

2024

SUSTAINABILITY REPORT



REGINA MARIA
REȚEAUA PRIVATĂ DE SĂNĂTATE





REGINA MARIA
REȚEAUA PRIVATĂ DE SĂNĂTATE

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REGINA MARIA

Building a healthier tomorrow — for **People**
and the **Planet**

Regina Maria at
a Glance

ESG Foundations and
Reporting Approach

Environmental
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Message from the CEO

| Leading with Care. Protecting the Future.

At **REGINA MARIA**, for over 29 years, we have always believed that **healthcare must be more than treatment — it must be trust, access, innovation, and responsibility. In 2024, we made that belief even more real.**

This year, we not only grew stronger and better through our operations — we became more accountable. To our patients. To our people. And to the world we all share. We took major steps toward sustainability: from completing our first full greenhouse gas emissions inventory to designing our decarbonization roadmap and integrating ESG principles across our governance and operations. With Scope 3 emissions now mapped, we know where change must begin — and we're acting, starting with smarter sourcing, greener infrastructure, and better energy use.

But sustainability for us is also about people. In 2024, we continued investing in the well-being of our more than **11,000 employees — the heart of everything we do, and the foundation of our impact.** We expanded training programs, supported mental health, and celebrated the women leaders who now represent 70% of our top management. Our engagement score — 82% — is not just a number. It tells the story of a workforce that believes in our mission.

We also stayed close to our communities. From providing over 7,000 preventive screenings to bringing healthcare to remote areas through our Healthcare Mobile Units, our work extended well beyond the walls of our clinics. We deepened our partnerships with schools and NGOs, teaching children about health and giving families access to care they could not otherwise reach.

Digitally, we remain at the forefront. More than 1.7 million patients now use our platforms to manage their health. They trust us not just with their data, but with their time, their families, and their futures. That trust drives us to do better every day.

We believe in One Health — the idea that human, environmental, and societal health are deeply connected. That's why we approach care holistically, thinking not just about the individual, but the whole ecosystem that surrounds them.

Sustainable healthcare isn't just about how we treat a disease — it is all about how we care for people, protect the planet, and create resilience for generations to come.

This is our direction. This is our responsibility.

Fady Chreih
Chief Executive Officer
REGINA MARIA
The Private Healthcare Network

About Regina Maria

Company Overview & Sustainable Healthcare Leadership

Regina Maria is a leading private healthcare provider in Romania, recognized for its premium medical services, nationwide reach, and innovative, patient-centric model. As one of the country's top healthcare networks, Regina Maria has expanded over the past decade from a specialty focus on women's and children's health to a comprehensive national platform offering very high-quality, integrated medical services.

Business Model and Strategic Vision

Regina Maria's business model blends **premium healthcare services** with an innovative subscription-based approach to corporate health. The company leads the market in corporate medical subscriptions, providing preventative care and medical benefits to over **1 million** subscribers, also through ~13,000 corporate clients. This subscription model – which **covers 1 in 5 private sector employees in Romania** – puts patients in control of their health by emphasizing prevention and early treatment, while also ensuring financial protection for serious conditions (complemented by private health insurance). Such an approach creates and captures value in the premium segment and has driven a consistently growing patient base over the years.

At the core of Regina Maria's strategy is a commitment to **patient-centric, high-quality care**. The network has steadily expanded over the last 10 years from a single women-and-children specialty nucleus into a nationwide system offering comprehensive services.

Today, the company's strategic vision centers on delivering very high quality healthcare sustainably – aligning growth and excellence in care with social responsibility and environmental stewardship **in line with EU Corporate Sustainability Reporting Directive (CSRD)** guidelines.

This growth has been underpinned by a “blueprint for success” focusing on operational excellence and international quality standards, full integration of medical services and patient experience, and a premium positioning in the market. **Regina Maria was the first in Romania to adopt Joint Commission International (JCI) accreditation for its hospitals**, reflecting rigorous auditing and transparent reporting practices on par with global healthcare benchmarks. The company's governance structure includes a Management Committee and a Medical Advisory Committee, ensuring both business and clinical oversight support its strategic vision. A forward-looking pillar of Regina Maria's vision is the embrace of **One Health and personalized medicine**. The company believes medical issues are best addressed holistically – fostering collaboration not only across specialties but also integrating physical and mental well-being as part of overall health. In practice, this means designing care models that see the patient “as a whole,” emphasizing prevention and wellness alongside treatment. By positioning itself as a “systemic operator” in health for both Romania and the region Regina Maria aims to set new standards in healthcare delivery that are both patient-centered and sustainably managed for the long term.

About Regina Maria


National and Regional Footprint



This extensive footprint essentially forms a “healthcare ecosystem” that Regina Maria has built to national scale. It not only ensures convenience and unified care standards for patients, but also allows the company to implement network-wide programs (e.g. unified electronic health records, epidemiological surveillance, etc.) effectively. Furthermore, Regina Maria’s size enables it to serve as a “systemic operator” in Romanian healthcare – partnering with public institutions and contributing to national health strategies when needed.

Romania

Regina Maria today stands as the #1 private healthcare provider in Romania by revenue and network size. The network encompasses a broad and strategic footprint across the country’s major regions and cities. It includes:

-  **Clinics (General & Specialty)** - Largest nationwide clinic network, offering outpatient care across all medical specialties, ensuring consistent standards of care throughout Romania.
-  **Hospitals** - Modern, accredited hospitals providing inpatient and surgical care. Market leader in maternity services in Bucharest, Cluj, and Timișoara. National leader in bariatric and robotic surgery.
-  **Laboratories & Imaging** - Robust diagnostics infrastructure with 36 laboratories, 18 sampling points, and 30 imaging centers—enabling fast, accurate testing and preventive care nationwide.
-  **Dental Clinics** - Comprehensive dental network in major urban areas, covering everything from routine care to advanced oral surgery under a unified quality system.

Regional - Serbia

In recent years, Regina Maria extended its reach beyond Romania’s borders. Through its parent group, the company established a presence in Serbia, integrating with the leading private healthcare network there (MediGroup). This strategic regional footprint means Regina Maria’s expertise and systems now benefit patients in Serbia as well, and the company can share best practices and digital solutions across both markets.

About Regina Maria

Market Leadership and Premium Positioning

Regina Maria's scale and quality focus have translated into clear market leadership. The company is the leader in several key segments of private healthcare: it dominates the corporate subscriptions market, is a top provider of inpatient hospital services, and **is a leader in premium segments like private maternity care and advanced surgery.** In Bucharest and other big cities, Regina Maria enjoys a strong brand presence and patient preference, often ranking first in patient volumes for many specialties. Nationally, its share of the private healthcare market continues to grow, especially in high-value services.

Premium brand & client base: A defining feature of Regina Maria is its premium positioning – the network has built a reputation for high-quality service, comfort, and patient experience. This is reflected in the makeup of its client base: 80% of Romania's top 100 companies offer Regina Maria subscriptions to their employees, including virtually all of the leading firms in IT (18 of the top 20), banking (9 of top 10), and automotive sectors. Altogether, Regina Maria serves over **13,000 corporate clients** and has achieved a stellar **97% subscription retention rate** year-on-year– indicating exceptional client satisfaction and loyalty. For many multinational and large domestic companies, Regina Maria is the provider of choice thanks to its premium service level and nationwide coverage that can support employees in any location.

The strength of the Regina Maria brand is also evident in consumer trust and satisfaction metrics. **Patients have submitted nearly 960,000 service reviews, with an average rating of 9.63 out of 10 for Regina Maria's doctors and clinics.** Such feedback, among the highest in the industry, underscores the company's consistent quality of care and customer experience. It has also led to Regina Maria being certified as a Top Employer in Romania, recognized for offering outstanding working conditions and career development for medical professionals. By attracting top medical talent and maintaining rigorous standards, the company reinforces its premium market position – creating a virtuous cycle where excellent staff drive superior patient outcomes, which in turn bolsters the brand's reputation.

Finally, **Regina Maria's premium positioning is supported by continuous investment in infrastructure and innovation.** The network introduces international best practices and cutting-edge medical technologies in Romania (from robotic surgery systems to advanced diagnostic equipment), often being the first mover in such improvements. It also operates with a mindset of transparent, ethical business practices, which appeals to investors and regulators: for instance, financial performance and outcomes are reported with a high degree of transparency, and the company adheres to robust governance and compliance standards in line with EU norms. **All these factors solidify Regina Maria's leadership status in the private healthcare market.**

#1 in Private Maternity & Advanced Surgery
13,000+ Corporate Clients

80% of Top 100 Romanian Companies are Clients
97% Subscription Retention Rate

Digital Transformation and Innovation



Digital transformation is a cornerstone of Regina Maria's strategy, propelling its efficiency, patient engagement, and data-driven decision making. The company proudly stands as "the most digitally advanced healthcare company in Romania," with the highest adoption rate of digital services among peers. This digital edge spans customer-facing tools, internal systems, and data infrastructure:

Patient Platforms: Regina Maria has developed a rich digital ecosystem for patients, leading healthcare digitalization in Romania. The company's website attracts about **3.7 million unique visitors each month**, serving as a key source of medical information and a gateway to services. **Its mobile app and online patient portals are widely used, logging roughly 1.7 million unique user accounts** and enabling convenient functions like appointment scheduling, test results access, and telemedicine consultations. To date, **over 55% of Regina Maria's subscribers are onboarded digitally** (i.e. registered and managing their health data through Regina Maria's digital channels)– a figure that grows as more people prefer online interaction. This high uptake reflects a tech-savvy patient base and Regina Maria's success in driving digital engagement.

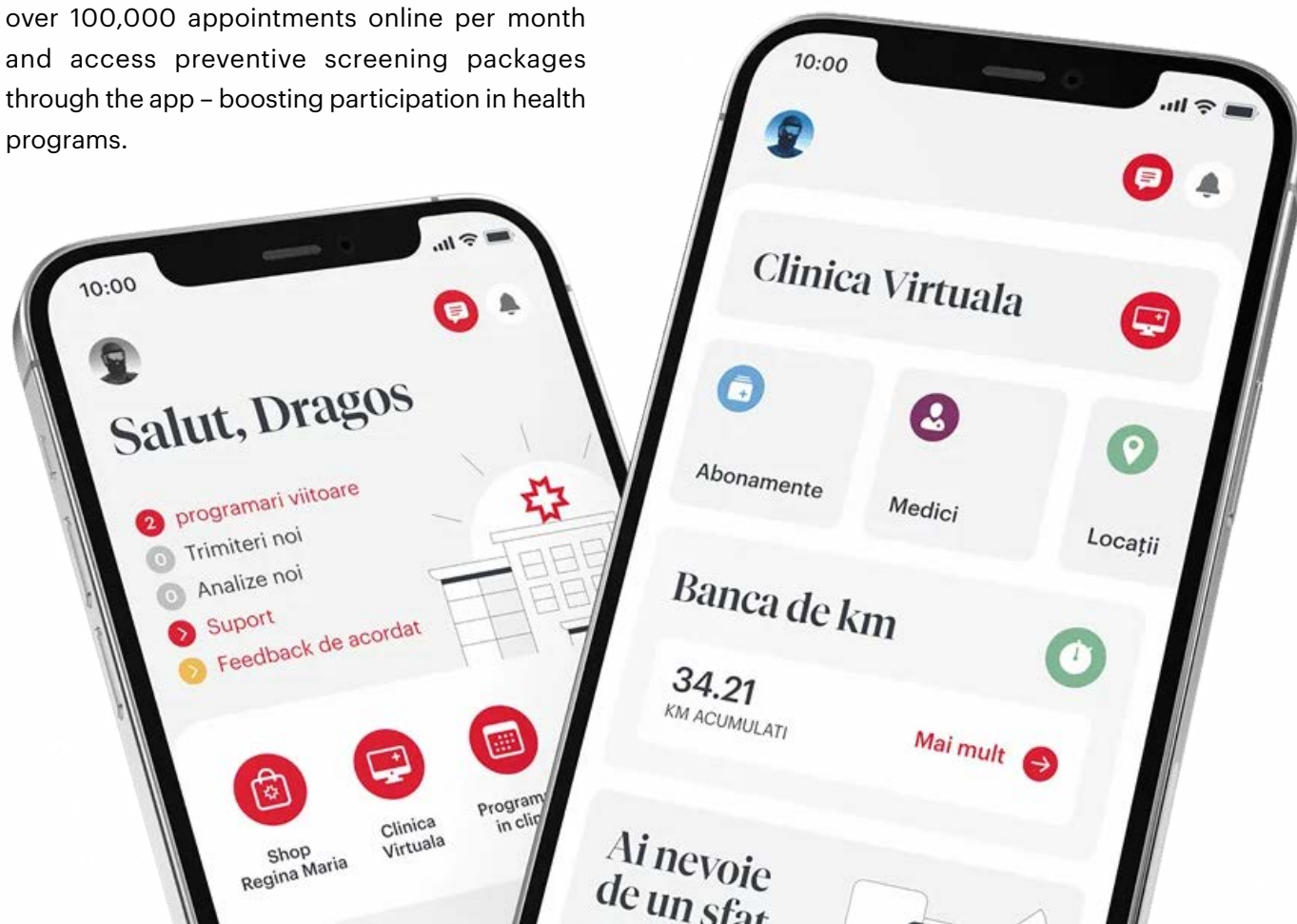
Integrated CRM and Operations: Regina Maria has fully integrated its sales, marketing, and customer care processes through a unified CRM platform, enabling a seamless and digitally supported patient journey from the first inquiry. Appointment reminders, follow-ups, and feedback requests are automated yet personalized, boosting efficiency and satisfaction. **Unified patient experience standards and centralized reporting** are backed by robust IT systems, while all clinics and hospitals share a centralized electronic health record system. This ensures real-time access to medical histories across the network, improving continuity of care and reducing redundant tests and paperwork. The centralized digital data management also allows continuous health monitoring and enhances both care quality and operational insight.

Digital Transformation and Innovation

Data-Driven Management: Regina Maria's leadership makes extensive use of data analytics and real-time dashboards to inform decisions. Thanks to a solid IT infrastructure enabling real-time data access for managers, clinicians, and even corporate clients, the company can monitor key performance indicators (from patient wait times to clinical outcomes to resource use) on the fly.

This agility was evident in how Regina Maria handled the COVID-19 period – rapidly deploying telemedicine and tracking capacity across the network – and continues to be a competitive advantage. Importantly, robust data security and privacy measures are in place as part of this digital framework, ensuring patient data is protected in compliance with GDPR and medical confidentiality standards (a critical aspect of sustainable data management and trust-building with stakeholders).

Overall, Regina Maria's digital transformation not only drives business efficiency but also creates value for patients and partners. It enables a seamless, omnichannel patient experience (online and offline) and fosters engagement through tools that encourage patients to take charge of their health. For example, patients can easily book over 100,000 appointments online per month and access preventive screening packages through the app – boosting participation in health programs.



Organizational Culture and Workforce Excellence

Regina Maria's sustained success is built on its **organizational culture and talented workforce**. The company has cultivated a culture that **attracts, develops, and retains top medical professionals** – so much so that it has repeatedly earned Top Employer accreditation for its employee conditions. **As of 2024, the network employs over 11,000 people (medical and support staff) across Romania**, making it not only a healthcare leader but also a major employer in the region's economy.



Continuous Learning: Regina Maria fosters a culture of continuous learning, with every employee following an Individual Development Plan and access to a dedicated online platform. The Surgical Training Institute—the only private center in Romania for hands-on training in minimally invasive surgery—and the European Academy of Nurses offer specialized skill-building. Through the “Royal Club of Physicians,” the company also engages top medical experts

in research and knowledge exchange, reinforcing its belief that great care starts with highly trained professionals.

Employee Engagement and Welfare: With an 82% employee engagement rate, Regina Maria benefits from a highly committed workforce. Staff express pride in the company's mission and feel supported in a collegial environment known as the “Regina Maria family.” Wellness programs, family health benefits, and service recognition initiatives foster motivation and loyalty, making it an employer of choice—and ensuring patients are cared for by dedicated professionals at the top of their fields.

Quality and Ethics: Regina Maria's staff operate under a strong quality and ethics framework, with regular training in safety, communication, and clinical standards that exceed regulatory requirements. A rigorous performance system includes both medical outcomes and patient feedback, reflected in an average satisfaction score of 9.63/10. Ethical conduct and compassion are emphasized at every level, from volunteer doctors to reception staff, shaping a trusted, patient-centered organization.

Regina Maria's culture can be described as one of professional excellence with a human touch. By continuously investing in its people and celebrating values of care, learning, and integrity, the company creates a positive feedback loop: happy, skilled employees deliver superior service, which keeps patients loyal and enhances Regina Maria's brand, which in turn attracts more top talent. This culture is a strategic asset that supports all other aspects of the company's sustainability journey.

Health Service Impact

Preventive Care Programs and Screenings

A crucial aspect of Regina Maria's impact on society is its emphasis on **preventive healthcare**. Beyond treating illness, the company proactively works to keep its subscriber base and the broader community healthy through early detection programs and health education. One flagship initiative in this realm is the Corporate Screening Program for subscription clients, which provides periodic health screenings to employees of partner companies as part of their benefits. These programs not only add value to corporate clients but also improve public health outcomes by catching issues early.

Scale of screenings: In 2024, Regina Maria conducted **7,365 preventive health screenings for adults through its corporate and community programs**. These screenings – ranging from cancer tests to general health checks – were delivered via 27 on-site campaigns at corporate client offices and through the company's mobile healthcare units, reaching employees directly at their workplaces or in their local communities.

By comparison, 7,896 screenings were done in 2023, so 2024 saw a slight 7% decrease in total screenings, but importantly a 15% increase in productivity measured as patients screened per day in the field. This was achieved by optimizing logistics and increasing average throughput to 30 patients/screening day in 2024. About two-thirds of all screenings were performed outside Regina Maria's clinics – either at client sites or via the mobile healthcare unit – underscoring **our effort to remove barriers to preventive care access** by bringing services directly to people.

Focus areas: The preventive packages cover a broad spectrum, but the most sought-after tests have been in areas of greatest health risk. **Breast cancer screening** remains the #1 utilized service, accounting for 52% of all screenings in 2024. **Cervical cancer screenings** (Pap tests) were the second largest at 14%, followed by **dermatology screenings** (for skin cancers and conditions) at 10%.

Together, these top three categories made up roughly three-quarters of all screenings – highlighting a strong emphasis on women's health and cancer prevention. Other screening types included general blood analyses, thyroid function checks, abdominal ultrasounds, vision (ophthalmology) exams, and colon/prostate checks, each contributing smaller shares. **Notably, 2024 saw significant growth in thyroid and eye screenings, which more than doubled compared to the previous year, indicating rising awareness and expanded offerings in these areas.** This diversification of screening types shows Regina Maria's responsiveness to emerging health concerns and client interests (for example, adding more thyroid screenings after noticing increasing thyroid disorders in the population).

In 2024, most Regina Maria screenings targeted cancer risks, with breast, cervical, and skin checks making up 76% of total screenings.

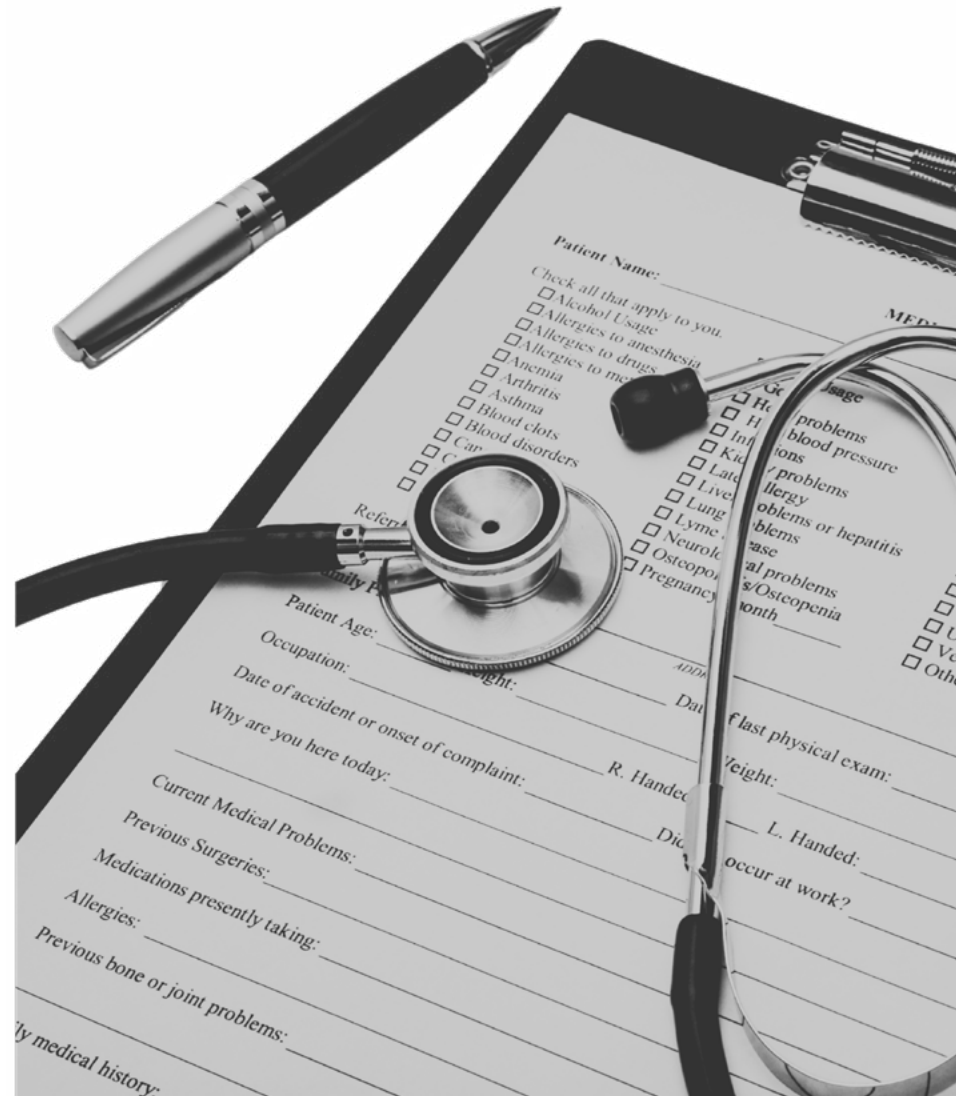
Health Service Impact

Beyond numbers, Regina Maria's **preventive programs align with SDG 3 (Good Health and Well-Being)** by reducing the burden of disease through early intervention. The high participation rates from corporate clients (many companies achieve over 50% employee uptake in offered screenings) demonstrate the success of the model. Regina Maria also runs educational wellness seminars for client employees, covering topics like nutrition, mental health, and disease prevention, further amplifying the impact of screenings. Going forward, the company aims to continually expand these preventive services – for example, by introducing newer screenings (such as lung health or diabetes risk screenings) and utilizing digital tools to follow up with at-risk individuals. In essence, **Regina Maria's healthcare model goes beyond reactive care to proactive health management, benefiting individuals, employers, and the public health system at large.**

Regina Maria has a deep-rooted commitment to community engagement and social responsibility, seeing itself not just as a healthcare business but as an agent of positive social change. The company actively invests in programs that extend quality healthcare to underserved populations, support education, and promote well-being in the community – many of which align with the United Nations Sustainable Development Goals (SDGs).



Regina Maria advances SDG 3 by combining early screenings, wellness education, and proactive care to reduce disease burden.



Community Engagement and Social Responsibility

Caravana Medicală #PentruComunitatiSanatoase

This is Regina Maria's flagship mobile healthcare project aimed at reducing health inequalities. In 2024, the Mobile Healthcare Units traveled to 5 counties in Romania, delivering essential medical services to children and youth in remote or disadvantaged communities. The mobile unit is staffed by volunteer Regina Maria doctors and nurses and equipped with portable ultrasound machines, lab test kits, and other diagnostic tools. Through this initiative, over 600 children received free high-quality blood tests, consultations, screenings, and treatments in their own villages (at the same standard as Regina Maria clinics). Additionally, **the company invested more than €160,000 in 2024 only to cover laboratory tests and medications**

for these patients. The impact is significant – many of these children had never seen a doctor before, and the mobile unit helped identify untreated conditions and refer serious cases for follow-up care.

By bringing healthcare to the doorstep of those in need, **Regina Maria's mobile healthcare unit project directly supports SDG 3 (Good Health) by promoting equitable access to quality services.** (Notably, all medical staff participate as volunteers in their own time, reflecting the company culture of giving back.) Seeing the success of the program, Regina Maria plans to expand the mobile healthcare project in 2025, both in scope of services (adding specialties like dentistry) and geographic reach, to benefit even more children in underserved areas.



Community Engagement and Social Responsibility

Health Education for Youth: In line with SDG 4 (Quality Education) and SDG 3, Regina Maria invests in health education programs to foster a culture of prevention and well-being from a young age. In 2024 the company strengthened its partnership with Junior Achievement Romania to roll out the **“Ora de Sănătate” (“Health Hour”)** program in schools. Launched in 2020, this program has reached 25,000 students to date, teaching primary school children about personal hygiene, disease prevention, healthy eating, and physical activity in an interactive, applied-learning format. An additional **6,000 students in rural and urban communities** are participating in the 2024-2025 edition of the course.

Moreover, from 2025, Regina Maria will also provide educational materials, training for teachers, and even bring medical professionals into classrooms (virtually or in-person) to engage with pupils and students in underserved areas. The health education program will be focused on nutrition, hygiene, and psycho-emotional health. This initiative underscores Regina Maria’s broader view of healthcare – recognizing that **health outcomes are deeply linked to education and habits formed early in life.**

Sustainability Advocacy and Partnerships: Regina Maria recognizes that it can leverage its influence to advance the sustainability agenda in Romania. In 2024, the company was an active participant and partner in major sustainability events, such as the **SustenLandia CEO Forum** (organized by the Sustainability Embassy) and the Climate Change Summit. **At the Climate Change Summit, Regina Maria introduced the critical topic of health in the context of climate change**, featuring a keynote by Dr. Chiara Cadeddu on the impacts of climate on public health and mental well-being (e.g. eco-anxiety among youth), as well as the topic of planetary health. By doing so, Regina Maria helped highlight the intersection of healthcare and environmental



issues, advocating for integrated solutions and public policies that protect community health in the face of climate challenges. The company has also forged **strategic partnerships with NGOs** that align with its values. For example, it works with Teach for Romania, an education NGO, to deliver health services and education to children in disadvantaged schools (often via the mobile healthcare project). With Asociația Casa Bună, another non-profit, Regina Maria ensures children from low-income families receive needed medical care and health education, serving as the health partner for this community organization. Through Junior Achievement, as mentioned, it furthers economic and health education for youth. In addition, Regina Maria supported numerous other NGOs and community projects in 2024 – from maternal health (providing “survival kits” to pregnant women in need) to sports and nutrition programs for youth, to student medical organizations – all aimed at advancing the SDGs related to health, education, and well-being. In recognition of its active role, Regina Maria became a member of the Ambasada Sustenabilității (Sustainability Embassy) in 2024, joining a coalition of leading companies committed to sustainable development in Romania.

Alignment with the SDGs

Sustainability Alignment with SDGs and Environmental Responsibility

The Sustainable Development Goals (SDGs) are 17 global targets set by the United Nations to promote well-being, protect the planet, and ensure sustainable growth by 2030.

Regina Maria aligns its sustainability efforts with six key Sustainable Development Goals: Good Health and Well-Being (SDG 3), Quality Education (SDG 4), Decent Work and Economic Growth (SDG 8), Responsible Consumption and Production (SDG 12), and Climate Action (SDG 13).

Modernizing Healthcare Access through Patient-Centered Innovation

- Digital Medical Access
- Inclusive Digital UX Design
- Patient-Centered Infrastructure

Building a Healthier Future: Prevention, Health Literacy, and Early Intervention

- Screening and Risk Identification
- Health Literacy Campaigns
- Caravana Medicală #PentruComunitatiSanatoase
- Health Education and Literacy in Schools

Environmentally Responsible

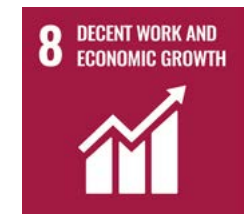
- Decarbonization
- Water Strategy
- Waste to Worth

Leading with Integrity, Insight and Transparent Oversight

- Ethics and Anti-Corruption
- Data Protection and Security
- Supplier Chain Tran
- parency and Management
- Transparency
- Board Accountability

Workforce Wellbeing and Excellence

- Listening and Engagement
- Talent Attraction and Retention
- Equality and Inclusion
- Wellbeing and Work-Life Balance
- Sustainability Ambassadors and Green Workplace Culture



Robotic Surgery Innovation

Regina Maria is the only private healthcare network in Romania that deploys da Vinci robotic surgery systems across all its hospitals. With 6 da Vinci Xi centers, the largest national footprint, the network leads robotic-assisted, minimally invasive surgery in the country.

Since its launch in 2018 at Ponderas Academic Hospital, the integrated minimally invasive and robotic surgical program has used the advanced da Vinci Xi system for a wide range of specialties including oncology, digestive, urology, gynecology, thoracic surgery, and hernia repair. In addition to the da Vinci system, the Mako orthopedic robot provides patient-specific implant planning through 3D modeling and precise intraoperative guidance. This system remains unique in Eastern Europe.

Over 2,000 da Vinci-assisted procedures have been successfully performed within the network, with more than 1,300 cases at Ponderas Academic Hospital alone. Robotic systems enable enhanced surgical precision through articulated robotic arms with seven degrees of freedom, tremor filtration, and 10x magnified 3D vision. These features support microscale dissection and minimal incisions. For patients, this results in fewer complications, less blood loss, reduced pain, shorter hospital stays - often just 24 hours - and faster recovery. Even complex procedures, such as prostate cancer surgery, benefit from more accurate and nerve-sparing techniques.

Ponderas Academic Hospital is accredited as Romania's first and only Surgical Review Corporation (SRC) Centre of Excellence in Robotic Surgery. This designation reflects rigorous evaluations based on case volume, surgical techniques, patient outcomes, established protocols, and safety standards. Furthermore, all oncology cases are reviewed by a multidisciplinary surgical team that includes oncologists, pathologists, anesthesiologists, and

radiologists, using structured evaluation protocols to ensure the highest standard of clinical governance.

To ensure long-term excellence and workforce sustainability, Regina Maria operates **the Surgical Training Institute (STI), Romania's only private training center for minimally invasive and robotic surgery.** Founded in 2011, STI has delivered more than 20 annual training programs and trained over 5,000 physicians from Romania and other European countries. The training combines virtual simulators, anatomical models, and functional tissue labs, preparing professionals before they enter the operating room. Delivered in English and co-developed with European surgical organizations such as EAES, ARCE, and the Romanian Robotic Surgery Club, STI serves as a regional hub for knowledge transfer and clinical excellence.

The implementation of robotic surgery throughout the Regina Maria network supports sustainable healthcare by improving patient outcomes, enhancing system efficiency, reducing complications and readmissions, ensuring equitable access to advanced treatment, fostering continuous learning, and elevating Romania's profile within the global healthcare community. By integrating advanced technologies, rigorous accreditation standards, and a sustainable training infrastructure, Regina Maria provides a resilient, safe, and forward-looking model of healthcare delivery.

Key Figures in 2024

70% women in Top Management



11.23 average training hours per employee



9.63 average doctor score



13,000 companies subscribed to Regina Maria



82% employee engagement score





2

ESRS 2

General disclosures — ESG foundations and reporting approach



Regina Maria at
a Glance

ESG Foundations and
Reporting Approach

Environmental
Responsibility

Social
Responsibility

Ethical
Governance

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Basis for Preparation

This sustainability report has been prepared in accordance with **ESRS 2 – General Disclosures** and covers the consolidated operations of the Regina Maria group of companies. The reporting boundary aligns with the financial consolidation perimeter of **Centrul Medical Unirea S.R.L.**, the parent company, and includes all fully owned subsidiaries and controlled entities that operate under the Regina Maria brand, all having activities in Romania.

This approach ensures that all entities under the Regina Maria Group, including subsidiaries, branches, and any other relevant organizational units, are covered in the scope of this report. As such, all references to “Regina Maria” in this report should be understood as referring to the entire group of companies listed in the consolidation scope:

- Centrul Medical Unirea S.R.L.,
- Delta Health Care S.R.L.,
- Delta Health Trade S.R.L.,
- Life Line Medical Center S.R.L.,
- Pozitron Medical Investigation S.R.L.,
- Materna Care S.R.L.,
- Materna Invest S.R.L.,
- Cosamext S.R.L.,
- Euroclinic Hospital S.A.,
- Elite Medical S.R.L.,
- Regina Maria Banca Centrala de Celule Stem S.A.,
- RM Education Services S.R.L.,
- RM Healthcare Solutions S.R.L.,
- RM Vet Healthcare S.R.L.,
- Femto Laser S.R.L.,
- Cabinet Oftalmologie Dr. Tomi S.R.L.,
- Peltecu Medical S.R.L.,

- Fetal Care Center S.R.L.,
- Diopromed Radiology S.R.L.,
- Infomedica S.R.L.,
- Implant Expert DSO S.A.,
- Implant Expert S.A.,
- Implant Expert Oradea S.R.L.,
- Implant Expert Ploiesti S.R.L.,
- Corident PRO S.R.L.,
- Implant Expert Dental Lab S.R.L.,
- Implant Expert Constructions S.R.L.,
- Implant Expert Comert S.R.L.

The list of consolidated entities is documented in the internal legal and financial registries and reflects the operational and governance structure applicable for the 2024 sustainability reporting year. The sustainability information presented here includes data and policies applicable across the group, unless otherwise specified.

Alignment with Regulatory Requirements and Standards

EU Directives and National Legislation: This disclosure is aligned with the requirements stipulated by the **Corporate Sustainability Reporting Directive** (CSRD) (Directive (EU) 2022/2464) and takes into account best practices from its predecessor, the **Non-Financial Reporting Directive** (Directive 2014/95/EU). In Romania, these directives are transposed into local legislation, which sets out specific reporting obligations for large undertakings and groups to ensure they cover all significant operations on a consolidated level.

Basis for Preparation

Global Frameworks: Where relevant, Regina Maria follows recognized sustainability reporting frameworks such as the **Global Reporting Initiative** (GRI) Standards and, where applicable, the **Sustainability Accounting Standards Board** (SASB) guidelines. By applying these frameworks, we strive for consistency, comparability, and transparency in reporting our economic, environmental, and social impacts.

Scope of consolidation of sustainability statement

Holistic View of Impacts: A consolidated statement allows us to capture and report the full scope of Regina Maria's ESG performance, ensuring that stakeholders have a clear understanding of our overall sustainability impacts.

Enhanced Transparency: This method of reporting mitigates the risk of omitting material ESG issues at the subsidiary or branch level, thus providing a more accurate portrayal of our footprint and progress.

Efficiency and Consistency: By centralizing our data collection and reporting processes, we reduce redundancies and streamline compliance efforts across the Group's multiple entities, facilitating a unified strategy for sustainability improvement.

Extent to which sustainability statement covers upstream and downstream value chain

We consider the entire value chain—both upstream (including suppliers, partners, and investors etc.) and downstream (encompassing patient and community engagement, service delivery, and follow-up)—to capture the full spectrum of our sustainability impacts. By examining every stage of our

operations, we can more effectively identify priorities, manage risks, and foster responsible practices in partnership with our stakeholders.

In alignment with ESRS 1, we define our short-term as coinciding with our regular financial reporting cycle, our medium-term as up to five years, and our long-term as any period beyond five years. If, at any point, we adopt alternative timeframes, we will clearly disclose those updated horizons and provide a corresponding explanation.



Metrics including value chain data estimated using indirect sources, their basis, accuracy, and improvement plans

In some instances, and in order to enhance accuracy and transparency, Regina Maria refers to publicly available sustainability reports or disclosures from peer companies as a basis for comparison. Because this information is gathered from external sources rather than our own operations, it is considered “indirect” data. We use it primarily to benchmark our performance on key indicators, while recognizing that such references may involve a degree of uncertainty and may not exactly match our specific context. Nonetheless, they offer valuable insights that help us identify areas for improvement and maintain alignment with industry practices.

Basis for Preparation

Sources of measurement uncertainty, assumptions, and judgments made in measurement

Regina Maria is committed to strengthening the reliability of its sustainability information by improving data tracking systems, increasing collaboration with our suppliers to gather primary data, and—where relevant—using advanced monitoring methods. These steps will progressively reduce our reliance on external benchmarks or estimations and enable us to provide more precise disclosures over time. We recognize that certain areas, such as variations in supplier data, calculations of indirect (Scope 3) emissions, or assumptions about end-of-life for healthcare-related products, may still involve a degree of measurement uncertainty. To maintain consistency across reporting periods, we follow standardized methodologies and continue to refine our processes, thereby ensuring transparency and comparability of our sustainability performance.

Explanation of changes in preparation and presentation of sustainability information

Building on our ongoing efforts to align with the Corporate Sustainability Reporting Directive (CSRD) and the European Sustainability Reporting Standards (ESRS), Regina Maria has introduced several methodological enhancements to this reporting cycle. These improvements focus on refining data collection processes and strengthening estimation models, ensuring that our sustainability disclosures remain clear, consistent, and responsive to stakeholder expectations. In the previous years of reporting on sustainability matters we did not identify any material errors, so no restatements or corrections have been necessary. Also, phase-in disclosures are not applicable.



Governance Structure

Governance Structure and Sustainability Oversight

At Regina Maria, governance is designed to keep patient welfare, ethical leadership, and sustainability at the forefront of every decision. In line with our commitment to diversity and inclusive leadership, 71% of our Management Committee is composed of women and 29% are men, while 100% serve as independent members, offering balanced oversight and objective guidance. Strategic executive management is ensured through our Management Committee, consisting of the following members:

- CEO (Chief Executive Officer),
- COO (Chief Operations Officer, responsible for: operational and medical activities across all locations, retail sales activities, laboratories, imaging, STEM sales, clinics, and hospitals, and quality of medical services and patient safety throughout the group),
- CFO (Chief Financial Officer, responsible for all financial and accounting activities, financial reporting, and procurement),
- Human Resources Director, responsible for all human resources activities and internal communication,
- Legal Director, responsible for ensuring alignment with and compliance with current legislation for the entire group,

- Marketing and PR Director, responsible for all marketing activities and external communication,
- Subscription Division Director, responsible for sales activities and customer relationships with subscribers (legal entities and individuals),
- Strategic Business Development Director, responsible for the strategic development (expansion, acquisitions, mergers),
- Business Processes Management Director, responsible for the effective management of all business processes,
- Director of Medical Quality and Patient Safety, responsible for setting standards in medical service quality and patient safety, as well as controlling the adherence to these standards,
- Division Directors (Hospitals, Imaging, Clinics, Laboratories),
- Controlling Director.

To reinforce sustainable growth, our Management Committee works in close collaboration with the Board of Directors, reviewing emerging risks and opportunities tied to environmental, social, and governance (ESG) factors. These governance bodies maintain direct lines of communication, guaranteeing that insights on material sustainability issues inform our corporate strategy. Annual or as required updates on ESG performance, including any potential risks or notable achievements, are presented to the board.

In addition, board members and executive leaders draw upon practical expertise in healthcare, regulatory compliance, and responsible business conduct. This knowledge enables them to integrate industry best practices into our governance model. When specific technical knowledge is needed, or to remain at the forefront of evolving global trends, we collaborate with external specialists and sustainability advisory groups.

70% Women in the Management Committee
100% Independent Members
Patient-first, ethical, and sustainable decision-making

Governance Structure

Currently workers' perspectives are not integrated into decision-making levels, but we have created an employee listening strategy and have targets for this specific purpose as seen in the S1 Own workforce – Social dialogue section of our report.

Our board members and executive management team have strong expertise in the health industry, particularly in Romania and the broader European market. Their backgrounds in regulatory compliance, financial risk management, and operational leadership provide a solid foundation for effective sustainability oversight.

Governance Roles, Oversight, and Risk Management Controls

The governance structure of Regina Maria includes mandates that reflect responsibilities for ESG risks and opportunities. Sustainability is embedded in the board's terms of reference, executive management policies, and risk management frameworks.

Key governance mechanisms include:

- Management's role in governance processes - The executive management team implements sustainability strategies, while the board ensures accountability.
- Oversight of sustainability risks and controls - Dedicated sustainability committees oversee compliance, strategic sustainability initiatives, and risk mitigation.

- Integration of sustainability-related risks into internal functions - The board and senior management ensure that ESG risks are monitored across all business units.
- Sustainability targets oversight - The board monitors progress toward sustainability goals, integrating KPIs into corporate performance evaluations.

Sustainability Expertise and Board Competencies

Regina Maria management is responsible for executing governance controls and ensuring that risk management processes related to sustainability are embedded within operational structures. Dedicated committees oversee sustainability performance, and our internal control mechanisms help integrate sustainability targets with overall business objectives.

To strengthen sustainability expertise within our leadership:

- Our board and Management Committee receive regular updates regarding ESG risks, regulatory developments, and sustainability practices from the CEO and the Sustainability Manager.
- The Management Committee is responsible for decision-making in advancing sustainability across the company, and the CEO has the necessary expertise to delegate issues to the correct departments.
- We leverage external sustainability advisors to enhance governance capabilities.

Governance Structure

Oversight of ESG Risks and Opportunities

We believe that governance begins with robust and transparent reporting. We update our Business Impact Analysis (BIA) at least annually or more frequently should significant developments arise in our operating environment—to ensure senior management, including the CEO and COO, remains well-informed of material impacts, risks, and opportunities. The approval and versioning process elevates each new BIA iteration from our Business Process Manager and Director (responsible for preparation) to the Director of Legal and Corporate Affairs (verification) and ultimately to the COO and CEO (formal approval). In doing so, the administrative and management bodies receive a comprehensive view of emerging threats and the effectiveness of current controls, as well as the due diligence steps needed to address any gaps.

During the BIA development, we conduct thorough interviews and collect data across our hospitals, clinics, labs, and support functions. This comprehensive process feeds into the “scenario and risk analysis”, empowering senior management with detailed insights on risk factors and highlighting the efficacy of existing measures. These findings also guide any additional due diligence or corrective actions.

In overseeing strategic direction, our executive team integrates the BIA’s conclusions directly into significant business decisions, including expansions, acquisitions, and crucial risk-management strategies. By ensuring that all major initiatives are “coordinated with the BIA results,” we proactively address potential disruptions—from natural disasters and pandemics to IT breakdowns and critical supply-chain failures.

Equally important is balancing the cost of advanced safeguards against the potential repercussions of operational downtime.

Incentive Schemes and Remuneration Policies Linked to Sustainability Performance

We currently do not integrate sustainability-related targets into our incentive structures. Our incentive schemes and remuneration policies do not include sustainability-linked KPIs.

Key characteristics of our planned incentive schemes:

- Performance benchmarks tied to material sustainability topics, such as energy efficiency, waste reduction, and responsible sourcing.
- Executive leadership and key management personnel are evaluated based on their contributions to sustainability initiatives, ensuring accountability for ESG performance.
- Specific sustainability-related targets include GHG emission reductions, workplace safety improvements, and sustainable product innovation.



Due Diligence in Sustainability Reporting

Regina Maria ensures that sustainability disclosures undergo a thorough due diligence process, adhering to internationally recognized reporting frameworks. Our governance structure mandates:

- Internal verification procedures
- External validation mechanisms
- Risk-based sustainability assessments to maintain reporting accuracy and compliance.

Risk Management and Internal Controls for Sustainability Reporting

Our risk management framework integrates sustainability risk assessments into overall corporate governance. We conduct annual or as needed evaluations of ESG risks, ensuring that sustainability-related challenges and opportunities are identified early and addressed through strategic planning and operational adjustments.

Our governance framework stipulates that the findings from risk assessments—covering financial, operational, and sustainability-related risks—are reported to the Board of Directors on an annual or as needed basis. In addition, ad hoc reports are presented whenever significant new risks emerge or existing risks escalate. This periodic reporting enables timely oversight, ensures alignment with our strategic objectives, and helps maintain robust controls throughout our organization.

Strategy

Regina Maria is a major private healthcare provider in Romania, catering to a wide array of patients and corporate clients. The company offers services ranging from primary care and specialized treatments to complex surgical procedures, laboratory services, and wellness programs. Its strategic vision emphasizes patient-centric care, technological innovation, and improved access to quality healthcare. These principles align with long-term sustainability objectives focused on social responsibility, ethical business practices, and operational excellence.

In terms of workforce, Regina Maria maintains a stable employee base, with 6,773 employees (head count at the end of 2024) employed directly by Regina Maria and 3,173 non-employees (collaborating doctors, medical services, legal services). The company strives to cultivate an inclusive and supportive workplace, offering career development opportunities and ensuring compliance with national labor standards, healthcare regulations, and broader well-being initiatives for its employees.

From a financial standpoint, Regina Maria recorded a total revenue of EUR 468,338,824.7 during the 2024 financial year. Revenues primarily derive from core healthcare segments, including inpatient services, outpatient clinics, diagnostic imaging, and laboratory testing. Other revenue streams include corporate healthcare plans and supplementary services such as telemedicine.

The company does not engage in operations related to fossil fuel extraction, controversial weapons, tobacco, or other high-risk industries. Instead, it operates within the healthcare and wellness sector, offering a portfolio of patient services aimed at enhancing public health and contributing to social welfare goals in Romania.

Strategy

Sustainability framework

Regina Maria's long-term sustainability framework revolves around patient well-being, community health outcomes, and the responsible use of resources. Core focus areas include:

- **Quality and Safety:** Continuously improving patient safety protocols, adopting evidence-based clinical practices, and maintaining internationally recognized healthcare standards.
- **Access to Healthcare:** Expanding clinic networks and telemedicine to increase service availability, especially for underserved communities
- **Workforce Development:** Investing in ongoing professional training, talent retention, and employee wellness programs.
- **Environmental Impact:** Implementing resource-efficient practices in facility management, waste disposal, and procurement of medical supplies.

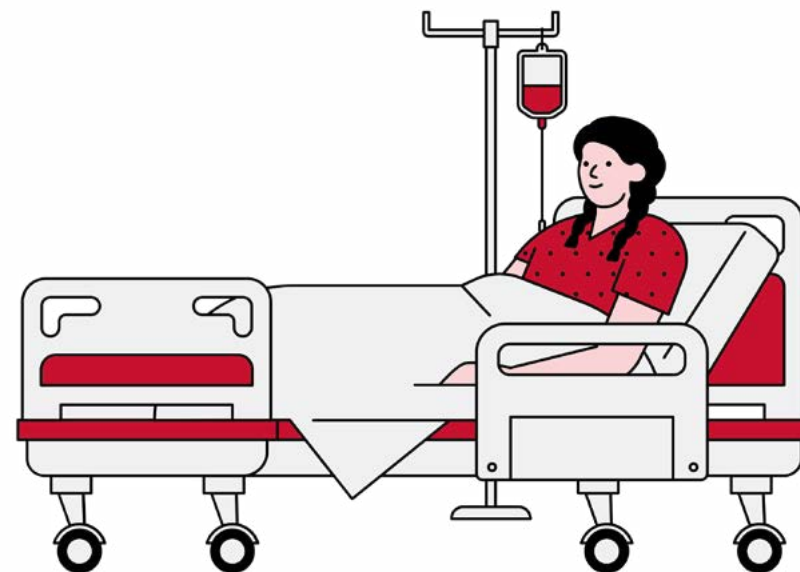
Regina Maria's portfolio of healthcare services is inherently linked to its sustainability commitment. By providing comprehensive medical care, patient education, and prevention-focused initiatives, the company aims to improve health outcomes while reducing the long-term societal costs of ill health. Efforts to digitize patient records, integrate telemedicine, and enhance data protection further reinforce the company's objectives around **operational efficiency, patient privacy, and reduced paper usage.**

Although the healthcare sector typically generates various types of clinical waste, Regina Maria actively seeks to minimize environmental impact through regulated waste disposal, responsible sourcing of supplies, and facility management practices that reduce energy consumption.

Elements of strategy that relate to or impact sustainability matters

Regina Maria embeds sustainability in its business strategy via:

- **Ethical Healthcare Delivery:** Upholding strict clinical governance, transparency in patient billing, and adherence to national and EU healthcare standards.
- **Digital Transformation:** Expanding telemedicine services and electronic health record systems to improve patient care and reduce administrative overhead.
- **Continuous Quality Improvement:** Using patient feedback, quality metrics, and technology-driven solutions to refine service offerings.
- **Community Engagement:** Partnering with local communities, NGOs, and public institutions to organize health education programs and preventative care initiatives.



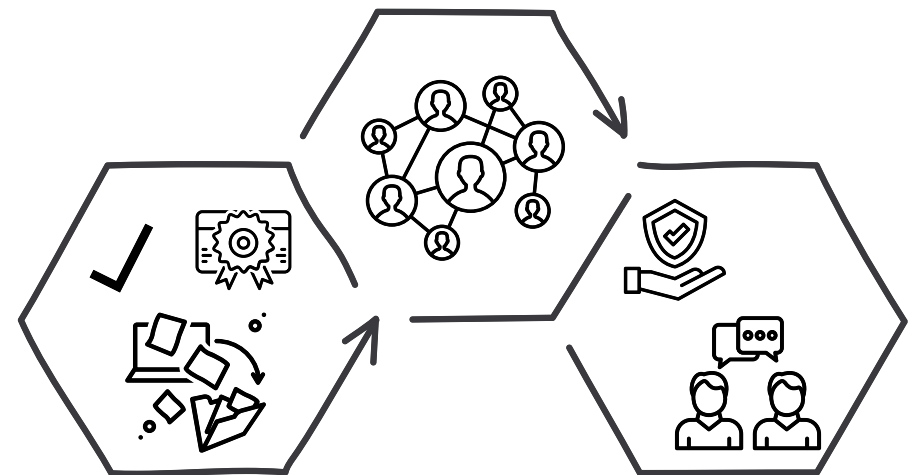
Value Chain

Regina Maria's upstream value chain comprises various healthcare-related inputs, including medical equipment, pharmaceutical products, laboratory supplies, and IT infrastructure to support patient data systems. The company relies on both local and international suppliers that must comply with regulatory standards for quality and safety. Whenever feasible, Regina Maria emphasizes sourcing from certified providers, reducing lead times, and minimizing supply chain disruptions—critical to maintaining uninterrupted patient care.

The key outputs of Regina Maria's business model include primary care services, specialized medical procedures, diagnostic testing, and wellness programs delivered through its network of clinics and hospitals. Patients benefit from improved health outcomes, timely diagnostics, and quality treatment, while investors and partners gain from a stable, socially responsible healthcare enterprise with consistent financial returns. Additional stakeholder benefits include community health initiatives, corporate health partnerships, and contributions to the overall healthcare infrastructure in Romania:

- **Upstream:** Procurement of licensed medications, EMA (European Medicines Agency)-approved devices, medical-grade consumables, and IT solutions for electronic health records and telemedicine platforms.
- **Core Operations:** Provision of healthcare services—ranging from consultations and diagnostics to full-scale surgical interventions, across a network of clinics, hospitals, and specialized centers.
- **Downstream:** Post-treatment follow-ups, telemedicine support, and health education. Regina Maria's downstream value chain also includes corporate health plans and collaborations with insurance providers, ensuring continuity of care and broad coverage for patient populations.

By continuously refining its healthcare services, digital infrastructure, and stakeholder partnerships, Regina Maria remains committed to aligning its operational strategies with sustainability and ethical business practices, thereby delivering quality healthcare and contributing to the social well-being of the communities it serves.



Stakeholder Engagement

Regina Maria maintains a comprehensive stakeholder engagement framework to ensure that its healthcare services and sustainability endeavors remain aligned with both business objectives and societal well-being. By proactively seeking input, collaboration, and feedback from key stakeholder groups, Regina Maria upholds transparent governance and supports the continuous enhancement of patient care.

Identification of Key Stakeholders

STAKEHOLDER NAME	STAKEHOLDER CATEGORY	HOW ENGAGEMENT IS DONE	OUTCOMES
Board of Directors	Both	<ul style="list-style-type: none"> • Regular Board meetings (quarterly, annual) • Strategic workshops and ad-hoc sessions • Ongoing reporting on financial and non-financial KPIs 	<ul style="list-style-type: none"> • Aligned organizational vision • Oversight of strategy and performance • Informed governance decisions
Sustainability Committee	Both	<ul style="list-style-type: none"> • Scheduled committee meetings • Review of ESG data and progress • Dialogue with relevant departments 	<ul style="list-style-type: none"> • Enhanced sustainability strategy • Policy development and monitoring • Improved cross-functional collaboration
Medical Staff	Affected stakeholder	<ul style="list-style-type: none"> • Internal communication channels (email, intranet) • Training sessions and workshops • Periodic town halls and feedback surveys 	<ul style="list-style-type: none"> • Continuous improvement in patient care • Better staff engagement and well-being • Alignment on clinical best practices
Patients	Affected stakeholder	<ul style="list-style-type: none"> • Patient feedback forms and surveys • Dedicated customer care hotlines 	<ul style="list-style-type: none"> • Enhanced patient experience and satisfaction • Improved service offerings • Ongoing refinements to clinical and support processes
Shareholders	Users of sustainability statements	<ul style="list-style-type: none"> • Annual General Meetings • Quarterly financial updates and sustainability disclosures • Direct engagement (calls, emails) as needed 	<ul style="list-style-type: none"> • Informed investment decisions • Continued financial support • Increased transparency and accountability

Stakeholder Engagement

STAKEHOLDER NAME	STAKEHOLDER CATEGORY	HOW ENGAGEMENT IS DONE	OUTCOMES
ANAF	Users of sustainability statements	<ul style="list-style-type: none"> • Regular compliance reporting • Audits and reviews • Direct liaison through finance/legal teams 	<ul style="list-style-type: none"> • Compliance with tax regulations • Avoidance of financial/legal penalties • Maintained credibility with authorities
ANPC	Users of sustainability statements	<ul style="list-style-type: none"> • Compliance checks and reports • Consumer protection briefings • Direct communication when issues arise 	<ul style="list-style-type: none"> • Proper consumer rights adherence • Strengthened reputation through compliance • Reduced risk of sanctions
CNSSP	Users of sustainability statements	<ul style="list-style-type: none"> • Submission of relevant health-related documentation • Participation in industry-level consultations • Compliance audits 	<ul style="list-style-type: none"> • Adherence to national health and safety standards • Reduced operational risks • Alignment with public health objectives
Ministry of Health	Users of sustainability statements	<ul style="list-style-type: none"> • Official reporting obligations • Policy consultations • Active participation in healthcare initiatives 	<ul style="list-style-type: none"> • Regulatory compliance • Contribution to national healthcare policies • Potential collaboration on public health programs
Local Departments of Public Health	Users of sustainability statements	<ul style="list-style-type: none"> • Regular inspections • Submission of regional public health data • Joint initiatives on local community health 	<ul style="list-style-type: none"> • Regulatory compliance at local levels • Community-focused health programs • Strengthened relationships with local authorities
CNCAN (National Commission for Nuclear Activities Control)	Users of sustainability statements	<ul style="list-style-type: none"> • Compliance reports for equipment handling (if applicable) • Safety documentation and audits • Specialized training and certifications 	<ul style="list-style-type: none"> • Safe and compliant use of nuclear-related equipment • Reduced health and environmental risks • Maintained operational licenses

Stakeholder Engagement

STAKEHOLDER NAME	STAKEHOLDER CATEGORY	HOW ENGAGEMENT IS DONE	OUTCOMES
RENAR (Accreditation Body)	Users of sustainability statements	<ul style="list-style-type: none"> • Accreditation processes • Quality assurance reviews • Ongoing improvement and feedback loops 	<ul style="list-style-type: none"> • Maintenance of lab/hospital accreditations • Assurance of high-quality standards • Improved credibility in healthcare services
CASMB (Public Health Insurance)	Users of sustainability statements	<ul style="list-style-type: none"> • Contractual updates and claims processes • Periodic performance reporting • Joint discussions for service improvements 	<ul style="list-style-type: none"> • Smooth reimbursement processes • Enhanced access to healthcare for insured patients • Financial stability through public funding
National Authority for the Supervision of Personal Data Processing	Users of sustainability statements	<ul style="list-style-type: none"> • GDPR compliance reporting • Data protection assessments • Remedial action plans as needed 	<ul style="list-style-type: none"> • Strengthened data privacy practices • Avoidance of data breaches/penalties • Increased trust from patients and partners
Casa Buna Association	Both	<ul style="list-style-type: none"> • Partnership agreements • Joint community initiatives • Direct involvement in social programs 	<ul style="list-style-type: none"> • Positive community impact • Shared resources for philanthropic efforts • Strengthened brand as a responsible corporate citizen
United Way Romania	Users of sustainability statements	<ul style="list-style-type: none"> • Collaboration on social impact projects • Fundraising events and campaigns • Regular performance updates 	<ul style="list-style-type: none"> • Expanded social reach and community benefits • Improved stakeholder engagement • Enhanced reputation for corporate citizenship
Teach for Romania	Users of sustainability statements	<ul style="list-style-type: none"> • Sponsorships and educational programs • Joint social projects • Periodic reporting on outcomes 	<ul style="list-style-type: none"> • Support for educational development • Enhanced social responsibility profile • Positive societal impact

Stakeholder Engagement

STAKEHOLDER NAME	STAKEHOLDER CATEGORY	HOW ENGAGEMENT IS DONE	OUTCOMES
Medical Consumables Suppliers	Affected stakeholder	<ul style="list-style-type: none"> • Procurement process and vendor evaluations • Periodic performance reviews • Compliance with quality and safety standards 	<ul style="list-style-type: none"> • Reliable supply chain • Improved product quality and compliance • Strengthened supplier relationships
Non-medical Consumables Suppliers	Affected stakeholder	<ul style="list-style-type: none"> • Negotiations and performance tracking • Sustainability criteria in procurement • Ongoing feedback exchange 	<ul style="list-style-type: none"> • Efficient resource sourcing • Alignment with sustainability goals • Cost optimization
Partner Clinics	Affected stakeholder	<ul style="list-style-type: none"> • Contractual agreements • Joint patient referrals and shared protocols • Regular reviews of service quality 	<ul style="list-style-type: none"> • Consistent patient experience • Extended care network • Strengthened partnerships and shared best practices
Marketing Services Suppliers	Affected stakeholder	<ul style="list-style-type: none"> • Tender processes and service-level agreements • Creative briefs and review sessions • Periodic strategy alignment 	<ul style="list-style-type: none"> • Effective marketing campaigns • Strengthened brand awareness • Mutual growth opportunities
External Medical Services Suppliers	Affected stakeholder	<ul style="list-style-type: none"> • Collaboration on specialized procedures • Quality and safety audits • Direct involvement in patient care pathways 	<ul style="list-style-type: none"> • Comprehensive patient services • Shared risk management • Consistent quality standards
Utilities Suppliers	Affected stakeholder	<ul style="list-style-type: none"> • Service contracts and regular communication • Maintenance scheduling and contingency planning • Timely payment and issue resolution 	<ul style="list-style-type: none"> • Stable and reliable utilities provision • Reduced operational disruptions • Predictable costs and service levels

Stakeholder Engagement

STAKEHOLDER NAME	STAKEHOLDER CATEGORY	HOW ENGAGEMENT IS DONE	OUTCOMES
Media	Users of sustainability statements	<ul style="list-style-type: none"> Press releases and media briefs Interviews and public statements Ongoing relationship management 	<ul style="list-style-type: none"> Positive public image Informed public on healthcare advancements Increased transparency and brand trust
Competitors	Users of sustainability statements	<ul style="list-style-type: none"> Publicly available industry data Participation in healthcare associations Shared advocacy on key issues 	<ul style="list-style-type: none"> Elevated industry standards Healthy competition spurring innovation Potential collaborations for sector-wide improvements
Banks	Users of sustainability statements	<ul style="list-style-type: none"> Financial reports and sustainability disclosures Loan agreements and covenants Relationship management meetings 	<ul style="list-style-type: none"> Access to capital and favorable financing terms Support for expansion and modernization Lower risk profile
Auditors	Users of sustainability statements	<ul style="list-style-type: none"> Regular financial and sustainability audits Compliance checks Certification and assurance engagements 	<ul style="list-style-type: none"> Validated financial and non-financial data Enhanced credibility and trust Continuous improvement in internal controls

A systematic evaluation of stakeholders' interest and influence in the company has led to a structured engagement process, allowing Regina Maria to align its business strategy with sustainability expectations. Through this ongoing engagement, Regina Maria refines its materiality assessments, ensuring that climate risks, regulatory requirements, and supply chain considerations are reflected in its business operations.

Double Materiality Assessment

At Regina Maria, we follow a systematic methodology to identify, evaluate, prioritize, and monitor risks and opportunities in a way that is both rigorous and objective. By combining both qualitative and quantitative analyses—and incorporating stakeholder insights via structured workshops and consultations—we can ensure that the sustainability matters most crucial to our business and stakeholders receive comprehensive attention.

Identification and Assessment of Material Impacts, Risks, and Opportunities

Our Double Materiality Assessment (DMA) aligns with the Corporate Sustainability Reporting Directive (CSRD) and European Sustainability Reporting Standards (ESRS). Using EFRAG's IG 1 Materiality Assessment framework, we conducted our DMA through four key phases:

- **Identification of IROs** – We undertook a context analysis across our entire value chain, informed by industry benchmarks and regulatory expectations.
- **Assessment and Scoring** – Each impact was rated based on severity, likelihood, and financial considerations to determine its overall materiality.
- **Stakeholder Consultation** – Feedback from internal experts, impacted stakeholders, and external specialists was incorporated to refine our assessment.
- **Validation and Finalization** – Final materiality decisions were reached through internal consensus, anchored in transparent and objective criteria.



Double Materiality Assessment

At Regina Maria, our Board of Directors and executive leadership teams actively oversee and address material sustainability impacts, risks, and opportunities. These governance structures ensure that sustainability considerations are integrated into strategic decision-making processes, supporting long-term value creation and corporate responsibility.

After the DMA assessment we concluded that the following **39 Impacts, Risks and Opportunities are material for Regina Maria:**

E1 - Climate Change

SUB-TOPIC	DESCRIPTION OF IMPACT	TYPE OF IMPACT	VALUE CHAIN POSITION
Climate change mitigation	54% of healthcare-related GHG emissions are linked to upstream supply chains, such as the production of pharmaceuticals and medical devices.	Actual Negative Impact	Upstream
	Switching to low-GWP anesthetics like sevoflurane and improving gas capture systems.	Actual Positive Impact	Upstream – Own Operations
	Failure to include carbon metrics in supplier evaluations leads to higher indirect emissions.	Actual Negative Impact	Upstream
GHG Emission and Energy	Installing energy monitoring systems in large facilities allows real-time optimization, reducing emissions.	Actual Positive Impact	Own Operations

Double Materiality Assessment

S1 - Own Workforce

SUB-TOPIC	DESCRIPTION OF IMPACT	TYPE OF IMPACT	VALUE CHAIN POSITION
Secure employment	By ensuring better retention of skilled staff and high employee engagement, Regina Maria gains improved service continuity, higher patient satisfaction, reduced recruitment costs, and a stronger reputation as an employer of choice.	Opportunity	Upstream – Own Operations
Working time	Allows medical staff to balance personal and professional responsibilities, enhancing job satisfaction.	Actual Positive Impact	Own Operations
Adequate wages	Competitive salaries in private healthcare attract skilled medical professionals, improving service quality.	Actual Positive Impact	Own Operations
	Clear and standardized pay scales prevent wage disparities.	Actual Positive Impact	Own Operations
Social dialogue	Regular meetings between management and staff facilitate open communication, fostering a collaborative work environment.	Actual Positive Impact	Own Operations
	Encouraging staff participation in decision-making processes enhances engagement and job satisfaction among medical professionals.	Actual Positive Impact	Own Operations

Double Materiality Assessment

S1 - Own Workforce

SUB-TOPIC	DESCRIPTION OF IMPACT	TYPE OF IMPACT	VALUE CHAIN POSITION
Work-life balance	Flexible work arrangements may enhance employee satisfaction, reducing turnover and improving Regina Maria's image as an employer.	Opportunity	Own Operations
Health and safety	Accessible counseling services for medical and administrative staff alleviates stress.	Potential Positive Impact	Own Operations
Training and skills development	Programs enhance the skills of medical staff, leading to better patient outcomes.	Actual Positive Impact	Own Operations
	Offering professional development improves employee retention and boosts Regina Maria's image as a preferred employer.	Opportunity	Own Operations
Measures against violence and harassment in the workplace	Designated staff members handle harassment complaints confidentially.	Actual Positive Impact	Own Operations
Talent availability, attraction and retention	By offering inclusive benefits from onboarding and recognizing employee loyalty with significant rewards, Regina Maria enhances satisfaction, retention, and brand appeal—ensuring a robust and committed workforce.	Actual Positive Impact	Own Operations

Double Materiality Assessment

S2 - Workers in the Value Chain

SUB-TOPIC	DESCRIPTION OF IMPACT	TYPE OF IMPACT	VALUE CHAIN POSITION
Adequate wages	The provider can ensure fair pricing agreements with suppliers that allow them to pay living wages to their workers.	Potential Positive Impact	Upstream
Gender equality and equal pay for work of equal value	By implementing supplier diversity programs, the provider can incentivize gender-inclusive hiring and fair pay practices.	Potential Positive Impact	Upstream
Child labor	The provider can include strict anti-child labor and anti-forced labor policies and monitoring mechanisms in supplier contracts.	Potential Positive Impact	Upstream, Own Operations
Social dialogue	Corporate wellness programs build partnerships with businesses, strengthening Regina Maria's community involvement and reputation.	Opportunity	Upstream

Double Materiality Assessment

S3 - Affected Communities

SUB-TOPIC	DESCRIPTION OF IMPACT	TYPE OF IMPACT	VALUE CHAIN POSITION
Communities' economic, social and cultural rights	By offering training academies, collaborating with NGOs, and investing in workforce retention, Regina Maria strengthens local economies, expands career pathways, ensures reliable healthcare access, and effectively addresses marginalized groups' needs—driving more inclusive and resilient communities.	Actual Positive Impact	Downstream
Communities' economic, social and cultural rights	Ensuring healthcare workers are sensitive to the cultural needs of affected communities - need to train "people skills".	Potential Positive Impact	Downstream



Double Materiality Assessment

S4 - Consumers and End Users

SUB-TOPIC	DESCRIPTION OF IMPACT	TYPE OF IMPACT	VALUE CHAIN POSITION
Access to (quality) information	By offering online medical record access, personalized preventive outreach, and comprehensive health information, Regina Maria enhances patient transparency, empowers informed decision-making, and ultimately fosters greater trust.	Actual Positive Impact	Downstream
Privacy (consumers and end users)	Improved transparency through enhanced reporting can build trust with stakeholders and attract new clients who value accountability.	Opportunity	Downstream
Health and safety	By maintaining state-of-the-art facilities, delivering high-quality care, and providing rapid treatment access, Regina Maria enhances patient safety and outcomes—ensuring prompt, effective care in critical situations.	Actual Positive Impact	Downstream
	By implementing robust safety protocols and expanding quality care to underserved communities, Regina Maria boosts patient confidence, attracts new clients, and solidifies its reputation as both a reliable and socially responsible healthcare provider.	Opportunity	Downstream

Double Materiality Assessment

S4 - Consumers and End Users

SUB-TOPIC	DESCRIPTION OF IMPACT	TYPE OF IMPACT	VALUE CHAIN POSITION
Non-discrimination	By training staff to serve diverse cultural and ethnic groups and offering direct specialist access, Regina Maria promotes equitable healthcare, ensuring no community is marginalized.	Potential Positive Impact	Downstream
Responsible marketing practices	By promoting preventive care and ensuring transparent treatment information, Regina Maria's ethical marketing empowers consumers to make informed decisions and fosters better health outcomes.	Actual Positive Impact	Downstream
Public Perception and Reputation	Infectious disease outbreaks may disrupt services and impact patient safety, creating negative public perception of Regina Maria's preparedness.	Risk	Downstream
	By improving service quality, adaptability and subscription diversity, Regina Maria strengthens its reputation, expands its customer base, boosts revenue, and reinforces trust through patient-focused care and innovation.	Opportunity	Downstream

Double Materiality Assessment

G1 - Corporate Governance

SUB-TOPIC	DESCRIPTION OF IMPACT	TYPE OF IMPACT	VALUE CHAIN POSITION
Corporate Governance	Publishing detailed environmental impact reports builds trust and compliance.	Actual Positive Impact	Own Operations, Downstream
	Cybersecurity risks could lead to data breaches, eroding patient trust and impacting Regina Maria's public image.	Risk	Own Operations, Downstream
	By expanding into emerging markets, forming academic partnerships, and implementing reliable backup systems, Regina Maria strengthens its credibility, broadens access to care, and enhances stakeholder trust.	Opportunity	Upstream, Own Operations, Downstream
Ethics and Compliance	Updated whistleblower policies encourage reporting of unethical practices.	Potential Positive Impact	Own Operations
Supplier Management	All new supplier contracts include mandatory ESG compliance clauses.	Potential Positive Impact	Upstream

Double Materiality Assessment

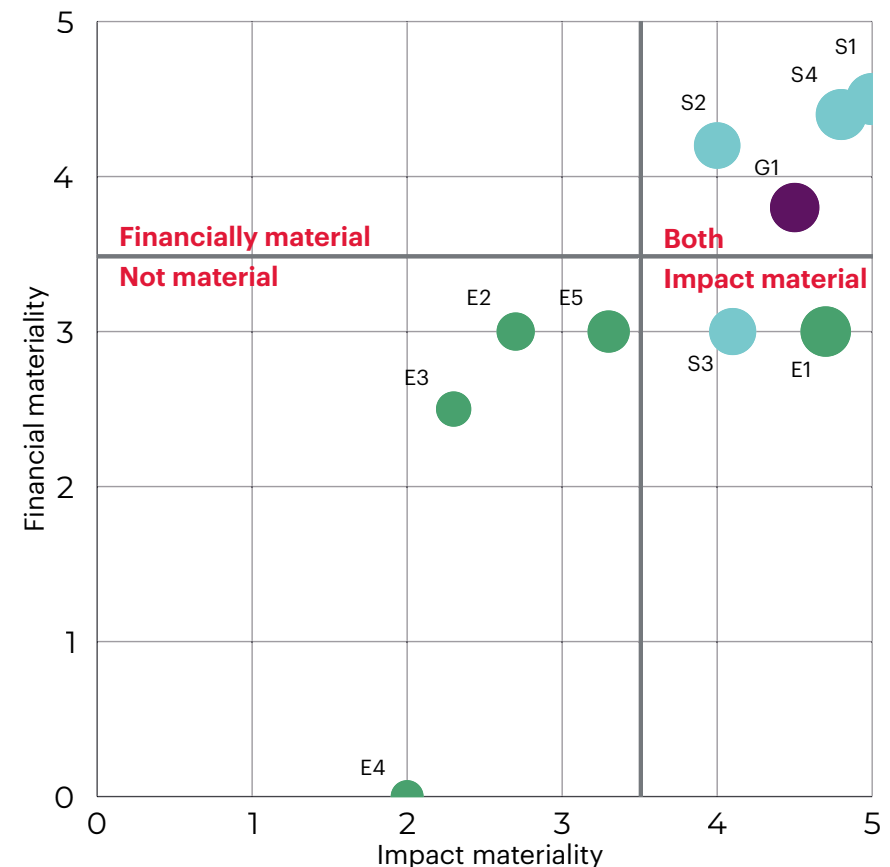
Double Materiality

Our Materiality Matrix distinguishes between topics identified as material versus those deemed non-material in our assessment. Although we conducted an in-depth review of the non-material topics, their relatively low impact and limited organizational resources led us to classify them as non-critical at this time. However, we remain attentive to these areas and will revisit them in future assessments, developing action plans and targets as needed.

Methodologies and Assumptions in Identifying Material IROs

Regina Maria's assessment evaluates business relationships, specific operations, and geographies that present elevated risk, ensuring that both direct and indirect impacts are captured across financial, social, and environmental dimensions. By consulting external experts and engaging with affected stakeholders, we gain deeper insights into the broader implications of sustainability-related risks and opportunities.

Our prioritization model appraises both negative and positive impacts according to their severity, scope, likelihood, and irremediability. This structured methodology enables us to identify and proactively manage the most pressing sustainability matters.



Double Materiality Assessment

Identification, Prioritization, and Monitoring of Sustainability Impacts

Regina Maria's impact materiality assessment draws on scientific research, industry benchmarks, and internal expertise. We map each impact across the entire value chain—including our own operations, upstream suppliers, and downstream customers—to capture its full breadth. We incorporate time horizons to determine when specific risks or opportunities are likely to occur. Stakeholder input is then used to assess each impact's severity and likelihood along four key dimensions:

scale - scope - irremediability - likelihood

- Scale – The magnitude of the negative or positive impact
- Scope – The extent to which stakeholders are affected
- Irremediability – How difficult it is to reverse or mitigate the impact
- Likelihood – The probability of occurrence within a given timeframe

This process includes both actual and potential impacts and integrates closely with Regina Maria's broader risk management framework. By embedding sustainability considerations into strategic planning and investment decisions, we ensure that our approach to sustainability is both comprehensive and forward-looking.

Process for Identifying, Prioritizing, and Monitoring Financial Risks and Opportunities

Regina Maria identifies potential risks and opportunities by looking at both direct sustainability impacts and broader business factors. We consider:

- Operational impacts tied to climate issues and regulatory changes
- Changes in market demand driven by evolving consumer expectations
- Reputational concerns that could affect stakeholder trust
- Resource-related vulnerabilities in our supply chain

To gauge the financial significance of each risk or opportunity, we look at:

- Magnitude – The potential size of the financial impact
- Probability – How likely it is to occur

These considerations are integrated into our overall risk management to keep financial, operational, and strategic decisions consistent. In recent updates, we have emphasized scenario analysis, stress testing, and regulatory compliance to better evaluate these risks and opportunities.

Regina Maria follows Appendix A of the ESRS and Appendix E of EFRAG's guidance to ensure that material sustainability matters are fully mapped to their respective topical ESRS disclosures. A detailed index of disclosure requirements and their locations in the sustainability statement is provided in Annex I of the DMA Report. Additionally, Annex II contains a reference table mapping the data points derived from EU legislation.

Double Materiality Assessment

Impact significance thresholds

Given that the scale for assessing the significance of the impact is between 0 and 5, Regina Maria set the significance threshold of the impact at 3.5. This decision was made to align materiality thresholds with the company's overall risk appetite as well as its approach to materiality. Setting a threshold higher than the midpoint of the scale ensures that Regina Maria will focus on reporting only identified material topics, as well as implementing actions, objectives and policies related to material sustainability issues where necessary.

Explanation of negative materiality assessment for ESRS E1 Climate Change

While Regina Maria has identified several positive impacts related to climate change mitigation—such as installing energy monitoring systems in major facilities and adopting low-GWP anesthetics—our analysis also reveals a significant negative impact driven by the broader healthcare supply chain. Specifically, studies indicate that 54% of healthcare-related GHG emissions originate upstream, in the production of pharmaceuticals, medical devices, and other essential inputs.

In our double materiality assessment, this upstream footprint constitutes an actual negative impact because it falls largely outside our direct operational control yet contributes substantially to our overall climate impact. Even though our own operational improvements can mitigate emissions at the point of service, we recognize the need for proactive engagement with suppliers and industry partners to address the embedded carbon in products and materials. This negative dimension is material because it aligns

directly with ESRS E1's objectives of monitoring and reducing greenhouse gas emissions across the entire value chain. Consequently, we consider upstream emissions a critical challenge requiring targeted strategies, such as sustainable procurement standards, supplier collaboration, and advocacy for sustainable manufacturing processes.



Double Materiality Assessment

Financial and strategic implications of material impacts, including expected time horizons

Regina Maria has identified climate transition risks, regulatory challenges, and shifts toward sustainable materials as key business concerns. To address these risks, the company has adopted renewable energy, enhanced operational energy efficiency, and increased investment in recycled raw materials.

From a financial perspective, sustainability-related risks and opportunities influence cost structures, revenue streams, and long-term business resilience. The company continuously evaluates these impacts, ensuring its business model remains adaptable to regulatory changes, technological advancements, and evolving market demands.

Financial projections on material risks and opportunities

Building on the insights from our Business Impact Analysis (BIA) and our Double Materiality Assessment (DMA), we model potential revenue disruptions, additional operating costs, or investment needs under various risk scenarios. By quantifying the worst-case financial exposure—for instance, evaluating how an IT outage, a pandemic-related slowdown, or critical supply-chain interruptions might affect revenues, expenditures, and cash flow—we can better inform our strategic decision-making across all time horizons.

I Short-Term Projections

Focus on immediate cost implications and revenue impacts of events such as brief IT outages, localized natural disasters, or sudden supplier shortages.

Include contingency budgets for urgent crisis response (e.g., backup systems, expedited procurements) and near-term health and safety measures.

I Medium-Term

Address potential expansions, acquisitions, and investment in resilience (e.g., enhanced backup capabilities, workforce programs) that align with Regina Maria's strategic plan.

Incorporate transition risks or opportunities, such as evolving healthcare regulations, expansions of clinical services, and sustainability-linked financing instruments.

I Long-Term

Reflect broader trends that may significantly alter the healthcare landscape, such as climate change-induced risks, large-scale demographic shifts, or macroeconomic factors.

Encompass more sizable capital commitments (e.g., major infrastructure upgrades, new hospital developments) and transformative opportunities (such as strategic partnerships or technological innovation).

Minimum Disclosure Requirements on Policies and Actions

Policies

At Regina Maria, we believe that every significant sustainability matter deserves well-defined, transparent policies that shape our decisions and actions. Accordingly, for each of our material sustainability topics, we commit to sharing the policies we have in place—detailing their objectives, clarifying how they address both risks and opportunities, and illustrating their connection to our broader business strategy.

We will specify precisely where these policies apply across our operations, value chain, and geographic footprint, while also disclosing any exceptions or exclusions. To promote accountability, we will clearly indicate who is responsible for policy implementation and oversight, so our stakeholders understand how leadership and governance are structured within Regina Maria.

Where appropriate, we will align our policies with leading international standards, industry best practices, and regulatory obligations, reinforcing our pledge to continuous advancement. We also recognize the importance of stakeholder engagement in shaping these policies, and we will outline how we integrate their perspectives and expectations.

In the interest of open communication, we will explain how our policies are shared with employees, partners, investors, and other key stakeholders. Whenever a policy for a particular sustainability matter is still under development, we will be forthright about its absence and provide a clear timeline and action plan for its completion.

Actions

We take a proactive stance in managing sustainability-related risks and opportunities. For every material topic, we will present a thorough summary of both the actions we have already undertaken and the initiatives we plan to roll out in support of our longer-term sustainability goals.

Each action will be directly tied to the specific impact, risk, or opportunity it aims to address, demonstrating how sustainability is woven into our business priorities. We will identify where these actions apply within our value chain and which geographic regions and stakeholder groups are involved or affected.

For each initiative, we will highlight its anticipated outcomes and objectives, showcasing how it aligns with our aspirations for environmental, social, and governance performance. When relevant, we will also include any remedial actions we have taken to mitigate adverse impacts and detail any corrective steps introduced.

To ensure stakeholders can see how we allocate resources, we will disclose both capital and operational expenditures associated with our sustainability endeavors. Where applicable, we will also highlight the use of instruments such as green bonds or sustainability-linked loans. If certain actions are yet to be implemented for any material topic, we will confirm this transparently and share our forward-looking plans, timeframes, and next steps—ensuring all stakeholders can track our progress toward these objectives.

Minimum Disclosure Requirements on Policies and Actions

Metrics and Targets

Tracking our progress is a central part of delivering on our sustainability commitments. We will therefore present the metrics used to gauge the effectiveness of our actions, aligning them with recognized industry benchmarks and regulatory standards. Where appropriate, we will disclose our methodologies and data sources to bolster the credibility of our reporting.

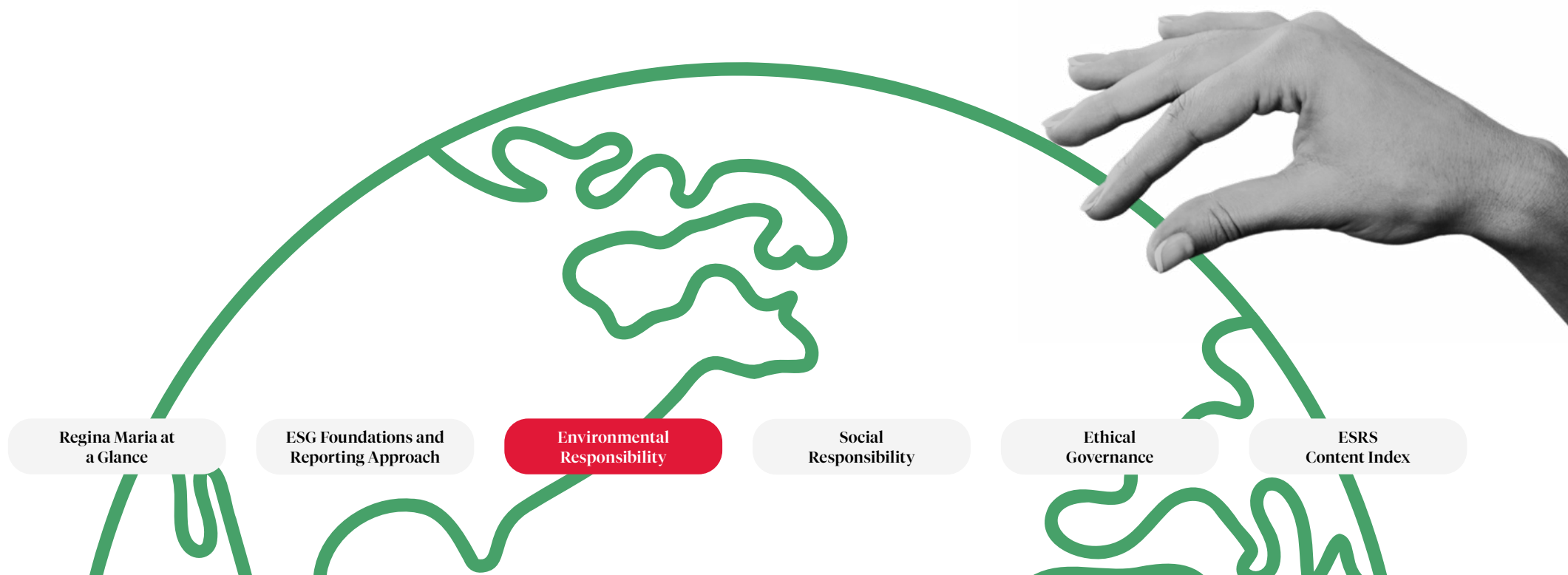
For every material sustainability topic, we will outline the specific targets that capture our level of ambition and the tangible impact we seek. These targets will map clearly to our strategic objectives, sustainability pledges, and key performance indicators (KPIs). To keep our disclosure straightforward, we will supply a summary table linking each material sustainability matter to its corresponding targets.

If we have not yet set concrete targets for a given topic, we will explain the underlying reasons and clarify whether we plan to define them in the future. In cases where setting a target is not feasible or appropriate, we will provide a transparent rationale.

Finally, we will describe how we monitor our progress—both internally and externally—through periodic assessments, data reviews, and continuous improvement measures. If a material topic does not yet have established metrics or targets, we will disclose this candidly and furnish our roadmap, timelines, and strategies for implementing them, underlining our dedication to long-term sustainability excellence.

ENVIRONMENT

Because healing should never harm **the Earth**



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Transition Plan for Climate Change Mitigation

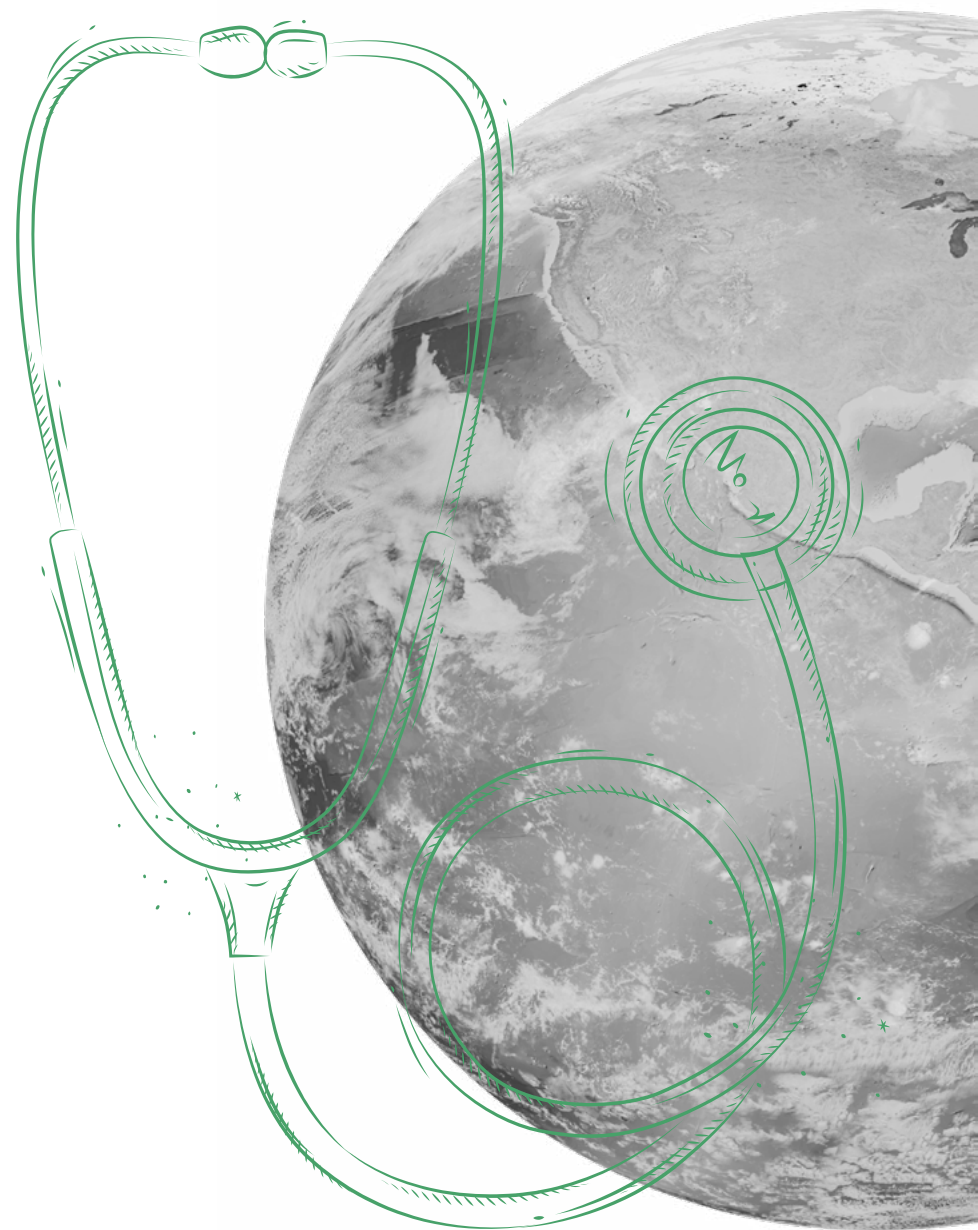
Transition Plan

Regina Maria is currently developing a formal climate strategy and decarbonization plan aligned with the objectives of the Paris Agreement and the European Climate Law, which aim to limit global warming to 1.5°C above pre-industrial levels. The climate strategy and decarbonization plan are scheduled for finalization in the fourth quarter of 2025, followed by a two-year implementation and integration timeline (2026–2027) to fully embed climate objectives into our business model, operations, and governance systems. The strategy will be approved by the Sustainability Manager and Committee, with an overview from the CEO.

Our goal is to align with the net-zero 2050 commitment, by reducing greenhouse gas emissions in our operations and across our value chain (Scopes 1, 2, and 3). We aim to have at least a 90% reduction in all Scopes, with the remaining 10% or lower offset by long-term emission credits.

Integration of sustainability-related performance in incentive schemes

At present, no climate-related performance indicators are factored into the remuneration schemes of Regina Maria's administrative, management, or supervisory bodies. This will be reviewed following the finalization of our climate strategy in 2025.



GHG Emissions Reduction Targets

While formal targets are still under development, Regina Maria has completed a baseline assessment of Scope 1, 2, and 3 emissions for the first time during the year of 2024, using a methodology that followed the GHG Protocol and was based on the operational control approach, covering emissions from across all medical units and administrative locations.

Scope 1 (direct emissions): 5,468.11 tonnes CO₂e (including stationary and mobile combustion, refrigerants, and medical gas use).

Target: at least 10% reduction by 2030, through replacement of fleet with hybrid/electric vehicles and substitution of high-GWP refrigerants.

Scope 2 (indirect from energy, market-based): 4,411.20 tonnes CO₂e

Target: at least 10% reduction by 2030, through facility-level energy audits, changing energy providers for largest locations, and gradual transition to green energy sourcing across all medical units.

Scope 2 (indirect from energy, location-based): 4,690.60 tonnes CO₂e

Scope 3 (value chain emissions): 175,479.81 tonnes CO₂e

The first step is to review Purchased Goods and Services for internal operations. **Target: establish a supplier rating system by 2025 based on GHG disclosures** and introduce screening for sustainability in strategic procurement decisions starting 2026.

 **Total GHG footprint (market-based): 185,359.12 tonnes CO₂e**

The climate strategy will include time-bound and outcome-oriented emission reduction targets across all scopes, to be progressively integrated into our operational and strategic planning, with a prioritization of Scope 2 reductions through energy efficiency and renewable sourcing and Scope 3 reductions through our planned sustainability strategy and supplier code of conduct.



Decarbonization Levers and Operational Measures

Based on the emissions profile and internal policies, Regina Maria has already identified the following decarbonization levers that will form the core of its transition roadmap:

- **Facility efficiency upgrades:** All major facilities are subject to the preventive and corrective measures outlined in the Maintenance and Facility Management Policy. These include optimized HVAC systems, LED lighting, and routine verification of heating, ventilation, and electrical installations.
- **Energy transition:** Feasibility assessments for on-site solar photovoltaic systems are planned for 2026, targeting select hospitals with appropriate infrastructure. Current energy procurement will be reviewed with the aim of increasing the share of renewables.
- **Emergency readiness and climate resilience:** Climate-related physical risks are recognized as material in our Business Impact Analysis and Emergency Continuity Plan, which include response protocols for extreme weather, heatwaves, floods, and prolonged utility interruptions.
- **Waste and emissions management:** Through the Infection Prevention & Control Policy and Environmental Hygiene Protocols, we monitor medical and hazardous waste streams and apply strict disinfection and waste segregation protocols, reducing emissions from incineration and landfill.
- **Staff awareness and behavioral change:** Internal education initiatives are underway, including training modules on sustainability, energy efficiency in the workplace, and digitalization to reduce travel and paper use.

These operational levers are already integrated into daily procedures and will be strengthened as part of the full transition plan.

Locked-in Emissions and Climate Resilience

As a healthcare provider, Regina Maria recognizes the presence of locked-in emissions, particularly from energy-intensive medical infrastructure, diagnostic equipment, and long-term facility investments. These assets generate unavoidable emissions due to operational necessities, safety requirements, and long replacement cycles.

To address this, our maintenance schedule includes lifecycle assessment of equipment and infrastructure, as detailed in the Maintenance and Facility Management Policy. When planning refurbishments or procurement, we prioritize equipment with better energy ratings and reduced carbon intensity. In line with the Emergency Continuity Plan and annexes, every major location has predefined protocols for climate-related emergencies, including earthquake-specific procedures, blackout scenarios, pandemic response, and critical infrastructure redundancy. These form part of our organizational resilience and adaptation to climate-related physical risks.

The Business Impact Analysis also acknowledges the reputational and operational risks posed by delayed climate action and climate-related service disruptions. This supports the case for integrated planning and forward-looking capital allocation that aligns with long-term climate resilience.

Our Material Impacts, Risks, and Opportunities

Climate Change Mitigation

54% of healthcare-related GHG emissions are linked to upstream supply chains, such as the production of pharmaceuticals and medical devices.

A significant portion of the healthcare sector's environmental footprint originates from upstream activities, particularly the production and delivery of pharmaceuticals, medical equipment, and other purchased goods and services. According to sector-specific data, up to 54% of total emissions are linked to supply chains, placing a high decarbonization burden on procurement decisions. At Regina Maria, this systemic impact represents a material challenge, as it contributes substantially to the organization's total Scope 3 emissions and limits our ability to meet future climate targets.

Switching to low-GWP anesthetics like sevoflurane and improving gas capture systems.

Within our medical operations, Regina Maria has identified the use of anesthetic gases as a source of direct emissions (Scope 1). We planned to fully transition to lower-global-warming-potential (GWP) agents, such as sevoflurane, in place of older-generation anesthetics. These measures are integrated into clinical procurement protocols and align with the principles of the Infection Prevention and Control Policy and equipment lifecycle assessments under the Facility Management Policy. This contributes to the emission intensity reduction of our high-impact medical interventions.

IRO	TYPE	VALUE CHAIN	TIME HORIZON	DESCRIPTION	RELATED POLICIES
Indirect Emissions from Supply Chains	Actual negative impact	Upstream, Own Operations	Medium-Term	54% of healthcare-related GHG emissions are linked to upstream supply chains, such as the production of pharmaceuticals and medical devices.	-
Reduction in Anesthetic Gas Emissions	Actual positive impact	Own Operations	Long-Term	Switching to low-GWP anesthetics like sevoflurane and improving gas capture systems.	Maintenance and Facility Management Policy
Lack of Carbon Accountability in Procurement	Actual negative impact	Upstream, Own Operations	Medium-Term	Failure to include carbon metrics in supplier evaluations leads to higher indirect emissions.	-

Our Material Impacts, Risks, and Opportunities

Failure to include carbon metrics in supplier evaluations leads to higher indirect emissions.

An identified negative impact on climate change mitigation lies in the absence of carbon footprint considerations in current supplier selection and evaluation processes. While we completed a full Scope 3 GHG inventory in 2024, our suppliers have not been systematically assessed for their environmental performance. This leads to higher embodied emissions in our purchased goods and services. To mitigate this, Regina Maria is developing a Supplier Code of Conduct and a supplier rating system to be deployed starting 2026, which will prioritize transparency in GHG disclosures and sustainability performance. This initiative is part of our broader value chain decarbonization effort, outlined in the climate transition plan.

Policies related to Climate Change Mitigation

Policy name: Maintenance and Facility Management Policy

Key contents related to climate change mitigation: Ensures real-time monitoring and maintenance of key buildings, installations, and technical systems.

Scope: All Regina Maria facilities

Value chain: Own operations

Most senior level accountable: Facility and Safety Director

Availability: Internally available on the Regina Maria policy platform.

Third party standards: Romanian Laws 50/1991, Order 96/2017, and Norm P130/99

Last updated: September 2024

Actions related to climate change mitigation:

Integrating climate considerations into supplier assessments In response to the high proportion of Scope 3 emissions identified in our 2024 GHG inventory (175,479.81 tonnes CO₂e), Regina Maria has initiated the development of a Supplier Code of Conduct and sustainability rating system. These tools will incorporate GHG disclosure requirements, emissions performance, and climate transition plans as part of supplier evaluations. The rollout will begin with strategic procurement categories in 2026. This will support our commitment to reducing value chain emissions and enable more climate-resilient procurement decisions.

Targets related to climate change mitigation:

- » **Replace 100% of older anesthetic agents with low-GWP alternatives across eligible departments by 2030.**
- » **Devise a Supplier Code of Conduct by the end of 2026. Focusing on reducing emissions in our value chain.**
- » **Implement supplier sustainability scoring for strategic vendors (Scope 3 mitigation) by 2026.**

Our Material Impacts, Risks, and Opportunities

Energy and climate change adaptation

Regina Maria recognizes the strategic importance of operational energy efficiency related to climate change adaptation. By installing real-time energy monitoring systems in high-consumption facilities, we are able to optimize HVAC usage, identify inefficiencies, and adjust energy flows dynamically. These systems provide granular data on energy consumption, which is essential for defining decarbonization priorities and tracking reduction progress. The deployment of monitoring infrastructure is governed by the Maintenance and Facility Management Policy, which mandates scheduled reviews of building systems, including heating, ventilation, cooling, and lighting. These actions reduce Scope 2 emissions and contribute to achieving our emissions reduction targets for 2030. Planned expansions of the monitoring systems will be aligned with our upcoming climate strategy.

Policies related to Energy and Climate Change Adaptation

Policy name: Maintenance and Facility Management Policy

Key contents related to energy and climate change adaptation: Provisions for implementing energy monitoring systems in high-consumption medical units. Regular inspections and efficiency verification for HVAC, lighting, and utility systems.



IRO	TYPE	VALUE CHAIN	TIME HORIZON	DESCRIPTION	RELATED POLICIES
Advanced Energy Monitoring Systems	Actual positive impact	Own Operations	Medium-Term	Installing energy monitoring systems in large facilities allows real-time optimization, reducing emissions.	Maintenance and Facility Management Policy, Business Impact Analysis

Our Material Impacts, Risks, and Opportunities

Policy name: Business Impact Analysis

Key contents related to energy and climate change adaptation: Identifies climate-related risks such as extreme weather, energy grid failure, and utility shortages as critical scenarios for continuity planning. Includes predefined actions for heatwaves, blackouts, and earthquake risks with infrastructure and clinical priorities mapped by location. Acknowledges reputational risk from delayed climate action and mandates business continuity alignment with evolving environmental and energy realities.

Scope: Group-wide operational continuity and resilience planning

Value chain: Own operations and downstream (patients and service users)
Most senior level accountable: COO

Availability: Internally available to management and operations teams; referenced in strategic planning, risk management, and continuity protocols.

Third party standards: none.

Last updated: March 2024

Actions related to energy and climate change adaptation:

Installing energy monitoring systems in large facilities

In 2025, Regina Maria is to implement real-time energy monitoring systems in one of its highest consumption facility: Euroclinic Hospital. These systems provide actionable data to track HVAC usage, lighting loads, and utility peaks. Insights gathered are being used to identify overconsumption patterns and initiate immediate corrective actions, such as reprogramming ventilation

hours or replacing outdated fixtures. The energy monitoring initiative is managed under the Facility and Maintenance Management Policy and will be expanded in 2026 to cover additional large units, while focusing on installation of Building Management Systems (BMS) in all new facilities.

We are also preparing the groundwork for conducting full facility energy audits in 2025 and 2026, which will support the prioritization of energy efficiency investments and enable progress toward our 2030 Scope 2 emissions reduction target. After the energy audits, we will install photovoltaic panels on the rooftops of facilities that qualify.

Targets related to energy and climate change adaptation:

- » **Expand energy monitoring systems to 100% of large facilities by 2030.**
- » **Conduct energy audits for all large facilities: hospitals and laboratories in 2026.**
- » **Reduce Scope 2 emissions by 10% (market-based) through energy provider changes by 2030.**

Energy Consumption and Mix

ENERGY CONSUMPTION IN MWh	2024
Total energy consumption	48,087.15
Total fossil energy consumption	31,626.58
Fuel consumption from coal and coal products	0
Fuel consumption from crude oil and petroleum products	6,038.94
of which diesel fuel	1,609.30
of which gasoline	4,237.48
of which liquefied petroleum gas (LPG)	192.16
Fuel consumption from natural gas	12,694.01
Fuel consumption from other fossil sources	0
Consumption of purchased or acquired electricity, heat, steam, and cooling from fossil sources	6,854.69
Consumption from nuclear sources	4,467.20
Total renewable energy consumption	11,993.37
Fuel consumption from renewable sources	0
Consumption of purchased or acquired electricity, heat, steam, and cooling from renewable sources	11,993.37
Consumption of self-generated non-fuel renewable energy	0
Non-renewable energy production	0
Renewable energy production	0
Share of fossil sources in total energy consumption	65.77%
Share of consumption from nuclear sources in total energy consumption	9.29%
Share of renewable sources in total energy consumption	24.94%

Energy Consumption and Mix

Regina Maria's total energy use was calculated by summing the amounts of diesel, gasoline, LPG, natural gas, and purchased electricity, each converted to megawatt-hours (MWh). Electricity bought from the grid and natural gas were first converted from kilowatt-hours (kWh) to MWh. Regarding electricity consumption, because we couldn't gather all the data from all our facilities, a total of 20,812.25 MWh was extracted as primary data while 2,503.01 MWh was calculated as an estimation from last year's electricity consumption.

For the conversion of mobile combustion fuel (diesel, gasoline, LPG) from liters to MWh we used the net calorific value in TJ/kt provided by Eurostat "Energy Data, 2020 edition" and for the density in kg/L we used the coefficients issued by CDP, the international climate-data NGO.

The breakdown of electricity sourced from fossil, nuclear and renewable generation reflects Romania's 2023 national power mix which is publicly available on the ANRE website: "2023 Annual ANRE Report". Data on Regina Maria's self-generated renewable electricity and the portion consumed on-site will be disclosed starting with the 2025 financial year.

Regina Maria does not use coal, coal-derived fuels, or any other fossil fuels directly. The reported mobile fuels and natural-gas heating fuels are those that were used when calculating their Scope 1 counterparts. Except for the limited assurance performed by the appointed verifier, these figures have not undergone additional external validation.

Although Regina Maria does not operate in a high climate impact sector as defined by Commission Delegated Regulation (EU) 2022/1288, we maintain close oversight of our energy intensity based on net revenue as part of our business strategy and have therefore chosen to disclose this information voluntarily.

ENERGY INTENSITY	2024
Net revenue of all Regina Maria activities (million EUR)	468.34
Total energy consumption of all Regina Maria activities (MWh)	48,087.15
Energy intensity (MWh/million EUR)	102.68

The energy intensity was calculated using the formula provided by the European Sustainability Reporting Standards.

Scope 1, 2, and 3 Greenhouse Gas Emissions

Regina Maria's 2024 carbon-footprint statement was compiled under the GHG Protocol Corporate Standard following the operational control approach. For the calculation, the five principles outlined in the GHG Protocol: relevance, completeness, consistency, transparency, and accuracy were applied. Primary activity data (meter readings, invoices, purchasing journals) were multiplied with the most recent, sector-relevant emission factors.

To quantify greenhouse gas emissions across Scopes 1, 2, and 3, Regina Maria employed internationally recognized and peer-reviewed emission factor databases, selected for their relevance to the Romanian healthcare context, compatibility with the GHG Protocol, and methodological transparency. For direct emissions (Scope 1) and selected Scope 3 categories, including domestic wastewater and municipal waste, Regina Maria used the 2024 DEFRA (UK Department for Environment, Food and Rural Affairs) emissions factors. DEFRA is widely considered a best-practice source for national inventory reporting and offers annually updated cradle-to-grave factors applicable to European operations. These factors were used to estimate emissions from natural gas, diesel, petrol, LPG, waste incineration, and wastewater treatment. DEFRA values were also used for ground transportation and rail travel under the business travel category.

For Scope 2 location-based emissions the Romanian emission factor for the year 2023 was used 172.21 g/kWh, while for Scope 2 market-based emissions we used emission factors from 14 energy providers linked to each of our locations.

For Scope 3 categories involving procurement, including purchased goods and services, capital goods, and IT equipment, Regina Maria applied the EXIOBASE 3.8.2 multi-regional input-output model. This MRIO database,

which offers country-specific emission intensities, was selected due to its availability of 2022 monetary factors for Romania and its compatibility with spend-based estimation methods. Supplier expenses denominated in Romanian Leu were converted to Euro using the 2024 average exchange rate published by the European Central Bank, prior to applying EXIOBASE carbon intensities.

Medical and biohazardous waste, a specific concern in healthcare operations, was calculated using emission factors from ADEME's Base Carbone 2024. ADEME provides the most comprehensive EU life-cycle inventories for clinical waste streams, accounting for incineration, transport, and pre-treatment stages. Where waste streams were not fully traceable, Regina Maria applied conservative upper-bound estimates to ensure methodological robustness.

Emissions from air travel were estimated using the ICAO Carbon Emission Calculator, which considers flight distance, class, and aircraft type. This was supplemented with DEFRA factors for travel modes such as taxi and train, allowing full coverage of the business travel category. Where activity data gaps remained, Regina Maria employed sector-appropriate proxies. For example, electricity, gas, and water usage at sites with missing utility data were estimated using averages by facility type. Refrigerant use was modeled using an assumption of 19 kilograms of charge per 305 square meters, with a 3% annual leak rate, based on the UK Building Research Establishment (BRE) data from inspections of 500 HVAC systems.

Scope 1, 2, and 3 Greenhouse Gas Emissions

All emission factors embedded the 100-year global warming potentials (GWPs) as defined by the IPCC. No removals, offset credits, or EU Emissions Trading Scheme allowances were deducted. As per the methodology, all emissions were reported on a gross basis, following the operational control approach of the GHG Protocol. The emissions data included in this report represent a transparent and conservative estimate of Regina Maria's climate impact in 2024, forming the foundation for future mitigation targets and monitoring efforts.

GROSS EMISSIONS IN TONNES OF CO ₂ e	2024
Scope 1 emissions	5,468.11
Stationary combustion	3,480.39
Mobile combustion	1,415.18
Fugitive emissions	572.54
Percentage of Scope 1 GHG emissions from regulated emission trading schemes %	N/A
Location-based Scope 2 emissions	4,690.60
Market-based Scope 2 emissions	4,411.20
Scope 3 emissions	175,479.81
3.1 Purchased goods and services for internal use	157,438.42
3.2 Capital goods	7,895.72
3.3 Fuel and energy related activities	1,334.86
3.4 Upstream transportation and distribution	1,196.21
3.5 Waste generated in operations	309.07
3.6 Business travel	91.33
3.7 Employee commuting	7,214.21
Total emissions Scope 1 + 2 + 3 Location-based	185,359.12
Total emissions Scope 1 + 2 + 3 Market-based	185,638.52

Scope 1, 2, and 3 Greenhouse Gas Emissions

From our carbon footprint assessment, we have excluded the following categories:

Scope 3.8 Upstream Leased Assets. Already accounted for under Scope 1 and 2 due to the operational approach.

Scope 3.9 Downstream Transportation and Distribution. Regina Maria does not have a central record of transportation costs borne by third parties.

Scope 3.10 Processing of Sold Products, Scope 3.11 Use of Sold Products, and Scope 3.12 End-of-Life Treatment of Sold Products were all excluded because we do not sell products.

Scope 3.13 Downstream Leased Assets. Our activities do not include leasing or renting.

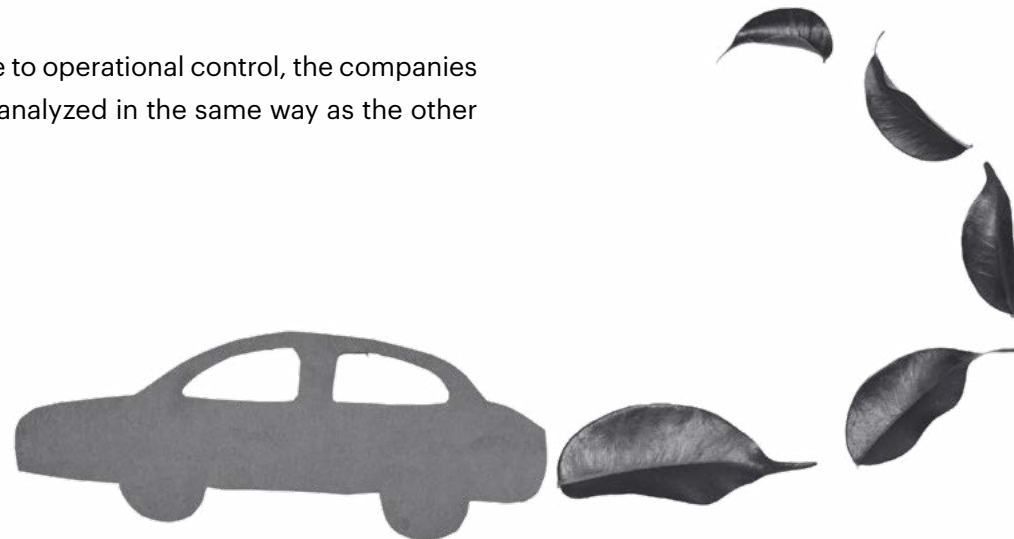
Scope 3.14 Franchises. Regina Maria does not own any franchises.

Scope 3.15 Investments. Excluded due to operational control, the companies in which investments are made were analyzed in the same way as the other companies in the group.

The GHG intensity metric is calculated by dividing total emissions, expressed in tonnes of CO₂e, by the consolidated net revenue of 468.338 million EUR.

In 2024, Regina Maria did not use any carbon offsetting mechanisms, purchase carbon credits, or account for GHG removals in its emissions footprint. Our current approach is based exclusively on gross emissions accounting, in line with the GHG Protocol.

GHG INTENSITY (tCO ₂ e / million EUR)	2024
GHG emissions intensity (location-based)	395.5
GHG emissions intensity (market-based)	396.4





4

SOCIAL

Caring for people, respecting rights — **advancing health
with responsibility.**



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Social S1 – Own Workforce

At Regina Maria, we believe that the well-being, engagement, and development of our workforce are foundational to delivering exceptional healthcare services. In 2024, we continued to prioritize the creation of a work environment that is equitable, inclusive, and supportive of personal and professional growth. This commitment is reflected in our integrated policies, updated programs, and data-informed initiatives that address job stability, working conditions, adequate wages, and fair treatment.

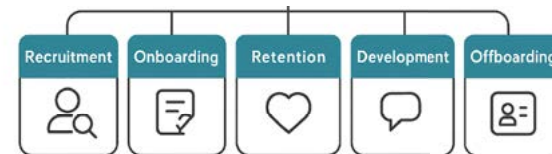
Material impacts, risks and opportunities and their interaction with strategy and business model

All individuals in Regina Maria's workforce who could be materially impacted by the company's operations are included in the scope of this disclosure. The workforce is composed of two categories of employees: those with an active employment contract directly with Regina Maria and back-up employees. Back-up employees hold full-time or part-time individual employment contracts with an uneven work schedule and maintain their primary employment with another company outside of Regina Maria. They are engaged exclusively to cover shifts or vacant positions, following a mutually agreed work schedule when applicable. We also have people working for Regina Maria through other types of contracts: PFA (self-employed freelancers), firms and collaboration contracts.

Since Regina Maria operates exclusively in Romania, all employees who may be affected by its activities are located within the country. The company's workforce structure reflects the specific needs of the healthcare sector, ensuring flexibility while maintaining a stable employment framework for both permanent and back-up staff. All employees that are impacted by Regina Maria's activities are further described under the scope of each policy.

As part of our commitment to improving workplace outcomes and understanding the evolving expectations of our employees, Regina Maria has developed a formal Employee Listening Strategy for the 2024–2030 period. This strategy is integrated within our broader HR roadmap and includes a structured approach to capturing employee feedback across all key stages of the employment lifecycle, from recruitment and onboarding to development and exit. Listening touchpoints are mapped across five pillars: recruitment, onboarding, retention, development, and offboarding. Tools such as automated feedback via Jobful, monthly and annual employee surveys, 1:1 performance and development conversations, and exit interviews provide ongoing insight into employee satisfaction, organizational culture, and potential areas for improvement. Data from these tools is aggregated and analyzed through dedicated dashboards, enabling HR and leadership teams to implement targeted interventions.

Employee Listening Strategy for 2024-2030



Regina Maria strictly prohibits all forms of forced labor, child labor, and human trafficking across our healthcare network and we have strict recruitment processes that validate age and ensure compliance with labor regulations. We adhere to Romanian employment regulations aligned with European Union standards and have implemented a Human Rights Policy to ensure that fundamental rights are respected within the organization and actively promoted throughout our value chain. We also have a yearly training course for all our staff, refreshing knowledge on human rights topics.

Processes for Engaging with Workers about Impacts

Processes for engaging with own workforce and workers' representatives about impacts

Engagement occurs both directly and through employee representatives. The Internal Regulation and the Anti-Harassment and Anti-Discrimination Policy outline mechanisms such as anonymous suggestion platforms, structured feedback systems, and involvement of union or employee representatives in investigations and consultations. Feedback is collected during onboarding, at performance reviews, and as part of initiatives like the “Comunitatea Oamenii Reginei” (Queen’s People Community) internal platform. Moreover, in case of grievances or investigations, employees are consulted and their input recorded formally. This is done regularly or as needed, depending on circumstances.

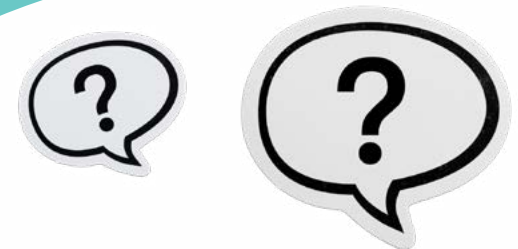
Responsibility for overseeing engagement and ensuring feedback informs decisions lies with the HR Director, supported by the CEO, as outlined in both the Internal Regulation and the Anti-Discrimination Policy. We also have several annual two-hour sessions in the different Regina Maria locations where employees have the opportunity to ask the CEO questions.

Annually, Regina Maria initiates collective negotiations and encourages employees to organize in order to elect employee representatives for each company. Employees have a month to organize, but this stage ends without elected representatives because the required 50% + 1 threshold is not met.

The Employee Listening Strategy enhances our ability to identify material impacts and take corrective action where needed, particularly in relation to employee inclusion, discrimination risk, training effectiveness, and working conditions. The effectiveness of our listening mechanisms is reviewed annually and feeds into our continuous improvement plan, as outlined in our HR Strategic Objectives 2024–2030. The company does monitor resolution rates, feedback implementation, and employee satisfaction trends. One of the tools we use to engage employees in decision-making processes related to workplace conditions and policies is the Employee Opinion Survey which is used to identify the top 5 issues with the lowest scores. Based on the results of the survey, specific projects are initiated to address the identified issues.

During 2024, we had 56% of employees responding to the survey, with a total satisfaction score of 82 out of 100.

Our policies acknowledge the right to non-discrimination on various grounds including gender, disability, and social background. In grievance handling or policy consultation, the presence of experts on equal opportunities is mandated to protect vulnerable groups and ensure equity.



Processes for Remediating Negative Impacts

Processes for remediating negative impacts and raising concerns

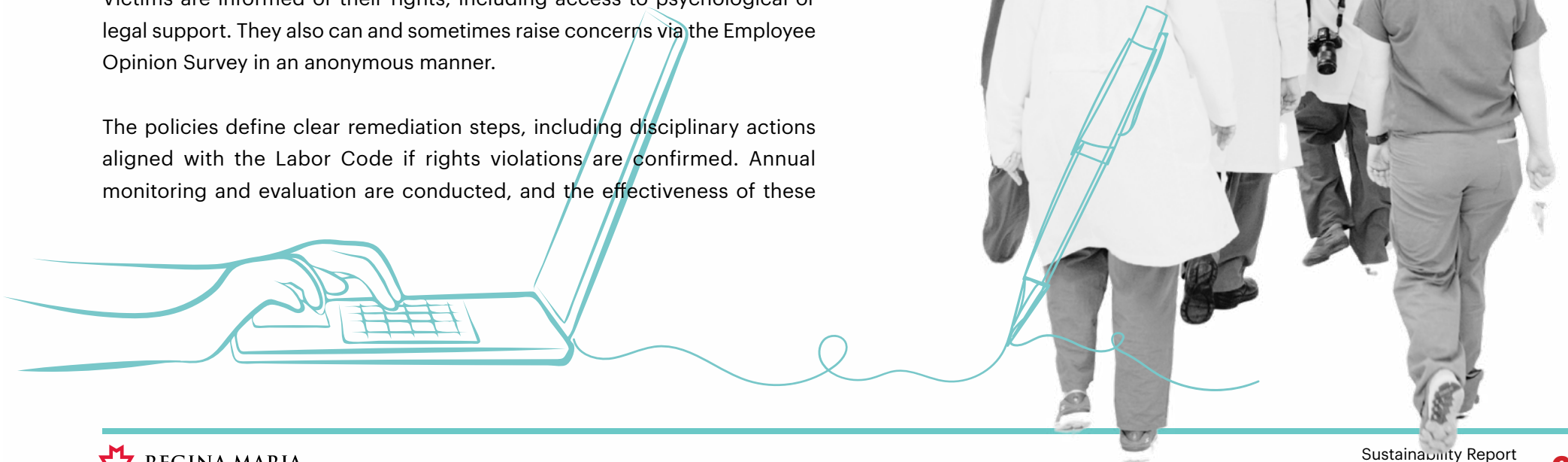
Regina Maria has established internal procedures for addressing complaints, resolving conflicts, and remediating actual and potential negative impacts on its own workforce. These mechanisms are detailed primarily in the Internal Regulation and reinforced through the Human Rights Policy and the Anti-Harassment and Anti-Discrimination Policy.

Employees have the right to raise concerns confidentially via formal channels, including a dedicated reporting email (integritate@reginamaria.ro). They can also submit complaints in writing or verbally, which are then registered and investigated by a designated person or internal commission. The process ensures impartiality, confidentiality, and timely resolution, typically within a maximum of 45 working days.

Victims are informed of their rights, including access to psychological or legal support. They also can and sometimes raise concerns via the Employee Opinion Survey in an anonymous manner.

The policies define clear remediation steps, including disciplinary actions aligned with the Labor Code if rights violations are confirmed. Annual monitoring and evaluation are conducted, and the effectiveness of these


processes is reviewed and improved as needed. All employees are annually trained in these procedures, and all policies are made accessible internally on the company's learning platform, "Invatare Continua". Furthermore, Regina Maria provides a Learning Management System that includes training on recognizing and preventing negative impacts, ensuring employees are informed about their rights and available support channels. The CEO also engages directly with employees through regular sessions, creating an additional platform for addressing concerns.



Our Material Impacts, Risks and Opportunities

The **disclosures under S1** provide a detailed account of the material impacts, risks, and opportunities affecting our workforce, as well as the actions and targets set to continuously improve employment quality, workplace dialogue, and professional development. As part of our alignment with the European Sustainability Reporting Standards, **this section also includes structured responses to the cross-cutting requirements of ESRS 2**, particularly related to materiality assessment, stakeholder engagement, and progress tracking.

Secure employment - Management of impacts, risks and opportunities



IRO	TYPE	VALUE CHAIN	TIME HORIZON	DESCRIPTION	RELATED POLICIES
Skilled staff retention and employee engagement	Opportunity	Own Operations	Medium-term	By ensuring better retention of skilled staff and high employee engagement, Regina Maria gains improved service continuity, higher patient satisfaction, reduced recruitment costs, and a stronger reputation as an employer of choice.	Internal Regulation, Performance Management Program

As part of our double materiality assessment, we have identified retention of skilled staff and high employee engagement as key aspects of secure employment. Providing permanent contracts not only ensures stability for our employees but also strengthens Regina Maria's workforce, enhancing patient satisfaction, reducing recruitment and turnover costs, and reinforcing our reputation as an employer of choice. By prioritizing long-term employment, we cultivate a supportive company culture and promote the well-being and professional growth of our staff.

Secure Employment

Policies related to secure employment

Policy name: Internal Regulation

The Internal Regulation serves as the cornerstone of Regina Maria's employment policies, ensuring that job security and work-life balance measures are clearly defined, equitable, and aligned with Romanian labor legislation. It establishes transparent guidelines for employment conditions, fostering a fair and supportive work environment. Our objective is to create a workplace where employees feel secure, valued, and empowered to perform at their best with minimal stress.

Key contents related to secure employment: Contractual framework. Employees receive individual employment contracts, which include detailed terms on job roles, working conditions, and remuneration, ensuring clarity from the start of employment. Employee representation and consultation. Employees have the right to elect representatives annually, who if elected can participate in discussions regarding employment conditions and workplace rights, ensuring fair representation in decision-making processes.

Scope: all employees and back-up employees working for Regina Maria in all premises

Value chain: own operations

Most senior level accountable: CEO and HR Director

Availability: internally on our policies platform for all employees and back-up employees

Third party standards: redacted in accordance with law 53/2003 "Codul Muncii", law 31/1990 and legislation specific for the medical field and OHS legislation

Last updated: January 2025

Policy name: Performance Management Program

Our Performance Management Program Policy is designed to support professional growth by evaluating performance, providing structured feedback, and guiding career development for our employees. Staff members are encouraged to regularly assess their progress and share insights into the performance review process. Reviews are conducted annually, as well as within three to six months of hiring new employees, allowing us to identify strengths and areas for improvement within our team. This approach enables us to reward high performance through enhanced benefits while encouraging engagement and long-term retention, ensuring that our focus remains on developing our existing workforce rather than continuously recruiting new hires.

Key contents: promoting key attitude and attributes for our staff, career development through performance reviews and structured feedback, and promotion, bonuses and wage increase guidance.

Scope: all employees and managers

Value chain: own operations

Most senior level accountable: approved by the CEO and HR Director

Availability: internally on our policies platform for all employees

Last updated: January 2019

Secure Employment

Actions related to secure employment

We conduct annual performance reviews as part of our ongoing efforts to retain and develop skilled employees. In 2023, 95.37% of eligible employees participated in a formal evaluation process; in 2024, the coverage was 95.34%. These evaluations provide structured opportunities for feedback, development planning, and career alignment, and remain a cornerstone of our people strategy.

2023: 95.37% of eligible employees evaluated
2024: 95.35% of eligible employees evaluated

A major focus in 2024 was placed on early-stage retention, particularly within the first six months of employment. Through our dedicated Retention Strategy, we aim to reduce early attrition, ensure service continuity, and minimize recruitment and onboarding costs. This strategic direction has led to operational projects across the organization, including targeted interventions in departments with higher turnover rates, such as Reception and Contact Center. Division-specific action plans were implemented, introducing salary increases, more predictable work schedules, technical improvements, and clearly defined professional development paths.

To complement this, we continued to invest in long-term engagement and motivation programs for key talent. These initiatives form part of our broader organizational development efforts and are designed to foster sustained commitment and growth.

In 2024, we also launched the first operational year of our Wellbeing Strategy 2024–2030, which outlines our long-term commitment to strengthening employee health, resilience, motivation, and satisfaction across eight strategic pillars. Structured actions were delivered to support physical health (via prevention packages, insurance access, ergonomic programs, and nutritional guidance) and mental wellbeing (through in-office psychological counselling, resilience training, and expanded educational resources focused on stress, emotional regulation, and inclusive leadership).

Engagement and retention were further reinforced through key HR-led projects: the **“10 Key Managerial Actions”** course equipped people managers with tools to support their teams; structured mentoring programs and coaching pathways were launched to build peer support and belonging; and the **Customer and Patient Experience Academy** offered a structured and supportive onboarding path for newly hired front-desk employees, contributing to faster integration and improved service delivery. Additionally, we introduced stay-in interviews, revised our exit interview approach, and implemented BI-powered tracking tools to monitor key retention indicators and respond more rapidly to staff concerns.



Secure Employment

We also advanced personal and career development by providing all employees with access to a comprehensive training catalogue and launching targeted coaching initiatives for key positions.

Work-life balance was supported through flexible work arrangements, additional leave days, and family-oriented benefits. Employees were encouraged to participate in community support and volunteering initiatives, and groundwork was laid for the introduction of structured spiritual wellbeing programs starting in 2025. These actions were monitored through participation rates, feedback mechanisms, and engagement metrics to assess impact and guide ongoing improvement.

To identify and support high-potential talent, Assessment Centers were implemented, helping prepare employees for leadership roles. Updates to the bonus system and new recognition programs were also introduced, reinforcing long-term motivation and strengthening Regina Maria's positioning as an employer of choice.

Finally, we conducted our annual Employee Opinion Survey, achieving an engagement score of 82 out of 100, the same as in 2023. This score is viewed as a strong benchmark, with 80% considered a very good baseline.

Employee Engagement Score:

2024: 82/100 - the same as in 2023

Benchmark: 80 - is considered very good

2025 Targets – Secure Employment:

Performance Reviews: Maintain at least 90% participation

Employee Engagement: Keep score at 80% or higher



Working Time

Working Time - Management of impacts, risks and opportunities

IRO	TYPE	VALUE CHAIN	TIME HORIZON	DESCRIPTION	RELATED POLICIES
Working time	Actual positive impact	Own Operations	Long-term	Allow medical staff to balance personal and professional responsibilities, enhancing job satisfaction.	Internal Regulation, Compensation and Benefits Management Manual

Regina Maria is committed to ensuring that employees can balance their professional and personal responsibilities while maintaining high-quality healthcare services. Structured working hours and predictable schedules help medical staff manage fatigue, improve job satisfaction, and support overall well-being.

The company recognizes that clear regulations regarding working time contribute to higher employee retention, reduced burnout, and improved patient care outcomes. To support these principles, Regina Maria has integrated working time provisions into its Internal Regulation, ensuring compliance with Romanian labor laws and best practices in the healthcare sector.



Working Time

Policies related to working time

Policy name: Internal Regulation

The Internal Regulation clearly defines working time conditions for all categories of employees, ensuring transparency and fairness in scheduling. Predictable work schedules provide medical staff with greater stability and help reduce fatigue-related risks, particularly for employees working in shifts or emergency services. Employees working on-call shifts or irregular schedules receive special work-hour considerations to ensure sufficient rest periods. Shift structures are designed to prevent excessive workloads while maintaining operational efficiency, ensuring that Regina Maria's workforce remains healthy, engaged, and capable of delivering high-quality medical services. For further details, please refer to the [Internal Regulation](#).

Key contents related to working time:

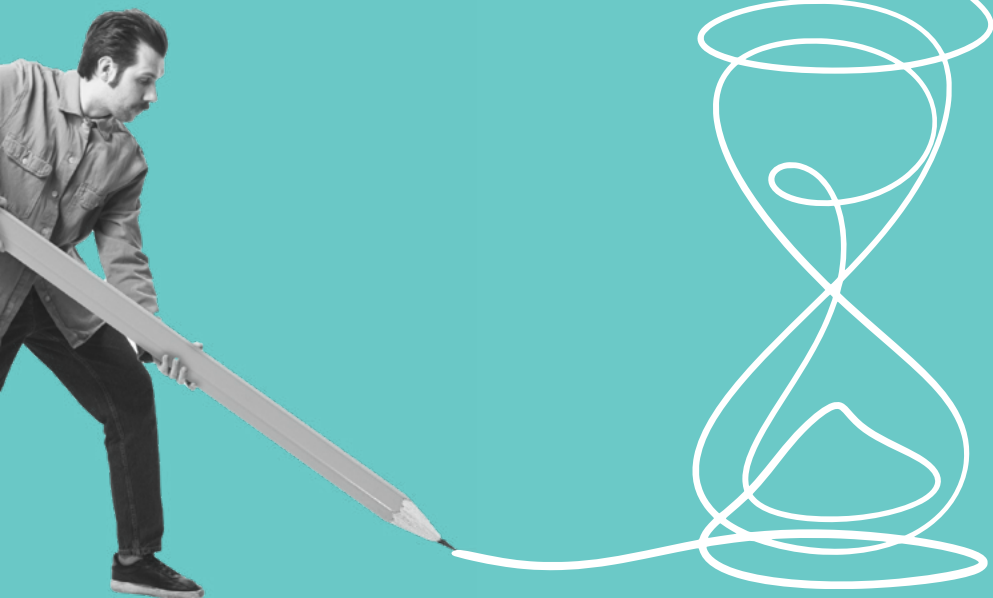
Standard working hours: Full-time employees work 8 hours per day, 40 hours per week, with a monthly average of 168 working hours, ensuring compliance with legal labor standards.

Job specific hours: Certain medical specialties, such as radiology and pathology, have adjusted working hours that recognize the unique demands of these roles. For example, a full-time radiologist may work 6-hour daily shifts, while hospital-based doctors may have 7-hour daily schedules

Overtime management: Overtime is only permitted with prior written approval from direct management. If overtime hours cannot be compensated with paid leave within 90 days, they are remunerated at the applicable overtime pay rate as specified in the Compensation and Benefits Management Manual.

Breaks and rest periods: Employees working at least 6 hours per day are entitled to a 30-minute meal break, which is not included in their paid working time. Additionally, employees are entitled to at least 12 hours of rest between shifts and a 48-hour consecutive weekly rest period.

Predictable schedule for medical staff: The work schedule for medical staff is planned in advance, typically at the end of each month for the following month, considering estimated patient flow and operational needs. Employees are consulted before finalizing schedules to ensure fair distribution of shifts.



Working Time

Policy name: Compensation and benefits management manual

In order to help our team manage work times and more importantly balance the work with their personal life, we award our team with extra days off as follows: between 21 and 25 days off per year depending on the position of the employee (for all employees), extra days off for each year alongside Regina Maria up to six years (all employees except back-up), one extra day every three years after the first six years (all employees except back-up), day off for employee's birthday (all employees), 5 days off for study per year (all employees).

Key contents: job attributes, pay scales, bonuses, benefits, paid overtime and days off, and pay review and increase

Scope: all people employed directly by Regina Maria, does not include back-ups

Most senior level accountable: HR committee (CEO, COO, CFO, HR Director)

Availability: internally on our policies platform for all employees

Third party standards: Mercer International Position Evaluation

Last updated: January 2021



Working Time

Actions related to working time

In 2024, we expanded our approach through the implementation of four core action areas:

Time dedicated to social wellbeing: We introduced additional paid leave entitlements — such as extra leave for birthdays and increased rest days based on seniority or role. Flexible work schedules were implemented for eligible roles, particularly in administrative functions. In parallel, we enhanced employee connection and morale through corporate events including team building activities and the annual Christmas party. A new internal communication platform, Queen's People Community was also launched to support peer connection, recognition, and informal exchange across the network.

Work-life balance education: To strengthen awareness and self-management, we delivered a series of educational programs. These included online courses such as “Work-Life Balance – Career vs. Personal Life” and webinars like “Don't Pack Outlook in Your Vacation Bag”. Educational materials on the health risks associated with overwork were also made available, helping employees make informed decisions about time management and self-care.

Family-specific benefits: Recognizing the role of family life in overall wellbeing, we expanded our internal benefits packages to include targeted support for life events. These included birth-related benefits, stem cell banking services, and financial support for significant personal situations such as marriage, bereavement, serious illness, or natural disasters.

External partnerships: To further support quality of life outside the workplace, we negotiated employee discount programs with selected partners including Christian Tour, Therme, Hard Rock Cafe, Chic Salon, and others. These partnerships aim to enhance employees' access to leisure, relaxation, and personal care opportunities.



2027 Target - Fair Scheduling Framework

By 2027, Regina Maria aims to establish a comprehensive framework to ensure fairness and accuracy in shift scheduling (overtime, night shifts, weekends, rest days, public holidays, work locations). The system will compare scheduled vs. actual shifts, identify discrepancies, and introduce KPIs to monitor them — creating a structured, auditable control process.

Adequate Wages

Adequate wages - Management of impacts, risks and opportunities

We understand that competitive wages attract skilled medical professionals, promote productivity and job satisfaction, and improve the quality of our services. This is why we are constantly monitoring wages and ensuring that our employees manage a decent standard of living.



IRO	TYPE	VALUE CHAIN	TIME HORIZON	DESCRIPTION	RELATED POLICIES
Competitive salaries	Actual positive impact	Own Operations	Long-term	Competitive salaries in private healthcare attract skilled medical professionals, improving service quality.	Internal Regulation, Compensation and Benefits Management Manual
Standardized pay scales	Actual positive impact	Own operations	Long-term	Clear and standardized pay scales prevent wage disparities.	Compensation and Benefits Management Manual

Adequate Wages

Policies related to adequate wages

Policy name: Compensation and benefits management manual

The Compensation and Benefits Management Manual is the primary policy that governs wage structure at Regina Maria. Each employee receives a comprehensive salary package composed of base pay, additional benefits, performance-based bonuses, social assistance, supplementary rewards, and paid overtime and leave. All employees participate in an annual performance review in April, with salary adjustments applied in May based on individual performance outcomes. These adjustments typically range from 3% to 10% and are applied to the employee's salary level, defined as the ratio between net salary and job value. There is no distinction between new and existing employees in terms of salary increase methodology, the determining factors are the individual's current salary level and performance score. The salary grid is reviewed regularly to ensure alignment with inflation and labor market dynamics, maintaining both internal equity and external competitiveness.

The manual also standardizes our pay scales. The standardized wages consider the following aspects: job value (standardized using the Mercer methodology), wage level, wage interval and job position. The positions are ranked according to their complexity and role within the undertaking as well as in achieving the company's strategic objectives, on a scale from nine (most complex) to one (least complex). For further details, please refer to the [Compensation and Benefits Management Manual](#).

Our nine categories of positions are: top management, senior management, middle management, front line management, doctors, medical specialists, non-medical specialists, customer and patient services specialists, and support personnel.

One of the KPIs we constantly follow is the **gender pay gap**. **In 2023 we had 19% gap (women had 81% of the salary of men on average over the year), while in 2024 we decreased it to 18%.** This gap exists due to the following reasons: occupational segregation (more men are in IT jobs which have a higher overall salary), and a gender pay gap is not always the result of discrimination but can be influenced by objective and structural factors such as experience, performance, effective work time, and termination of employment contracts. Even in the absence of intentional discrimination, these factors can lead to salary differences between men and women. For this reason, Regina Maria takes measures to ensure pay equity, promoting diversity in higher-paying fields, and ensures that the performance evaluation process and the granting of salary increases are objective and fair.



Adequate Wages

Actions related to adequate wages

We recognize that competitive and equitable compensation is essential for attracting and retaining skilled professionals in private healthcare. In 2024, we continued to strengthen the systems and processes that ensure wage fairness, transparency, and market competitiveness across all levels of our organization.

All salaries at Regina Maria are governed by standardized pay scales outlined in the Compensation and Benefits Management Manual. These scales are reviewed annually to reflect inflation, changes in market benchmarks, and organizational priorities. During each annual cycle, salaries are adjusted based on individual performance evaluations, typically conducted in April, with subsequent salary increases applied in May. New employees also benefit from early-stage salary adjustments between three and six months after joining, supporting early retention and reward.

To maintain internal equity, we conduct an annual pay scale analysis using the Mercer evaluation methodology. This approach ensures that job value, responsibility, and strategic relevance are reflected consistently in compensation decisions. All positions are categorized on a nine-tier scale, ranging from support staff to top management. Each level is associated with a defined salary interval, and all new hires or internal movements are aligned to the relevant band. We do an annual pay scale analysis which is conducted to ensure internal equity and alignment with market benchmarks.

Targets related to adequate wages

Our overarching compensation target is to maintain a transparent, equitable, and performance-driven salary system that supports employee motivation, professional growth, and trust in leadership. We will continue to align salary bands with market and industry trends, ensure internal fairness across roles, and embed these principles in all recruitment and promotion practices.

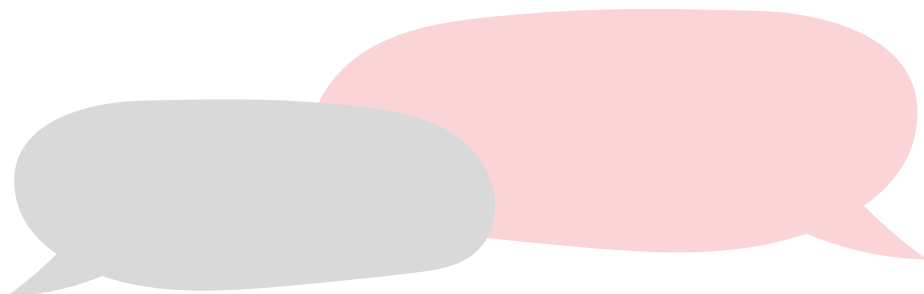
We will enhance compliance by ensuring that all salary decisions, including those related to internal promotions and new hires remain within the established salary scales, and that any exceptions are documented and justified through an objective review process.



By 2026, Regina Maria aims to improve the methodology used to calculate the gender pay gap indicator, with the objective of ensuring greater accuracy and transparency. In parallel, we are committed to maintaining a downward trend in the gender pay gap through 2030, building on our current progress from the existing 18% level.

Social Dialogue

Social dialogue - Management of impacts, risks and opportunities



It is important that employees have a clear, safe, and structured way to engage in meaningful dialogue with management. Regular meetings and structured feedback mechanisms ensure that employees can voice their concerns, contribute to decision-making, and participate in shaping workplace policies. This commitment to social dialogue strengthens engagement, enhances job satisfaction, and ultimately improves the quality of healthcare services delivered.

IRO	TYPE	VALUE CHAIN	TIME HORIZON	DESCRIPTION	RELATED POLICIES
Meetings between staff and management	Actual positive impact	Own Operations	Long-term	Regular meetings between management and staff facilitate open communication, fostering a collaborative work environment.	Internal Regulation
Staff participation in decision making	Potential positive impact	Own operations	Long-term	Encouraging staff participation in decision-making processes enhances engagement and job satisfaction among medical professionals.	Internal Regulation

Social Dialogue

Policies related to social dialogue

Policy name: Internal Regulation

Key contents related to social dialogue

Employee representation and consultation. Employees are invited annually to elect workforce representatives, ensuring that their perspectives are considered in company-wide decisions. In cases where representatives achieve 50% representation, they can participate in collective labor contract negotiations.

Grievance and conflict resolution mechanisms. Employees have multiple formal and informal channels for raising concerns. The first recommended step is an informal discussion with direct management to find a solution amicably. If unresolved, employees can escalate concerns through a structured procedure, including written submissions to HR or direct appeals to the HR Committee.

Dedicated communication channels. Employees can submit complaints or suggestions through email (comitet.hr@reginamaria.ro) or the “Comunitatea Oamenii Reginei” platform. These channels ensure that all feedback is reviewed and addressed appropriately .

Transparency in decisions. Employees at managerial levels receive weekly updates on financial performance and key business indicators, ensuring alignment between staff and leadership on company goals and performance.

For further details, please refer to the [Internal Regulation](#).

The Internal Regulation formalizes the communication framework between employees and management, ensuring that all concerns and proposals are handled transparently and equitably.



Social Dialogue

Actions related to social dialogue

Employee representation is ensured through the annual process of electing workforce representatives. When representation thresholds are met, these representatives are involved in collective bargaining and discussions with leadership. In 2024, employees continued to benefit from transparent access to grievance and escalation procedures. Staff are encouraged to first seek informal resolution with their direct managers, but when this is not sufficient, concerns may be escalated to the HR Committee or submitted through formal channels including the organizational email address (comitet.hr@reginamaria.ro) and the “Regina Maria Community” platform.

As mentioned before, we continue to have the yearly meetings with the CEO where employees can voice their concerns and needs in a two hour session. All the discussions are saved as minute for later consultations by our HR department.

We have integrated social dialogue into our broader engagement and wellbeing strategy. In 2024, we organized a series of targeted focus groups in key divisions with the goal of understanding the issues most relevant to employee engagement at the local level. These sessions enabled employees to contribute directly to identifying improvement opportunities, which local management teams then translated into action plans. This approach reflects our intention to evolve from a compliance-driven model to a participatory management culture that listens actively to its people.

Targets related to social dialogue

By the end of 2025, Regina Maria aims to design and implement an online consultation mechanism through the internal “Comunitatea Oamenii Reginei” platform, enabling employees to contribute to selected managerial decisions. The system will allow management to post key questions related to ongoing decisions, gather employee input, and integrate the most relevant and constructive suggestions into the final resolution. Employees whose feedback meaningfully contributes to the final decision will be recognized with a symbolic reward, reinforcing the culture of transparency, participation, and shared responsibility.

Work-life Balance

Work-life balance - Management of impacts, risks and opportunities

Recognizing the importance of **well-being** and **job satisfaction**, the company has established clear work schedule regulations, teleworking guidelines, and structured shift management to support employees in balancing professional and personal commitments. These provisions are covered in detail in the **Internal Regulation** and the **Teleworking Procedure**, ensuring compliance with national labor laws and industry best practices.



IRO	TYPE	VALUE CHAIN	TIME HORIZON	DESCRIPTION	RELATED POLICIES
Flexible work	Opportunity	Own Operations	Long-term	Flexible work arrangements may enhance employee satisfaction, reducing turnover and improving Regina Maria's image as an employer.	Internal Regulation, Teleworking Procedure

Work-life Balance

Policies related to work-life balance

Policy name: Internal Regulation

Key contents related to work-life balance:

Work schedule and rest periods. Employees are subject to a structured work schedule that regulates breaks, maximum working hours, and overtime limits. The total working time, including overtime, cannot exceed 48 hours per week, ensuring employees receive adequate rest and recovery time .

Shift planning and predictability. For medical staff, shifts, on-call duties, and night shifts are planned in a manner that optimizes both patient care and employee well-being, reducing excessive workloads and promoting efficiency.

Leave policies. Employees are entitled to annual leave, maternity/paternity leave, and other statutory leaves, ensuring that they have the necessary time to manage personal commitments.

For further details, please refer to the [Internal Regulation](#).



Policy name: Teleworking Procedure

The Teleworking Procedure further enhances work-life balance by defining remote work eligibility, work conditions, and accountability measures for employees who can perform their duties outside Regina Maria's physical locations. Telework is available for non-medical employees whose roles do not require direct patient interaction. Approval is subject to managerial consent, ensuring that remote work aligns with operational requirements.

Key contents: regulate the conditions, method of granting, and methods of working from home (telework).

Scope: all permanent employees (non-probation) that are non-medical, and that do not have to interact directly with patients, customers, and business partners.

Value chain: own operations

Most senior level accountable: Top Management (CEO, COO, CFO), implemented by HR Director

Availability: internally on our policies platform for all employees and sent by email

Last updated: July 2024

Work-life Balance

Actions related to work-life balance

As part of our Wellbeing Strategy, we expanded awareness and support for work-life balance by delivering targeted educational content. This included webinars such as “Don’t Pack Outlook in Your Vacation Bag,” courses on managing boundaries between work and personal life, and online materials on the health effects of overwork. In addition, we provided tailored assistance for life events such as childbirth, bereavement, marriage, or serious illness, as well as a suite of preferential benefits through commercial partnerships.

We also monitor employee turnover as an indirect indicator of work-life quality. In 2024, the overall turnover rate was 19.38%, showing a positive trend compared to 20.5% in 2023. We are actively working to manage this indicator by implementing retention projects to reduce turnover. These initiatives are particularly focused on roles with higher turnover rates: 39.42% in 2024 for our call center department and 24.17% in 2024 for our non-medical staff.

2025 Target - Employee Retention:

Aim to further reduce overall turnover from the 2024 rate of 19.38%, with a focus on high-turnover areas such as:

-Call Center: 39.42% in 2024

-Non-Medical Staff: 24.17% in 2024

Targets related to work-life balance

We aim to reduce the turnover rate among non-medical staff to below 23% by 2026, and in the Call Center division to below 38%, through the continued implementation of flexible work arrangements and personalized retention programs.

To promote a culture of balance and self-care, we also aim to increase annual participation in wellbeing programs to at least 500 employees by 2025, with a planned year-over-year growth of 5%, supported by the development of new resources and internal awareness campaigns.

Turnover Reduction by 2026:

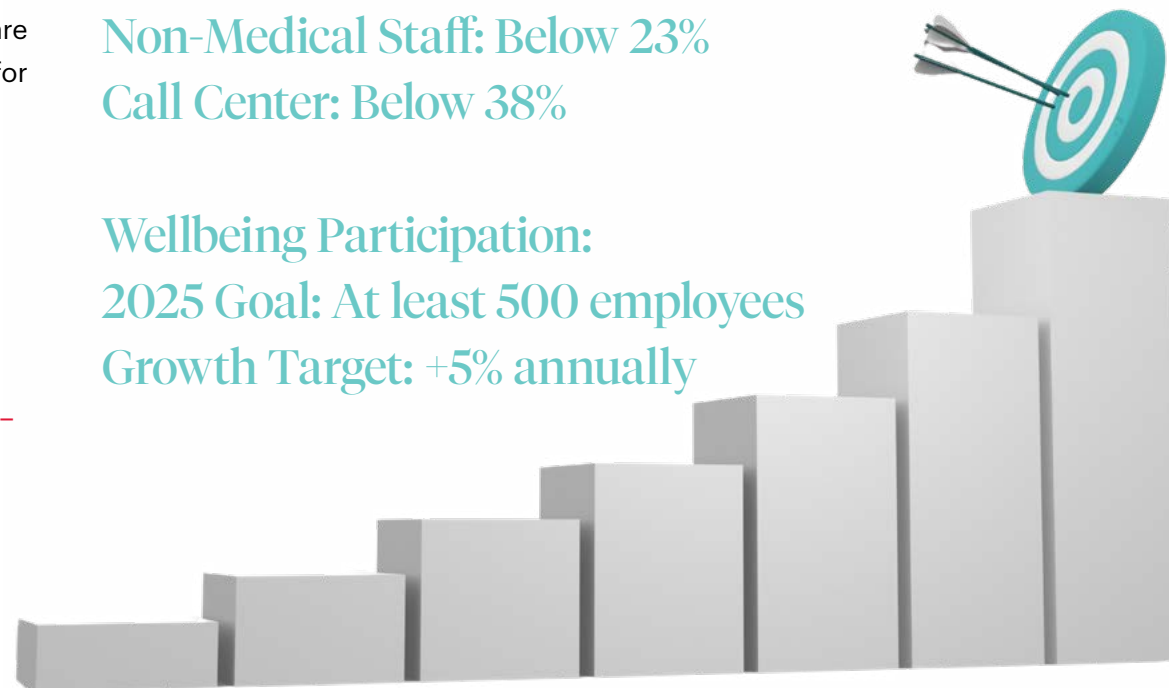
Non-Medical Staff: Below 23%

Call Center: Below 38%

Wellbeing Participation:

2025 Goal: At least 500 employees

Growth Target: +5% annually



Health and Safety

Health and Safety - Management of impacts, risks and opportunities

To address mental health needs in a structured and sustainable way, Regina Maria launched the **Wellbeing Strategy 2024-2030**, a multi-year initiative focused on improving the physical, emotional, social, and psychological health of employees. Mental health support is embedded under the “Emotional Wellbeing” pillar, which aims to build resilience, reduce stress, and normalize access to psychological services across the organization.

IRO	TYPE	VALUE CHAIN	TIME HORIZON	DESCRIPTION	RELATED POLICIES
Mental health counseling	Potential positive impact	Own Operations	Long-term	Accessible counseling services for medical and administrative staff alleviates stress.	Wellbeing Strategy



Health and Safety

Policies related to health and safety

Policy name: Wellbeing Strategy 2024–2030

Key contents related to mental health counseling:

Implementation of the **#InTerapieLaBirou** initiative offering in-person psychological support at the company's central office (available two days per week, with confidential sessions provided by Regina Maria specialists). Integration of psychological consultations into existing medical subscription plans, enabling free access to therapy sessions for employees. Provision of discounted multi-session therapy packages to encourage long-term engagement with mental health professionals. Delivery of stress management webinars and online education covering burnout prevention, emotional regulation, and work-related anxiety. Development of emotional wellbeing KPIs and participation tracking mechanisms to monitor usage and effectiveness.

Scope: All employees with medical subscriptions or working at central office locations

Value chain: Own operations

Most senior level accountable: HR Director, with strategic oversight by the Executive Committee

Availability: Internally available on the HR platform and shared through internal communication channels

Third party standards: Informed by WHO workplace wellbeing recommendations and Romanian health legislation

Last updated: January 2024

Health and Safety

Actions related to health and safety

In 2024, we launched the #InTerapieLaBirou initiative, providing in-person psychological counseling at our central headquarters. Employees have the opportunity to schedule individual sessions every Monday and Wednesday with a Regina Maria psychologist, creating a confidential and accessible space to address work-related stress and emotional challenges.

To further extend mental health support beyond the central office, we integrated psychologist consultations into the medical subscription packages offered to our employees. This ensures that therapy is available at no additional cost across the network, removing financial barriers to care. For those interested in longer-term engagement, we also introduced discounted multi-session packages, encouraging sustained involvement in therapeutic processes.

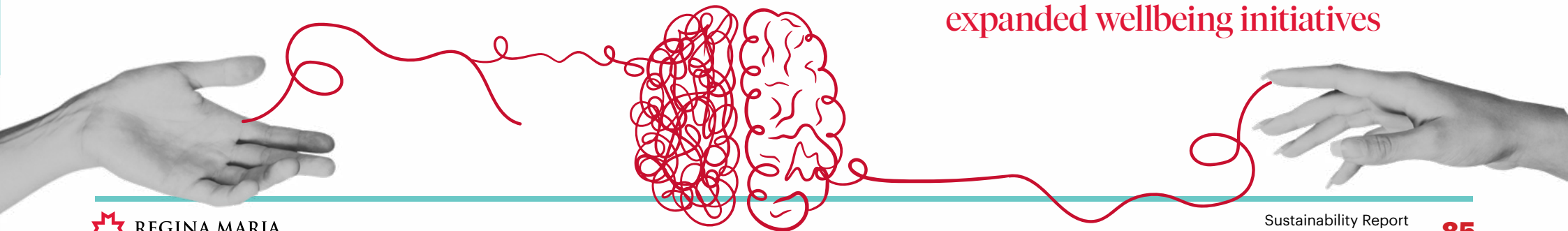
Complementing these services, we delivered a series of educational webinars and digital resources on stress, burnout prevention, and emotional resilience. These sessions are part of our broader wellbeing agenda and are designed to equip employees with the tools needed to recognize and manage psychological strain in both personal and professional contexts.

- » By the end of 2025, Regina Maria aims to deliver a minimum of 400 psychological counseling sessions, made available to all employees through the existing medical subscription system.
- » In parallel, we plan to reach at least 200 employees annually through structured mental and emotional health training, including webinars, resilience workshops, and stress management courses. This number is expected to grow by 5% per year through the continued expansion of wellbeing content and employee engagement initiatives.

2025 Targets - Mental Health Support:

- **Psychological Counseling: Minimum 400 sessions offered by end of 2025**
- **Mental Health Training: Reach at least 200 employees annually**

Includes webinars, resilience workshops, stress management +5% yearly growth planned through expanded wellbeing initiatives



Training and Skills Development

Training and Skills Development - Management of impacts, risks and opportunities

Training initiatives are structured through the Training Procedure and Customer & Patient Experience Academy Procedure. The Training Procedure establishes the framework for identifying and delivering professional development programs, ensuring employees receive the necessary training for role performance and career progression. The process includes an annual needs assessment, a training catalog with internal and external courses, and a structured approval system. The Customer & Patient Experience Academy focuses on front-line employees, particularly those in reception roles, providing specialized training in communication, patient interaction, and operational procedures.

On our online platform “Invatare Continua” (Continuous Learning) all our employees can access the general online courses (e.g. crisis management) and specific online courses that are targeted towards certain groups of employees (e.g. medics, marketing).

IRO	TYPE	VALUE CHAIN	TIME HORIZON	DESCRIPTION	RELATED POLICIES
Training programs	Actual positive impact	Own Operations	Long-term	Programs enhance the skills of medical staff, leading to better patient outcomes.	Training Procedure
Professional development	Opportunity	Own operations	Long-term	Offering professional development improves employee retention and boosts Regina Maria’s image as a preferred employer.	Training Procedure, Customer & Patient Experience Academy Program

Training and Skills Development

Policies related to training and skills development

Policy name: Training Procedure

Yearly, at the start of each year, we identify and centralize the training needs of all Regina Maria's employees. Based on our professional development strategy and using information from other sources (e.g. Employee Opinion Survey results) we identify these needs and build the annual professional development plan. This contains the following information: training, target audience, duration, trainers and location.

Key contents: framework, rules and criteria for employee professional development, professional development program planning, training catalogue, and responsibilities of those involved in the training process.

Scope: all employees can participate in online courses, and permanent employees (non-probation) can participate in offline courses. Back-up employees can receive training only in special conditions.

Value chain: own operations

Most senior level accountable: HR Director

Availability: internally on our policies platform for all employees

Last updated: December 2020

Actions related to training and skill development

At Regina Maria, we continue to invest in structured training programs that support the ongoing development of both medical and non-medical staff, contributing directly to patient safety, service quality, and employee retention. Our training initiatives are guided by the Training Procedure and the Customer & Patient Experience Academy Program and are implemented in alignment with the objectives set out in our Wellbeing Strategy 2024–2030.

Based on our professional development strategy, we built a development plan that includes targeted programs for clinical, administrative, and support staff. In 2024, our efforts focused on expanding both soft and hard skill development for nurses, doctors, and frontline employees. Courses ranged from therapeutic communication and medical team collaboration to critical care protocols and infection prevention practices.

Training delivery includes in-person sessions, webinars, and digital modules accessible via the “Continuous Learning” platform. Medical staff participated in skill-based training such as Basic Life Support (BLS), medication administration, intensive care procedures, and biological sample collection. Complementary to these, physicians engaged in specialized tracks through our Surgical Training Institute and The Royal Club of Physicians, including medical leadership and excellence in digital patient experience.

Training and Skills Development

Actions related to training and skills development

The Surgical Training Institute, hosted by Regina Maria, has gained national and international recognition as a premier center for medical education in minimally invasive and robotic surgery. The institute uses advanced simulation technologies to prepare surgeons from across Europe for complex procedures. This contributes directly to our goal of improving patient outcomes through hands-on, high-fidelity medical training.

For newly hired reception and patient-facing staff, the Customer & Patient Experience Academy provided onboarding and role-specific training, ensuring alignment with operational procedures and patient interaction standards. Across all training programs, employee participation is tracked and evaluated, and feedback is used to improve future learning cycles.

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Targets related to training and skills development

By the end of 2025, Regina Maria aims to ensure that at least 50% of employees in medically oriented roles participate in at least one training course specifically designed for medical teams. These sessions will cover clinical competencies, patient safety, or specialized protocols relevant to their field of work.

Additionally, we target that over 60% of employees with direct patient interaction responsibilities, including those in Contact Center and Front Desk roles, complete structured training programs focused on communication and soft skills, supporting better patient experiences and more effective service delivery.

Measures Against Harassment and Violence

Measures Against Harassment and Violence in the Workplace - Management of impacts, risks and opportunities

We have a whistleblower system in place (aligned with the EU whistleblower procedure) and all harassment, discrimination or bullying complaints are handled confidentially. The issues can be reported anonymously through a designated email and the maximum duration for finding a solution for the cases is 45 days.

IRO	TYPE	VALUE CHAIN	TIME HORIZON	DESCRIPTION	RELATED POLICIES
Harassment complaints	Actual positive impact	Own Operations	Long-term	Designated staff members handle harassment complaints confidentially.	Anti-harassment and Anti-discrimination Workplace Policy



Measures Against Harassment and Violence

Policies related to harassment and violence in the workplace

Policy name: Anti-harassment and Anti-discrimination Workplace Policy

The **Anti-harassment and anti-discrimination policy** establishes clear principles to ensure a safe and respectful work environment, free from any form of discrimination or harassment. The policy enforces a zero-tolerance approach to discrimination, harassment and bullying. The policy is designed to protect employees and ensure compliance with Romanian labor law and international best practices. In the policy, “direct discrimination” and “indirect discrimination” are defined as being based on sex, sexual orientation, genetic characteristics, age, national affiliation, race, color, ethnicity, religion, political opinion, social origin, disability, family situation or responsibilities, trade union membership or activity, among others.

A designated investigation committee is responsible for reviewing and resolving complaints, ensuring compliance with the policy, and implementing corrective measures. The committee has three members and signs a confidentiality agreement under law 53/2003 “Codul Muncii” (Labor Code).

Key contents: responsibilities of employees, managers, and HR in preventing and addressing such issues, clear definitions of various forms of harassment and discrimination, procedures for reporting incidents, and disciplinary actions and sanctions for violations.

Scope: all employees in all workplace locations, extending to delegated or seconded employees, interns, temporary workers, service providers, and business partners who interact with Regina Maria employees

Value chain: own operations, indirectly impacting external stakeholders upstream and downstream

Most senior level accountable: HR Director and CEO

Availability: internally on our policies platform for all employees

Third party standards: Romanian Labor Code, Law 53/2003, Penal Code, Ordinance nr. 137/2000 regarding discrimination, Law 167/2020, Law 202/2002, Law 178/2018, and H.G. 262/2019.

Last updated: April 2024



Measures Against Harassment and Violence

Actions related workplace harassment

In 2024, we recorded four complaints related to harassment or discrimination through this system, compared to five in 2023. All cases were investigated and resolved without escalation to external authorities or resulting penalties. While the number of reports remains low, we recognize that this may indicate underreporting or limited trust in the confidentiality and effectiveness of the process. To strengthen preventive action, we are exploring ways to expand awareness of employee rights and to cultivate a culture in which reporting misconduct is safe and supported.

In 2024, Regina Maria recorded four internal harassment or discrimination complaints, two fewer than in 2023.

In parallel, we are integrating workplace respect and anti-discrimination principles into broader employee engagement and wellbeing initiatives.

Targets related to workplace harassment

- » By the end of 2026, Regina Maria aims to deliver a recurring series of anti-discrimination and anti-harassment awareness workshops across all business units, with at least 50% of employees participating in one training module annually. The content will focus on how to recognize, prevent, and report inappropriate behavior, and will be tailored to role-specific risks and responsibilities.
- » To increase trust in the confidentiality and integrity of our harassment reporting mechanisms, we will implement an internal communication campaign by the end of 2026 to clarify how the investigation process works, who is involved, and what safeguards are in place to protect the anonymity and security of those who file complaints.

Talent Availability, Attraction, and Retention

Talent availability, attraction, and retention - Management of impacts, risks and opportunities

IRO	TYPE	VALUE CHAIN	TIME HORIZON	DESCRIPTION	RELATED POLICIES
Employee benefits	Actual positive impact	Own Operations	Long-term	By offering inclusive benefits from onboarding and recognizing employee loyalty with significant rewards, Regina Maria enhances satisfaction, retention, and brand appeal—ensuring a robust and committed workforce.	Compensation and Benefits Management Manual, Employer Branding Strategy

Talent retention and attraction are key priorities at Regina Maria, ensuring a skilled, engaged, and motivated workforce. To achieve this, the company has developed a structured compensation and benefits framework that provides financial and non-financial incentives aimed at promoting long-term employee commitment. The Compensation and Benefits Management Manual sets the foundation for salary structures, benefits, and rewards, aligning with best practices and industry benchmarks.

The manual establishes clear policies on salary reviews, bonuses, paid leave, and social support, ensuring that employees feel valued and secure in their roles. Regina Maria's benefits program includes medical services, additional paid leave, financial assistance for special circumstances, and long-term incentives for loyalty and performance. The company regularly updates these programs to reflect market conditions and employee expectations, reinforcing its position as an employer of choice in the healthcare sector.

Talent Availability, Attraction, and Retention

Policies related to talent availability, attraction, and retention

Policy name: Compensation and Benefits Management Manual

Key contents related to Employee benefits:

Loyalty incentives. Employees who remain with Regina Maria for extended periods receive progressive benefits, including additional paid leave and financial rewards. Employees with five years of tenure receive an extra day of annual leave, increasing with each additional five-year period.

Medical benefits. All employees have access to private healthcare services, including routine check-ups, specialist consultations, and discounted medical treatments. Additional benefits extend to employees' families, depending on tenure and contract type. For further details, please refer to the [Compensation and Benefits Management Manual](#).

Social assistance and financial support. Employees facing personal challenges, such as serious medical conditions or family emergencies, may receive financial support from the company. Special allowances are available for marriage, childbirth, and bereavement.

Additional paid leave. Employees are entitled to various types of paid leave beyond statutory requirements, including leave for special personal circumstances, study leave, and additional rest days for senior employees.

Flexible work arrangements. For eligible employees, flexible work schedules and hybrid work models are available, particularly for administrative roles that do not require direct patient interaction. Policy name: Employer Branding Strategy (as referenced in HR Strategy 2025)



Talent Availability, Attraction, and Retention

Policies related to talent availability, attraction, and retention

Policy name: Employer Branding Strategy

Key contents related to talent availability and attraction:

Visibility campaigns. Continued implementation of internal and external projects to strengthen the employer brand, including the “Extraordinary Medicine Begins with You” campaign.

Anniversary initiatives. Promotion linked to Regina Maria’s 30th anniversary to build public trust and candidate interest.

University partnerships. Collaborations with faculties and post-secondary medical schools to enhance early career pipelines.

Sustainability values. Alignment of employer branding with sustainability values and DEI (Diversity, Equity, and Inclusion) narratives to attract value-driven candidates.

Scope: All entities within the Regina Maria healthcare group

Value chain: Own operations

Most senior level accountable: HR Director, supported by the CEO and Communication teams

Availability: Internally on our policies platform for all employees

Third party standards: Benchmarked against Top Employer standards and local recruitment best practices

Last updated: January 2024



Talent Availability, Attraction, and Retention

Actions related to talent availability, attraction and retention

Throughout 2024, we continued to offer a comprehensive benefits program tailored to the diverse needs of our workforce. Employees benefit from private healthcare services, flexible working options, financial assistance for significant life events, and additional leave entitlements linked to seniority and role. Medical benefits also extend to family members, depending on contract type and tenure. To support employees through challenging circumstances, we provide targeted social assistance and personalized financial support.

To support organizational visibility and appeal among prospective candidates, our HR strategy includes active promotion of our benefits offer and employer value proposition during the recruitment process. We continuously assess the relevance and competitiveness of these offerings through benchmarking studies, employee feedback, and regular internal reviews.

In 2024, we implemented multiple projects under our Employer Branding Strategy, aligned with the ATTRACT pillar of the HR framework. One of the flagship campaigns, **“Extraordinary Medicine Begins with You”**, was deployed internally and externally to strengthen Regina Maria’s positioning as an employer of choice in the healthcare sector. The campaign emphasized values such as empathy, professionalism, and innovation, all of which are central to our service promise and employee experience.

To mark our 30th anniversary, dedicated communication and engagement initiatives were launched to reinforce pride in belonging and institutional continuity. These efforts included storytelling around career growth, testimonials from long-tenured staff, and online visibility across recruitment channels. In parallel, our teams developed a long-term collaboration plan with medical and healthcare universities, contributing to early talent pipeline development and strengthening connections with emerging professionals.

Targets related to talent availability, attraction, and retention

By the end of 2025, Regina Maria aims to implement 100% of the actions outlined in the annual Employer Branding Strategy and Action Plan, ensuring full execution of planned visibility, attraction, and engagement initiatives.



Own Workforce Metrics

EMPLOYEES (head count)	2023		2024		Variation	
	W	M	W	M	W	M
Total number by gender	5,310	1,005	5,695	1,078	7.25%	7.26%
Percentage by gender	84%	16%	84%	16%	-	-
Total employees	6,315		6,773		7.25%	

All employee data is presented as head count at the end of the year 2023, respectively 2024. The employees presented are only those that have an employment contract with Regina Maria, and all are employed in Romania.

CONTRACT TYPE (number of employees)	2023		2024		Variation	
	W	M	W	M	W	M
Permanent employees	5,262	997	5,616	1,064	6.73%	6.72%
Temporary employees	48	8	79	14	64.58%	75.00%
Percentage of permanent employees	99.11%		98.63%		-0.49%	
EMPLOYMENT TYPE (number of employees)						
	W	M	W	M	W	M
Full time	4,710	876	5,139	948	9.11%	8.22%
Part time	600	129	556	130	-7.33%	0.78%

Our temporary employees are those that at the end of the year were on the three to six month probation period.

Own Workforce Metrics

EMPLOYEE AGE (head count)	2023		2024		Variation	
	W	M	W	M	W	M
Under 30	1,482	261	1,718	302	15.92%	15.71%
30 to 50	3,076	569	3,214	597	4.49%	4.92%
Over 50	753	174	763	179	1.33%	2.87%

EMPLOYEES WITH DISABILITIES (head count)	2023		2024		Variation	
	W	M	W	M	W	M
Employees	29	11	37	15	27.59%	36.36%

A person with a disability is an individual who, according to a certificate, has long-term physical, mental, intellectual, or sensory impairments that require annual evaluation and classification into a degree of disability. However, they have not lost their ability to work and are evaluated as being fit for the tasks performed in the position held.

NON-EMPLOYEES	2023	2024	Variation
Private individuals (PFA)	7	7	0%
Firms (SRL)	1,034	1,276	23.40%
Collaboration contracts	1,686	1,890	12.10%
Total	2,727	3,173	16.35%

Own Workforce Metrics

TRAINING AND PERFORMANCE REVIEWS	2023		2024		Variation	
	W	M	W	M	W	M
Total training hours per gender	28,219	4,172	67,451	8,619	139.03%	106.57%
Average training hours per gender	5.31	4.15	11.84	8.00	122.87%	92.58%
Average training hours per year	5.13		11.23		118.91%	
Performance reviews per gender	3,471	657	3,667	656	5.65%	-0.15%
Percentage of employees that participated in performance reviews	65%	65%	64%	61%	-1.50%	-6.91%
Average performance reviews per year	0.65		0.64		-1.54%	

HEALTH AND SAFETY	2023		2024		Variation	
	W	M	W	M	W	M
Total number of work-related injuries	24		44		83.33%	
Total number of work-related ill-health	0		0		0%	
Total number of fatalities	0		0		0%	
Days lost as a result of injuries	119		336		182.35%	

Days lost as a result of injuries are total calendar days of medical leave for work-related accidents. Calendar days include weekends and holidays. All work-related injuries that happened in the reporting periods were only for employees.

PARENTAL LEAVE	2023		2024		Variation	
	W	M	W	M	W	M
Employees that took parental leave per gender	267	1	273	8	2.25%	700.00%
Total employees that took parental leave	268		281		4.85%	

All employees that requested parental leave during the reporting years were granted the benefit.

Own Workforce Metrics

	2023		2024		Variation	
	W	M	W	M	W	M
GENDER PAY GAP						
Average gross salary (RON)	7,863.8	9,674.5	8,579	10,426	9.09%	7.77%
Gender pay gap	18.72%		17.72%		-5.35%	

The gross salary does not include bonuses. All information is presented in Romanian Lei.

MANAGEMENT DIVERSITY	2024	
	W	M
Board of Directors by gender	1	5
Board of Directors average age	52	
Board of Directors seniority (years)	7,6	
Top Management by gender	12	5
Top Management average age	49	

Social S2 – Workers in the Value Chain

Material impacts, risks and opportunities and their interaction with strategy and business model

In the context of value chain workers, Regina Maria has identified several potential positive impacts and opportunities that can arise from targeted interventions and improvements in procurement practices. These include the ability to contribute to adequate wages in supplier organizations by implementing fair pricing agreements, promoting gender equality through supplier diversity programs, and advancing child protection by requiring suppliers to explicitly prohibit forced and child labor. Additionally, we view corporate wellness initiatives as a potential vector for strategic collaboration with other businesses, strengthening both our community presence and our reputation.

These impacts have been identified through internal policy analysis and stakeholder expectations, including those defined in our Human Rights Policy and procurement procedures. However, the integration of these impact areas into our core strategic and procurement frameworks remains in progress. At this stage, these opportunities have not yet been formally embedded into our business model or procurement scoring criteria.

Processes for engaging with value chain workers about impacts

At present, Regina Maria does not have a dedicated formal mechanism for engaging directly with value chain workers on sustainability related impacts. Existing supplier evaluation processes are focused on performance, contract

compliance, and legal requirements, as outlined in our procurement policy. While these processes involve communication with supplier management, they do not currently extend to consultation with or feedback from the workers employed by our suppliers or contractors.

The future Supplier Code of Conduct will introduce expectations for suppliers to maintain accessible grievance mechanisms for their employees, and to facilitate dialogue on ethical and social conditions. The code will also promote alignment with the standards outlined in our Human Rights Policy and will require formal acknowledgment from suppliers as part of the contractual process.

Processes to remediate negative impacts and channels for value chain workers to raise concerns

Regina Maria has not yet established a specific remediation mechanism for value chain workers to raise concerns or report negative social impacts. Our current approach to managing incidents and non-compliance focuses on internal staff, as described in the Procedure for Incident Reporting and Root Cause Analysis. This system does not extend to third-party workers or those employed by our suppliers.

Until such contractual requirements are formalized through our future Supplier Code of Conduct, and monitoring procedures are in place, all workers in the value chain can address issues in their companies by using our whistleblowing email integritate@reginamaria.ro.

Our Material Impacts, Risks, and Opportunities

Management of impacts, risks, and opportunities

To strengthen alignment with the Social and Governance standards and address current policy gaps related to workers in the value chain, Regina Maria will initiate the development of a Supplier Code of Conduct. This document will formalize our expectations regarding ethical, social, and labor practices among our suppliers and will reflect our commitment to ensuring that human rights, fairness, and inclusive standards are upheld across our entire value chain. The action plan described below is structured in line with policy-level foundations and implementation-level measures, and its progress will be transparently reported in our CSRD disclosures under the relevant ESRS standards.

The rationale for this initiative is anchored in our existing commitments, particularly those outlined in the Human Rights Policy, which prohibits child labor, forced labor, and discrimination, and affirms our adherence to international labor standards. In addition, our procurement procedures establish clear requirements for legal compliance and performance monitoring, but these do not yet include specific clauses addressing social or labor conditions. The Supplier Code of Conduct will serve as a necessary extension of these frameworks.

IRO	TYPE	VALUE CHAIN	TIME HORIZON	DESCRIPTION	RELATED POLICIES
Fair pricing agreements	Potential positive impact	Upstream, downstream	Medium-term	The provider can ensure fair pricing agreements with suppliers that allow them to pay living wages to their workers.	-
Supplier diversity programs	Potential positive impact	Upstream, downstream	Medium-term	By implementing supplier diversity programs, the provider can incentivize gender-inclusive hiring and fair pay practices.	-
Human rights management for suppliers	Potential positive impact	Upstream, downstream	Medium-term	The provider can include strict anti-child labor and anti-forced labor policies and monitoring mechanisms in supplier contracts.	-
Corporate wellness programs	Opportunity	Upstream, own operations, downstream	Long-term	Corporate wellness programs build partnerships with businesses, strengthening Regina Maria's community involvement and reputation.	-

Our Material Impacts, Risks, and Opportunities

Actions for workers in the value chain

We will begin with a policy scoping phase to benchmark international and European best practices, including the UN Guiding Principles on Business and Human Rights, the ILO Core Conventions, and the OECD Guidelines for Multinational Enterprises. This process will guide the drafting of our Supplier Code of Conduct, which will be structured around core principles such as the prohibition of child and forced labor, respect for diversity and equal treatment, occupational health and safety, freedom of association, fair working hours, and adequate wages.

The draft will be developed and internally validated by a cross-functional working group coordinated by our Procurement, HR, and Sustainability departments. The code will also be reviewed to ensure compatibility with our Code of Ethics and Anti-Corruption Policy. This phase will ensure that the new provisions are operationally feasible and legally sound within our existing contract management systems.

Following internal approval, we will begin integrating the Supplier Code of Conduct into our procurement operations. This will include updating supplier selection and evaluation criteria, revising contract templates to include reference to the code, and incorporating compliance monitoring mechanisms into the supplier management process. To accompany this rollout, we will launch a supplier communication campaign to introduce the code and its implications. All current and prospective suppliers will be required to formally acknowledge its provisions as a prerequisite for continued or future collaboration. Recognizing the diversity of our supplier base, we will apply a phased implementation strategy and provide additional guidance to critical or smaller partners who may need support in aligning

with these new standards.

Finally, we will implement a formal evaluation and continuous improvement process. This will build on our internal audit framework and leverage the existing quality monitoring tools, including Power BI and internal reporting applications. Supplier adherence to the code will be assessed during evaluation, and when needed.

This initiative represents a key step in extending our sustainability commitments across the value chain and the progress will be transparently presented in our 2025 sustainability report.



Social S3 - Communities

In our CSR strategy we prioritize initiatives aimed at children, who represent 90% of our focus, especially in communities outside urban areas. While there are no explicit policies or statements, the company's efforts are guided by actionable targets and tangible initiatives designed to address these challenges and provide equitable healthcare access across the country. We continued the Mobile Healthcare Units program, developed in partnership with two NGOs, where we offered free healthcare services to hundreds of children from vulnerable communities, most of whom had never been examined by a doctor before. In 2024, we reached over 600 children from six Romanian communities offering them pediatric and endocrinology care.

Regina Maria avoids actions that could disrupt local communities, such as dislocating people to establish healthcare facilities. The only potential negative impact might stem from opening blood sample collection points on the first floors of residential buildings, but this is carefully managed to minimize interference with the local community and was not deemed material during our assessment.

Processes for engaging with affected communities about impacts

Regina Maria engages with affected communities, particularly vulnerable groups, primarily through partnerships with NGOs. When engaging with communities without established NGO connections, the process is more challenging. For general communities, the company uses multiple communication channels, including email, social media, apps, and participation in Facebook groups.

We collaborate with several NGOs, such as the Casa Buna Association, Teach for Romania, and Junior Achievement, for long-term projects and initiatives. The CEO and the Sustainability Team are responsible for deciding which NGOs to partner with and approving related projects on a yearly basis. During 2024, we have provided financial and in-kind sponsorships to NGOs amounting to more than 1 million EUR.

Our flagship project is the mobile healthcare units project developed in collaboration with NGOs. Regular meetings are held to identify community needs, with NGOs providing insights on which communities should be prioritized. Once needs are identified and approved, we work closely with community points of contact to explain the initiative and ensure legal and operational requirements are met. High engagement levels between the company and these contacts are essential for the project's success.

The CEO plays a pivotal role in these efforts, driving investment decisions and ensuring alignment with annual targets, such as the number of impacted locations, budget allocations, and the reach of the initiatives. The Sustainability Team is tasked with implementing engagement processes and maintaining partnerships. The effectiveness is assessed based on annual targets for locations, budget, and impacted people, as well as feedback from NGOs and community representatives.

Communities' Economic, Social, and Cultural Rights

Processes to remediate negative impacts and channels for affected communities to raise concerns

All communities can raise concerns about our potential negative impacts through our feedback system, which is open to any individual and is easily accessible through our website support page with a feedback form, email address (feedback@reginamaria.ro), a mobile app feedback feature, social media private messaging, and a call center with a dedicated team. Serious issues involve multiple stakeholders for resolution. All feedback received through these channels is registered, tracked, and addressed by the Customer Experience Team, and if an issue cannot be resolved at this level, it is escalated to a superior. The call center is supported by hundreds of members, alongside a smaller, specialized team focused on enhancing the customer journey and strategy.

Communities' Economic, Social, and Cultural Rights - Management of impacts, risks and opportunities

IRO	TYPE	VALUE CHAIN	TIME HORIZON	DESCRIPTION	RELATED POLICIES
Training academies, NGO collaboration and workforce retention	Actual positive impact	Own operations, downstream	Long-term	By offering training academies, collaborating with NGOs, and investing in workforce retention, Regina Maria strengthens local economies, expands career pathways, ensures reliable healthcare access, and effectively addresses marginalized groups' needs—driving more inclusive and resilient communities.	Training Procedure, Customer and Patient Experience Academy Procedure, Compensation and Benefits Manual
People skills training for staff	Potential positive impact	Own operations	Medium-term	Ensuring healthcare workers are sensitive to the cultural needs of affected communities - need to train 'people skills'.	Customer and Patient Experience Academy Procedure, Anti-discrimination and Anti-harassment Policy

Communities' Economic, Social, and Cultural Rights

Regina Maria contributes to long-term healthcare quality by continuously training staff and ensuring their retention through performance-driven compensation. The Training Procedure provides a standardized framework for assessing training needs, developing an annual professional development plan, and facilitating both internal and external learning opportunities. Respectful communication and professionalism are core expectations for all patient-facing staff, the Customer and Patient Experience Academy Procedure provides onboarding for newly hired Front Desk Patient Specialists. It focuses on technical and procedural knowledge, communication skills, and role-specific competencies. Trainees are evaluated through structured tests and manager assessments.

To retain staff, Regina Maria uses a structured pay system defined in the Compensation and Benefits Manual, which includes annual performance-based salary reviews, recognition bonus, and standardized wage intervals across job categories. These measures help ensure continuity in service delivery and strengthen the company's ability to respond to long-term healthcare needs.

These practices are reinforced by Regina Maria's Human Rights Policy, which affirms the company's commitment to equality, non-discrimination, and the fair treatment of all patients and employees. Additionally, the Anti-discrimination and Anti-harassment Policy establishes definitions for discrimination, outlines preventive responsibilities for managers, and includes procedures for reporting and addressing complaints in both employee and patient contexts.

While we do not have policies that specifically address our collaboration with NGOs, we are constantly partnering to drive positive impacts in the Romanian communities.

Policies related to communities' economic, social, and cultural rights

Policy name: Training Procedure

Key contents related to communities' economic, social, and cultural rights:

Defines the training planning cycle, identifies yearly development needs, and regulates access to both internal and external learning resources. Includes rules on eligibility, approvals, and performance-linked professional growth. For further details, please refer to the [Training Procedure](#).



Communities' Economic, Social, and Cultural Rights

Policy name: Customer & Patient Experience Academy Program

The Customer & Patient Experience Academy Program establishes a structured framework for training new employees hired as Front Desk Patient Specialists at Regina Maria. Its main objectives are to ensure that employees acquire the necessary knowledge to perform their roles effectively, align with company policies and values, and deliver high-quality patient interactions. The policy outlines recruitment, onboarding, training, and assessment processes, with a focus on communication skills, procedural adherence, and technical proficiency. Monitoring is conducted through structured evaluations, including theoretical tests, practical assessments, and manager observations.

Key contents related to communities' economic, social, and cultural rights

Onboarding and technical training for new front desk employees, covering communication, documentation handling, and operational procedures. Includes multiple evaluations and a 3-week program structure, soft skills modules focused on patient communication, empathy, and handling difficult interactions. It is part of a broader onboarding framework for non-medical staff.

Scope: front desk patient specialists working in outpatient clinics, imaging divisions, and collection points in Bucharest

Value chain: own operations

Most senior level accountable: HR Director

Availability: internally on our policies platform for all employees

Last updated: January 2024

Policy name: Anti-discrimination and Anti-harassment Policy

Key contents related to communities' economic, social, and cultural rights

Prohibits discriminatory conduct based on protected characteristics (sex, ethnicity, age, religion, disability, etc.); includes reporting and remediation procedures.

For further details, please refer to the [Anti-discrimination and Anti-harassment Policy](#).



Communities' Economic, Social, and Cultural Rights

Actions related to communities' economic, social, and cultural rights

Staff training is a key enabler of this impact. Through our Personal Development Strategy, we systematically identify learning needs and provide structured development opportunities for both medical and administrative personnel. In 2024, we continued to implement training programs focused on clinical skills, operational standards, and soft skills such as empathy, communication, and conflict management. These sessions are critical for enhancing patient experience and ensuring that our teams are equipped to respond sensitively to the needs of all individuals, including those from underrepresented or marginalized communities.

The Customer and Patient Experience Academy plays a vital role in this effort by delivering targeted onboarding training for newly recruited Front Desk Patient Specialists. These training programs include modules on respectful communication, non-discriminatory conduct, and managing complex interactions. The onboarding process is structured and assessed through both theoretical testing and real-time observation, ensuring consistency across our facilities.

Although we do not yet have a formal policy governing our partnerships with NGOs, these collaborations remain an important vehicle for delivering community benefits. We regularly engage in joint actions to improve access to healthcare services for vulnerable groups, including children in underserved areas through the Mobile Healthcare Units project.

Targets related to communities' economic, social, and cultural rights

By 2027, we aim to implement soft skills training modules focused on communication with marginalized and underrepresented communities in all reception and administrative units within Bucharest, with a phased expansion to national facilities by 2027.

We also plan to provide difficult situation communication ability training sessions for at least 50% of our front-line workforce (Contact Center and Reception) by 2026.

Social S4 - Consumers and End-Users

All consumers and end-users who may be materially impacted by Regina Maria's services are included in the scope of this disclosure. The company serves a diverse and nationwide client base through outpatient clinics, hospitals, laboratories, imaging centers, and collection points across Romania. The impacted consumers include individual patients (both with and without medical subscriptions), corporate clients and their employees, and vulnerable groups such as rural residents and patients with limited access to medical specialists. During 2024, we had 1,773,669 unique patients and 13,000 companies subscribed to our services.

Regina Maria's services are concentrated in Romania, and as such, all material impacts on consumers and end-users occur within the national territory. Through its digital platforms—such as the Regina Maria mobile app the company enables transparent access to medical information, supporting informed decision-making and empowering patients to actively manage their healthcare. This platform is available to all patients and subscribers, ensuring wide accessibility to both urban and rural users.

Additionally, preventive health campaigns, ethical marketing practices, and subscription models tailored to individual and corporate needs contribute to reducing health inequalities. Regina Maria promotes a patient-centered approach, as reflected in internal policy frameworks such as the Internal Regulation, Code of Ethics, and the Anti-harassment and Anti-discrimination Policy, which emphasize clarity in patient communication, respect, and non-discrimination in the provision of healthcare services.

Patients may also be affected during public health emergencies or service disruptions. Regina Maria addresses such scenarios through the Business Impact Analysis (BIA), which identifies infectious disease outbreaks as a key

risk with the potential to influence service availability and stakeholder trust. This preparedness strategy ensures that critical operations and patient-facing services remain resilient under adverse conditions.

Processes for engaging with consumers and end-users about impacts

Regina Maria considers end-users and customers in its strategy and business model, with a strong focus on patient experience. Decisions are made with the patients' safety, service quality, and overall experience in mind. The company has two key departments dedicated to this: the Patient and Customer Experience Division, which handles both complaints and requests, and the Customer Experience Team, focused on managing complaints. There is also a Corporate Accounts Department with 10 employees and a Quality Department that collaborates with the Call Center to ensure high standards are met. The Call Center handles around 250,000 calls monthly, with Mondays being the busiest day, recording up to 17,000 calls, and 10,000 on Sundays. The employees in these departments have a direct impact on customer satisfaction and experience.

Regina Maria follows a clear procedure for managing complaints, which includes several channels for patient feedback: phone, email, feedback forms, and satisfaction surveys sent after each visit. If a patient's rating is below a threshold, an automatic complaint is raised, with the patient being contacted for further clarification. The company emphasizes patient satisfaction and applies principles aimed at preventing future complaints and educating patients. These measures align with human rights principles and ensure that negative impacts are addressed effectively.

Our Material Impacts, Risks, and Opportunities

Processes for remediating negative impacts and channels for consumers and end-users to raise concerns

Regina Maria has effective processes in place to remediate negative impacts on consumers and end users. We have a structured approach to provide remedies when material negative impacts are identified, including monitoring KPIs such as promptness, the percentage of visits where doctors are late, and the percentage of blood test results sent on time. Specific channels for consumers to raise concerns include feedback cards at locations and QR codes at reception, ensuring customers can easily express their concerns.

The Management Committee receives monthly feedback on patient experiences. Recurrent meetings are held monthly with Directors, where complaints are discussed, categorized, and action plans are produced for the top three categories of complaints. The company assesses the effectiveness of this engagement by tracking the decrease in the number of complaints and monitoring the ratio of visits to complaints, including complaints in the Net Promoter Score (NPS).

Furthermore, a cybersecurity drill is conducted to prepare the Call Centre department for potential issues, helping to ensure that feedback and concerns are addressed effectively.

Access to (quality) information - Management of impacts, risks and opportunities

IRO	TYPE	VALUE CHAIN	TIME HORIZON	DESCRIPTION	RELATED POLICIES
Online medical records, preventive outreach and health information	Actual positive impact	Own operations, downstream	Long-term	By offering online medical record access, personalized preventive outreach, and comprehensive health information, Regina Maria enhances patient transparency, empowers informed decision-making, and ultimately fosters greater trust.	Confidential Data Access, Respecting Patient's Rights

Access to (quality information)

Regina Maria supports informed decision-making and patient empowerment through digital access to medical records, preventive healthcare communication, and comprehensive health-related education. Ensuring that patients receive transparent, accurate, and timely information not only improves trust but also supports better health outcomes. These practices are grounded in our commitment to data protection and ethical standards, particularly through the enforcement of strict information security and patient confidentiality rules outlined in our policies.

We offer a mobile app as well as an account section on our website that helps our patients manage their medical appointments and access their medical history, test results, and medical recommendations. And we also have an account portal that provides electronic medical records, online bill payment, and appointment scheduling among others.

Policies related to access to (quality) information

Policy name: Confidential Data Access Policy

Key contents related to access to (quality) information: The policy ensures that personal data is processed lawfully, transparently, and fairly, safeguarded against loss or destruction, and properly archived in accordance with applicable regulations. It applies to all personal data operation processes regarding patients.

Scope: all employees and patients in all Regina Maria's locations

Value chain: own operations and downstream patients and families

Most senior level accountable: Quality and Safety Manager and DPO

Availability: internally on our policies platform for all employees

Third party standards: Romanian Patient Rights Law 46/2003, EU GDPR 2016/679, JCI Accreditation Standards for Hospitals, and Order 1782/575/2006

Last updated: June 2023

Policy name: Policy on Respecting Patient's Rights

One of the most emphasized rights in the healthcare provider's patient rights policy is the right to medical information. This includes clear, timely, and accurate communication about the patient's medical condition, treatment options, risks, and services available. The policy also details the right to a second medical opinion and ensures access to personal data in compliance with the GDPR.

Access to (quality information)

Key contents related to access to (quality information):

The right to receive clear and personalized medical information, information provided at every step, including before procedures, during hospitalization, and at discharge, consent-based sharing of information with family members and third parties, structured guidance on how to request a second opinion and obtain medical records, and privacy, data protection and patient access to their own records.

Scope: all employees and back-up employees working for Regina Maria in all premises

Value chain: own operations and downstream patients and families

Most senior level accountable: COO with oversight from the CEO

Availability: internally on our policies platform for all employees, information for patients is also publicly displayed and shared via official Regina Maria channels

Third party standards: Romanian Patient Rights Law 46/2003, EU GDPR 2016/679, JCI Accreditation Standards for Hospitals, and national accreditation guidelines Ordinul 446/2017

Last updated: July 2024

Actions related to access to quality information

In 2024, Regina Maria continued to expand the use of its digital health platforms, including “Clinica Virtuală” and the mobile application, offering patients access to test results, consultations, and preventive recommendations. Preventive outreach was enhanced through targeted SMS/email campaigns for vaccination reminders, screenings, and chronic disease monitoring.

The user experience (UX) interface was updated to improve clarity, navigation, and trust. At the same time, NPS (Net Promoter Score) is actively monitored across units to ensure that patients are satisfied with the information and services they receive.

Targets related to access to quality information

By **2030**, we plan to use AI to optimize reception processes, automated scheduling options for additional tests or for consultations immediately after the visit to the doctor.

We also plan to increase medical literacy in the general population, by raising awareness of the importance of prevention and a healthy lifestyle through our free educational platform: <https://www.reginamaria.ro/articole-medicale>.

Patient Privacy

Patient Privacy - Management of impacts, risks and opportunities

Regina Maria strengthens patient trust and medical safety by ensuring timely and confidential communication of critical imaging and laboratory results. The Critical Result Reporting Procedure sets a clear framework for identifying and reporting life-threatening findings from clinical and paraclinical investigations. The procedure ensures that this sensitive information reaches the responsible medical professional, or in outpatient settings, the patient within a maximum of 30 minutes of validation.

Communication is strictly limited to authorized personnel, and the process is documented in dedicated critical result registers. Additionally, the procedure includes correct data handling. Patient data is treated confidentially throughout the process, in alignment with GDPR obligations and internal standards.

IRO	TYPE	VALUE CHAIN	TIME HORIZON	DESCRIPTION	RELATED POLICIES
Reporting transparency	Opportunity	Own operations, downstream	Long-term	Improved transparency through enhanced reporting can build trust with stakeholders and attract new clients who value accountability.	Critical Result Reporting Procedure

Patient Privacy

Policies related to patient privacy

Policy name: Critical Result Reporting Procedure

Key contents related to patient privacy:

Clear definition of critical results and clinical importance, identification and responsibility of authorized personnel for communicating and receiving such results, documentation of all steps in critical result registers, privacy safeguards and escalation protocols, and audit of communication timeliness during internal quality evaluations.

Scope: Applied in all of our hospitals imaging and laboratory departments, relevant for medical staff, inpatients and outpatients

Value chain: own operations and downstream patients

Most senior level accountable: Medical Director

Availability: internally on our policies platform for all employees

Third party standards: Aligned with JCI Patient Safety Goals

Last updated: October 2021

Actions related to privacy

Our current framework is governed by the Critical Result Reporting Procedure, which ensures that any urgent or life-threatening imaging and laboratory findings are communicated swiftly to the appropriate medical professional or directly to the patient in outpatient settings. Critical results are now reported within 30 minutes in 92% of eligible cases, thanks to clear escalation protocols and data management workflows

The procedure is currently implemented in the imaging and laboratory departments of all hospitals, where it is supported by clear documentation practices, including the use of critical result registers and periodic audits of reporting times. All patient data associated with critical results is handled in full compliance with GDPR and internal confidentiality policies.

Targets related to privacy

By 2030, Regina Maria aims to ensure that 95% of all validated critical results are communicated within 30 minutes across all hospitals and outpatient units in the network. Progress will be tracked through audit logs and internal quality review cycles.

Patient Health and Safety

Patient health and safety - Management of impacts, risks and opportunities

Regina Maria's adherence to international quality standards, such as the Joint Commission International (JCI) accreditation obtained by multiple hospitals within the network, underscores its commitment to patient safety and high-quality care. This attests the compliance with rigorous parameters, including high level of medical safety, low complication rates, efficiency and effectiveness of medical care, as well as the level of cooperation among medical teams. We currently have 22 facilities accredited with the JCI standard. To obtain the accreditation, 240 quality standards and over one thousand KPIs have been evaluated. This is an ongoing process that happens periodically and currently we have a 98% conformity rate.

We also follow a continuous renewal process through which older facilities are gradually replaced with newer ones that comply with updated safety

regulations and environmental criteria.

We prioritize patient safety through rigorous quality management systems, continual infrastructure upgrades, and standardized medical protocols. The network ensures that its facilities are maintained to high operational standards, and it conducts regular internal audits, evaluations, and risk assessments to uphold safety and clinical performance. According to the Quality Plan and the Maintenance and Facility Management Policy, facility safety is ensured through scheduled maintenance, verification of medical equipment, and contingency planning for utilities, including backup generators and water systems.

Medical quality is monitored through a comprehensive set of quality indicators (e.g., incident rates, response times, waiting times) listed in Quality Indicators Annex, while incident monitoring and root cause analysis are regulated under the Reporting and Incident Analysis Procedure

IRO	TYPE	VALUE CHAIN	TIME HORIZON	DESCRIPTION	RELATED POLICIES
Patient safety	Actual positive impact	Own operations, downstream	Long-term	By maintaining state-of-the-art facilities, delivering high-quality care, and providing rapid treatment access, Regina Maria enhances patient safety and outcomes—ensuring prompt, effective care in critical situations.	Maintenance and Facility Management Policy
Safety protocols	Opportunity	Own operations, downstream	Long-term	By implementing robust safety protocols and expanding quality care to underserved communities, Regina Maria boosts patient confidence, attracts new clients, and solidifies its reputation as both a reliable and socially responsible healthcare provider.	Reporting and Incident Analysis Procedure, Prevention and Control of HAI

Patient Health and Safety

Policies related to health and safety

Policy name: Reporting and Incident Analysis Procedure

Key contents related patient health and safety:

Establishes mandatory procedures for reporting and documenting incidents, near-misses, and adverse events affecting patient care. Includes detailed responsibilities for incident evaluation, classification by severity, and root cause analysis. The policy requires action plans and follow-ups to prevent recurrence

Scope: All Regina Maria units where patient care is delivered, including hospitals, clinics, imaging, and laboratories.

Value chain: Own operations

Most senior level accountable: Quality & Patient Safety Manager

Availability: Internally available in the policy management system

Third party standards: Aligned with JCI accreditation standards and Romanian Order 446/2017

Last updated: October 2023

Policy name: Prevention and Control of Healthcare-Associated Infections

Key contents related to patient health and safety:

Defines the structure and operational measures used to prevent and control infections associated with medical procedures within Regina Maria units. It outlines the responsibilities of the infection prevention team, the use of evidence-based prevention bundles (e.g., for catheter use, surgery), and protocols for hygiene, antisepsis, and disinfection. The policy emphasizes staff training and continuous monitoring of compliance with standard precautions such as hand hygiene, the use of personal protective equipment, and environmental cleaning. Infection risk evaluations are conducted regularly, and the outcomes are used to guide yearly.

Scope: Inpatient departments, ICUs, operating rooms, and outpatient facilities.

Value chain: Own operations

Most senior level accountable: Medical Director, Infection Control Committee

Availability: Internally available in the policy management system

Third party standards: Compliant with Romanian Order 1101/2016, ECDC guidelines, and JCI standards

Last updated: 2022

Patient Health and Safety

Policy name: Maintenance and Facility Management Policy

Key contents related to patient health and safety:

Regulates the technical maintenance and facility management activities necessary to ensure safe and functional environments across Regina Maria medical units. By ensuring that buildings and equipment remain fully operational and safe, this policy directly supports uninterrupted access to care and contributes to patient and staff safety. For further details, please refer to the [Maintenance and Facility Management Policy](#).



Actions related to patient health and safety

In 2024, we continued to expand our JCI-accredited network, reaching a total of 4 accredited facilities, each meeting over 240 standards and more than 1,000 indicators. In 2024, both Cluj Hospital and the Bucharest Central Laboratory were accredited. We also reached 11 ANMCS 2nd level accreditations, and 4 Surgical Review Corporation Accreditations.

To support this high standard, we maintained a rolling investment program focused on upgrading critical infrastructure and medical technology. Through our Maintenance and Facility Management Policy, we implemented scheduled checks and preventive maintenance on life-support systems, power and water infrastructure, fire safety mechanisms, and HVAC systems across all locations.

Clinically, patient safety is supported through rigorous monitoring of incident rates, adverse events, and infection risks. The Reporting and Incident Analysis Procedure standardizes the response to near-misses and clinical complications, including mandatory root cause analyses, action planning, and regular incident trend reviews. In parallel, our infection prevention policies guide hospital hygiene protocols, antiseptic procedures, and the use of evidence-based bundles to prevent healthcare-associated infections, including catheter-related bloodstream infections and surgical site infections.

Patient Health and Safety

Targets related to patient health and safety

We will maintain the surgical site infection rate (SSI) at or below 0.5% across all applicable facilities, as tracked by our infection prevention teams and reported quarterly through internal dashboards.

By 2030, we aim to obtain or renew JCI accreditation for all eligible facilities (inpatient, outpatient, imaging, and laboratory) in the Regina Maria network.

In 2024 we reached a 91% hand hygiene compliance rate, which is above the 88% average for Europe. Our target is to reach a 95% hand hygiene compliance rate by 2030 making sure that all our followed JCI indicators are at 95% or higher.



Non-discrimination

Non-discrimination - Management of impacts, risks and opportunities

IRO	TYPE	VALUE CHAIN	TIME HORIZON	DESCRIPTION	RELATED POLICIES
Non-discrimination training	Potential positive impact	Own operations, downstream	Long-term	By training staff to serve diverse cultural and ethnic groups and offering direct specialist access, Regina Maria promotes equitable healthcare, ensuring no community is marginalized.	Anti-harassment and Anti-discrimination Policy, Human Rights Policy

As a private healthcare network serving a diverse Romanian population, we acknowledge the importance of ensuring that every patient—regardless of ethnicity, gender, age, or background—receives compassionate, respectful, and equal treatment. While formal diversity training is not yet standardized across all employee groups, the Human Rights Policy and Anti-Harassment and Anti-Discrimination Policy articulate clear principles that support inclusive care delivery and prohibit any form of discriminatory behavior.

Policies related to non-discrimination

Policy name: Anti-harassment and Anti-discrimination Policy

The Anti-Harassment and Anti-Discrimination Policy defines and prohibits all forms of direct and indirect discrimination, including on grounds of race, ethnicity, national origin, sex, age, religion, disability, sexual orientation, and political opinion.

Key contents related to non-discrimination:

The policy clearly defines direct and indirect discrimination, harassment, victimization, and instruction to discriminate. Applies not only to employment but also to interactions with patients, colleagues, and third parties. Establishes a confidential complaint procedure and guarantees protection against retaliation for those who report discriminatory behavior. Reinforces the organization's obligation to inform and educate employees about their responsibilities regarding respectful and inclusive behavior. For further details, please refer to the [Anti-harassment and Anti-discrimination Policy](#).

Non-discrimination

Policy name: Human Rights Policy

The Human Rights Policy highlights Regina Maria's long-term commitment to diversity, equity, and inclusion, explicitly stating that employees are recruited, hired, trained, compensated, and promoted based on merit and skills, without discrimination. These principles apply to our approach to patients as well.

Key contents related to non-discrimination:

The policy prohibits all forms of direct or indirect discrimination in recruitment, training, promotions, and day-to-day operations. Special emphasis is placed on the importance of equal treatment for both employees and external parties, reinforcing that discrimination or harassment based on protected characteristics will not be tolerated.

Scope: All Regina Maria employees and collaborators, regardless of contract type (permanent, temporary, consultant), as well as in interactions with patients, business partners, and suppliers.

Value chain: Own operations and indirectly upstream and downstream through partner and patient interactions.

Most senior level accountable: CEO, with oversight from the HR Director and Legal Director.

Availability: Internally available on the Regina Maria policy platform and accessible to all employees.

Third party standards: Aligned with the Romanian Labour Code (Law 53/2003), Law 202/2002 on equal opportunities, Law 167/2020 on discrimination prevention, ILO Core Conventions, and the UN Guiding Principles on Business and Human Rights.

Last updated: April 2024

Actions related to non-discrimination

While formal diversity training is not yet standardized across all categories of personnel, in 2024 we initiated an important step in this direction by launching empathy training for doctors. The training began in September 2024 and focuses on communication, sensitivity to cultural and social backgrounds, and managing complex patient interactions. At the end of the year, 55 doctors have received empathic communication training.

Targets related to non-discrimination

2025 Goal: Expand empathy training to 100 doctors in patient-facing roles, prioritizing specialties requiring sensitive communication.

2030 Goal: Provide annual anti-discrimination and inclusive communication training to 80% of employees, with progress tracked via HR systems, patient feedback, and performance evaluations.

Responsible Marketing Practices

Responsible Marketing Practices - Management of impacts, risks and opportunities

IRO	TYPE	VALUE CHAIN	TIME HORIZON	DESCRIPTION	RELATED POLICIES
Preventive care promotion	Actual positive impact	Own operations, downstream	Long-term	By promoting preventive care and ensuring transparent treatment information, Regina Maria's ethical marketing empowers consumers to make informed decisions and fosters better health outcomes.	Internal Regulation

Regina Maria positions ethical communication and patient education as central elements of its service model. In both preventive campaigns and service promotion, we emphasize transparency, accuracy, and accessibility of medical information. Through our medical subscriptions and communication practices, we encourage patients to make informed decisions about their health and we constantly promote preventive check-ups as a cornerstone of long-term well-being. Additionally, in cases where information provided during a consultation is found to be incorrect or misleading, we offer compensation, either through a refund or a free consultation with a different doctor.

Policies related to responsible marketing practices

Policy name: Internal Regulation

The Internal Regulation clearly states that all communication—whether internal or directed toward patients—must be simple, structured, and respectful. Marketing messages reflect the company's values, aiming to inform rather than manipulate, and prioritize truthfulness over exaggeration.

Key contents related to responsible marketing practices:

It outlines principles for internal communication that reflect Regina Maria's broader approach to public and patient communication. It emphasizes clear, responsible, and values-based messaging, stating that all communications should be truthful, respectful, and aligned with legal requirements.

For further details, please refer to the [Internal Regulation](#).

Responsible Marketing Practices

Actions related to responsible marketing practices

In 2024, we continued to promote preventive care through targeted outreach campaigns, educational articles, and printed brochures distributed across our facilities. These materials emphasize the importance of regular check-ups, early diagnosis, and healthy lifestyle choices. We also offer dedicated subscription packages that focus exclusively on preventive services, helping patients access consultations, screenings, and diagnostics at reduced costs. All promotional content is reviewed for compliance with our values and ethical communication principles defined in the Internal Regulation.

Targets related to responsible marketing practices

By 2030, Regina Maria will ensure that 100% of marketing materials, including brochures, emails, digital campaigns, and subscription descriptions, are reviewed for compliance with internal ethical communication standards. These reviews will be documented through the centralized content validation process.



Public Perception and Reputation

Public perception and reputation - Management of impacts, risks and opportunities

IRO	TYPE	VALUE CHAIN	TIME HORIZON	DESCRIPTION	RELATED POLICIES
Disease outbreaks	Risk	Own operations, downstream	Short-term	Infectious disease outbreaks may disrupt services and impact patient safety, creating negative public perception of Regina Maria's preparedness.	Business Impact Analysis, Emergency Continuity Plan, COVID Protocols, Infection Risk Management Plan, Isolation Guide
Service quality and subscription diversity	Opportunity	Own operations, downstream	Long-term	By improving service quality, adaptability and subscription diversity, Regina Maria strengthens its reputation, expands its customer base, boosts revenue, and reinforces trust through patient-focused care and innovation.	Feedback Management Procedure, Quality Plan

Infectious disease outbreaks in a healthcare setting can have severe consequences, including patient harm, service disruptions, increased mortality rates, and regulatory scrutiny. Public trust in Regina Maria's ability to manage health crises could be significantly impacted, leading to major reputational damage. Additionally, operational strain and financial costs associated with outbreak containment efforts could be substantial. While Regina Maria has robust infection control protocols, vaccination policies, and emergency preparedness plans, the unpredictability of emerging infectious diseases (e.g., COVID-19, influenza outbreaks, or hospital-acquired infections) makes this a moderately likely risk. Increased global mobility and antibiotic resistance trends further heighten the risk of disease transmission within healthcare environments.

Regina Maria has established a structured emergency response system to ensure patient safety and maintain operational continuity in the event of infectious disease outbreaks. This is documented in the Business Impact Analysis and the Emergency Continuity Plan, which detail critical service recovery, resource allocation, and continuity priorities. The Isolation Guide regulates patient zoning and protective protocols, while the COVID-19 Protocols set isolation measures, PPE usage, and triage workflows. The Annual Infection Risk Management Plan outlines proactive measures for infection prevention, surveillance, and response.

Public Perception and Reputation

To reinforce our reputation as a patient-centered provider, we actively monitor service quality. The Feedback Management Process standardizes how feedback, complaints, and suggestions are collected, validated, and addressed across the network. Satisfaction levels are tracked in real-time through the Net Promoter Score (NPS) on the Qlik platform, which informs operational adjustments. These processes are overseen through the Quality Plan and a system of internal indicators, which track timeliness, communication, safety, and resolution of incidents. This offers us the opportunity of continuous improvement and enhancing our image as a reliable and responsive medical provider.

Policies related to public perception and reputation

Policy name: Business Impact Analysis

Key contents related to public perception and reputation:

The Business Impact Analysis specifically recognizes pandemic outbreaks as a critical risk scenario that may impact both patient safety and public trust. It outlines a contingency framework that includes implementing remote work where possible, applying special in-location measures based on the latest pandemic experience, and activating centralized response protocols. The BIA also evaluates the public health and reputational consequences of such disruptions and integrates them into the overall business continuity strategy.

Scope: all employees and facilities

Value chain: own operations

Most senior level accountable: Chief Operating Officer

Availability: internally on our policies platform for all managers

Third party standards: none

Last updated: March 2024



Public Perception and Reputation

Policy name: Emergency Continuity Plan

Key contents related to public perception and reputation:

The Emergency Continuity Plan outlines Regina Maria's preparedness and response framework in the event of critical disruptions such as pandemics, natural disasters, infrastructure failures, and other emergencies. It identifies the essential services that must be maintained under any circumstance, classifies critical functions (e.g., triage, intensive care, patient registration, diagnostic services), and assigns continuity roles and responsible personnel. It provides detailed recovery timelines for various operational units, including patient care, logistics, utilities, and IT systems. The plan includes contact lists, escalation procedures, communication channels with public authorities, and reference to annexes for specific scenarios such as epidemics or mass casualty events. Activation and deactivation procedures are defined for different phases of emergency response.

Scope: applies to all hospitals; applies to all medical, administrative, and support units of each of Regina Maria's hospitals

Value chain: own operations

Most senior level accountable: Hospital Director and Emergency Response Coordinator

Availability: internally on our policies platform for all managers

Last updated: October 2023

Policy name: Feedback Management Procedure

Key contents related to public perception and reputation:

Defines how feedback is collected and categorized; ensures follow-up actions and systemic improvements; includes NPS tracking in Qlik with access for unit managers and headquarters.

Scope: All Regina Maria facilities with direct patient interaction

Value chain: own operations and downstream patients

Most senior level accountable: Quality and Patient Experience Team

Availability: integrated into internal dashboards and reviewed monthly

Third party standards: NPS and ANMCS satisfaction monitoring criteria

Last updated: January 2025



Public Perception and Reputation

Actions related to public perception and reputation

In 2024, these frameworks were reinforced by updated procedures for emergency role allocation, triage readiness, utility continuity, and coordination with public authorities. Regular internal audits and infection risk evaluations were also carried out to verify compliance with evolving safety regulations. Additionally, we maintained the implementation of the Emergency Continuity Plan in all of our hospitals, ensuring network-wide alignment in critical response capabilities.

Net Promoter Score (NPS) metrics are monitored in real time through our Qlik dashboard and reviewed monthly by local managers and the Quality team, which was at 85% during 2024. Insights from this feedback process directly inform service improvements and communication strategies.

In 2024, Regina Maria enhanced emergency readiness and began expanding its Continuity Plan network-wide. An 85% NPS, tracked in real time, guided ongoing service and communication improvements.

Targets related to public perception and reputation

Throughout the 2025–2030 period, we will aim to maintain an NPS score of at least 85% across all patient-facing divisions, measured continuously via the Qlik platform.





GOVERNANCE

Strong ethics, smart leadership — building trust through
transparent and **accountable** governance.



Regina Maria at
a Glance

ESG Foundations and
Reporting Approach

Environmental
Responsibility

Social
Responsibility

**Ethical
Governance**

ESRS
Content Index

Business Conduct

Role of administrative, management and supervisory bodies related to business conduct

Board's Supervisory Role

The Management Committee provides top-level oversight by approving and supervising strategic direction, risk management, and compliance with ethical standards. It ensures high-level accountability, safeguarding the Group's integrity and reputation.

Executive Management Committee

Led by the CEO, senior executives meet once a week and translate the Board's directives into daily operations, fostering a culture of ethics and adherence to regulations. The Committee is composed of the: CEO, COO, CFO, HR Director, Legal Director, Marketing and PR Director, Subscription Division Director, Strategic Business Development Director, Business Processes Management Director, Medical Quality and Safety Director, Business Divisions Directors, and the Control and Financial Reporting Director.

Dedicated Ethics Committee

The Ethics Committee addresses and resolves ethical dilemmas, maintaining a code of conduct that reflects input from legal, HR, and medical representatives. It promotes uniform application of integrity principles across all levels of the organization.

Internal Audit Committee

The Audit Committee oversees financial controls, compliance, and risk management, identifying potential misconduct and recommending corrective actions. The Committee meets twice a year and is composed of the: CEO, COO, CFO, Legal Director, and Internal Auditor.

Sustainability Committee

The Sustainability Manager proposes responsible business practices for operations by monitoring environmental, social, and governance matters, aligning strategy with ethical standards. The Committee meets once every three months, or more often if required and is composed of the: CEO, HR Director, Legal and Corporate Affairs Director, Marketing Director, Sustainability Manager, Procurement Director, Stock and Fleet Director, Facility and Safety Director, and Medical Quality and Safety Director.

Clear Roles and Procedures

A group-wide organizational chart defines decision-making limits, accountability, and reporting lines. The matrix structure ensures thorough oversight at both local and functional levels, reinforcing consistent, ethical, and transparent operations.



Business Conduct

Expertise of administrative, management and supervisory bodies on business conduct matters

The members of Regina Maria's administrative, management, and supervisory bodies collectively demonstrate substantial expertise in areas relevant to business conduct. Their backgrounds emphasize governance, finance, risk management, healthcare operations, and compliance. An overview of their collective experience is provided below; further details regarding individual professional qualifications may be found through Regina Maria's internal communications or upon request.

Business and Financial Expertise

CEO and CFO: hold experience in financial management, strategic planning, and the governance of complex organizations. Legal Department and other Executives: Complement the financial expertise of the CEO and CFO by ensuring strict compliance with regulatory frameworks, including healthcare regulations, labor laws, and sector-specific requirements.

Governance and Risk Management

Internal Audit Committee: Composed of top-level executives (CEO, COO, CFO, Legal Director) and internal/external audit representatives, this committee regularly assesses internal controls, business conduct policies, and ethical standards. In doing so, it monitors compliance with both national and international regulations while recommending improvements and corrective measures.

Ethics and ESG Committees: Led by individuals with in-depth knowledge of corporate governance and sustainability principles, these bodies guide the ethical, environmental, and social dimensions of the company, ensuring that governance structures remain transparent and robust.

Continuous Development

To remain updated on emerging compliance, governance, and risk-management challenges, senior leaders and committee members engage with external experts and participate in ongoing training programs, including legal, regulatory, and sustainability workshops. These initiatives bolster Regina Maria's capacity to navigate evolving healthcare and business conduct requirements, reinforcing the Group's broader commitment to ethical and responsible operations.



Business Conduct and Corporate Culture

Business Conduct and Corporate Culture - Management of impacts, risks and opportunities

Business conduct and corporate culture are essential for fostering trust, upholding ethical practices, and guiding consistent, value-driven decision-making at Regina Maria. The organization is committed to honesty, integrity, and fairness, in line with its Code of Ethics, which clarifies the duties and responsibilities of managers and employees toward patients, colleagues, business partners, public authorities, and the broader community.

Building on these principles, Regina Maria identifies key Impacts, Risks, and Opportunities (IROs) related to its business conduct and corporate culture. Dedicated policies—aligned with the Code of Ethics and the organization’s governance practices—are in place to prevent misconduct, protect stakeholder interests, and maintain high standards of patient care and workplace integrity. This framework ensures that Regina Maria’s commitment to ethical conduct is consistently applied, reinforcing trust and reputation across all levels of the organization.

IRO	TYPE	VALUE CHAIN	TIME HORIZON	DESCRIPTION	RELATED POLICIES
Transparent Reporting	Actual positive impact	Own Operations	Long-Term	Publishing detailed environmental impact reports builds trust and compliance	Internal Regulation
Data protection	Risk	Own Operations	Medium - Term	Cybersecurity risks could lead to data breaches, eroding patient trust and impacting Regina Maria’s public image	IT Policy, Information Security
Enhancing trust and credibility	Opportunity	Own Operations	Medium - Term	By expanding into emerging markets, forming academic partnerships, and implementing reliable systems, Regina Maria strengthens its credibility, broadens access to care, and enhances stakeholder trust.	Performance Management Policy
Whistleblower protection	Potential positive impact	Own Operations	Medium - Term	Updated whistleblower policies encourage reporting of unethical practices.	Internal Regulation

Business Conduct and Corporate Culture

Policies related to Business Conduct and Corporate Culture

Policy name: Internal Regulation Policy

Key contents related to business conduct: The Internal Regulation Policy (RI) is an integral part of each employee's obligations at Regina Maria. It applies to all companies within the Group, consisting of Centrul Medical Unirea SRL and its directly or indirectly owned subsidiaries. Newly incorporated businesses and their employees become subject to the Internal Regulation as soon as they sign their employment or transfer offer.

The Internal Regulation Policy has been developed in line with Regina Maria's internal values, principles, and rules set by its CEO, the Internal Regulation also adheres to key legislative requirements

Alongside its annexes, the Internal Regulation forms a binding component of every employee's Individual Employment Contract.

Striking a balance between legal formality and RM's day-to-day culture, this policy is designed to be friendly, accessible, and easy to understand. It mixes informal language—reflecting RM's desire for an everyday, approachable tone—with procedural guidelines that ensure top-quality medical services, and legal references that safeguard patient and employee safety. Through this approach, the Internal Regulation provides clarity on the mandatory rules, norms of conduct, and broader vision that unify the Regina Maria Group.

For further details, please refer to the [Internal Regulation](#).

Policy name: IT Policy

Key contents related to business conduct: The IT Policy requires all employees to follow strict login credentials, avoid sharing passwords, and store patient data only in secured, approved drives of the company network. Employees are required to protect both digital and printed confidential data, with procedures for password renewal, physical workstation security, and secure use of laptops and USB drives.

Scope: all employees, collaborators, and partners working for Regina Maria in all premises

Value chain: own operations, upstream security practices, and downstream patient impact

Most senior level accountable: Business Processes Manager

Availability: internally on our policies platform for all employees

Third party standards: none

Last updated: July 2023

Business Conduct and Corporate Culture

Policy name: Information Security Policy

Key contents related to business conduct: the policy ensures that data is processed confidentially, with integrity, and is available. The policy ensures that all information systems and data are protected from unauthorized access, use, modification, and destruction.

Scope: all employees, collaborators, and partners

Value chain: own operations, upstream and downstream

Most senior level accountable: IT Security Manager, Business Processes Manager

Availability: internally on our policies platform for all employees

Third party standards: ISO/CEI 27001:2018, ISO/CEI 27002:2013, network and information systems security Law 362/2018, and the Information Security Management Manual M-SMSI 3rd edition.

Last updated: July 2023

Policy name: Performance Management Program

Key contents related to corporate culture: Regina Maria's Performance Management Policy establishes the organization's fundamental purpose and guiding aspirations, with the motto "Mai buni decât ieri!" (Better than Yesterday). This principle consolidates the company's commitment to delivering performant medical services while maintaining a focus on genuine care and empathy, entrepreneurial collaborations, and a culture of integrity. By providing continuous learning experience at every level, Regina Maria encourages personal development, shared knowledge, and innovation thus ensuring that each employee is both empowered and accountable. This approach drives the consistent improvement of patient care and positions the organization to excel in today's dynamic healthcare environment.

For further details, please refer to the [Performance Management Program](#).



Business Conduct and Corporate Culture

Actions related to business conduct and corporate culture

Periodical Internal Audits for Data Protection

We have implemented a system of regular, unannounced internal audits focused on data protection practices across all locations. These audits are complemented by ad-hoc training sessions, independent of our scheduled training calendar, ensuring continuous reinforcement of good practices. In 2024 alone, over 1,000 employees received targeted training on data protection, significantly enhancing our organizational resilience to data risks.

Our whistleblower reports channel is actively monitored to ensure that all cases are addressed appropriately and timely. Through regular case reviews, we uphold transparency and reinforce our commitment to ethical conduct. Additionally, we have initiated the update of our Whistleblower Protection Policy, aiming for its completion by the end of 2025, with full enforcement and awareness to begin in 2026.

To strengthen our ethical culture and ensure all employees feel safe to report concerns, we are launching a comprehensive awareness initiative focused on our Whistleblower Protection Policy. This campaign will include targeted internal communications, short-format training modules accessible to all staff, and dedicated training sessions for managers. These actions aim to clarify reporting procedures, emphasize confidentiality, and reinforce non-retaliation principles. The full implementation of this program is planned to be completed by the end of 2026.

Targets related to business conduct and corporate culture

By the end of 2025, Regina Maria will publish a full Sustainability report for all facilities, using 2022 as the baseline when reporting was still partial. Aligned with the Greenhouse Gas Protocol, Corporate Sustainability Reporting Directive (CSRD) and the European Sustainability Reporting Standards (ESRS), this goal covers GHG emissions, social impacts and risks and as well as corporate governance impacts and risks. This comprehensive report will be developed further to include additional pressing matters that Regina Maria will tackle in the years to come while tracking progress against the current targets.

To ensure data protection and maintain trust, Regina Maria aims for zero major data breaches by 2027, following ISO/IEC 27001 standards. This includes all information systems, with 2020 as the baseline when partial safeguards were in place. Stakeholders like IT teams, data protection officers, and patient representatives are involved in achieving this goal. Should regulations change, Regina Maria will disclose updates, and annual audits will monitor performance.

Regina Maria is committed to achieving full compliance with the EU Whistleblower Directive by the end of 2026. Our objective is to ensure 100% workforce awareness of the whistleblower policy, which applies to all employees, contractors, and suppliers. The policy provides clear and accessible reporting channels and is supported by annual surveys to measure awareness and engagement. An important enhancement to the policy is the commitment to acknowledge all whistleblower reports within 48 hours, a significant improvement from the previous 7-day timeframe. New training programs will be introduced across all organizational levels, with tailored modules for managers. Any significant changes to the policy or approach will be transparently disclosed, and annual updates will detail progress toward our awareness targets.

Corporate Culture

Regina Maria's organizational culture is grounded in a clear mission "helping people become healthier"—and is built on five core values: Impact, Entrepreneurial Collaboration, Care for People, Continuous Learning, and Integrity. From induction onward, employees learn to provide patients and colleagues with positive experiences by combining active listening, empathy, and solution-oriented thinking. Managers—known as "Managerii Reginei" (Queen's Managers) — play a central role in sustaining this culture by modeling desired behaviors, delivering transparent feedback, and reinforcing high standards of professional excellence.

Visible symbols, such as the logo, marketing materials, and social media pages, introduce newcomers and external audiences to the culture. Through a structured performance management system, Regina Maria evaluates how employees uphold its values and addresses any behaviors that undermine its ethical or collaborative ethos. This integrated approach ensures that patients consistently experience respectful, high-quality care, and that employees remain committed to learning, collaboration, and a "better than yesterday" mindset.

Regina Maria prioritizes integrity as a core value and has created clear procedures for detecting and responding to conduct that violates either the law or the company's internal rules.



Overview of our main mechanisms and policies:

Codes of professional and organizational ethics

- Medical staff (doctors, nurses, pharmacists, psychologists) follow a professional code of deontology, issued by their respective professional bodies (College of Physicians).
- Regina Maria's Code of Ethics, part of the Employee Handbook, applies to all employees and collaborators, ensuring consistent ethical standards.

Dedicated ethical committees

- Ethics Committees operate at the hospital level, governed by their own regulations.
- A Group-Level Ethics Committee and a Medical Consultative Committee oversee company-wide ethical matters. They review reported violations and recommend corrective actions as necessary.

Anti-Bribery and Anti-Corruption Policy

- Included in the Employee Handbook, this policy aims to discourage, prevent, and detect bribery and corruption.
- It clarifies each individual's responsibilities for maintaining legal compliance and maintaining Regina Maria's zero-tolerance stance on unethical conduct.

Corporate Culture

Reporting Channels

Dedicated email addresses:

integritate@reginamaria.ro: Serves as the primary channel for reporting issues related to ethics and integrity—such as suspected corruption, fraud, harassment, or discrimination. This inbox is monitored by the HR Committee or a designated Ethics body, ensuring a confidential and focused review.

comitet.hr@reginamaria.ro: Allows employees to escalate significant workplace concerns that could not be resolved with their direct manager. By providing a higher-level route, this channel ensures fair consideration of issues and avoids potential conflicts of interest.

nepasadeoameni@reginamaria.ro: Although initially created for cases in which employees need moral, financial, or operational support, it also acts as a safety valve for broader issues that might otherwise remain unreported. All messages sent here are treated with sensitivity and confidentiality.



Community Voice (Vocea Comunitatii) section:

Accessible via the internal website (www.comunitateareginamaria.ro), this platform's "Community's Voice" section gives employees a structured way to submit proposals, file complaints, and raise concerns. Submissions are categorized and routed to the relevant department or committee, streamlining the review process.

Investigation and resolution

Submitted reports are reviewed by the appropriate body, such as the HR Committee, Ethics Committee, or the Medical Consultative Committee, ensuring a thorough investigation. Where necessary, disciplinary measures or further corrective steps are taken to uphold Regina Maria's high ethical standards.

Regina Maria's Anti-Bribery and Anti-Corruption Policy sets out clear processes for promptly, independently, and objectively investigating alleged business misconduct.

Zero-Tolerance stance

The Policy explicitly states Regina Maria's zero-tolerance for all forms of bribery and corruption. This non-negotiable standard applies to all employees, contractors, and any third parties acting on the company's behalf.

Defined responsibilities and oversight

Designated Investigatory Bodies: Depending on the nature of the incident, relevant committees (e.g., HR Committee, Ethics Committee, Disciplinary Committee) are involved to ensure objective evaluation.

Corporate Culture

Clear investigation steps

- Risk Identification: Employees must report any suspicious activity to their direct supervisor.
- Documentation and Record-Keeping: All concerns—especially around gifts, hospitality, or potential unethical transactions—are logged in a dedicated registry to facilitate transparent evidence gathering.
- Independence: Investigations are escalated to appropriate senior staff or committees not directly involved in the reported incident, ensuring an unbiased approach.

Prompt inquiry and corrective measures

The Policy calls for immediate review of reported incidents. This includes collecting relevant information, interviewing involved parties, and consulting legal experts when necessary. If misconduct is confirmed, Regina Maria takes swift disciplinary or corrective action.

Regular monitoring and periodic reviews

The Policy is subject to formal review at least every two years—or sooner if new risks emerge—to maintain effectiveness and compliance.

Audit procedures

Internal audits periodically verify that processes and controls remain robust, further improving Regina Maria's capacity to handle suspected corruption cases impartially and effectively.

Regina Maria's Anti-Bribery and Anti-Corruption Policy identifies three primary risk areas that expose the organization to potential acts of bribery or corrupt practices:

Gifts and hospitality

This includes offering or receiving gifts, meals, entertainment, or travel. While some gestures may be acceptable business practices, they become high-risk if they exceed proportional limits, involve influential stakeholders, or create an appearance of undue influence.

Relationships with agents (third parties)

Any collaboration with external agents, suppliers, consultants, or contractors can pose elevated risk if they act on the company's behalf without proper oversight. Such arrangements require clear contractual obligations and consistent monitoring to ensure compliance with anti-corruption standards.

Transactions

Negotiations, contract awards, invoicing, and financial transactions may invite unethical practices—particularly where public or private officials are involved and corporate oversight is insufficient.

Performance Metrics related to business conduct

According to the reported data for 2024, there were zero incidents of corruption or bribery within Regina Maria's operations. This includes zero confirmed cases among its own employees, with no need for disciplinary measures, dismissals, or contract terminations due to unethical practices. Furthermore, the organization did not refer any corruption or bribery investigations to law enforcement.

Training for prevention and detection of fraud in 2024	Number of Employees	Percentage
Course completed	85	90.43%
Course in progress	6	6.38%
Course not started	3	3.00%
Total employees in management positions	94	100%

Out of 94 management-level employees, 85 (90.43%) have completed the self-paced online mandatory Prevention and Detection of Fraud training, while 6 (6.38%) are currently in progress and 3 (3%) have not yet begun. The high percentage of completion shows that Regina Maria has a strong engagement with the training initiative. The remaining employees who are still in progress or have not started will be encouraged to finalize their training promptly, ensuring that all management staff are equipped with the necessary knowledge to identify and address potential fraud risks.



Management of Relationship with Suppliers

Management of relationship with suppliers - Management of impacts, risks and opportunities

At Regina Maria, managing relationships with suppliers is a key component of our operational and strategic approach. We work closely with a broad network of providers—ranging from medical equipment manufacturers and pharmaceutical suppliers to various service contractors—to ensure safe, high-quality healthcare delivery. By maintaining transparent, mutually beneficial partnerships, we safeguard continuity of supply for critical consumables, medical equipment, and other essential goods and services, thus supporting our mission of offering top-tier patient care.

The following table presents the identified Impacts, Risks, or Opportunities (IROs) associated with Regina Maria's management of relationships with suppliers and the corresponding policies that address them, aligning with the Group's commitment to keeping fair, transparent, and long-lasting supplier relationships.

IRO	TYPE	VALUE CHAIN	TIME HORIZON	DESCRIPTION	RELATED POLICIES
ESG compliant suppliers	Potential positive impact	Own Operations	Long-Term	All new supplier contracts include mandatory ESG compliance clauses.	Procurement Procedure

Management of Relationship with Suppliers

Policies related to management of relationship with suppliers

Policy name: Procurement Procedure

Key contents related to relationship with suppliers:

Regina Maria's Procurement Procedure establishes transparent criteria for supplier selection, procurement processes, and contract management. By applying these criteria such as quality, price, operational compliance, and ethical standards, Regina Maria ensures a fair, competitive approach to contracting goods and services essential to healthcare delivery. The policy promotes long-term supplier relationships based on ethical procurement practices and continuous performance monitoring. This ongoing evaluation is supported by supplier assessments, structured contract management, and controlled approvals for procurement documents. Our evaluation currently takes into account these following main topics: quality, pricing, delivery time, and customer support.

Scope:

The procurement policy guidelines apply to all divisions and departments within Regina Maria, both medical and non-medical acquisitions. They govern relationships with suppliers operating locally or internationally, ensuring uniform standards of compliance, quality, and accountability across the healthcare network. Whether for specialized medical devices, consumables, or auxiliary services, all procurement activities follow a consistent, transparent process.

Value chain: own operations, upstream procurement practices

Most senior level accountable: Procurement Manager, Procurement, Stock and Fleet Director, Director of Quality and Patient Safety

Availability: internally on our policies platform for all relevant employees: procurement teams, department managers, and executive leadership

Third party standards: none

Last updated: October 2023

Managing Supply Chain Risks: In its role as a healthcare provider, Regina Maria must ensure the traceability and integrity of medical supplies, pharmaceuticals, and equipment. The company's internal procedures, backed by supplier evaluations, ensure alignment with mandatory safety measures and regulatory guidelines. As a result, while the medical field is highly regulated, Regina Maria's sourcing and oversight minimize the likelihood of encountering disruptive supply chain risks.

Management of Relationship with Suppliers

Actions related to management of relationship with suppliers

Supplier Evaluation. Screening of key suppliers during the procurement process to ensure compliance with ethical standards, including confirming they do not engage in corruption or anti-competitive behavior, and they are not included on any international sanctions list.

Contract Management. Ensuring all contracts are adhered to, particularly in regard to payment terms, to promote fair and responsible supplier relationships.

Payment Timeliness Monitoring. Robust mechanism in place to monitor and enforce timely payments to suppliers according to contractual terms.

As mentioned in our S2 - Workers in the value chain chapter of our report, we are currently in the process of creating a Supplier Code of Conduct that will include ESG requirements. This code of conduct will create a list of requirements for all suppliers, thus helping us identify and work only with compliant ones. As part of our commitment to responsible sourcing and ethical business practices, Regina Maria will update all supplier contracts to include dedicated sustainability clauses by the end of 2026. These clauses will specifically address key areas such as human rights, particularly the prohibition of child labor and environmental responsibility. This measure aims to strengthen accountability across our supply chain and align our procurement practices with international sustainability standards.

Targets related to management of relationship with suppliers

By the end of 2026, Regina Maria will develop and implement a comprehensive Supplier Code of Conduct addressing key sustainability practices such as anti-corruption, labor standards, human rights, and environmental stewardship. The objective is for 100% of key suppliers to sign and comply with these provisions, using 2024 as the baseline year (when sustainability requirements were minimal). Progress will be monitored annually through internal audits and supplier self-assessments.

To maintain strong supplier relationships and financial integrity, Regina Maria commits to a 100% on-time payment rate across all supplier invoices, resolving any delays within 30 days.

Regina Maria integrates standardized fair-payment clauses and anti-corruption provisions into 100% of new or renewed supplier contracts, reinforcing ethical conduct throughout its supply chain. Progress is tracked by monitoring the share of updated contracts each quarter and confirming that legal and procurement teams follow these requirements.

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ESRS

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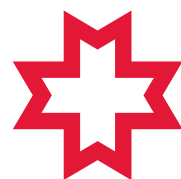
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