

Policy statement on the human rights strategy

1 Commitment

The Executive Board of the Central Institute of Mental Health and its subsidiaries, together with their respective management teams, are committed to implementing the human rights and environmental due diligence obligations pursuant to Section 2 (2) and (3) LkSG and anchoring them in all relevant processes through appropriate measures.

We implement applicable law, respect internationally recognized human rights and environmental obligations and take care to prevent human rights violations and environmental pollution in the course of our business activities. In particular, we condemn all forms of child and forced labor (Section 2 (2) No. 1 and 2 LkSG), all forms of slavery and (modern) human trafficking (Section 2 (2) No. 3 LkSG) as well as all forms of discrimination (Section 2 (2) No. 7 LkSG). We are also committed to compliance with the occupational health and safety regulations applicable at the respective place of employment (Section 2 (2) No. 5 LkSG), the payment of appropriate wages (Section 2 (2) No. 8 LkSG) and the protection of our employees' freedom of association (Section 2 (2) No. 6 LkSG).

In addition, we focus our attention on the environmental risk areas arising from the contents of the Minamata, Stockholm and Basel Conventions (Sections 2 (3) Nos. 1-4, 7 and 8 LkSG).

2 Responsibilities for implementing the due diligence obligations of the LkSG

Overall responsibility for the human rights and environmental due diligence obligations lies with the Executive Board of the Central Institute of Mental Health (Section 4 (3) and (4) LkSG). In the subsidiaries over which the Central Institute of Mental Health exercises a controlling influence, responsibility lies with the respective management teams. The Central Institute of Mental Health actively works to ensure that the due diligence obligations are implemented by them.

Responsibility for the operational implementation and execution of the human rights and environmental due diligence obligations lies with the respective heads of the organizational units and is implemented on a task-specific basis.

A central officer will be appointed by the end of 2023 to monitor the implementation of the due diligence obligations.

2.1 Risk analysis and measures

In order to fulfill our duty of care in accordance with Section 3 (1) LkSG, an appropriate risk management concept will be established by the end of 2023 (Section 4 LkSG) and anchored in all relevant business processes in accordance with the legal requirements.

As part of risk management, we carry out an annual risk analysis to identify human rights and environmental risks along our supply chain, in which we pay particular attention to those risks that are predominant based on our experience in the medical sector. In addition, ad hoc risk analyses are carried out in relation to supplier companies if substantiated indications of potential violations of due diligence obligations become known or if a change in the risk situation makes this necessary.

If we identify human rights or environmental risks along our supply chain as part of the risk analysis, we immediately take the following preventive measures in our own business area, among others:

- Conducting training in the business areas relevant to procurement (Section 6 (3) No. 3 LkSG)
- Developing and implementing suitable procurement strategies and purchasing practices (Section 6 (3) No. 2 LkSG)

In the case of risks identified for our direct suppliers, we take the following preventive measures, among others:

- Establishing contractual control mechanisms for all our direct suppliers (Section 6 (4) No. 4 LkSG)
- Substitution with other products or suppliers if necessary

All measures are regularly reviewed for their effectiveness and adjusted if necessary.

2.2 Communication

In addition to continuous and event-driven risk identification and assessment, a central communication channel is available to all employees and external partners as well as third parties. In accordance with Section 3 (1) No. 7, Section 8 LkSG, an internal company complaints procedure has been set up, which enables all of the above-mentioned persons to report human rights and environmental risks as well as violations of human rights and environmental obligations that have arisen as a result of the business activities of a company in its own business area or a direct supplier. The complaints procedure is publicly accessible via our website [<https://www.zi-mannheim.de/service/verstoesse-gegen-das-lieferkettengesetz-melden.html>]. If information or complaints are received via this system, they are forwarded by the responsible employees in the Legal, Compliance and Data Protection department to the relevant organizationally responsible department for clarification of the facts.

If demonstrable breaches can be identified, consistent and appropriate remedial measures are introduced to prevent future breaches (§§ 7, 15 LkSG).

Furthermore, all indications of potential violations and inquiries are examined to determine whether the existing processes and regulations can be adapted or improved.

The effectiveness of the complaints procedure is constantly reviewed and further developed by us, but at least once a year (Section 8 (5) LkSG).

We document our efforts to effectively implement our due diligence obligations on an ongoing basis.

2.3 Reporting

Transparent and objective internal and external communication of the implementation of human rights and environmental due diligence obligations is a fundamental element of our actions (Section 10 LkSG). To this end, the Management Board is informed regularly, but at least once a year, about the implementation of the due diligence obligations under the LkSG (Section 10 (2) LkSG). In addition, starting on January 1, 2025, an annual report on the fulfillment of our due diligence obligations will be submitted to BAFA. This report will be published on our website no later than four months after the end of our financial year and will be available free of charge for a period of seven years (Section 10 (2) LkSG).

3 Our expectations of our employees and suppliers

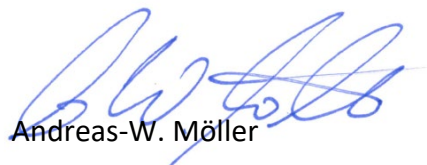
The principles set out in this declaration of principles apply to the entire Central Institute of Mental Health and its subsidiaries, i.e. to all our employees at all levels. To this end, we have drawn up a Code of Conduct that clearly and comprehensibly sets out our expectations of our employees.

We also expect our suppliers and business partners to commit to complying with our principles and to develop and implement appropriate and effective processes for complying with human rights and environmental due diligence obligations in order to address and prevent the risks and violations we have identified and to identify further potential risks.



Prof. Dr. Andreas Meyer-Lindenberg

Head of the Executive Board



Andreas-W. Möller

Deputy Managing Director