



## Policy Statement on the Respect of Human Rights at Münster University Hospital

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Münster University Hospital (UKM in the following) with its staff of more than 11,500 employees and annually more than 550,000 patients is aware of its social and ecological responsibility as a public-law institution and a leading healthcare provider in the region. Optimal patient care can only be achieved in harmony with the people and the environment. Therefore, UKM is committed to respecting human rights and avoiding environmental risks. At the same time, this commitment is also an aspiration and applies both to our own business activities and to our global supply chains.

This policy statement provides a binding basis for the human rights due diligence obligations we have at UKM that are prescribed in the German Supply Chain Due Diligence Act (Lieferkettensorgfaltspflichtengesetz, LkSG). UKM has established and published a Code of Compliance that both lays down the framework for interaction within its own scope of business and defines the responsibilities along the supply chain. The Code of Compliance is publicly accessible on the UKM website at <https://www.ukm.de/verhaltenskodex>

## Human Rights and Environmental Protection

UKM complies with the applicable legal obligations and requirements and is guided by ethical principles. Within this framework, it undertakes to respect the following international standards:

- The United Nations (UN) Universal Declaration of Human Rights
- The conventions and recommendations of the International Labor Organization (ILO) on labor and social standards
- The principles of the United Nations Global Compact (UNGC)
- The International Covenant on Civil and Political Rights
- The International Covenant on Economic, Social and Cultural Rights
- The United Nations Guiding Principles on Business and Human Rights

UKM particularly commits to protecting the following human rights and fulfilling the following environmental due diligence obligations and expects the same from its direct suppliers:

### Ban on child labor:

UKM strictly repudiates any form of child labor. UKM respects the right to education and observes the regulations

on the minimum age for employment in accordance with national legislation and internationally recognized standards.

### Ban on forced and compulsory labor:

UKM opposes any form of forced or compulsory labor.

### Right to health and safety at the workplace:

Occupational health and safety are essential prerequisites for day-to-day work at UKM.

### Freedom of association, the right to collective bargaining and the right to strike:

UKM acknowledges our employees' right to freedom of association, their right to join or to form trade unions, their right to collective bargaining and their right to strike.

### Right to privacy:

UKM respects the international human right to privacy. Data protection as laid down in the European and German General Data Protection Regulation is crucial, particularly when dealing with employee and patient data.

### Equal opportunities and protection against discrimination:

We at UKM support a culture of equal opportunities, mutual trust and mutual respect and we value all employees, partners and patients to the same extent, regardless of their gender, age, skin color, culture, ethnic origin, sexual identity, disability, religious affiliation or ideology.

### Environmental protection:

UKM considers environmental and climate protection to be important strategic goals. UKM assumes responsibility for its environment - all of its activities are geared to environmentally-friendly, resource-saving and energy-efficient implementation. UKM complies with all of the environmentally relevant agreements referred to in the LkSG - including the Minamata Convention, the Stockholm Convention and the Basel Convention.

### Remuneration and benefits:

The remuneration and other benefits paid at UKM conform at least to statutory tariffs and are paid regularly. We oblige our suppliers to pay all of their employees a wage that at least enables them to finance a living standard.

### Protection of local communities and indigenous peoples:

We at UKM take into account the local implications of our business activities. We respect the rights of local communities and indigenous peoples and expect the same from our suppliers.

### Human protection when deploying security forces:

When private or public security forces are deployed at UKM to protect our operations, internationally recognized human rights must be respected. We at UKM reject the use of private or public security forces for torture, inhumane treatment or harm to life and limb. We expect the same from our suppliers.

Based on our insights and the aforementioned international standards we have created structures within our clinic that regularly monitor the compliance with labor rights, including the function of a human rights, equal opportunities and data protection officer. In the domain of environmental protection, hazardous goods officers ensure the safe use of hazardous goods. We have our own fire department for emergency response. A central portal is available to all employees who want to report critical incidents. There are disaster control and emergency plans in place that regulate emergencies in detail as well as central telephone numbers for emergency care.

## Implementation of Human Rights and Environmental Due Diligence Obligations at Münster University Hospital

### Risk management and responsibilities

A risk management system has been put into place in order to ensure compliance with due diligence obligations at UKM and along its supply chain. The implementation of and compliance with the UKM Policy Statement on the Respect of Human and Environmental Rights is the responsibility of the UKM executive board. A human rights officer who works together with the sustainability management department and relevant business divisions, such as Purchasing and Compliance, to continuously improve and monitor the overall process, supports the executive board. The human rights officer regularly reports to the executive board on the sustainability management system established at UKM, the identified risks and the measures taken to eliminate and avoid such risks in the future. Every manager at UKM is responsible for fulfilling the human rights due diligence obligations in their own business area. Managers are required to inform their employees about the contents of this policy statement.

### Risk analysis

In order to determine risks for human rights and the environment at UKM and its direct suppliers, risk analyses are conducted annually and on an ad hoc basis, taking into account potential risks related to the respective country and the business model. The assessment of the identified human rights and the environmental risks is based on criteria such as their extent and the possibility of influencing them and their remediability. In alignment with the prioritized results

obtained in the risk analyses measures are introduced to minimize specific risks.

Identified risks (such as occupational health and safety issues, environmental protection, the proper use and the disposal of chemicals (persistent organic pollutants) as well as the import and export of hazardous waste as defined by the Basel Convention) are discussed with our direct suppliers and suitable preventive measures introduced as necessary. The risk analyses prioritized no specific risks in respect of our direct suppliers.

In our own scope of business we have identified the following issues as priorities:

- Occupational health & safety
- Environmentally responsible disposal of waste containing POPs
- Ban on the import and export of hazardous waste as defined by the Basel Convention
- Ban on the use and disposal of mercury in accordance with the Minimata Convention

If there is tangible evidence the risk analysis is also extended to indirect suppliers of UKM.

### Preventive measures

At UKM various steps are taken to prevent a violation of human rights and environmental due diligence obligations. These include measures like the inclusion of human rights due diligence obligations into the procurement strategy and the training of employees. As part of the preventive measures, human rights due diligence obligations are also demanded and integrated in the selection and tendering of suppliers.

UKM has been implementing preventive measures to avert risks in its scope of business for many years. For instance, UKM has appointed a waste management officer and a hazardous goods officer who cooperate with the waste disposal companies in order to ensure that hazardous waste and materials are disposed of in an environmentally compatible manner. Moreover, random checks are carried out at our disposal companies at regular intervals. The central „Occupational Health and Safety Service“ and other institutions (Hygiene, Fire Protection, Compliance, Data Protection, etc.) assist the employer in all employees trainings at the beginning of their employment and subsequently at regular intervals depending on the requirements at their workplace. The entire UKM is visited by such institutions as part of routine inspections after

which potential improvements are discussed with the person in the employer function. Moreover, UKM offers various preventive work-related health check-ups to all employees and provides support in all matters relating to physical and mental health in the workplace.

The preventive measures are evaluated annually and reviewed in respect of their effectiveness.

### Remedial measures

Substantiated suspicions or specific evidence of possible violations of human rights and environmental due diligence obligations within the scope of business of the UKM or along the supply chain will be consistently investigated. In this framework, UKM obliges its suppliers to contribute to the establishment of the facts. Depending on the severity of human rights violations committed by direct or indirect suppliers UKM reserves the right to draw the consequences after an appropriate response time, up to and including the termination of the business relationship.

The remedial measures are evaluated annually and reviewed in respect of their effectiveness.

### Complaints procedure

Information about human rights and environmental risks or violations within the scope of business of UKM as well as the scope of business of direct and indirect suppliers, can be reported within the framework of our complaints procedure (<https://www.ukm.de/kontakt/hinweisgebersystem-lieferkette>). Reports submitted within the complaints procedure are treated with impartiality, independency and confidentiality.

The rules of procedure of our complaints procedure are publicly available on our website and are actively communicated to the UKM employees. The adjacent QR code leads directly to the complaints procedure and the rules of procedure.



The complaints procedure is evaluated annually and reviewed in respect of its effectiveness.

### Documentation, Audit and Review Reporting

The fulfillment of the due diligence obligations is documented on an ongoing basis and the documentation is kept on file for at least seven years. The report on the fulfillment of the UKM's rights and environmental due diligence obligations in compliance with the LkSG is published annually at <https://nachhaltigkeit.ukmuenster.de>. This report is also submitted to the Federal Office of Economics and Export Control, BAFA, for review.

### Continued Refinement of our Measures to Implement Human Rights and Environmental Due Diligence Obligations

We are aware that the implementation of human rights and environmental due diligence in the framework of our own business activities and in our supply and service chains is an ongoing process. We accept this challenge and regularly review our strategic approaches and measures with the aim of continuous improvement. With this in mind, this policy statement is also updated and refined at regular intervals. We attach great importance to the transparency of this process as we will only succeed if all stakeholders – the management, the employees, our suppliers and all business partners – are involved.



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