

## IZJAVA O SPOŠTOVANJU ČLOVEKOVIH PRAVIC

Skupina PHOENIX<sup>1</sup> s sedežem v Mannheimu je vodilni evropski veletrgovec z zdravili, lastnik lekarn in ponudnik storitev za farmacevtsko industrijo. S prisotnostjo na 29 evropskih trgih zagotavlja edinstveno geografsko pokritost Evrope in z več kot 48.000 zaposlenimi pomembno prispeva k celoviti oskrbi z zdravili.

### NAŠA ZAVEZA SPOŠTOVANJU ČLOVEKOVIH PRAVIC IN VARSTVU OKOLJA

S postopki skrbnega pregleda poslovanja in dobavne verige, vključno z varstvom okolja kot ključnega temelja za življenje, in iskanjem dialoga z relevantnimi deležniki, prevzemamo odgovornost za zaščito in spoštovanje človekovih pravic.

Naš pristop k spoštovanju človekovih pravic temelji na mednarodno sprejetih standardih, kot so: Splošna deklaracija človekovih pravic Združenih narodov, Mednarodna pogodba o civilnih in političnih pravicah ter Mednarodna pogodba o ekonomskih, socialnih in kulturnih pravicah, Smernice za podjetja in človekove pravice Združenih narodov, Temeljni principi Mednarodne organizacije dela ter Smernice OECD za multinacionalna podjetja glede odgovornega poslovanja.

### PRIČAKOVANJA DO ZAPOSLENIH IN POSLOVNIH PARTNERJEV

Ta izjava velja za skupino PHOENIX in predstavlja temelje za delovanje naših zaposlenih in poslovnih partnerjev.

Pričakovana ravnanja naših zaposlenih so podrobno opisana v [Kodeksu ravnanja](#). Pričakujemo, da vsak zaposleni ravna v skladu z etičnimi poslovnimi praksami in spoštovanjem zakonodaje ter da se drži predpisanih postopkov skrbnega pregleda za spoštovanje človekovih pravic.

Podobna pričakovana ravnanja naših poslovnih partnerjev so opisana v [Splošnem kodeksu ravnanja za dobavitelje skupine PHOENIX](#). Pričakujemo, da naši poslovni partnerji upoštevajo veljavne zakone in konvencije glede dela, človekovih pravic in varstva okolja ter da sodelujejo z nami in znotraj dobavne verige. To vključuje vpeljevanje postopkov skrbnega pregleda v organizacijo in spodbujanje poslovnih partnerjev k poslovanju, ki spoštuje človekove pravice in varuje okolje.

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<sup>1</sup> V tem dokumentu se skupina PHOENIX nanaša na družbo PHOENIX Pharma SE ter njene neposredne in posredne hčerinske družbe pod odločilnim vplivom v skladu z 2. členom, 6. odstavkom, 3. stavkom nemškega zakona o skrbnem preverjanju dobavne verige (German Supply Chain Law), vključno z družbo PHOENIX Pharmahandel GmbH & Co KG.

## POSTOPKI SKRBNEGA PREGLEDA SPOŠTOVANJA ČLOVEKOVIH PRAVIC IN VARSTVO OKOLJA

Skupina PHOENIX je vzpostavila sistem upravljanja tveganj za prepoznavanje, preprečevanje in zmanjševanje tveganj, povezanih s spoštovanjem človekovih pravic in varstvom okolja, ter za preprečevanje, zmanjšanje ali prenehanje kršitev. Naša prizadevanja so osredotočena predvsem na naše lastno poslovanje in na neposredne dobavitelje. Indirektne dobavitelje ocenjujemo, če imamo objektivne dokaze, da so se morda zgodile kršitve človekovih pravic ali okoljevarstvenih obveznosti. Sledimo pristopu, ki se osredotoča na obvladovanje prednostnih tveganj in prepoznavanju ustreznih ter učinkovitih ukrepov. Učinkovitost vseh elementov sistema za obvladovanje tveganj se redno pregleduje, tj. vsaj enkrat letno. Pridobljena spoznanja so vključena v optimizacijo sistema obvladovanja tveganj. Zavedamo se, da imamo kot člen v dobavni verigi v nekaterih primerih le omejen vpliv, zato na obvladovanje tveganj gledamo kot na proces nenehnega izboljševanja, ki ga oblikujemo skupaj z našimi partnerji v vrednostni verigi in v regulativnem okviru zdravstvenega sektorja.

### Odgovornosti

Splošno odgovornost za skrbno preverjanje človekovih pravic imata izvršni odbor družbe PHOENIX Pharma SE in upravni odbor generalnega partnerja PHOENIX Verwaltungs GmbH, ki zastopa družbo PHOENIX Pharmahandel GmbH & Co KG. Vodja oddelka za trajnostni razvoj, ki opravlja tudi funkcijo pooblaščenca za človekove pravice, spremlja izvajanje upravljanja tveganj za človekove pravice in mesečno poroča članu izvršnega odbora za logistiko in trajnostno dobavno verigo v zdravstvu. Izvršni odbor oziroma upravni odbor je o dogajanju obveščen sproti in vsaj enkrat letno.

Projektna skupina v korporativnem oddelku za trajnostni razvoj koordinira operativno izvajanje sistema za upravljanje tveganj. Pri tem tesno sodeluje z relevantnimi oddelki, kot sta kadrovski oddelk in nabava. V vsaki državi je imenovana lokalna pooblaščenca oseba za spoštovanje človekovih pravic, ki skrbi za podporo procesov in poroča projektni skupini v korporativnem oddelku za trajnostni razvoj.

### Analiza tveganj

Od leta 2023 izvajamo letno analizo tveganj, pri čemer identificiramo in se osredotočamo na tveganja, povezana s spoštovanjem človekovih pravic in varstvom okolja, znotraj lastnega poslovanja in pri neposrednih dobaviteljih, ob upoštevanju vseh podružnic, ki so pod našim vplivom.

Analiza vključuje tako abstraktno kot konkretno analizo. V abstraktni analizi se tveganja na področju spoštovanja človekovih pravic in okolja ocenjujejo na podlagi tveganja države in sektorja z uporabo različnih indeksov tveganj ter študij. Če so zaznana tveganja, so povezani dobavitelji, sektorji, naše lokacije ali dejavnosti analizirani v konkretni analizi tveganja z intervjuji, programsko opremo in vprašalniki ali poročili raziskovalnih inštitutov ter nevladnih organizacij. Identificirana tveganja so ponderirana in razvrščena po prednosti.

Poleg tega so vsi novi poslovni partnerji analizirani v postopku preverjanja poslovnih partnerjev s programsko opremo, ki vključuje rezultate spletnih iskanj in uporabo vprašalnikov. Postopek se lahko dopolni z zahtevo po dodatnih informacijah in sodelovanjem z dobaviteljem.

Abstraktna in konkretna analiza sta izvedeni tudi ad hoc v primeru dogodkov, ki spremenijo stopnjo tveganja, na primer znotraj našega poslovanja ali dobavne verige, ali če obstajajo utemeljena spoznanja o morebitnih kršitvah človekovih pravic ali varstva okolja. To velja tudi za posredne dobavitelje.

### **Tveganja so prednostno razvrščena v tri kategorije:**

Naša lastna poslovna dejavnost:

- nemarnost glede varnosti in zdravja pri delu.

Dobavitelji netrgovskega blaga:

- nemarnost glede varnosti in zdravja pri delu,
- prepoved neenakopravnega obravnavanja pri zaposlovanju,
- prepoved zadrževanja ustreznega plačila.

Dobavitelji trgovskega blaga:

- nemarnost glede varnosti in zdravja pri delu,
- prepoved uvoza in izvoza nevarnih odpadkov v skladu z Baselsko konvencijo,
- uničevanje naravnih virov življenja zaradi onesnaževanja okolja, zlasti zaradi onesnaženja zraka in vode ter pretirane porabe vode.

### **Preventivni ukrepi**

Na podlagi izvedenih analiz tveganja se izvajajo preventivni ukrepi. Skrbimo za ozaveščanje naših zaposlenih, na primer z našim Kodeksom ravnanja, ter relevantnih oddelkov, ki naša pričakovanja komunicirajo do dobaviteljev. Dodatno zahteve vključujemo v pogodbe in izvajamo kontrolne ukrepe pri novih dobaviteljih. Glede varnosti in zdravja pri delu zagotavljamo strogo skladnost z ustrezno nacionalno in evropsko zakonodajo ter predpisi, ki so del našega sistema upravljanja kakovosti, za katerega je odgovorno lokalno vodstvo. Sprejeti so različni ukrepi, kot so sistematične ocene tveganja za vsako delovno mesto, vključno s presojami skladiščnih prostorov, navodili za varnost pri delu in rednimi usposabljanji zaposlenih. Sprejete preventivne ukrepe nenehno skrbno preučujemo in dopolnjujemo.

## Postopek pritožb in korektivni ukrepi

Zaposleni, poslovni partnerji ali druge tretje osebe lahko skupini PHOENIX poročajo o tveganjih, domnevnih kršitvah smernic ali veljavnih zakonov ter incidentih znotraj lastnega poslovanja ali v dobavni verigi. V Smernicah o skladnosti (dostopne na spletni strani [www.kemofarmacija.si](http://www.kemofarmacija.si): [Skladnost poslovanja](#)). Za prijavo se lahko neposredno obrnejo na oddelek za skladnost poslovanja ali obvestijo neposrednega vodjo. Poročanje je možno tudi preko našega zunanjega spletnega sistema za poročanje o primerih (<https://phoenixgroup.integrityplatform.org/>), po želji anonimno in v različnih jezikih.

Postopek za pritožbe se dosledno uporablja v celotni skupini, spletni sistem za poročanje o primerih pa je na voljo vsem podružnicam. Vsako poročilo se obravnava zaupno, sprejeti pa so tudi ukrepi za zaščito prijavitelja. Odgovorna oseba za vodenje pritožbenega postopka deluje nepristransko, je neodvisna in pri tej funkciji ni vezana na navodila. Ugotovitve pritožbenega postopka se vključijo v analizo tveganja in izboljšanje preventivnih ukrepov.

Kljub našim skrbnim postopkom se zavedamo, da lahko pride do kršitev. Če bomo za kršitve izvedeli, na primer prek nadzornih mehanizmov, rezultatov spletnega iskanja ali našega sistema za poročanje o primerih, bomo stanje analizirali in sprejeli ustrezne korektivne ukrepe. Kršitve v našem poslovanju je treba preprečiti in takoj odpraviti. Prizadevamo si, da bi preprečili, odpravili ali zmanjšali obseg kršitev neposrednih in posrednih dobaviteljev, kar vključuje tudi razvoj konceptov za odpravo nepravilnosti.

## POROČANJE

V letu 2023 smo začeli poročati tudi o našem skrbnem pregledu s področja spoštovanja človekovih pravic in s tem bomo nadaljevali, skladno z zakonskimi zahtevami ter ob upoštevanju interesov deležnikov. Poročila in relevantni dokumenti so na voljo za prenos na spletni strani skupine PHOENIX: [Poročila o trajnostnem razvoju in prenosi](#).

Kljub poročilom na ravni skupine naša podružnica v Združenem kraljestvu objavi letno izjavo o sodobnem suženjstvu in trgovini z ljudmi v skladu z britanskim Zakonom o sodobnem suženjstvu. Poleg tega je naša norveška podružnica objavila svoje prvo poročilo o skladnosti z obveznostmi skrbnega pregleda po Zakonu o transparentnosti.

Ta dokument je bil posodobljen novembra 2024.

*Dokument je prevod angleške verzije, ki je del tega dokumenta.*

## **POLICY STATEMENT ON HUMAN RIGHTS**

The PHOENIX group<sup>2</sup>, headquartered in Mannheim, Germany, is the European leader in pharmaceutical wholesale, pharmacy retail, and services for the pharmaceutical industry. With a presence in 29 healthcare markets, the company offers unique geographical coverage throughout Europe, making a vital contribution to comprehensive healthcare with more than 48,000 employees.

### **OUR COMMITMENT TO HUMAN RIGHTS AND ENVIRONMENTAL PROTECTION**

As an internationally operating company, we accept our responsibility to protect and promote human rights through due diligence processes in our own business area and our supply chain, including protecting the environment as a crucial basis for living and seeking dialogue with relevant stakeholders.

Our human rights management approach is guided by internationally agreed standards such as the United Nations Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights and the International Covenant on Economic, Social and Cultural Rights, the United Nations Guiding Principles on Business and Human Rights, the Fundamental Principles of the International Labor Organization, and the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct.

### **EXPECTATIONS TOWARDS EMPLOYEES AND BUSINESS PARTNERS**

This policy statement applies to the PHOENIX group. It forms the basis for our expectations towards our employees and business partners.

The expectations towards our employees are set out in detail in the PHOENIX group [Code of Conduct](#). Furthermore, we expect every employee to act in accordance with ethical business practices and compliance with law as well as to adhere to defined due diligence processes in support of human rights.

Similarly, the expectations towards our business partners are set out in the PHOENIX group [General Procurement Supplier Code of Conduct](#). We expect our business partners to comply with applicable laws and conventions regarding labour, human rights, and environmental protection and to cooperate with us and along the value chain. This includes incorporating due diligence processes in their own organisation and promoting business conduct in alignment with human rights and environmental protection towards their business partners.

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<sup>2</sup> In this document PHOENIX group refers to PHOENIX Pharma SE and its direct and indirect subsidiaries under determining influence according to section 2 para. 6 sentence 3 of the German Supply Chain Due Diligence Act, including PHOENIX Pharmahandel GmbH & Co KG

## **DUE DILIGENCE PROCESSES FOR HUMAN RIGHTS AND ENVIRONMENTAL PROTECTION**

The PHOENIX group has established a risk management system to identify, prevent, and mitigate human rights-related and environment-related risks and to prevent, minimise, or end violations. We concentrate our efforts primarily on our own business area and direct suppliers. We assess indirect suppliers if we have objective indications that violations of human rights or environmental obligations have potentially occurred. We follow a risk-based approach guided by our prioritised risks and identifying adequate and effective measures. The effectiveness of all elements of the risk management is regularly reviewed, at least once a year, and learnings are incorporated to optimise our risk management. We are aware that, as an intermediary in the supply chain, we only have limited influence in some cases and therefore see our risk management as a continuous improvement process that we shape together with our partners along the value chain and within the regulatory frame of the healthcare sector.

### **Responsibilities**

Overall responsibility for human rights due diligence lies with the PHOENIX Pharma SE's Executive Board and the Management Board of the general partner PHOENIX Verwaltungs GmbH, representing PHOENIX Pharmahandel GmbH & Co KG. The Head of Corporate Sustainability, who also holds the position of Human Rights Officer, monitors the implementation of the human rights risk management and reports monthly to the Executive Board member for Healthcare Logistics & Sustainable Supply Chain. The Executive Board, respectively the Management Board, is updated as events occur and at least on an annual basis.

The operational implementation of the risk management is coordinated by a project management office in the Corporate Sustainability department in close collaboration with relevant departments such as HR and procurement departments. Furthermore, every country has nominated a Local Human Rights Officer to support processes and share local information with the project management office.

### **Risk analysis**

Since 2023, we have conducted an annual risk analysis, identifying and prioritising human rights-related and environment-related risks for our own business area and direct suppliers, considering all subsidiaries within our determining influence.

The analysis consists of both an abstract and concrete analysis. In the abstract analysis, human rights risks and environmental risks are evaluated based on country risk and sector risk, using various risk indices and studies. If risks are identified, related suppliers, sectors, and our own locations or activities are analysed in the concrete risk analysis via interviews, a software tool and questionnaire, or reports from research institutes and non-profit organisations. The identified risks are weighted and prioritised.

In addition, all new business partners are analysed in the software-based business-partner screening process which integrates web-search results and options for questionnaires. The process may be supplemented, requiring more information and collaborating with the supplier.

The abstract and concrete analysis are also carried out on an ad hoc basis following events that change the risk situation, for example, within our own business activities or supply chain, or if there is substantiated knowledge of possible human rights or environment-related violations. The latter also applies to indirect suppliers.

### **Risks are prioritised across three categories:**

Our own business area:

- Disregard of occupational health and safety

Non-trade good suppliers:

- Disregard of occupational health and safety
- Prohibition of unequal treatment in employment
- Prohibition of withholding an appropriate wage

Trade good suppliers:

- Disregard of occupational health and safety
- Prohibition of the import and export of hazardous waste according to the Basel Convention
- Destruction of the natural basis of life through environmental pollution, especially through pollution of air and water and excessive water consumption

### **Preventive measures**

Based on the risk analyses carried out, preventive measures are implemented. We invest in raising awareness among our employees, for example, by our Code of Conduct, and sensitise relevant departments to also communicate our expectations towards suppliers. In addition, we seek contractual assurances and conduct control measures in the onboarding of suppliers. Regarding occupational health and safety, for example, we ensure strict compliance with relevant national and EU legislation and regulations as part of our quality management system and enforced by local management. Different measures are taken, such as systematic risk assessments for each workplace, including audits of warehouses, occupational safety instructions, and regular employee trainings. We continuously examine and further develop the preventive measures taken.

### **Complaints procedure and remedial measures**

Employees, business partners, or any other third parties can report risks, suspected violations of guidelines or applicable laws, and specific incidents within our own business area or along the value chain to the PHOENIX group. In our Rules of Procedure (accessible on our Compliance website: [Compliance - PHOENIX group](#)) we inform about various reporting channels and the process of the complaints procedure. Besides directly contacting Corporate Compliance or informing the line manager, reports can be sent via our externally hosted

web-based case reporting system (<https://PHOENIXgroup.integrityplatform.org/>), anonymously and in various languages, if desired.

The complaints procedure is consistently applied across the group and the online case reporting system is available to all subsidiaries. Every report is treated confidentially, and measures are taken to protect the reporting person. The responsible person for conducting the complaints procedure acts impartially and is independent and not bound by instructions in this function. Findings from the complaints procedure will be fed back into the risk analysis and improvement of preventive measures.

Despite our due diligence processes, we are aware that violations can occur. Should we become aware of violations, for example, through control mechanisms, web search results, or our case reporting system, the situation will be analysed and appropriate remedial measures taken.

Violations within our own business area must be prevented and ended immediately. We endeavour to prevent, end, or minimise the extent of violations by direct suppliers and indirect suppliers, and this includes developing concepts for remediation.

## REPORTING

In 2023, we started to report on our human rights due diligence, for example, in our annual sustainability report, and we will continue to do so in accordance with legal requirements and by considering interests of stakeholders. Reports and relevant documents can be downloaded from the PHOENIX group website: [Sustainability report & downloads](#).

Despite the reports on group level, our UK subsidiary publishes an [annual statement on modern slavery and human trafficking](#) in accordance with the UK Modern Slavery Act. Additionally, our Norwegian subsidiary published its [first report](#) on compliance with its due diligence obligations under the Transparency Act.

This document has been updated in November 2024.

Mannheim, 19 November 2024

PHOENIX Pharma SE, represented by the Executive Board

Sven Seidel (Chairman) Dr Carsten Sauerland

Dr Roland Schütz

Stephen Anderson

Marcus Freitag

Stefan Herfeld

Leon Jankelevitsh



PHOENIX Pharmahandel GmbH & Co KG, represented by its general partner, PHOENIX Verwaltungs GmbH,  
represented by the Managing Directors

Sven Seidel (Chairman) Dr Carsten Sauerland

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