



Pihlajalinna

HUMAN RIGHTS PRINCIPLES



Pihlajalinna's human rights principles

These human rights principle describes how Pihlajalinna fulfils its obligation to respect human rights and implement continuous human rights due diligence, and how Pihlajalinna promotes stakeholder cooperation, corrective measures and the available grievance mechanisms. Pihlajalinna's human rights principles have been created in cooperation with internal and external expert groups, and they are available to all stakeholders.

Human rights due diligence

The duty of care regarding human rights is included in the UN Guiding Principles on Business and Human Rights. This means that companies must identify, prevent and mitigate adverse human rights impacts caused by their operations and address them. In accordance with the UN Guiding Principles Concerning Business and Human Rights, Pihlajalinna aims to fulfil its duty of care in human rights issues as part of the company's decision-making process.

Based on the principle of continuous development, the due diligence process helps to identify current and potential impacts on people and to address any shortcomings immediately. Corrective processes support the principle and enable the respect and implementation of human rights as part of the operations.

Pihlajalinna's human rights due diligence process covers the following measures:

- Identifying the most important actual and potential human rights issues
- Taking action and preventive measures
- Monitoring, mitigation and control
- Communicating, reporting and training on impacts

1. Commitment

Public commitment to practices that respect human rights

2. Human rights due diligence process

An ongoing due diligence process helps to identify current and potential impacts on people.

- 2.1. Identify key human rights issues
- 2.2. Taking action and prevention
- 2.3. Monitoring, mitigation and control
- 2.4. Communication, reporting and training

3. Remedial actions

Remediation of direct or indirect effects

Identification and assessment of Pihlajalinna's human rights impacts

In accordance with its duty of due diligence, Pihlajalinna has identified that, as a significant health and social care operator, it has potential and actual impacts on human rights and their realisation, both directly and indirectly through its value chain. Direct human rights impacts are related, in particular, to personnel and customers. Indirect impacts are targeted at employees in the supply chain. Pihlajalinna is also aware that, in addition to positive human rights impacts, there are human rights risks throughout the value chain, including its own business and supply chain. By increasing awareness and understanding within the entire organisation and maintaining an active dialogue with stakeholders, it is possible to address any shortcomings at a sufficient level and find the best means of remediation.

Potential adverse human rights impacts are impacts that Pihlajalinna may cause through its own operations, contribute to directly or through an external actor, or Pihlajalinna may be connected with the party causing the impact through business operations or some other contact.

Pihlajalinna's most material human rights impacts			
Value chain	Customers	In-house personnel	Supply chain
Human rights	• Security of services • Privacy • Right to self-determination • Equality and non-discrimination • Accessibility of services	• Occupational health and safety (physical and psychological) • Privacy • Equality and non-discrimination • Right to private life • Protection of young workers	• Occupational health and safety • Child/forced labour • Living wage • Labour rights • Working hours • Freedom of association
Affected areas	Business operations in Finland, international customers	Employees in Finland, international recruitment	Global supply chains

Pihlajalinna has identified its key human rights impacts through an assessment process. The most important factor in the assessment is the severity of the human rights risks, which comprises the scale, extent and remediability of the impacts, and the probability of the human rights risk.

The **scale** indicates the significance of the impact, the **extent** describes the scope of the impact and the **remediability** explains how easy or difficult it is to return to the situation that prevailed before the negative impact. Remediability is always assessed from the point of view of the person affected.

The human rights risk assessment is reviewed regularly and is part of the continuous development of operations. This ensures that the assessment reflects any changes in the business environment.

Defining measures and preventing risks

Pihlajalinna addresses all observations of possible adverse human rights impacts and any illegal activities that are contrary to its values and agreements. Clear processes help to handle matters systematically so that human rights violations can be addressed and corrective measures can be taken immediately. Targeted measures to minimise and prevent negative impacts are defined for all the most critical potential and actual human rights impacts.

Monitoring, mitigation and control

Pihlajalinna continuously develops its operations. The company uses internal and external feedback channels and surveys that enable monitoring the realisation of human rights and compliance in different areas of operations.

Regular Pulse and DEI surveys for **personnel** help to monitor the impact of actions and identify potential areas for development. The company's goal is an excellent personnel experience. This is pursued by purposefully developing work community skills, leadership and occupational safety, treating experts equally and fairly and by creating a framework for personal and professional growth.

The feedback channels and surveys are used to identify problems related to discrimination, bullying and/or harassment in the units. An extensive personnel survey is carried out once a year, supplemented by two smaller pulse surveys. Every Pihlajalinna employee is responsible for monitoring wellbeing at work and working conditions, ensuring safety and addressing problems. Pihlajalinna has a reporting system for personnel to report any occupational safety deviations they observe and their concerns. At Pihlajalinna, the management of occupational safety is aimed at maintaining a healthy and safe working environment and the effective prevention of accidents through training and the improvement of operating practices, for example.

Regional and company-specific cooperation groups carry out occupational safety and health cooperation within the Group. Their key task is to ensure safe, healthy and fair working conditions and to promote the implementation of the occupational safety and health action plan. Another form of cooperation at Pihlajalinna are the Kimpassa meetings, which involve employee-elected representatives, shop stewards and the occupational safety organisation. In addition, personnel are encouraged to engage in active dialogue with supervisors or shop stewards in order to identify potential negative impacts and take corrective measures.

Customers must be treated equally and without discrimination, and everyone must have equal access to services. Pihlajalinna has identified customer groups that may have challenges in terms of, for example, the accessibility of services or the right to self-determination. Customer equality can be increased, for example, by improving the availability of services through the provision of remote services, even in areas where in-person services or the specialist in question may not be available.

The professional competence of the personnel is the foundation of patient safety. Pihlajalinna develops the professional competence of its personnel actively. The professional qualifications of employees are verified during recruitment, and all new employees are trained for their duties in accordance with an induction training programme.

Clinical quality and impact are among Pihlajalinna's key strategic priorities. Continuous development enhances dialogue with customers and other stakeholders, creates systematic structures and a measurement culture to support the management, development and monitoring of quality and efficacy to ensure safe and effective care for everyone. Pihlajalinna's quality management is based on comprehensive self-monitoring, external quality assurance and comprehensive monitoring by the authorities.

The systematic collection and processing of customer feedback enables Pihlajalinna to develop services, processes and operating models according to the customers' wishes. Customers can also submit open feedback to Pihlajalinna through feedback surveys, Pihlajalinna's self-service channels in OmaPihlajalinna and the Pihlajalinna Health App. Feedback is also collected by means of a customer feedback form on the website, a feedback survey incorporated into the online booking tool and feedback devices in treatment and service situations.

Suppliers in the supply chain must commit to Pihlajalinna's Supplier Code of Conduct. Our efforts to assess and manage the human rights impacts in the supply chain are still in their infancy, but the work is in progress and will proceed systematically over the next year. The aim is to create clear practices to ensure sufficient compliance with due diligence and to address deficiencies and initiate preventive/corrective measures. For example, suppliers must, upon request, verify the control mechanisms they use to monitor the implementation of human rights in their own operations and supply chain. In addition, suppliers must ensure that they or their supply chain are not

involved in human rights violations. In the future, third-party audits and assessments will be used more actively in order to appropriately address any adverse observations concerning human rights.

Reporting, communication and training

Pihlajalinna's **human rights commitment** and human rights **due diligence process** can be found on the pihlajalinna.fi website. The management and the sustainability working group review and assess the human rights work regularly, and related risks are addressed as part of the Group's risk management process. The assessment of adverse impacts on human rights and corrective measures are carried out as part of human rights due diligence and in cooperation between different functions. Pihlajalinna reports on the progress of its human rights work annually in the sustainability report that is part of the Board of Directors' report. Progress with the various areas of the human rights principles is communicated regularly, both internally and externally. Pihlajalinna will also develop the training it offers to its personnel and increase stakeholder dialogue on the topic.

Reporting mechanisms

Pihlajalinna has several channels through which its personnel, customers and other stakeholders can report any concerns and observations they may have.

Pihlajalinna's confidential whistleblowing channel

Via the whistleblowing channel, you can report any misconduct and shortcomings observed in the organisation. The channel is anonymous and based on a secure and encrypted service. The average processing time is approximately one month. Pihlajalinna's legal affairs unit is responsible for processing whistleblower notifications, and the company's Board of Directors monitors messages submitted via the whistleblowing channel and the actions taken in response to them. The whistleblowing channel is available on Pihlajalinna's website in Finnish, Swedish and English, and its operations will be communicated regularly to the personnel and stakeholders.

<https://pihlajalinna.ilmoituskanava.fi>

Patient matters

The wellbeing services counties and the City of Helsinki are responsible for patient ombudsperson activities, including with regard to private service providers. If the customer needs help or advice with writing a reminder, the patient ombudspersons (formerly patient ombudsmen) will help. The patient ombudsperson does not take a stand on the medical treatment decisions of patients or whether a patient injury has occurred during treatment.

According to Section 10 of the Act on the Status and Rights of Patients (785/1992), a patient who is not satisfied with the health care or medical care and the related treatment received by then has the right to submit an **objection** on the matter to the director responsible for health care in the health care unit in question. If the customer is dissatisfied with the response to the objection, they can make an official **complaint** directly to the Regional State Administrative Agency or Valvira. An official complaint is a notification of suspected misconduct or negligence that is made to a supervisory authority.

If the customer suspects a patient injury, they can submit a **patient injury notice** to the Patient Insurance Centre.

<https://www.pihlajalinna.fi/en/general-information/customer-feedback>

Pihlajalinna's Board of Directors approved the Human Rights Principles on 13 December 2024.