtained certification for our new medical centre in Warsaw at Szturmowa 2 Street, where outpatient services are provided in the areas of: preventive healthcare, treatment, rehabilitation, diagnostic testing, and biological sample collection and oversight of laboratory test results. Besides these locations, ISO 14001 certification is also held by the following companies: Centrum Medyczne MAVIT Sp. z o.o., Medical Magnus Sp. z o.o., Tomograf Sp. z o.o., and Medika Usługi Medyczne Sp. z o.o.

DNV

CERTYFIKAT SYSTEMU ZARZĄDZANIA

Certyfikat Nr: C606361

Data pierwszej certyfikacji: 18 stycznia 2024

Ważność certyfikatu: 24 listopada 2025 – 17 stycznia 2027

Niniejszym potwierdza się, że system zarządzania organizacji:

LUX MED Sp. z o.o.

ul. Szturmowa 2, 02-678 Warszawa, Polska

oraz lokalizacji wymienionych w załączniku dołączonym do niniejszego certyfikatu

spełnia wymagania normy Systemu Zarządzania Środowiskowego:

ISO 14001:2015

Certyfikat obejmuje następujący zakres:

Udzielanie ambulatoryjnych świadczeń zdrowotnych w zakresie: profilaktyki, leczenia, pobierania materiału biologicznego i nadzoru nad wynikami badań laboratoryjnych, rehabilitacji oraz badań diagnostycznych.

Miejsce i data:
Barendrecht, 26 stycznia 2026

W imieniu biura wystawiającego certyfikat:
DNV - Business Assurance
Zwolseweg 1, 2994 LB Barendrecht, Netherlands

Erie Kaak
Pełnomocnik Zarządu

Niespełnienie wymagań wymienionych w Umowie o Certyfikację może spowodować utratę ważności certyfikatu.
Jednostka Akredytowana: DNV Business Assurance B.V., Zwolseweg 1, 2994 LB, Barendrecht, Netherlands - TEL: +31(0)102922689. www.dnv.com/assurance

Appendices

2-2

List of Group Entities and Affiliates

As at 31 December 2025, the LUX MED Group comprised the following entities:

Company name	Ownership structure
Centrum Edukacji Medycznej Sp. z o.o. (formerly Centrum Medyczne Diagnostyka)	100% LUX MED Sp. z o.o.
Elbląska Sp. z o.o.	100% LUX MED Sp. z o.o.
Fundacja LUX MED im. Dr Joanny Perkowicz	100% LUX MED Sp. z o.o.
LMG Forsakrings AB	100% LUX MED Sp. z o.o.
LMG Forsakrings AB Spółka Akcyjna Oddział w Polsce	
LUX-MED Investment S.A.	100% LUX MED Sp. z o.o.
LUX MED Sp. z o.o.	100% BUPA INVESTMENTS OVERSEAS LIMITED
LUX MED Onkologia 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.
Megamed Sp. z o.o.	100% LUX MED Sp. z o.o.
Sport Medica S.A.	100 % LUX MED Sp. z o.o.
SILVER DENTAL CLINIC Sp z o.o.	100% LUX MED Sp. z o.o.
Tomograf Sp. z o. o	100% LUX MED Sp. z o.o.
Centrum Medyczne MAVIT Sp. z o.o.	100% LUX MED Sp. z o.o.
LUX MED SZPITAL GDAŃSK S.A. (formerly Swissmed Centrum Zdrowia S.A.)	100 % LUX MED Sp. z o.o.
Swissmed Opieka Sp. z o.o. w likwidacji (in liquidation)	100% LUX MED SZPITAL GDAŃSK S.A. (formerly Swissmed Centrum Zdrowia S.A.)
Swissmed Nieruchomości Sp. z o.o.	100% LUX MED SZPITAL GDAŃSK S.A. (formerly Swissmed Centrum Zdrowia S.A.)
Citomed Nieruchomości Sp. z o.o.	100% LUX MED Sp. z o.o.
Med-Polonia Sp. z o.o.	100 % LUX MED Sp. z o.o.
LUX MED BENEFITY sp. z o.o.	100% LUX MED Sp. z o. o.
MEDISS DENTAL CLINIC SP. Z O.O.	100 % LUX MED Sp. z o.o.
FUNDACJA MEDPOLONIA	100% Med-Polonia Sp. z o.o.
ORTHOS SZPITAL WIELOSPECJALISTYCZNY SP. Z O.O.	100 % LUX MED Sp. z o.o.
4DENT SP. Z O.O.	100 % LUX MED Sp. z o.o.
LUX MED SZPITAL KRAKÓW Sp. z o.o. (formerly ORTOPEDICUM Sp. z o.o.)	100 % LUX MED Sp. z o.o.
WYŻSZA SZKOŁA NAUK MEDYCZNYCH (Higher School of Medical Sciences)	100% LUX MED Sp. z o. o.
MEDICAL MAGNUS Sp. z o.o.	100 % LUX MED Sp. z o.o.
SPÓŁKA LEKARSKA "KROMED" Sp. z o.o.	100% MEDICAL MAGNUS Sp. z o.o.
LUX MED UBEZPIECZENIA Towarzystwo Ubezpieczeń i Reasekuracji S.A.	234,999 shares held by LUX MED Sp. z o.o.
A2 CLINIC Sp. z o.o.	1 share held by LUX-MED Investment S.A.
DENTIKA Sp. z o.o.	100 % LUX MED Sp. z o.o.
MENTAL PATH GROUP Sp. z o.o.	100 % LUX MED Sp. z o.o.
CENTRUM SEKSUOLOGII, PSYCHOTERAPII I (entity name truncated in the original document)	80 % LUX MED Sp. z o.o.
CENTRUM TERAPII KONTINUUM Sp. z o.o.	100 % MENTAL PATH GROUP Sp. z o.o.
	100 % MENTAL PATH GROUP Sp. z o.o.

List of BUPA Policies in Force at the LUX MED Group

Policy name	Policy's objective	Key provisions
Brand & Reputation Management Policy	Ensuring the building, promotion and protection of the LUX MED Group brand and reputation through the consistent use of brand identity (visual and tonal) and coherent, effective communication, both external and internal.	a) Care for the brand and reputation (in processes of change to existing products and the rollout of new ones, in marketing and advertising campaigns, in announcing partnerships, mergers and acquisitions, in recruitment processes, in consumer matters, etc.) b) Communication and external relations (including media communication, social media communication, external representation of the company, or entering into partnerships on the company's behalf – such activities must be undertaken in agreement with, and with the consent of, the external communications department) c) Crisis communication (additionally governed by the Procedure: Crisis Communication Management within the LUX MED Group) d) Use of the brand (in both internal and external communication)
Capital Management Policy	Establishing clear principles under which the LUX MED Group ensures it manages its capital as efficiently as possible, while maintaining capital sufficient to protect the interests of its customers and meet the expectations of regulatory authorities, rating agencies and other key stakeholders.	a) Insurance companies are required to comply with capital requirements, to identify and review risks, and to identify the level of the Solvency Intervention Ladder indicator and report it quarterly, as well as to report any actions that may affect liquidity b) Other companies should e.g. maintain positive capital and comply with capital requirements, monitor cash flows, and carry out quarterly reviews of capital- and liquidity-related risks
Clinical Governance Policy	Defining the LUX MED Group's approach to maintaining and continuously improving clinical governance and clinical risk management, to establish the LUX MED Group as the most patient/customer-centric 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.'	a) Clear guidelines on leadership (clinical oversight, clinical governance committees and sub-committees) b) Guidelines on the qualifications of staff providing clinical care and treatment, including information on training and access to continuing professional development, and on systems for managing, monitoring and evaluating the performance and staffing levels of employees, consistent with patients' needs and regulatory requirements c) Provisions concerning compliance with legal regulations, safety, ensuring clinical compliance, quality improvement, clinical risk management, and cooperation with Third Party Providers.

Policy name	Policy's objective	Key provisions
Conflicts of Interest Policy	A conflict of interest can affect both LUX MED Group's and employees' ability to act honestly and transparently, and can also cause harm to one or more of our customers. This policy sets out the principles for managing the risk arising from a failure to effectively identify and manage conflicts of interest	a) Principles and control tools b) Establishment of the Conflict of Interest Management Committee c) Identification and analysis of the risk of actual conflicts of interest arising d) Implementation of tools aimed at preventing conflicts of interest e) Employee training on the conflicts of interest policy
Financial Crime Risk Policy	Setting out requirements for managing the risk of financial crime within the Organisation, such as: sanctions, external and internal fraud, corruption, facilitating tax evasion by third parties, or money laundering	Five main pillars of the policy: a) Leading by example (management staff must actively promote and raise awareness of the Financial Crime Risk Policy) b) Governance and resources (ensuring the given 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, introducing and documenting controls) e) Incident management (recording and investigating indicated incidents, and maintaining statistics on potential financial crimes)
Financial Reporting Control Policy	Establishing clear principles for maintaining a robust financial control environment across the whole of the LUX MED Group, in order to prevent and protect against material misstatement of financial information (including internal management information, as well as externally reported information), and to safeguard the Organisation against financial losses and reputational damage arising from errors and fraud	The policy addresses the following risk categories: a) Misstatement of financial information or regulatory reporting; b) Non-compliance with International Financial Reporting Standards; c) Misstatement of management information; d) Cash misappropriation. The policy's most important requirements include: a) The financial control environment and Internal Control over Financial Reporting (ICFR); b) Compliance with Technical Accounting Policies; c) Model risk management.

Policy name	Policy's objective	Key provisions
Information Security Policy	Setting out requirements for managing information security, including personal data belonging to our employees, patients, customers, suppliers and business partners, as well as other business information.	The policy addresses the following risk categories: a) Unavailability of services or information; b) Information leakage / data exfiltration; c) Manipulation of information / data. The policy's requirements are as follows: a) The LUX MED Group must effectively manage risk in the area of Information Security; b) The LUX MED Group must protect information using appropriate techniques, business processes and technology (the policy contains a list of standards); c) To protect information, the LUX MED Group must implement appropriate technical control measures (the policy contains a list of such measures).
Insurance Risk Policy	Setting out principles for the effective management of insurance risk in the insurance business area of the LUX MED Group.	This Policy contributes to ensuring consistent, efficient and effective practices across Bupa's insurance business units. Key policy requirements include: 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	Explaining the position and obligations established for managing legal risk, and setting out the main principles to be followed to ensure the Organisation is protected against excessive legal risk and its potential consequences, and that it conducts its operations responsibly and in compliance with the law.	This Policy sets out key requirements for managing the following legal risks: a) Legislative risk; b) Contractual risk; c) Non-contractual rights risk; d) Non-contractual obligations risk; e) Risk of a dispute arising (in or out of court).
M&A and Investments Policy	Ensuring a structured approach and robust management standards for assessing acquisition targets, sales processes within business areas, and establishing appropriate approval processes, as well as ensuring consistency and quality across all stages of a transaction and adherence to appropriate decision-making and review mechanisms in line with their significance, ensuring that the LUX MED Group uses its resources efficiently.	Mandatory policy requirements include: a) Planning (a thorough assessment and due diligence of strategic partners / joint ventures must be carried out, and the intended purpose and scope of the partnership / venture clearly defined); b) Approvals (carried out in accordance with M&A governance and approval guidelines); c) Minimum requirements; d) Post-acquisition and integration activities; e) Documentation; f) Monitoring and reporting.

Policy name	Policy's objective	Key provisions
Operational Resilience Policy	Defining how the LUX MED Group maintains operational resilience, defined as the ability to anticipate, prepare for, respond to, and adapt to gradual changes and sudden operational disruptions.	The purpose of this Policy is to protect customers, patients, employees, business partners and society as a whole, safeguard the reputation of the LUX MED Group, demonstrate a commitment to meeting regulatory expectations, and support the Group's long-term stability, market position, and ability to achieve its strategic objectives. Internal and external events that may cause significant operational disruption include: a) Natural disasters, climate change, and specific weather phenomena; b) Utility supply interruptions 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. The policy contains rules of conduct in the event of the above situations occurring.
Property Policy	Ensuring proper management of the property portfolio, as well as the processes necessary to incorporate new assets into the LUX MED Group, whether through lease or acquisition. In addition, ensuring a safe environment in which all property-related risks are appropriately identified and managed, meeting established legal and regulatory requirements and ensuring the proper functioning of infrastructure, as well as establishing an orderly, transparent and controlled process for the construction, renovation or adaptation of properties and their handover for use.	Policy requirements relate to: a) Principles relating to purchase and sale, including mergers and acquisitions of property, and joint ventures; b) Property management; c) Construction and capital works; d) Strategic objectives.
Privacy Policy	Maintaining the trust of LUX MED Group's patients/customers/employees by ensuring the responsible and secure processing of personal data.	This Policy sets out the rules for handling personal data, in particular special category data, relating to our patients (and their family members), insured persons, suppliers, business partners, application users, and LUX MED Group employees. The key principles and requirements arising from the policy relate to data processing and transparency of its use, scope, retention period, security, data protection and risk management, control mechanisms, monitoring and implementation of changes to legal regulations, and regular training for people responsible for personal data protection.

Policy name	Policy's objective	Key provisions
Regulatory Compliance & Conduct Risk Policy	Setting out high-level requirements for managing compliance with regulatory requirements and conduct risk arising from customer relationships. Establishing clear accountability for regulatory risk and setting out requirements to support open, transparent and constructive relationships with regulatory authorities.	a) Defines high-level requirements for managing compliance with regulatory requirements and conduct risk arising from customer relationships b) Clearly assigns responsibility for compliance with regulatory requirements and conduct risk arising from customer relationships c) Sets a high standard of requirements to support open, transparent and constructive relationships with regulatory authorities d) Sets out requirements for managing conduct risk arising from customer relationships in insurance business and in areas where the entity is the payer for claims settled e) Points to the key role of compliance (compliance leadership) f) Emphasises the active role of management staff in managing regulatory risk and conduct risk arising from customer relationships g) Establishes accountability – all employees must fulfil their role in accordance with applicable regulatory requirements and internal organisational rules h) Defines how relationships with supervisory authorities are managed – a dedicated person in each entity i) Defines conduct risk arising from customer relationships – customers must receive appropriate information, and support must meet their needs.
Risk Management Policy	Establishing a consistent and systematic approach to the identification, assessment, management, monitoring and reporting of risk, and ensuring a decision-making process within defined risk appetites.	Effective risk management implementation helps to ensure that LUX MED Group's Patients, Customers and Employees, as well as its reputation, finances and relationships with regulators, do not feel the effects of potential risk. The policy defines the following matters: a) Appropriate oversight; b) Culture and responsibilities; c) Risk appetite; d) Risk management framework; e) Internal control system; f) Incident management; g) Monitoring and reporting.

Policy name	Policy's objective	Key provisions
Subsidiary Governance Policy	Establishing corporate governance standards that must be applied across all subsidiaries. Requires the Organisation to apply a robust governance framework in order to reduce legal and regulatory risk. Contributes to promoting a culture of good corporate governance across all of the Organisation's services and activities.	Policy requirements: a) Reporting of any changes in positions occurring within subsidiaries; b) Documented and functioning principles for managing subsidiaries; c) The need to minute all Management Board meetings. All employees are required to familiarise themselves with the Policy Set, to support local procedures, and to ensure compliance with requirements that apply to all employees, as well as those relating to their specific roles.
Suppliers Policy	Ensuring effective processes for selecting suppliers, entering into agreements, and managing all suppliers, which also makes it possible to manage supplier-related risk throughout the period of cooperation.	a) The policy addresses risks related to 'improper contracting' and 'non-performance by Suppliers' b) LUX MED Group employees involved in the supplier-selection process must be able to demonstrate that they acted in accordance with this policy and other procurement-related procedures. Information on: c) The existence of a supplier repository; d) Supplier segmentation; e) Outsourcing of services; f) The supplier-selection process; g) The supplier due-diligence process; h) Sustainable development/ESG principles for suppliers; i) Agreements; j) Supplier management; k) Payments and handling of procurement-related payments; l) Monitoring and reporting.
Tax Policy	Defining functions and responsibilities in the area of tax risk management, and establishing basic principles that must be applied to protect the LUX MED Group against adverse tax consequences.	The Group is required to responsibly comply with tax law, ensuring that tax is paid in the jurisdictions in which the Group operates, based on applicable law and practice. Policy requirements are as follows: a) Identification, assessment and control of tax risk; a) Fulfilment of tax obligations; a) Advisory support; a) Cooperation with tax authorities, inspections and proceedings; a) Monitoring.

Policy name	Policy's objective	Key provisions
Technology Management Policy	Setting out requirements for managing technology within the Organisation.	The Policy's requirements apply not only to systems and solutions managed by the IT and Projects Division, but also to those managed by other organisational units of the LUX MED Group. Key policy requirements include: 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 system capacity management i) Employee education and awareness j) Application development
Treasury Policy	Limiting exposure to liquidity risk, counterparty risk related to investments, and interest-rate risk to acceptable levels, in accordance with risk appetite.	a) The company should be financed primarily through intercompany 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 required to monitor its liquidity d) The company must invest its cash in secure instruments, in such a way as to minimise the risk of fraud or loss of funds e) ESG (Environmental, Social and Governance) issues/ratings and climate impact must be taken into account in every investment decision f) Investments related to the tobacco industry, weapons manufacturing, and thermal coal are prohibited g) Derivative instruments are prohibited h) Currency or interest-rate speculation is prohibited i) All payments require dual authorisation

Policy name	Policy's objective	Key provisions
Speak Up Policy	The Speak Up Policy enables the reporting of irregularities through, among other means, a free helpline and a dedicated online whistleblowing platform. Reports may be made by authorised persons who have a reasonable suspicion that an irregularity has occurred within the LUX MED Group companies. Reports are made confidentially, either by name or anonymously. The Speak Up Policy provides the basis for the 'Reporting Legal Violations and Follow-up Actions (Speak Up)' Procedure.	Policy requirements: a) Building awareness and trust (informing about the Speak Up Policy at the point of hiring and throughout employment, explaining how a report can be made and how reports are managed) b) Allocation of appropriate resources (the duties of the Speak Up Officer and additional persons with appropriate competencies) c) Speak openly, listen, and take action (appropriate management of the reporting process) d) Protection and support (for people making a report) e) Compliance with law and internal regulations (processes must comply with applicable legal regulations, rules and professional standards) f) Maintaining appropriate records (appropriate, digital records of all reports and proceedings made – ensuring full confidentiality) g) Monitoring and reporting
Wellbeing, Health and Safety Policy	Taking care of the comfort, health and safety of our employees, patients, customers, visitors and other people directly affected by our operations is a key element in achieving our objectives	a) Leadership and employee engagement (setting wellbeing, health and safety objectives, engagement of the Management Board and management team, involving employees in the process so they can express their views on the wellbeing, health and safety management system) b) Planning (hazard identification, risk assessment, assessment of legal requirements) c) Support and action (developing, implementing and monitoring control and critical measures for managing wellbeing, health and safety, and reporting on them appropriately, allocating resources for their implementation) d) Performance evaluation (internal control) e) Improvement (identifying non-conformities and opportunities to improve the wellbeing, health and safety management system)

Policy name	Policy's objective	Key provisions
Sustainability Policy	This Policy underscores LUX MED Group's responsibility for contributing to, and supporting the achievement of, the Sustainable Development Strategy's objective, by taking into account risks associated with achieving its plans, and sets out general expectations regarding how to operate and requirements for ensuring compliance.	a) A plan for implementing the Sustainable Development Strategy is required, appropriately defining local priorities and objectives and implementing appropriate processes, procedures and systems that enable the identification, monitoring and reduction of the organisation's impact, and that of its activities, on the environment b) The LUX MED Group is required to verify and monitor material environmental, social and governance matters c) Management principles must be established and implemented to monitor and ensure the delivery of the Sustainable Development Strategy, and people responsible for delivering the Sustainable Development Strategy must be designated d) The LUX MED Group must accurately measure, report and track progress in achieving objectives, and the ESG Team is required to cooperate with relevant teams across the company to ensure data is collected
People Enterprise Policy	The purpose of this policy is to protect employees from unfavourable treatment resulting from personnel practices, to ensure effective workforce planning and meet workforce requirements, to maintain an appropriately qualified and competent workforce, and to maintain a positive organisational culture.	a) Appropriate management of resources and employee turnover is necessary, along with the implementation of effective workforce-planning methods and processes. Employee verification and assessment must be documented, and people appointed to director and/or senior manager positions must be assessed to ensure they are suitable, in accordance with local legal or regulatory requirements b) Training must be provided to support employees in performing their duties to the required standards, and succession plans must be in place for every position deemed key c) Employment principles, practices, employment contracts and collective agreements must be consistent with the Code of Conduct and the LUX MED Group's values. Employee wellbeing must be supported and health and safety management continuously improved, and employees' personal data must be collected and processed in accordance with personal data protection principles d) All employees should be regularly invited to take part in the People Pulse survey. Managers should act on the feedback received. Employment practices must be non-discriminatory and support inclusion. An appropriate action plan promoting social inclusion is necessary

Policy name	Policy's objective	Key provisions
Solvency II Reporting Policy	Establishing a framework to ensure compliance with the Solvency II (SII) Directive 2009/138/EC of the European Parliament, and setting out requirements and principles for managing the quality of Solvency II data	a) Defining roles and responsibilities for reporting in accordance with legal regulations b) Regulatory reporting must be prepared in accordance with methodological documentation and process and control documentation, to ensure the accuracy, completeness, adequacy and quality of data c) Controls must be designed and implemented appropriately to the size and nature of the reporting, and evidence of controls must be retained d) Materiality, validation of individual elements of regulatory reporting, expert judgement, and data quality must comply with Solvency II standards e) Risks above a defined threshold must be reported

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Contact

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If, having read our report, you would like to share comments or observations about it, or ask questions, please do not hesitate to contact us.

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Jesteśmy częścią *Bupa*

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