

# HUMAN RIGHTS POLICY

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# CONTENTS

| INTR                             | INTRODUCTION - REGULATORY FRAMEWORK                |  |  |  |  |
|----------------------------------|--|--|--|--|--|
|                                  | PURPOSE OF THE POLICY                              |  |  |  |  |
|                                  | SCOPE  |  |  |  |  |
|                                  | RESPECT AND PROTECTION OF FUNDAMENTAL HUMAN RIGHTS |  |  |  |  |
|                                  |  |  |  |  |  |
|                                  | MAIN PREVENTION GUIDELINES                         |  |  |  |  |
|                                  | FINAL PROVISIONS                                   |  |  |  |  |
| ANNEX I: HISTORY OF THE DOCUMENT |  |  |  |  |  |

#### INTRODUCTION - REGULATORY FRAMEWORK

The company "IATRIKO ATHINON E.A.E." (ATHENS MEDICAL CENTER S.A.) (hereinafter referred to as the "Company" or the "Parent Company"), since its establishment in 1984, has envisioned the provision of high-quality healthcare services to society, investing in the realization of this vision within an environment of integrity, transparency, and high ethical standards.

Respect for human rights as an integral part of the Company's ethics and fundamental values is reflected in the basic guidelines of all existing Company Policies and in its business practices.

This Policy applies to all business activities of the Company, and its principles are expected to be respected and observed by all external collaborators, contractors, and suppliers.

This Policy expresses and reflects the Company's ZERO TOLERANCE for any violation of human rights, by ensuring that its business partners are committed to respecting human rights and do not participate, even passively or tacitly, in any such violations.

This zero-tolerance approach to any form of human rights violation is communicated at the beginning of each business relationship with third parties and is upheld through the Company's internal oversight mechanisms, policy enforcement processes, and employee training.

This Policy is founded on internationally recognized standards and guidelines, specifically:

- The Universal Declaration of Human Rights of the United Nations (UNIVERSAL DECLARATION OF HUMAN RIGHTS Regional Information Center of the UN Greece (unric.org))
- The Principles of the UN Global Compact (UN Global Compact Ten Principles of the United Nations Global Compact - Global Compact Network Greece)
- The United Nations Convention on the Elimination of All Forms of Discrimination against Women (Law 1342 of 1/1 April 1983)
- The United Nations Guiding Principles on Business and Human Rights (Intro\_Guiding\_PrinciplesBusinessHR.pdf (ohchr.org))
- In global goals Sustainable Development
  (Agenda 2030 Regional Information Center of the United Nations Greece (unric.org))
- In the Declaration of the International Labour Organization (ILO) on Fundamental Principles and Rights at Work (1998) (<u>The text of the Declaration and its follow-up | International Labour Organization</u>)
- The fundamental principles of the Greek Constitution

### 1. PURPOSE OF THE POLICY

This Policy aims to further inform the Company's employees, associates, customers, and suppliers about human rights and to ensure that they are respected in all areas of the Company's business and social activities.

#### 2. SCOPE

The objectives of this Human Rights Policy are achieved through their integration with the procedures and policies governing the Company's business activities, specifically:

- Due diligence in transactions with third parties
- Employment practices (staff evaluation, recruitment, training)
- Management of reports
- The evaluation and selection of suppliers
- Implementation of new investments
- Sustainable development

## 3. RESPECT AND PROTECTION OF FUNDAMENTAL HUMAN RIGHTS

The company "IATRIKO ATHINON E.A.E." is committed to respecting and protecting the following, among other, key human rights:

- 1. The right to health and safety at work
- 2. The right to appropriate and decent working conditions
- 3. The right to equal treatment and equal opportunities
- 4. The right to family life
- 5. The right to privacy
- 6. Freedom of collective bargaining
- 7. Prohibition of child and forced labor

The above rights are safeguarded through the establishment of the corresponding Policies and Procedures (such as the Sustainable Development Policy, Prevention and Combating of Violence and Harassment in the Workplace Policy, the Whistleblowing Policy, the Risk Management Policy, the Suppliers' Code of Conduct, the Data Protection and Cybersecurity Policy, the Due Diligence Policy, etc.), as well as through access to these documents, continuous training, and awareness of employees and partners, and the implementation of compliance measures aimed at:

- Ensuring the continuous application of high standards of occupational health and safety in all workplaces and facilities, along with systematic risk assessment and management.
- Maintaining and continuously improving a work environment based on dignity and respect.
- Strictly prohibiting discrimination and ensuring zero tolerance for any form of discrimination based on gender, social origin, nationality, citizenship, age, religion, sexual orientation, disability, or social and economic status.
- Ensuring zero tolerance for any incidents of harassment or violence.
- Facilitating motherhood and promoting work-life balance.
- Ensuring the protection and security of personal data.

The Company also commits to upholding its employees' right to freedom of association, within the framework of national legal provisions, and to taking all appropriate measures to avoid any form of direct or indirect involvement in cases of forced or compulsory labor, human trafficking, exploitation, or child labor.

### 4. MAIN PREVENTION GUIDELINES

The main prevention guidelines are implemented and continuously improved through the application of the Company's corresponding Policies:

- Identifying potential risks of human rights violations
- Assessing the human rights situation
- Implementing preventive or remedial actions, as defined in the Company's respective Policies
- Improving the configuration of security systems

## 5. FINAL PROVISIONS

The Regulatory Compliance Unit and the Risk Management Unit are responsible for ensuring the implementation and effective application of this Policy.

Any violation or suspected violation of human rights must be reported to the Company in accordance with the Whistleblowing Policy.

This Policy is communicated to all Company employees through the Intranet and is accessible to all interested parties via publication on the Company's official website.

This revised Policy was approved by the Company's Board of Directors (Decision No. 904/29-09-2025), is reviewed annually by the Regulatory Compliance Unit and the Risk Management Unit and is revised whenever deemed necessary.

# **ANNEX I: DOCUMENT HISTORY**

| Issue Number    | Details of Changes | Approval | Date                |
|-----------------|--------------------|----------|---------------------|
| 1 st            |                    | BoD      | 21.09.2023          |
| 2 <sup>nd</sup> |                    | BoD      | 29.09.2025          |
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|                 | <b>1</b> st        | 1st      | 1 <sup>st</sup> BoD |

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