

Employee Code of Conduct

1. Purpose

This Code of Conduct sets binding principles for ethical, legal, and responsible behavior by all employees, contractors, and management of heyPatient AG. It reflects our commitment to protecting human dignity, promoting sustainability, and building trust with patients, customers, partners, and the public.

This Code is aligned with:

- Swiss Labor Law (Obligationenrecht, Arbeitsgesetz)
- EU General Data Protection Regulation (GDPR)
- UN Guiding Principles on Business and Human Rights
- ISO 26000 (Guidance on Social Responsibility)
- WHO Principles on Preventing Sexual Exploitation, Abuse, and Harassment (PSEAH)

2. Diversity, Inclusion & Gender Policy

heyPatient fosters a diverse, inclusive, and respectful workplace. All employees are treated fairly, regardless of gender, origin, religion, age, disability, or any other protected characteristic.

heyPatient promotes an inclusive work environment free of discrimination, intimidation, or harassment.

All employees:

- Respect gender equality and cultural diversity.
- Contribute to preventing sexual exploitation, abuse, and harassment (PSEAH).

Example: In customer or partner interactions, any inappropriate personal contact, suggestive remarks, or abuse of power for personal gain is strictly forbidden.

We maintain a **zero-tolerance policy** regarding any form of:

- Sexual exploitation
- Sexual abuse
- Sexual harassment (PSEAH)

Employees are expected to contribute to a safe, inclusive environment and report any misconduct immediately.

Suspected violations must be reported immediately to HR or a designated reporting officer.

Legal Reference:

- Swiss Federal Gender Equality Act
- WHO PSEAH Guidelines



3. Anti-Corruption Policy

Bribery, corruption, or any form of unethical business practice is strictly prohibited. Employees must:

- Never offer, promise, give, request, or accept improper advantages. In case of uncertainty (e.g. present of value below CHF 50.00) consult HR
- Avoid conflicts of interest in all professional activities.
- Report any suspected corrupt practices.

Example: Offering a discount or feature upgrade in exchange for personal favors from a hospital stakeholder is strictly prohibited.

Legal Reference:

Swiss Penal Code Art. 322 (Bribery)

4. Human Rights Policy

We respect and promote internationally recognized human rights in all our activities and partnerships. We promote fair treatment and respect in all professional and ideally also personal interactions.

Employees are expected to:

- Respect the dignity and rights of all individuals.
- Oppose all forms of forced or child labor.
- Ensure fair and safe working conditions.

Legal Reference:

- UN Global Compact
- Swiss Responsible Business Initiative Guidelines (Link)

5. Environmental Policy

heyPatient commits to environmental sustainability. We only have one mother earth. Employees are expected to act in line with heyPatient's sustainability goals:

- Minimize waste and energy consumption (e.g. travel with public transport, avoid printing)
- Use digital communication tools instead of unnecessary travel
- Follow sustainable practices in day-to-day operations.
- Support initiatives that reduce the company's environmental footprint.

Legal Reference:

- Swiss Environmental Protection Act
- EU Green Deal (Reference Framework)

6. Health and Safety Policy

Employee well-being and workplace safety are priorities:

- Employees must comply with health and safety regulations (both physical and digital workplaces).
- Occupational health issues (mental health, ergonomic risks) must be reported proactively.



Example: Regular breaks and ergonomic desk setups are encouraged, even when working remotely.

Legal Reference:

Swiss Occupational Safety and Health Protection (ArG Art. 6)

7. Data Privacy Policy

As a healthcare technology provider, heyPatient is committed to data protection by design and by default. Handle personal data confidentially and lawfully. Pls also refer to NDA clauses in working contracts.

Employees must:

- Handle all personal data (especially patient data) as confidential and follow GDPR principles:
- Lawfulness, fairness, transparency
- Data minimization
- Purpose limitation
- Integrity and confidentiality
- Report any potential data breach without delay.

Example: Sharing login credentials to the patient portal, even with a colleague, is strictly forbidden.

Legal Reference:

• GDPR (EU Regulation 2016/679)

Swiss Federal Act on Data Protection (revFADP)

- Follow internal data protection guidelines and GDPR principles.
- Report any suspected data breaches without delay.

8. Supplier Code of Conduct (SCoC)

Employees involved in supplier management must ensure that all suppliers and partners:

- Comply with heyPatient's Supplier Code of Conduct.
- Uphold ethical, environmental, and human rights standards.
- Are assessed and monitored as part of supplier due diligence processes.

9. Reporting Misconduct

Any violation of this Code must be reported through appropriate internal channels. Employees raising concerns in good faith are protected from retaliation.

10. Commitment

By adhering to this Code of Conduct, every employee contributes to a responsible, ethical, and sustainable business culture.