

Terveystalo Human rights policy

Contents

1. Introduction
2. Our Commitment
3. Our salient human rights risks & impacts
4. Our process to manage, mitigate, and eliminate our salient risks
5. Reporting grievances
6. Policy implementation
7. Way forward
8. Policy approval

1. Introduction

At Terveystalo, we are committed to respecting all individuals' fundamental rights and freedoms, as outlined in international human rights standards. We believe respecting human dignity is central to building a sustainable, inclusive, and ethical organization. Terveystalo's first human rights policy underlines our commitment and approach to respecting human rights. Terveystalo's purpose "*to fight for a healthier life*" is the foundation for our human rights policy.

The expectations set in this policy are further elaborated in our Code of Conduct, Data protection policy, Data security policy, and our Supplier Code of Conduct.

2. Our Commitment:

Terveystalo is committed to respecting human rights in accordance with the United Nations Guiding Principles on Business and Human Rights (UNGPs). We also draw on guidance from the Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises.

Terveystalo is committed to respect human rights as enshrined in

- the International Bill of Human Rights consisting of the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights as well as the International Covenant on Economic, Social and Cultural Rights;
- the International Labour Organization's (ILO) Declaration on Fundamental Principles and Rights at Work including the freedom of association and the effective recognition of the right to collective bargaining; the elimination of all forms of forced or compulsory labour; the effective abolition of child labour; the elimination of discrimination in respect of employment and occupation; and a safe and healthy working environment.

Where there is potential for adverse impacts on vulnerable people or groups, we will also consider other international standards and principles that elaborate on the rights of such individuals or groups. This includes, for example, the Convention on the Rights of the Child.

Terveystalo is committed to taking measures, based on due diligence processes, to avoid **causing or contributing** to adverse human rights impacts throughout our value chain, including impacts on our personnel, on our customers and clients as well as on workers in our supply chain, and to **addressing**

and remediating such impacts when they occur. We find ways to exercise our leverage to address adverse human rights impacts arising from our business relationships.

3. Our salient human rights risks and impacts

Terveystalo's business operations impact people throughout our value chain in different ways. We conducted a human rights impact assessment process with the help of external experts in Q4/2024. During the process, we recognised the following actual or potential human rights risks in our value chain.

Own personnel

- Right to health & safety at work
- Right to freedom from discrimination

Our customers:

- Right to health: accessibility & quality
- Right to freedom from discrimination
- Right to privacy & the protection of personal information

Our supply chain:

- Right to decent work including just and favourable working conditions, wages & worktime
- Right to health & safety at work
- Forced labour & child labour

Own personnel

Terveystalo is one of the largest employers and a place to work for healthcare and other professionals in Finland. Our actual and potential human rights impacts concerning our personnel are related to **the right to a safe and healthy working environment** as well as **the right to freedom from discrimination**.

Our daily work involves various situations where the **health and safety** of our employees might be at risk if sufficient mitigation measures are not adhered to. These risks can have severe impacts on the affected professionals. We also recognise that some of our employee groups are more prone to these risks than others, and we have taken this into account in our safety measures.

Terveystalo is a significant employer, and we recognise that our current practices and ways of working might hinder **access to equal opportunities** for some employee groups, e.g., concerning cognitive accessibility or working language. As per our Code of Conduct, we value diversity and treat people with respect which gives us a solid foundation to ensure freedom from discrimination in our workplace.

Our clients & customers

A large share of the Finnish population uses Terveystalos services every year, underlining the importance of understanding our actual and potential human rights impacts concerning our customers. In the assessment process, we recognised salient risks related to the **accessibility of care**, the **quality of care**, the **equal & non-discriminatory treatment of our customers** as well as **privacy and the protection of personal information of our customers** as being areas where actual and potential human rights impacts can occur.

Our supply chain

There are salient human rights issues rising also from our supply chain related to **decent work, work time, and wages**, as well as **unsafe and poor working conditions**. Due to the geographical reach and raw materials present in our supply chain, there is also a potential risk related to the use of **forced labour** or **child labour**.

Our critical supply chains and the geographies we source from are prone to human rights risks and we recognize the need to actively identify possible changes in our and our suppliers' operating environment which might increase the likelihood of these risks.

4. Our process to manage, mitigate, and eliminate our salient risks

Our commitment to human rights is supported through an ongoing due diligence process to identify, address, evaluate, and communicate the risks of involvement with adverse human rights impacts. We are committed to providing for or cooperating in, the prevention, mitigation, and remediation of adverse human rights that we have caused or contributed to, and we will cooperate in the mitigation and remediation of adverse impacts where we are linked to these through our business relationships.

The following measures support our due diligence efforts.

Respecting the rights of our own employees:

We ensure that our personnel have a safe working environment that supports their well-being. In such a work environment everyone can work in the best possible way. We are all responsible for promoting safety and well-being at work. The best way to do this is to follow common instructions and promptly report any safety or security issues. In addition to physical safety, we promote our employees' mental health and well-being.

Examples of our processes & practices:

- Role- and site-specific risk assessment process
- Occupational safety action plan
- Occupational accident process
- Occupational health care processes
- Processes for preventing inappropriate behaviour
- Diversity, Equity and Inclusion as defined in our code of conduct as part of the personnel development plan
- Bi-annual survey for employees

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Respecting the rights of our customers:

Patient safety serves as the basis of the health care we deliver. We ensure it by verifying the competence and education of our employees and by continuously measuring and regularly reporting the quality and outcome of our operations. At Terveystalo high-quality professional expertise consists of the skills needed in the procedures relating to healthcare provision as well as those required when interacting with people, combined with values and ethics. Patient safety involves the safety of medical care delivery, pharmaceutical treatment and equipment, and

common processes that we comply with consistently. These common processes and methods are described in our operations manual.

We collect, process, and store personal data only in accordance with applicable laws. The implementation of data protection is everyone's responsibility at Terveystalo.

Examples of our processes & practices:

- Quality and operating system
- Self-monitoring plan for the quality and appropriateness of operations, subcontractors, and customer/patient safety
- Plan to ensure critical services during emergencies to maintain access to care
- Data protection and security policies
- Patient Data Protection Handbook
- Learning material for everyday equality and sensitive customer encounters
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Respecting the rights of workers in our supply chain

The Terveystalo Group Supplier Code of Conduct outlines the standards all our suppliers and partners must meet to do business with Terveystalo Group and its subsidiaries. Terveystalo is committed to the UN Guiding Principles on Business and Human Rights, the fundamental conventions of the International Labour Organization (ILO), and the Ten Principles of the UN Global Compact, and expects its suppliers to share the same high standards for sustainable business regarding ethical, social, and environmental aspects in addition to health and safety conditions.

Examples of our processes & practices:

- Terveystalo Supplier Code of Conduct
- Terveystalo procurement policy
- Supplier relationship management model
- Supplier self-assessment surveys
- Supplier relationship governance

5. Reporting grievances:

Should you become aware of any non-compliance with this Human Rights Policy by either a Terveystalo employee or a business partner, report such behaviour through the Terveystalo [Reporting Channel](#). The same reporting system is open for both Terveystalo employees as well as external parties, so anyone can submit their report through the channel. Reports made in good faith will not lead to adverse consequences for the informer and we do not tolerate any form of retaliation against such persons. Reports are investigated confidentially, thoroughly, and fairly with the assistance of appropriate internal or external parties.

6. Way forward

We recognise the need to constantly develop our human rights due diligence processes and practices to be able to manage, mitigate and eliminate the actual and potential adverse impacts deriving from our business operations in our value chain. We will continue to strengthen the processes and practices we have in place for our own employees and customers. Still, we acknowledge that our most critical development actions concern our processes and practices regarding sustainable sourcing.

7. Policy implementation & approval:

This Human Rights Policy has been adopted by the Board of Directors on 16 January 2025.

The Terveystalo Executive Team is responsible for integrating the principles reflected in this policy into the group's strategy and daily operations.

Operationally, responsibility for implementing our Human Rights Policy lies with all the group's businesses and functions, led by each Executive Team member. In addition, the sustainability, quality, HR, legal, customer experience, and procurement teams each have a critical role in implementing it within their area of responsibility. The Vice President of sustainability owns the Human Rights Policy and is responsible for its revision and internal coordination.

On an everyday level, each Terveystalo employee and private practitioner is expected to comply with this Policy and take the necessary steps to ensure that it is implemented throughout Terveystalo's business operations, including its own operations and supply chain.

The Policy will be regularly updated to allow us also to communicate our evolving approach to human rights.