



## **SYNLAB AG**

# Group Statement on Human Rights Strategy

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## Foundational Principles

The SYNLAB Group (“SYNLAB”) is committed to ensuring that our work improves the lives of our patients, Members, and the communities in which we operate. We are committed to ensuring that we provide access to the highest quality healthcare, which is the cornerstone of our business and one of our strongest paths to impact.

SYNLAB commits to respect and advance human rights in all regions of its presence and operational control, including in its global supply and value chains. We believe that although governments have a primary responsibility for respecting, protecting and promoting the human rights of their citizens, SYNLAB plays an important role in protecting and promoting human rights within our own sphere of influence. This means that we operate within and beyond the framework of applicable national laws and regulations; and where there is a discrepancy between international standards and local law, the higher standard will apply. The basis for our operations and the expectations we set for the collaboration with our partners are based on recognized human rights standards and guidelines (“Human Rights”), the most important of which are:

- the Universal Declaration of Human Rights (UDHR)
- the Guiding Principles of Business and Human Rights (UNGPs)
- the OECD Guidelines for Multinational Enterprises
- the International Labour Organisation (ILO) Core Conventions on Labour Standards

## Leadership and Culture

We take proactive leadership to be an essential part of the management of Human Rights across our business and SYNLAB encourages collaboration across all functions to achieve this goal. As such:

- At the Global level, our Group CEO is the sponsor of SYNLAB’s Human Rights commitments
- Our Human Rights commitments are managed and supervised by our Chief Human Rights Officer (CHRO) on a global level
- On a country level, our Human Rights strategy is driven by local management
- All SYNLAB Members are expected to live up to a culture where Human Rights are respected;

- Furthermore, we expect external stakeholders to fully commit to SYNLAB's Human Rights approach and expect their involvement as crucial for understanding Human Rights related issues.

## Management of Human Rights Risks

In order to live up to our commitments, SYNLAB has decided to operate a dedicated Human Rights risk management system covering impacts from own operations as well as from the supply chain. This system will be based on the following elements:

### 1. Risk Assessment

The risk assessment serves as a starting point in SYNLAB's Human Rights approach. It aims to identify Human Rights risks resulting from our operations and those of our suppliers. The risk assessment will consider particularities of the business and the countries geographies we and our suppliers operate in. For our risk assessment we can draw on information from independent human rights experts and related databases as well as internal surveys for our concrete risk analysis.

The risk assessment is planned to be carried out on a regular annual cadence; its scope and functioning will be adjusted on an ongoing basis in conjunction with the evolution of SYNLAB's business. Additionally, we will react to unexpected occurrences which may affect our evaluation by undertaking ad-hoc assessments.

A risk-weighting process developed by SYNLAB will help us to prioritize potential risks. Central aspects considered are the nature of our business, the capability to influence the risk (leverage) and the expected gravity of a damage in case of risk materialization.

### 2. Prevention

With respect to our own operations, SYNLAB has taken various preventive measures in order to reduce and mitigate risks to Human Right. In particular, SYNLAB has implemented the SYNLAB Code of Conduct which inter alia addresses Human Rights risk. In support of this, Human Rights-related trainings and capacity building will be conducted in the relevant business areas as well as risk-based control measures will be implemented. SYNLAB will further include tailored preventive and mitigation action planning as well as management measures for relevant business processes across our value chain, e.g. the development and implementation of appropriate procurement strategies and purchasing practices that help identify, prevent and minimize identified risks.

Preventive measures implemented towards suppliers include their mandatory commitment to our Supplier Code of Conduct, which expresses SYNLAB's beliefs and values on responsible and sustainable supply chain management. The Supplier Code of Conduct in particular formulates SYNLAB's expectations with respect to ethical conduct, principles of fair and safe labour conditions (e.g. ILO) and undertakes to also forward these principles as standard obligations within the supply chain. Additionally, SYNLAB will install a supplier due diligence process and is furthermore prepared to undertake risk based control measures to safeguard Human Rights compliance where required.

SYNLAB revisits its approach to risk prevention as part of its regular risk management process.

### 3. Speaking Up

SYNLAB offers "Speak Up" channels for employees, suppliers, and other stakeholders to report on potential or actual Human Rights violations. Further details are laid out in SYNLAB's

internal Speak-Up Policy and local Supplier Complaints Procedures as communicated on SYNLAB's websites.

#### **4. Remediation**

SYNLAB is preparing to react to findings from its risk assessment cycle and provide those affected by human rights violations with access to remedy. Upon establishment of an occurred or imminent violation of a risk to Human Rights, SYNLAB can actively undertake all reasonably required measures to mitigate or end the violation or provide a concrete concept to this extent.

#### **5. Monitoring**

As part of SYNLAB's ESG strategy various measures and processes for monitoring, evaluating and revisiting our Human Rights approach will be applied. Typical means can in particular include tracking of qualitative and quantitative indicators which are in particular obtained via stakeholder surveys, insights from Speak Up channels, learnings from remediation measures taken and related audits as the case may be.

#### **6. Documentation and Reporting**

The management of Human Rights Risks is handled transparently at SYNLAB. Our internal processes are constructed to create immediate and ongoing documentation on insights from the risk management cycle and measures taken based thereupon.

SYNLAB is committed to communicate insights from the risk management on a regular basis. To this extent, reports on Human Rights related matters will be provided to the public free of charge via SYNLAB's website in accordance with statutory obligations, in particular the German Supply Chain Due Diligence Act.

## **Human Rights Risks at SYNLAB**

SYNLAB has undertaken a preliminary assessment on Human Rights related risks associated to our business. Considering the nature of our operations and insights from our experience, SYNLAB has identified the following Human Right related areas which we will continue to monitor with particular attention:

- Disregard Occupational Health and Safety
- Unequal treatment in employment
- Harmful contamination of soil and water

We expect additional insights on Human Rights risks and how to handle them from our risk analysis and will draw on these results to further define our Human Rights-related expectations towards our employees, management and suppliers.

## **Outlook**

SYNLAB takes the respect of Human Rights serious and considers its protection an essential part of its corporate social responsibility strategy. We are therefore committed to continuously review our Human Rights strategy as well as related processes with the ambition to keep track with the needs of our industry and will report on our progress regularly.

Munich, January 2023

*Mathieu Floreani*  
Group CEO

*Catharina Monster*  
CHRO