

## EXPERTISE YOU CAN TRUST.

AS THE LARGEST MEDICAL NETWORK IN SWITZERLAND, OUR LEADING-EDGE FACILITIES INCLUDE SURGICAL CENTRES, RADIOLOGY, DIAGNOSTICS, EMERGENCY DEPARTMENTS, RADIOTHERAPY INSTITUTES AND INTEGRATED OUTPATIENT SURGERY UNITS. DRIVEN BY OUR CORE VISION OF CLINICAL EXCELLENCE, WE PROVIDE PERSONALISED CARE TO ALL OF OUR PATIENTS.

### OUR HOSPITALS AT A GLANCE



[WWW.HIRSLANDEN.CH/LOCATIONS](http://WWW.HIRSLANDEN.CH/LOCATIONS)

ADVICE AND INFORMATION  
HIRSLANDEN HEALTHLINE 0848 333 999

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### ETHICS HOTLINE - CONFIDENTIAL AND INDEPENDENT 0800 00 53 16

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# HIRSLANDEN

# CODE OF ETHICS AND PROFESSIONAL CONDUCT

THE IMPORTANCE OF ETHICS IN OUR WORKPLACE



**TOLL-FREE ETHICS LINE**  
CALL: 0800 00 53 16

# DEAR EMPLOYEES AND HIRSLANDEN PARTNERS

Ethical conduct has always been a fundamental guiding principle for Mediclinic and the Hirslanden Group. It is also a subject that is extremely important to me.

We are the partner of choice for many patients and clients when it comes to their health and well-being. Consequently, our success heavily depends on the trust that our stakeholders place in us.

This Code of Conduct provides the foundation for establishing, maintaining and strengthening that trust. Together, you and I determine how we interact with each other and how we achieve our goals through responsible, legally compliant action. To this end, we are guided by our four values of business ethics: fairness, transparency, accountability and responsibility.

Our commitment to these ethical standards and core values makes the Hirslanden Group an enjoyable workplace for us all. It creates a human corporate culture that is characterised by trust and respect. It provides a safe

environment, based on a culture of impartiality, in which employees, partner doctors and patients feel at ease. Such a culture not only improves our own quality of life, but also that of our colleagues and those who entrust themselves to us.

Our stakeholders rightly expect the names Hirslanden and Mediclinic to be synonymous with high ethical standards across the board. I am in no doubt that we all want others to uphold our ethical standards. Consequently, we are all obligated to live by them ourselves, because ethics is a joint venture in which we must all play a part. So, let us build trust together and follow this Code of Conduct in our daily lives. And let us have the courage to share our positive and negative experiences, so that we can learn from each other.

Best regards,

**DR DANIEL LIEDTKE**  
Chief Executive Officer

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# 1. INTRODUCTION

## 1.1. PURPOSE

The purpose of this Code of Conduct is to make all employees and partners (e.g. partner doctors, suppliers, etc.) of the Hirslanden Group aware of the applicable statutory provisions and Hirslanden's own internal policies and to commit employees and partners to engage in ethically appropriate behaviour. In addition, the Code of Conduct helps us to ensure that we have a shared value system and a culture of responsibility. This Code of Conduct is the foundation that underpins our activities. It forms the basis for our collaboration with all stakeholders.

## 1.2. SCOPE

Members of the Hirslanden Group Executive Committee personally endorse this Code of Conduct, live by it and expect all employees and partners to observe the sections relevant to their area of responsibility.

While the Code cannot provide specific answers to every conceivable workplace scenario, it does provide fundamental guidance. It complements our values and other guidelines implemented within the Group. It supplements and clarifies Mediclinic's Code of Business Conduct and Ethics, which also remains applicable.

## 1.3. ETHICS COMMITTEE

The purpose of the Ethics Committee (hereinafter the «Committee») is to review complaints received via the

Ethics Hotline or other sources regarding alleged violations of the Code of Ethics and Professional Conduct, to take appropriate investigative action and to impose sanctions.

The responsibilities and composition of the committee, along with other relevant information, are outlined in the Hirslanden Business Ethics Committee Charter.

## 1.4 AMBIGUITIES AND UNCERTAINTIES

Please discuss any uncertainty about a matter not clearly addressed in the Code with your supervisor. Employees and partners who have concerns regarding an actual or potential violation of the Code or other misconduct within the Group should immediately report this matter to the independent and confidential **Ethics Hotline (0800 00 53 16)**.

Enquiries can also be sent to the Ethics Contact Person via [ethik@hirslanden.ch](mailto:ethik@hirslanden.ch)

# 2. GENERAL RULES OF CONDUCT

## 2.1 CORE VALUES

Our conduct reflects our values. A code of ethics may not be able to completely eliminate unethical behaviour, but it does provide guidance. It is there to help you assess and evaluate your conduct based on the following questions:

- Is my conduct fair?
- Is my conduct transparent?
- Can I account for it?
- Is my behaviour responsible?

These questions are representative of the four business ethics values that guide us: fairness, transparency, accountability and responsibility.

We also draw on the following core values in our working relationships:

- Customer-centric
- Trusting and respectful
- Focused on patient safety
- Performance-driven
- Team-oriented

## 2.2 SUSTAINABILITY

Responsible and sustainable action is one of the cornerstones of our business practice. As one of Switzerland's leading healthcare providers, we want to be successful as a business, contribute to the well-being of our society and handle our natural resources carefully - for both present and future generations.

We make every effort to continuously improve our corporate, social and environmental sustainability standards

by managing our resources responsibly and efficiently for the benefit of our stakeholders and the environment. We also ensure that we select our business partners according to these principles.

## 2.3 POWERS AND DUTIES

Our organisational chart and business regulations define the fundamental competencies of the various levels and bodies of our company. In addition, the key rights and duties of all employees are listed and explained in our personnel regulations. All of the documents referred to here can be viewed by employees at any time in Signavio and on INSIDE (document group «Regulations/Personnel Policy»). Alternatively, you can contact the Legal & Company Secretariat to access these and to seek further clarification.

If you are unsure about the scope of your competencies or whether you require prior written authorisation for an undertaking, please contact your supervisor or the Legal & Company Secretariat.

## 2.4 MEDIA RELATIONS

Enquiries from the media are always forwarded to our Communications Department, which is part of the Corporate Office. Communication on behalf of the Hirslanden Group is handled exclusively by the Communications Department (Media Office) or by explicitly authorised individuals.

Employees must consult the Communications Department well in advance of any planned public appearance.

Comments made in private, particularly on social media, may reflect on the Hirslanden Group and therefore should only be posted with due caution. Employees are asked to refer to the social media guidelines in Signavio and on INSIDE.

## 2.5 DIVERSITY AND INCLUSION

We value the diversity of our employees and strive to create an inclusive, equitable environment where discrimination is not tolerated in any shape or form. One of the main objectives of Mediclinic International and Hirslanden's Diversity and Inclusion (D&I) programme is to ensure gender equality and genuine equality of opportunity. With regard to gender equality, we ensure equal pay and equal opportunities. Equal pay means the same pay for equally valued work. Equal opportunities means the same development and career opportunities for all employees, regardless of origin, gender, age, sexual orientation or cultural background.

## 2.6 PROTECTION OF PERSONAL INTEGRITY

We do not tolerate, permit or condone any form of harassment. Bullying, verbal abuse, discrimination of any kind, sexual harassment or other behaviour that violates boundaries

and damages a person's self-worth are not to be tolerated by those affected. We treat each other fairly and with respect, and we value the dignity, privacy and personal rights of each individual.

The «Guidelines for the Protection of Personal Integrity (in particular Protection against Sexual Harassment) in the Workplace» must be followed to prevent internal bullying and sexual harassment. These guidelines call on both employees and supervisors to prevent bullying and other forms of harassment and define the recommended procedure for those affected, as well as the measures to be taken in the event of actual incidents.

## 2.7 OCCUPATIONAL HEALTH AND SAFETY

We take all the necessary steps to maintain and improve workplace health and safety and to ensure the physical and mental health of our employees and partner doctors. We reduce the risk of occupational accidents, illnesses and health complaints in the working environment of our employees and partner doctors as much as possible and follow all guidelines for the prevention of accidents and illnesses. In this regard, we rely on you to take the initiative. Avoid hazardous situations, and please report any danger that you become aware of at work.

## 2.8 PROTECTION OF HIRSLANDEN'S ASSETS

We are careful with the assets of Hirslanden/Mediclinic. We require employees and partner doctors to use Hirslanden Group assets and resources exclusively for business purposes, and not for one's own private or professional benefit, or for improper or unlawful purposes. Any expenditure at the Hirslanden Group's expense is only permitted if it is appropriate and in the interests of the company. We are committed to a culture of trust and have a zero tolerance strategy in place when this trust is abused.

## 2.9 PROTECTION OF INFORMATION AND DATA

Information and data are of the utmost importance for business activities and must be protected and treated confidentially by all employees and partner doctors. Therefore, as an employee or partner doctor, you have a responsibility to do the following:

- Take and comply with measures against the unauthorised disclosure of company information and personal data.
- Conclude confidentiality and data protection agreements with third parties to whom Hirslanden entrusts information (cf. forms in Signavio).
- Act in good faith when obtaining, using, passing on and disclosing information and data.
- Be transparent when informing data subjects about the collection and use of personal data.

Ensure that you know and understand the laws, directives and codes of practice relevant to the confidential handling of all personal data and patient information. With regard to data protection compliance, you are expected to:

- be aware at all times that data protection, particularly medical confidentiality, is a fundamental obligation for all those who come into contact with patient information
- do everything possible to ensure that patient information and data are not improperly disclosed to other employees or third parties
- know and comply with key protection and security measures when dealing with ICT and data
- only view and pass on patient information and data as legally and contractually permitted

The relevant legal and internal company requirements must also be followed (e.g. Policy/Ordinance on Data Protection, Regulation on ICT Infrastructure and Data Protection; cf. Signavio Quicklinks). If you have any questions or are unsure about any of the above, please contact your supervisor or the internal Data Protection Helpline: T 044 388 63 63 | [datenschutz@hirslanden.ch](mailto:datenschutz@hirslanden.ch)

## 2.10 INFORMATION TECHNOLOGY

Hirslanden provides you with up-to-date infrastructure for your work. This infrastructure must be used responsibly

bly and safely. Employees must be aware of the risks involved in using ICT (malware, phishing, data theft, etc.).

The Regulations on Data Protection and Use of the ICT Infrastructure (available in Signavio) explains how this infrastructure may be used.

## 2.11 ACCOUNTING

Accounting must comply with recognised principles. Manipulation (e.g. deliberate valuation errors, concealment of debts or costs, deliberate circumvention of Group guidelines) is inadmissible.

## 2.12 CONFLICTS OF INTEREST

Business decisions must always be made in the best interests of the Hirslanden Group. You have certain opportunities to influence or make decisions according to your position in the company. Situations may arise in which your personal interests and the interests of the company do not fully coincide.

There is a conflict of interest if, in such a situation, you can influence or decide whether your interests or those of the company are taken into account («actual conflict»).

In other situations, your decisions may be completely unaffected by personal interests, but these may still be perceived as conflicts of interest from a third-party perspective («perceived

conflict»). An example of this would be a situation where you have the ability to influence the selection of a supplier and third parties are aware that you know one of the supplier representatives personally.

It is your responsibility to avoid situations where a conflict of interest, whether actual or perceived, arises. If this is not possible, you should consult your supervisor and agree on a course of action together.

In addition to this, you can also refer to the relevant personnel regulations for exact definitions and procedures, as well as to other internally applicable guidelines, especially the Policy for the Handling of Conflicts of Interest, particularly in the context of personal relationships. This stipulates a general obligation to report and, in certain situations, a proviso for approval (the document is available on INSIDE/Legal/Documents).

## 2.13 OUTSIDE ACTIVITIES

Any outside activity that interferes or may interfere with an employee's ability to perform the duties assigned to their position is subject to the approval of the employee's supervisor and Human Resources.

The employee must ensure that they inform their supervisor without delay. In the event of a conflict of interest, the interests of the Hirslanden Group always take precedence.

If you hold a majority share in a competitor company or in an actual or potential business partner, if you act for such a company in any capacity, or if you are active for such a company or partner in a managerial or advisory capacity or as an employee, you must obtain approval from your supervisor or Human Resources.

With regard to outside activities, the personnel regulations and the Policy for the Handling of Conflicts of Interest, particularly in the context of personal relationships, must also be observed.

## 2.14 FRAUD

Fraud is defined as:

- Asset misappropriation (e.g. stealing money, fictitious or inflated expenditures, misuse or theft of assets, theft of confidential company information)
- Accounting manipulation (e.g. deliberate errors in valuation, concealment of debts or costs, deliberate circumvention of Group guidelines)

## 2.15 GIFTS

Ensure that you are aware of the guidelines on the acceptance of gifts, invitations and other benefits from suppliers and third parties. You undertake to fully comply with these guidelines.

Do not accept gifts or other favours (for example, gifts in kind, discounts, invitations to travel or meals) that may compromise your professional judgement or give the appearance of doing

so. Advertising of products or services from suppliers and third parties at hospital or Corporate Office events must first be authorised by your supervisor.

Cash may not be accepted under any circumstances. Other gratuities from suppliers and external parties are discouraged and should be avoided. If the acceptance of such is nevertheless considered, it is imperative to comply with the approval procedures in accordance with the guidelines above.

## 2.16 CORRUPTION AND BRIBERY

All forms of corruption and bribery are prohibited, both active bribery (benefits related to the receiver's own activities, where the explicit or implicit condition is that the receiver will do something in the interests of the giver) and passive bribery (benefits related to the receiver's own activities, where the explicit or implicit condition is that the receiver will refrain from doing something in the interests of the giver). Active bribery, i.e. the acceptance of facilitation payments in your own interests or in the interests of the Hirslanden Group, is prohibited. Passive bribery is prohibited regardless of whether or not the intention is to harm the interests of the Hirslanden Group.

Actions that fall within the scope of the Money Laundering Act are also strictly prohibited. Money laundering is defined as the process that injects

## 3. CONDUCT TOWARDS OUR STAKEHOLDERS

illegally generated funds and/or illegally acquired assets into the lawful financial and economic cycle. This includes, for example, the deposit of funds and assets of this kind into a Swiss bank account.

### 2.17 INSIDER TRADING

Employees and partners of the Hirslanden Group are prohibited from using or disclosing insider information to gain a financial advantage for themselves or another person (for example, when trading or recommending trading in Mediclinic shares). Insider information is price-sensitive information about a company or transaction that, if disclosed, could affect the price of a company's securities or warrants. All employees and partners are prohibited from exploiting knowledge of pending or ongoing securities transactions for their own benefit or for that of a third party.

### 2.18 ANTITRUST LAW AND FAIR COMPETITION

Mediclinic endorses and complies with the competition and antitrust laws of the countries in which the Group operates. As these laws are extremely complex, the Group has issued guidelines for its employees on how to comply with competition laws in their respective countries. The Guidelines on Competition Law in Switzerland (available in Signavio) apply to the Hirslanden Group.

It is the personal responsibility of each supervisor to be aware of, understand and follow these guidelines. Where there is any doubt as to the correctness of a course of action, supervisors must consult the relevant legal department as soon as possible.

Examples include:

- Price fixing agreements that limit free competition, e.g. raising prices in agreement with a direct competitor and/or supplier.
- Prohibiting unfair competition, namely deceptive or dishonest conduct or business behaviour, such as the use of general terms and conditions that create a marked disparity between the rights and obligations of the parties involved, or the placement of misleading advertisements.

We manage the Hirslanden Group with a sense of responsibility and respect and take into account the needs of all our stakeholders, which include our employees, patients, medical professionals, shareholders, partners and suppliers, the public sector, patient organisations, the media, and society as a whole. We cultivate an honest, transparent and ethical relationship with our stakeholders and treat them with dignity and respect.

### 3.1 EMPLOYEES

- We foster good working relationships with our employees.
- We do not engage in child labour, forced labour or compulsory labour.
- We treat our employees fairly and respect their dignity and human rights.
- We compensate our employees fairly and in line with industry standards.
- We provide a safe and healthy working environment for our employees.
- We value diversity, provide equal opportunities for all and do not tolerate any form of discrimination (cf. 2.5).
- We do not tolerate any form of workplace favouritism.
- We do not tolerate, permit or condone any form of harassment (cf. 2.6).
- We communicate with our employees openly and on a regular basis.
- We invest in the ongoing training and development of our employees.

### 3.2 PATIENTS

- We have an ongoing commitment to maintaining and improving the quality of care and safety of our patients.
- We focus on the needs of our patients and are committed to their well-being.
- We work with our patients to gauge, maintain and improve patient satisfaction.
- We respect our patients' right to privacy and confidentiality.
- We respect the rights and dignity of our patients, do not tolerate discrimination, provide full information on our patients' state of health and treatment, enable second opinions and access to medical records, and support the right to self-determination and codetermination, the right to refuse treatment and the right to complain.
- We are committed to responsible billing (i.e. no unnecessary treatments, accurate and verifiable invoices, and charges that are solely for services actually provided).

### 3.3 MEDICAL PROFESSIONALS

- We foster good working relationships with our medical professionals and support them wherever possible.
- We maintain high-quality facilities and equipment to provide our medical professionals with an optimal working environment.
- We respect the clinical independence of our partner doctors.

- We do not accept unsolicited gifts or invitations from partner doctors and refrain from offering unsolicited gifts or invitations.
- We do not allow referral payments to partner doctors for referring patients to our facilities.
- We communicate with our medical professionals openly and regularly.
- We gauge the satisfaction of our medical professionals on a regular basis.
- We promote the training of young medical professionals and medical innovations.
- We uphold scientific integrity and independence (especially with regard to research).
- We act in accordance with the guidelines of the Swiss Academy of Medical Sciences.

### 3.4 SHAREHOLDERS

- We are committed to the responsible use of our shareholders' capital to achieve growth and sustainable returns.

### 3.5 PARTNERS AND SUPPLIERS

- We apply strict and fair selection criteria when choosing our partners and suppliers.
- We do not accept unsolicited gifts or invitations from partners, suppliers and other third parties and refrain from offering unsolicited gifts or invitations.
- We verify that suppliers and partners comply with human rights, to the

extent that this is possible, before signing any investment or procurement agreements.

### 3.6 THE PUBLIC SECTOR

- We comply with the regulations and directives relevant to the Hirslanden Group and the industry, and cooperate with the government and applicable authorities.
- We assert our interests in dealings with public authorities, but do so respectfully and with an awareness of the complex nature of the public sector's responsibilities.
- Donations from Hirslanden to political parties are only permitted if they are approved in advance by the Executive Committee and reported to Mediclinic's Executive Committee.

### 3.7 HEALTH INSURANCE PROVIDERS

- We conduct our negotiations with health insurance providers according to ethical and fair principles.

### 3.8 PATIENT ORGANISATIONS

- We interact with patient organisations in an open and transparent manner, taking into account the interests of the Hirslanden Group.

### 3.9 THE MEDIA

- We communicate with the media credibly and transparently, and provide pertinent information.
- We interact with media professionals on equal terms.

### 3.10 SOCIETY

- We accept our social, economic and ecological responsibility in the course of our business activities and act in a sustainable manner (cf. 2.2).
- We comply with the licensing requirements and conditions set by the authorities.

## 4. THE CODE IN PRACTICE

### 4.1 VIOLATIONS AND SANCTIONS

Violations of the law, the Code of Conduct, or our regulations, directives and guidelines will result in sanctions. Such violations may lead to disciplinary action, as well as to potential civil or criminal penalties, in particular:

- Verbal warnings
- Written warnings
- Dismissal
- Payment of damages
- Criminal charges

### 4.2 REPORTING VIOLATIONS

Every employee has the right and the duty to report violations of the law, the Code of Conduct, and our regulations, directives and guidelines. To report a violation, employees should contact one of the following:

- their supervisor
- the Ethics Contact Person, Claudia Dusold, Head of Legal & Company Secretariat T 044 388 85 38, [claudia.dusold@hirslanden.ch](mailto:claudia.dusold@hirslanden.ch)
- the independent and confidential Ethics Hotline 0800 00 53 16
- [ethik@hirslanden.ch](mailto:ethik@hirslanden.ch)

The employee who reports the violation will not be subject to any disadvantages, insofar as the report is made to the best of their knowledge and in good faith. Employees will proceed in a considered, responsible and diligent manner. They should refrain from making clearly unfounded disclosures.

### 4.3 ROLE OF MANAGERS

Within the context of this Code, your most important role is to exemplify and embed ethical behaviour through your own personal conduct as part of our corporate culture. Please observe the following guidelines for this purpose:

- Ensure that all your employees understand this Code and know what is expected of them.
- Live the Code.
- Create a working environment that promotes open and honest communication.
- Encourage your employees to voice their concerns.
- Do not drive results at the expense of ethical conduct or compliance with the Code or applicable laws.
- Listen actively when employees approach you with a question about the Code.
- Act when you become aware of violations of the Code or legal requirements.

## 5. OTHER GUIDELINES

Other relevant guidelines and codes of practice that apply within the Hirslanden Group are deemed to be part of this Code. You will already have received and agreed to some regulations as part of your employment contract. Other regulations can be viewed in Signavio (cf. document group «Regulations/Personnel Policy»). Relevant guidelines and codes of practice that apply within your hospital or area must also be observed. It is your responsibility to keep up to date on any changes to the policies and regulations relevant to you.



# AT YOUR SERVICE



1

Contact the Ethics Line service on 0800 00 53 16



2

The line is administrated by an **independent consultancy**.



3

The Ethics Line is available **24 hours a day**, seven days a week.



4

Whistleblowers have the option to remain **anonymous**.



## DID YOU KNOW?

The Ethics Line service is customised to serve each department in the local language of the region concerned.



7

The **Ethics Contact Person** ensures that the necessary investigation is performed.



6

You receive a case-specific **reference number**.



5

You **share** details of the incident or ethical concern that you might have.