



**SYNLAB AG**

Supplier Code of Conduct



## SYNLAB AG Supplier Code of Conduct

### I. Supplier Code of Conduct Statement

SYNLAB AG is committed to ensuring that our work improves the lives of our patients, SYNLAB Members, and the communities in which we operate. We are dedicated to providing access to the highest quality healthcare, which is the cornerstone of our business and one of our strongest paths to impact.

We promote a culture that values diversity and inclusion, gender equality, and inclusive, decent work for all. We are committed to upholding human rights and applicable local labour law, to doing business with the highest possible standards of ethics and integrity and to providing safe and healthy working conditions to our Members. SYNLAB has the high aspiration to effectively measure and manage our environmental impacts, reduce them across our operations and empower our Members to find new ways to make our diagnostic services more sustainable.

SYNLAB expects any third parties standing in a direct contractual relationship and engaging in business with SYNLAB who supply products and/or services to SYNLAB (“supplier”) or perform works on behalf of SYNLAB (“subcontractors”) to adopt an equally diligent approach on social and environmental matters, on business ethics and on integrity.

SYNLAB’s Supplier Code of Conduct formalizes SYNLAB’s expectations towards a responsible and sustainable approach on business conduct. Direct contractual partners are expected to read, acknowledge, and adhere to the principles set forth in this Supplier Code of Conduct and to pass them on to their contractual partners in their supply chains. SYNLAB has made a fundamental commitment to working only with partners whose standards are consistent with our own principles.

### II Objective

This Supplier Code of Conduct expresses SYNLAB’s beliefs and values on responsible and sustainable supply chain management. This Supplier Code of Conduct represents a clear commitment to compliance with applicable laws and regulations, and international standards on business ethics, human rights and labour law, occupational health and safety and environmental management and sustainability.

This Supplier Code of Conduct shall serve as a guidance for our suppliers and subcontractors in adopting an equally diligent approach in their business activities and operations. On the following pages our suppliers and subcontractors will find SYNLAB’s principles on responsible business conduct which SYNLAB expects to be applied in our supply chains.

This SYNLAB Supplier Code of Conduct references our SYNLAB Code of Conduct applicable to SYNLAB and associated companies.

### III The Supplier Code's Standing

SYNLAB is strongly committed to conducting our business affairs with honesty and integrity, in full compliance with the laws and regulations of the applicable legal systems. ("Law"). The Supplier Code of Conduct is based on principles of integrity, honesty, credibility, and responsibility. It is designed to integrate with the provisions of the Law, to complement them, and to add to them.

The Supplier Code of Conduct does not constitute a replacement and does not substitute the Law's provisions. In any case of conflict between the applicable provisions of the Law and the Code's instructions, the Law's provisions must be upheld. This Supplier Code of Conduct is a supplement to any contract between SYNLAB and its suppliers, and if there are more stringent requirements than such that are outlined in this Supplier Code of Conduct, the terms of the agreed contract shall supersede these.

### IV Key Principles of Business Conduct

SYNLAB expects our suppliers and subcontractors to conduct business in alignment with the following principles:

#### **ETHICS**

##### Legal and Ethical Conduct

SYNLAB expects our suppliers and subcontractors to operate in compliance with applicable laws which entails, in an international business context, both the laws of your own country and those of any other country concerned including those on responsible supply chain management. Suppliers and subcontractors are expected to avoid any violations of laws and to initiate investigations when a violation has been discovered. Beyond that, we expect our contractual partners to operate in alignment with our Supplier Code of Conduct.

##### Mutual Respect, Honesty and Integrity

SYNLAB expects our suppliers and subcontractors to respect personal dignity and the rights and diversity of the individual, to condemn any form of discrimination, harassment (including sexual) and insulting or aggressive behaviour in compliance with International Labour Organization (ILO) Convention No.111 on Discrimination in Employment and Occupation. We are convinced that a corporate culture of fair treatment, mutual respect and trust in which we have the same esteem for all individuals regardless of their nationality, cultural background, religion, ethnic origin, gender and gender identity, disability, marital status, parental status, sexual orientation or age forms the basis of all business conduct.



## Grievance Mechanism

SYNLAB expects our suppliers and subcontractors to establish a communication channel which allows employees to report grievances and observations of any kind in an anonymous manner without fear of retaliation or other personal consequences.

## Anti-Corruption and Bribery

SYNLAB expects our suppliers and subcontractors to abide by the law and adopt a zero-tolerance policy on corruption and bribery and have established appropriate compliance management systems to prevent and detect such cases.

## Competition Laws

SYNLAB expects our suppliers to operate in compliance with applicable competition law to ensure free and fair competition. Suppliers must not engage in collusion amongst competitors on prices and delivery of services, engage in agreements with suppliers which restrict or prevent competition and engage in any abuse of dominance.

## Economic Sanctions

Sanctions prohibit or restrict financial and trade transactions with targeted persons, entities, governments and countries. Export control laws prohibit unauthorised or unlicensed exports, transfers and sales of certain specific commodities, technology and technical data to certain countries, companies and individuals, as well as (in some cases) re-exports from one third country to another. SYNLAB expects our suppliers to comply with all applicable legal requirements on economic sanctions and export control.

## Intellectual Property and third party Copyrights

SYNLAB expects our suppliers and subcontractors to protect intellectual property and confidential information provided to them in the course of business. Suppliers and subcontractors are expected to abide by associated contractual agreements and to have systems established to ensure data security of intellectual property. Suppliers and subcontractors should never use materials or data under copyrights or otherwise protected unless expressly authorized to do so. The copying, distribution and selling of SYNLAB information, software and other intellectual property is strictly prohibited.

## Personal Data Protection

SYNLAB expects our suppliers and subcontractors to respect and protect the privacy of employees and others whose personal information they have access to, by complying with applicable data protection laws when processing personal information about employees, business partners, patients, health care professionals, consumers and others. Suppliers and subcontractors are expected to have systems established to ensure personal data security and protection.



## **FAIR LABOUR PRACTICES AND HUMAN RIGHTS**

### **Child Labour & Young Workers**

SYNLAB does not tolerate any form of exploitative child labour practices in our supply chain. Contractual partners must avoid any form of child labour in their operations consistent with the International Labour Organization (ILO) Conventions No.182 on Worst Forms of Child Labour and No.138 on Minimum Age of employment.

Subject to applicable law, children below the age of 18 can participate in e.g. in summer work, industrial placements, vocational trainings or internships, and only in non-hazardous work as defined by ILO Convention No.182 and in compliance with local applicable laws, and under managerial supervision.

### **Freely Chosen Employment**

SYNLAB does not tolerate any forms of modern slavery and human trafficking such as forced, bonded, or compulsory labour in the operations of our contractual partners consistent with the International Labour Organization (ILO) Convention No.29 on Forced Labour and its associated Protocol P029 dated 2014 to the Forced Labour Convention.

### **Freedom of Association and the Right to Collective Bargaining**

SYNLAB suppliers and subcontractors must respect the right to freedom of association and the right to collective bargaining consistent with the International Labour Organization (ILO) Convention No.98 on the Right to Organize and Collective Bargaining. SYNLAB suppliers and subcontractors must respect the rights of their employees to associate freely, form and join labour unions, seek representation, join works councils, and engage in collective bargaining. Employees must not experience any disadvantage from acting as workers' representatives. SYNLAB's contractual partners are expected to be committed to establishing a constructive dialogue with such representatives.

### **Working Conditions**

SYNLAB suppliers and subcontractors are expected to provide employees with decent working conditions in compliance with locally applicable labour law. Decent working conditions are understood to provide for social security, for at least minimum wage compensation but recommend that compensation and benefits should provide for an adequate standard of living. Working hours, breaks and rest periods either in alignment with local laws and/or ILO Conventions, whichever is more stringent. Employees have the right to humane treatment. Disciplinary policies and procedures need to be clearly defined and communicated to employees. No employee shall be subject to the threat or execution of harsh and inhumane treatment, corporal punishment, mental or physical coercion, verbal or sexual abuse or harassment. Employees shall not be subject to any form of discrimination based on race, colour, age, gender, sexual orientation, gender identity and expression, ethnicity or national origin,



disability, pregnancy, religion, political affiliation, union membership or marital status in hiring, occupation and employment.

## **QUALITY, HEALTH, SAFETY AND ENVIRONMENT**

### Provision of high-quality Goods and Services

SYNLAB suppliers and subcontractors are expected to provide high-quality goods and services which meet SYNLAB's quality requirements and standards and are safe for its intended use. Any issues which might negatively impact the quality and safety of use of delivered goods and services, must be notified to SYNLAB and mitigated by the contractual partner immediately. In addition, suppliers and subcontractors should notify SYNLAB about any changes in procurement and production processes which might impact the quality and safety of goods and services.

### Occupational Health and Safety

SYNLAB suppliers and subcontractors are expected to provide employees with healthy and safe working conditions in compliance with locally applicable occupational health and safety regulation. SYNLAB expects its contractual partners to assess health and safety risks of its operations and workplaces and to engage in risk management comprising the provision of employees with personal protective equipment (PPE) free of charge consistent with the International Labour Organization (ILO) Convention No.155 on Occupational Safety and Health. SYNLAB encourages suppliers to go beyond legal requirements by implementing occupational health and safety management systems in alignment with international standards such as ISO 45001 or equivalent standards.

### Environmental Management

SYNLAB suppliers and subcontractors are expected to comply with all environmental regulations relevant to their operations in the geographies in which they operate. They are expected to regularly review their environmental compliance, avoid any pollutions of the natural environment which may pose harm to human health and to effectively take action on any non-conformities. In addition, suppliers and contractors are encouraged to go beyond legal requirements by implementing environmental management systems in alignment with international standards such as ISO 14001 or equivalent standards.

### Environmental Sustainability

SYNLAB suppliers and subcontractors are encouraged to support SYNLAB's commitment to contribute the achievement of the Sustainable Development Goals (SDGs), notably SDG 12 Ensure sustainable consumption and production patterns and SDG 13 Climate Action through the implementation of associated goals and measures in their operations. SYNLAB encourages suppliers and subcontractors to engage in the protection of their surrounding natural environments, in the reduction of carbon emissions of their daily operations and to reduce waste and work towards a circular value chain.

## V Governance and Due Diligence

SYNLAB expects all supplier and subcontractor to read and acknowledge this Supplier Code of Conduct and to demonstrate responsible behaviour in alignment with the provisions set forth in this Supplier Code of Conduct with the ultimate aim to prevent any risks and mitigate any negative impacts associated with SYNLAB's supply chains. SYNLAB expects suppliers and subcontractors to adopt the principles on responsible business conduct defined in this Supplier Code of Conduct through their own policies and procedures. SYNLAB encourages suppliers and subcontractors to continuously improve their approach on responsible and sustainable business conduct within their own operations and within their supply chains. SYNLAB may audit or assess suppliers and subcontractors on the consistent implementation of this Supplier Code of Conduct. We will take appropriate steps regarding our relationship with any contractual partners, if there is a reason for concern.

It is SYNLAB's understanding of good corporate citizenship to assume responsibility beyond own company walls and to contribute to a positive impact on society. In this respect, we call upon our suppliers and subcontractors to cooperate in identifying social and environmental risks and impacts in our extended supply chains. SYNLAB asks our suppliers and subcontractors to support us in stakeholder engagement and concerted action through industry associations and initiatives to jointly improve social and environmental conditions in our supply chains.

## VI Supplier Complaints Procedure

Please raise your voice in case you have any concerns on something that may not be in consistency with this Supplier Code of Conduct or soundly suspected breaches of applicable laws and regulations. We encourage you to notify SYNLAB on any concerns, observations and questions associated with this Supplier Code of Conduct via SYNLAB's Supplier Complaint Procedure reporting system.

---

Mathieu Floreani

Chief Executive Officer

Version 1.0: December 2021