



GOVERNANCE

ETHICS AND RESPONSIBILITY: THE FOUNDATION OF OUR WORK

At Quirónsalud, we believe operating management must be based on ethics and responsibility. To this end, we have defined a strong, transparent governance structure and a framework of policies and procedures to guide the conduct of all employees in the progress of our activities in alignment with the company's strategy. We are firmly committed to maintaining the highest level of professional and ethical standards, always acting in the most transparent manner, with care, diligence, and integrity.

OUR POLICIES

Within Quirónsalud's corporate departments, we establish **corporate policies**, which are then implemented in each of the healthcare centers. These policies and procedures are continuously reviewed and updated to ensure that they are in line with the strategy, the needs of our stakeholders, and any new legal requirements that may apply.

They refer to these areas:

- Compliance and risks
- Patient experience
- Quality
- Employees
- Environment
- Finance

CODE OF ETHICS AND CONDUCT

Our **Code of Ethics and Conduct** is the guideline for all professionals who work in the company to act responsibly, in accordance with current regulations and our corporate principles. The Code, which was revised and updated in 2023, is available to employees through the employee portal, as well as to any third party through the [corporate website](#).

Furthermore, any employee who has **doubts about the interpretation** of the Code of Ethics and Conduct can contact the Risk and Compliance Committee.

Governance

ANTI-CORRUPTION POLICY

The fight against corruption is one of the material issues identified by Quirónsalud. We do not tolerate any form of bribery or corruption. Neither Quirónsalud employees nor any third party or entity acting on behalf of the company may give or accept a bribe under any circumstances.

Our **Anti-Corruption Policy** sets out the guidelines that employees must follow in their interactions with third parties. In 2023, management continued to roll out specific training on this policy.

The policy prohibits, for example, the delivery, offering, or promise of any payment or reward to any authority, public official, or employee of public or private companies or entities for the purpose of obtaining any favorable treatment or commercial benefit.

COMPLAINTS CHANNEL

Our whistleblower channel allows any employee or third party to report any breach of the Code of Ethics and Conduct of which they are aware, as well as any breach of applicable laws and regulations.

The reports received are treated **confidentially**, and it is strictly prohibited to take any retaliatory action against an employee who makes a report.

ENCOURAGING WHISTLEBLOWING

In 2023, we worked on generating a **greater culture of transparency** by:

- improving the functionality of the whistleblower channel
- presenting it with greater visibility, both on the external website and on the intranet
- publishing two key documents for internal use, namely:
 - Whistleblower Channel General Principles and Whistleblower Protection Policy
 - Group Complaint Management Procedure

Governance

Both documents are accessible to all employees. In addition, general information about the whistleblower channel, the General Principles Policy, and the frequently asked questions have been published on the Quirónsalud website to encourage their correct and appropriate use.

DATA PROTECTION

At Quirónsalud, we care for millions of patients every year and handle their **sensitive personal information**. We are committed to the right to data protection for all individuals, including the processing of data by third parties on our behalf.

We work continuously to comply with the requirements of the European Union's General Data Protection Regulation and other applicable data protection regulations. In this regard, we continuously improve our data protection measures in order to maintain and enhance the level of compliance.

HUMAN RIGHTS

We are **committed** to human and labor rights recognized in national and international legislation, including those of the United Nations Universal Declaration of Human Rights.

Quirónsalud adheres to the guidelines of our parent company: the Fresenius [Human Rights Statement](#), which is applicable to all the activities and businesses of the companies that make up the Fresenius Group.

Health is a human right, and with our services we make a decisive contribution to ensure access to adequate, accessible, and high-quality medical care. As part of our commitment, we also want to contribute to a more equitable society, assuming the role of promoting and disseminating respect for human rights as part of our business. Our commitment to human rights includes working continuously to save lives, promote health, and improve the quality of life of our patients.

In the course of 2023, Quirónsalud, under the guidelines of our parent company Fresenius, rolled out a human rights risk assessment and established due diligence processes. To find out more about the overarching **Human Rights Program**, consult the [2023 Report on the German Act on Corporate Due Diligence Obligations in Supply Chains](#).

Governance

COMMITTED TO THE UN GLOBAL COMPACT AND THE SDGS

The Global Compact is a UN initiative that foster corporate sustainability around the world. Through ten universal principles on human rights, labor standards, environment, and anti-corruption, the initiative calls on companies and organizations to align their strategies and operations with these principles, to establish the transition process towards a more sustainable business model, based on the Sustainable Development Goals.

In order to contribute to achieving the goals of Agenda 2030 (Sustainable Development Goals – SDGs), the Quirónsalud Group has been one of the signatory companies of the Global Compact since 2016, annually renewing our commitment and publishing our compliance and progress through the corresponding Corporate Social Responsibility Reports. You can find our progress reports [here](#).