

**ZurRose
Group**

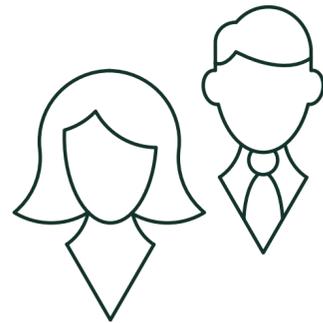
Sustainability Report 2022



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Facts & figures



Healthier People

Further therapeutic areas added to chronic care services

Over about 1 Mio. electronic prescriptions have been filled successfully in Germany

>18 Mio Drug Safety Notes sent



Caring Company

1.1% Gender pay gap in comparable positions

66 Different nationalities are employed by the Zur Rose Group.

55% of our employees are women



Sustainable Planet

172 Trees planted during Climate Action month

5,000 Solar cells installed at Heerlen location

First measurement of Scope 3 emissions



Reliable Partnerships

>150 Industry partners – the majority of them manufacturers and suppliers – attend first DocMorris Supplier Day

First Supplier Code of Conduct is currently being drafted in collaboration with industry peers

About the Zur Rose Group

The Swiss Zur Rose Group AG is Europe’s largest e-commerce pharmacy and one of the leading medical wholesalers in Switzerland. It also operates the leading marketplace in southern Europe for consumer health, beauty and personal care products commonly sold in pharmacies. The company serves several global markets, including Germany’s best-known pharmacy brand, DocMorris, and employs about 2,700 people in Switzerland, Germany, the Netherlands, Spain and France. Now serving more than 10 million active customers in core European markets, Zur Rose Group generated external revenue of CHF 1,837 million in 2022.

With its business model, Zur Rose Group offers high-quality, safe and cost-effective pharmaceutical care as well as digital services relating to marketplaces, ecosystems, technology and telemedicine. In addition, Zur Rose Group is actively establishing itself as a comprehensive healthcare service provider,

with a focus on building up and extending its European healthcare ecosystem, networking qualified providers of products, services and digital solutions. This includes its leading online pharmacy business. Its ambition is to provide customer-centred health journeys, so people are offered optimum supply and a range of medication and treatment options.

In doing so, Zur Rose Group is pursuing its vision of creating a world for everyone to manage their own health in one click.

GRI 2-1, 2-2, 2-6, 2-7

Germany

- 8.9m** active customers
- 1.1bn** CHF revenue in 2022
- #1** e-commerce pharmacy
- 65 %** DocMorris brand awareness
- 80 %** repeat order rate

Switzerland

- 490k** active customers
- 687m** CHF revenue in 2022
- #2** medical wholesaler
- #2** e-commerce pharmacy
- 54 %** Zur Rose brand awareness

Spain & France

- 1.1m** active customers
- 71m** CHF revenue in 2022
- 260k** products
- >1.5k** sellers





Foreword

Dear readers,

For all of us at Zur Rose Group, sustainable entrepreneurship and profitable growth go hand in hand. Our first Sustainability Report for the year 2021 outlined the importance of sustainability for us. With this 2022 Sustainability Report we have set ourselves ambitious and clear goals for our short- and long-term future that are intertwined with our strategy. These goals are tied to Executive Board compensation, to show our accountability in delivering value for all of our stakeholders: Employees, customers, shareholders, health partners and the communities in which we live.

Throughout 2022, we continued to work on the architecture of our sustainable future at Zur Rose Group. We have further enhanced our sustainability governance structure, to drive more accountability in day-to-day operations and within the Executive Board and Board of Directors. To that end, we have significantly enhanced our sustainability reporting, worked towards a Code of Conduct internally and externally as well as a human rights policy. Throughout our businesses we engaged in many new partnerships, improved health services for our patients and made our activities that emit emissions more efficient. During these developments we have engaged with our colleagues and have been in a fruitful dialogue with our external stakeholders.

Sustainability is a Group wide effort, where each of our four sustainability pillars go hand in hand: Healthier People, Sustainable Planet, Caring Company and Reliable Partnerships. We have set key goals for each of these pillars that are closely aligned with the Sustainable Development Goals (SDGs) of the United Nations. In 2022, we have officially

joined the United Nations Global Compact and committed to improving our sustainability reporting each year. Our sustainability goals aim to address the most pressing issues, where we as Zur Rose Group can make a difference. In 2023 and beyond, we will aim to bring our chronic care services and medication safety services to even more patients. We will reduce our direct (Scope 1) and indirect (Scope 2) greenhouse gas (GHG) emissions, working towards net neutrality. We will further institute our cultural principles to share ownership and seek consensus together as a team. In that, we will further improve our already inclusive workplace diversity. Together with our industry partners we are in the final stages of developing a Code of Conduct that we will increasingly hold our business partners accountable to.

In reading this report, we hope that you can see what has been evident since the foundation of Zur Rose Group: We strive towards making our patients' and customers' lives healthier by creating a world where everyone can manage their health in one click. For us, innovation enables sustainability. We are convinced that only in partnership with all of our stakeholders, we can achieve our mission to create a sustainable future.

Sincerely,

Walter Hess
Group CEO
GRI 2-22

2. Sustainability approach



- 2.1 Sustainability strategy**
- 2.2 Materiality analysis**
- 2.3 Committed to the Sustainable Development Goals (SDGs)**
- 2.4 New sustainability goals tied to Executive Compensation**
- 2.5 Sustainability governance structure: Further increasing relevance**

2. Sustainability approach

The sustainability approach of the Zur Rose Group (“Zur Rose”) is structured along four strategic pillars:

- Healthier People
- Sustainable Planet
- Caring Company
- Reliable Partnerships

Zur Rose’s commitment to health and well-being informs how the company views its contribution to a sustainable future. Zur Rose develops and implements measures in these fields that can intersect and holistically create well-being for people and the planet. These include responsible economic activities, social responsibility, environmental protection, and ethical business conduct – all critical for maintaining the position as a responsible citizen. As part of its ongoing stakeholder engagement, Zur Rose systematically informs its stakeholders about its corresponding performance against these four pillars.

2.1 Sustainability strategy

Zur Rose Group recognises that strategic planning and management of risks and opportunities are not just financial decisions but must encompass all parts of the business and its impacts. This includes supporting the health and well-being of people as a fundamental aspect of Zur Rose’s sustainability strategy (Healthier People). It is also important for Zur Rose to factor in the effect that its business has on the environment and climate, and to take action to protect it (Sustainable Planet). Furthermore, the strategy considers Zur Rose’s prosperity by ensuring sustainable corporate governance and accounting for any impacts on its workforce (Caring Company). Finally, Zur Rose strives to maintain healthy relationships and contribute to sustainable development collectively with its stakeholders (Reliable Partnerships).

To address these issues systematically, Zur Rose Group has developed a sustainability approach that covers responsible economic activities, social responsibility, environmental protection, and ethical business conduct.

The sustainability strategy is part of the business strategy that identifies the topics where Zur Rose Group has a considerable impact on society and the environment and, conversely, the topics that have a significant influence on the Group’s success. It also determines how Zur Rose approaches and manages its material topics (see chapter 2.2 for details about the materiality analysis). These material topics lie at the heart of the Group’s sustainability endeavours. Zur Rose considers it vital to regularly review its strategic positioning to redefine targets and to adapt to changes at an early stage, including requirements of the capital market, customer expectations or the digitalisation of the business. New legislation, product and service innovations, and the ongoing development of communication channels also require a high degree of flexibility, foresight and adaptability.

In 2022, Zur Rose refined its sustainability strategy based on the materiality assessment, sharpening its focus on carbon footprint, and diversity and inclusion. Zur Rose also revised its strategy and implementation plan to anchor the topic of sustainability more firmly across the company and to take all employees on the journey. To this end, the Group set itself firm goals that are tied to executive compensation, established internal communication on the topic and held a “Climate Action”-theme month in September (see chapter 4, „Sustainable Planet“).

2.2 Materiality analysis

To determine the most vital economic, environmental, social and governance topics for a company, it is important to view the task with a relevant perspective: a materiality analysis. The analysis develops a comprehensive list of potentially relevant material topics, and then systematically assesses their relevance from different perspectives.

Zur Rose's materiality assessment was conducted in collaboration with external experts, stakeholders as well as the Executive Board and was supported by a specialised external consultancy. For the assessment, a list of potentially relevant topics based on recognised (i) sustainability standards (including SASB and GRI Standards), (ii) criteria used in sustainability rankings, and (iii) topics addressed by peers of Zur Rose Group, was compiled and consolidated into 30 topic groups for further evaluation. These topics were then examined from 3 perspectives: relevance to the long-term business success of Zur Rose, relevance to the impact of Zur Rose's business activities on sustainable development and relevance to stakeholders' decision-making. This entailed:

- assessing the relevance of the topics to the long-term business success of Zur Rose by conducting an online survey among selected internal managers;
- assessing the impact of Zur Rose's business activities on sustainable development by interviewing experts from the field and
- assessing the relevance for stakeholders through an online survey with suppliers, employees, customers, business partners, investors and analysts internationally

Once the topics were mapped according to their materiality within these 3 parameters, they were evaluated and validated by Zur Rose's Sustainability Steering Committee.

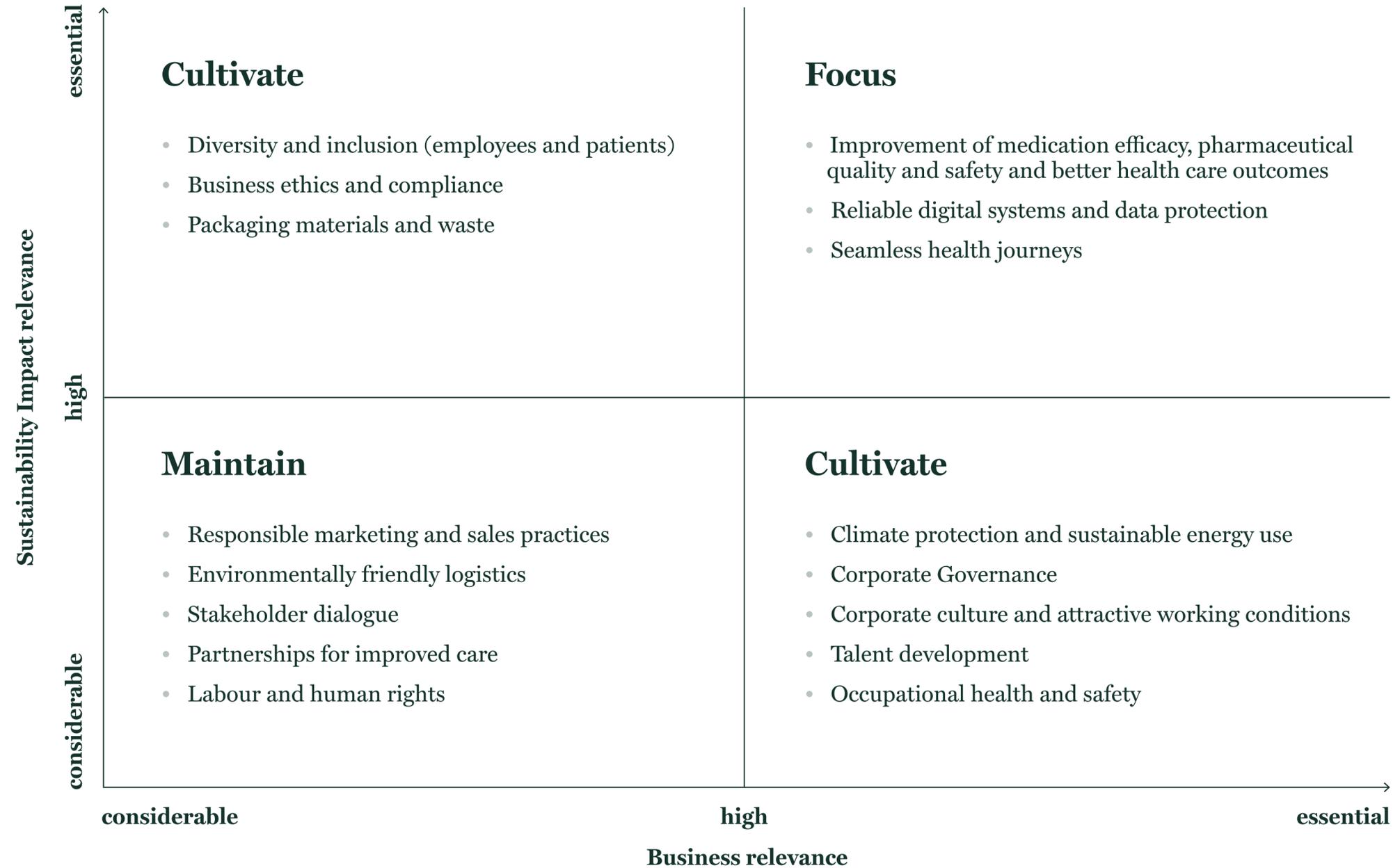
Considering the update of the GRI Standards as well as the introduction of the Corporate Responsibility Initiative (RBI) counterproposal, Zur Rose finetuned the materiality matrix in 2022 by focusing on the visualisation of the "impact" rather than on the "stakeholder" dimension. Moreover, some topics were merged to better reflect the content. The analysis resulted in the 16 material topics shown in the Focus, Cultivate and Maintain sections of the materiality matrix. They form the core of the company's strategic approach to sustainability and the focus for the content of this report.¹

As part of the materiality analysis, Zur Rose Group ensured a continuous dialogue with its stakeholders (see chapter 6, "Reliable partnerships" for more details about the stakeholder approach). The outcome of the materiality analysis was presented to and approved by the Board of Directors and the Executive Board.

GRI 2-14, 3-1, 3-2

¹ The 16 topics determined to be material include all topics that were assessed to be of the highest (vital) impact relevance, in line with the requirements of the GRI Standards.

Materiality Matrix of the Zur Rose Group GRI 3-2

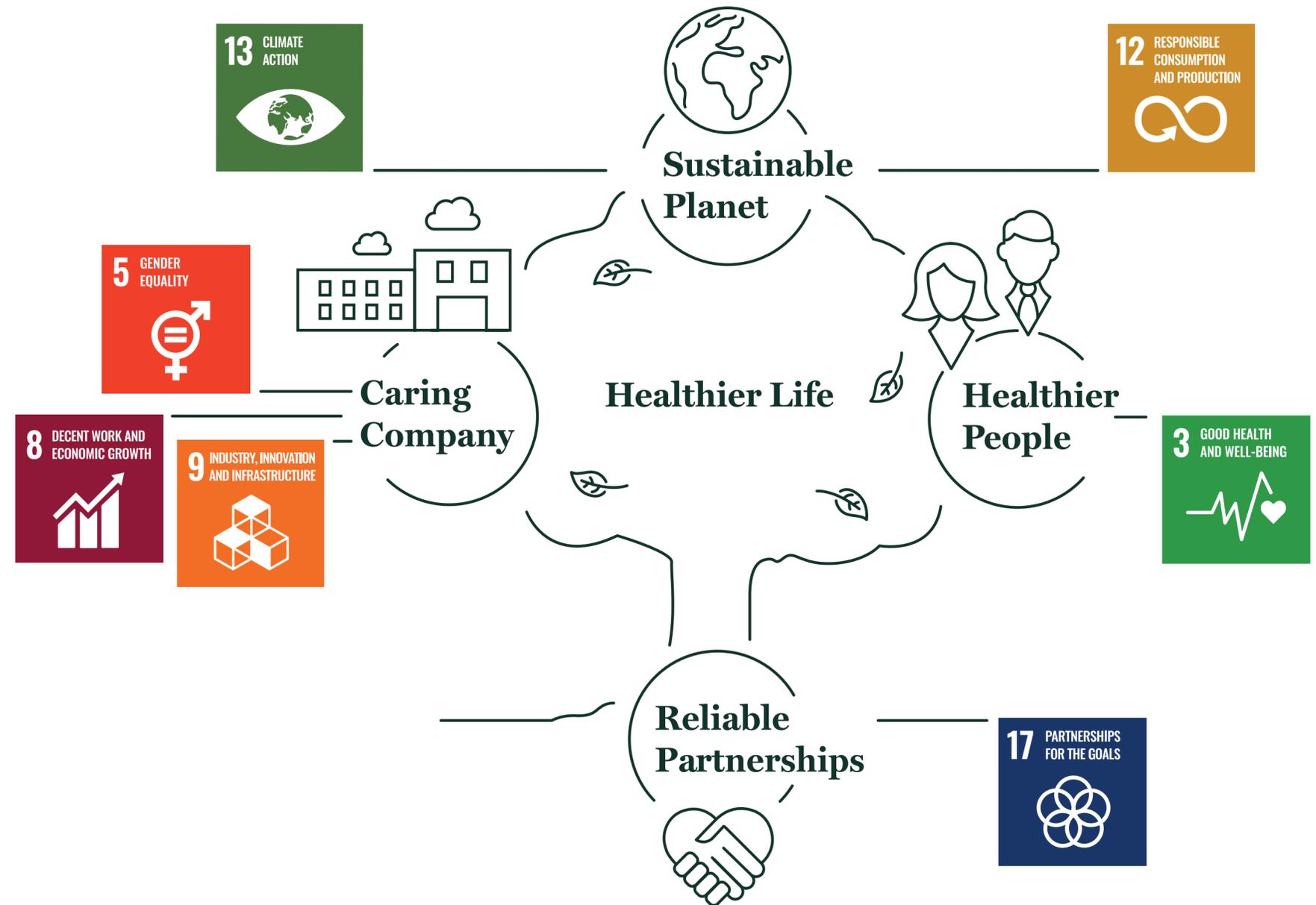


2.3 Committed to the Sustainable Development Goals (SDGs)

Zur Rose Group’s sustainability strategy is inspired by and aligned with the United Nations’ Sustainable Development Goals (SDGs), which were developed as a global blueprint to achieve a better and more sustainable future for all. While all 17 SDGs are related to the Group’s activities and impact, the company has identified seven that are most closely linked to the pillars of its sustainability strategy:

- SDG 3 Good Health and Well-Being
- SDG 5 Gender Equality
- SDG 8 Decent Work and Economic Growth
- SDG 9 Industry, Innovation and Infrastructure
- SDG 12 Responsible Consumption and Production
- SDG 13 Climate Action
- SDG 17 Partnerships

Zur Rose Group is also committed to the [United Nations Global Compact \(UNGC\)](#), the world’s largest corporate sustainability initiative with a mission to help companies align their strategies and operations with universal principles relating to human rights, labour, the environment and anti-corruption. In 2022, Zur Rose handed in its first Communication on Progress (CoP) and reiterated in its Letter of Commitment to support public accountability and transparency and to report annually on the progress made regarding the implementation of the Compact’s Ten Principles. The latter are derived from the [Universal Declaration of Human Rights](#), the [International Labour Organization’s Declaration on Fundamental Principles and Rights at Work](#), the [Rio Declaration on Environment and Development](#), and the [United Nations Convention Against Corruption](#).



2.4 New sustainability goals tied to Executive Compensation

In 2021, Zur Rose Group published its first Sustainability Report and undertook significant efforts to drive projects forward to achieve progress. Against this background and in order to strengthen responsibility at the highest level, Zur Rose Group now sets itself specific short-term, mid-term and long-term goals in each of the four strategic pillars. These goals are tied to short-term incentives (STI) of the Executive Board.

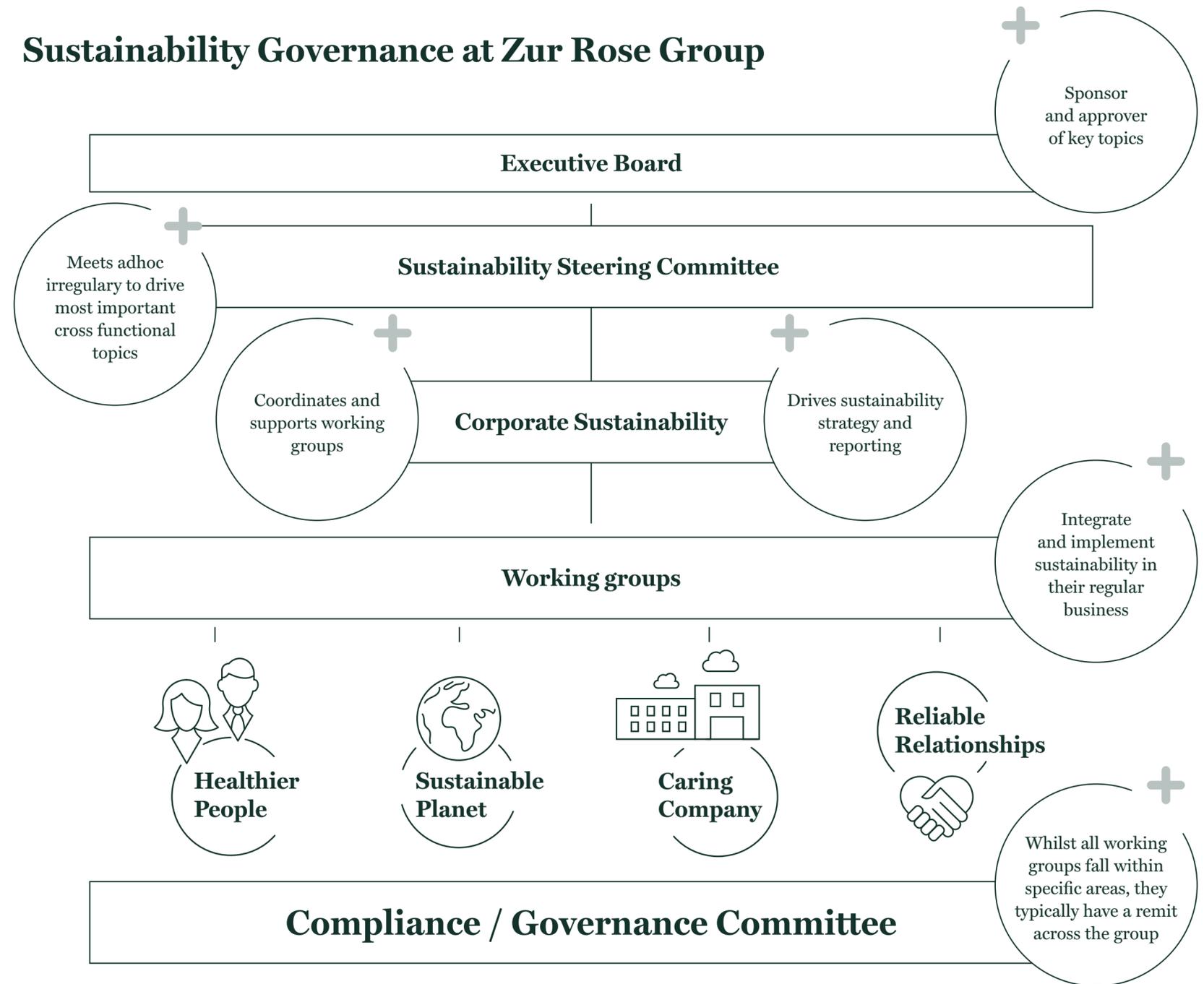
The new sustainability goals reflect the refined sustainability strategy with an enhanced focus on carbon footprint, diversity and inclusion and emphasise the strong commitment of Zur Rose Group to take action in a transparent and accountable way. As will be outlined at the beginning of the respective chapters, the main goals (see below) are complemented by further additional goals that represent key areas of focus and thus enlarge and corroborate the Group’s efforts.

2023	Mid-term	Long-term
Healthier People		
We commit to increase the number of pharmaceutical information letters. We will increase the services for chronic disease patients.	We will further expand our chronic disease services and build out our digital health ecosystem platform. As new services are launched, we will commit to specific goals.	We commit to working towards achieving our vision of enabling everyone to manage their health in one click.
Sustainable Planet		
We commit to reduce CO ₂ emissions at our sites by 4.2 % per year (Scope 1 & 2).	We commit to reduce CO ₂ emissions at our sites by 25 % until 2030 (Scope 1 & 2).	We commit to work towards net zero by 2050.
Caring Company		
We commit that > 95 % of Zur Rose Group’s management has been trained in our core cultural principles. We will reduce the gender pay gap in all major regions (Germany, Netherlands, Switzerland, Spain) to below 5 %.	We commit to train >90 % of our extended management in our core cultural principles. We will reduce the gender pay gap in all major regions (Germany, Netherlands, Switzerland, Spain) to below 3 %.	We will train all of our colleagues in our core cultural principles. We will achieve equal pay for all genders in all major regions (Germany, Netherlands, Switzerland, Spain).
Reliable Partnerships		
Finalise and publish our Supplier Code of Conduct.	75 % of our suppliers have agreed to the Supplier Code of Conduct until 2025.	All of our suppliers have agreed to the Supplier Code of Conduct by 2030.

2.5 Sustainability governance structure: Further increasing relevance

Overall responsibility for the sustainable development of Zur Rose lies with the Board of Directors and the Executive Board. Zur Rose uses its Sustainability Steering Committee as a Group-wide cross-sectional coordination body to link governance to business. The Sustainability Steering Committee reports on a regular basis about important developments to the Board of Directors and the Executive Board (i.e. regularly at the Executive Board meeting, yearly Board of Directors meeting; additional meetings with selected members of the Board of Directors and Executive Board). As part of the materiality assessment (see chapter 2.2), the material topics were presented to and approved by the Executive Board and the Board of Directors. The Chairman of the Board of Directors approves the sustainability report before publication. GRI 2-9, 2-12, 2-13, 2-14, 2-17

Sustainability Governance at Zur Rose Group



To give further importance to sustainability as a key pillar of Zur Rose Group's strategy, in 2022 the governance structure was further solidified and expanded, after the corporate sustainability function was established in 2021.

The corporate sustainability function drives the strategy and reporting as well as coordinates and supports the working groups in implementing sustainability topics in their day-to-day work across the four key pillars. The corporate sustainability function reports directly to the Executive Board.

The Sustainability Steering Committee is chaired by the Head of Corporate Sustainability. It meets around four times per annum to drive the most important cross functional topics, to ensure collaboration and to provide inspiration. It defines priorities, specifies guidelines and recommends initiatives to the Executive Board. Within their respective areas of responsibility, each Board member is responsible for sustainability.

Changes in 2022 to the sustainability governance structure were made to ensure increasing transparency and operational implementation across the Group of our sustainability strategy:

1. The Sustainability Council is now the Sustainability Steering Committee.

The Council established the sustainability function in 2020 and 2021. Its members were therefore the most senior, comprising essentially Executive Board members. To drive the strategy at an operational level, the Sustainability Steering Committee includes around ten senior management members that report to the Executive Board that are in charge of the relevant operational working groups across Zur Rose Group, such as in regions and business functions.

2. Corporate sustainability reports to the entire Group Executive Board.

Until 2022, corporate sustainability reported to the Group CEO and only on an ad hoc basis to other Board members. Starting late 2022, corporate sustainability reports regularly, at least at each board meeting, to all members.

3. The Executive Board Short Term Incentives (STI) are tied to the achievement of the sustainability goals from 2023.

Zur Rose Group believes that this governance structure enables each employee to have a regular and meaningful impact on our sustainable growth strategy and to ensure frequent and meaningful reporting on our goals.

3. Healthier people



- 3.1 Improvement of medication efficacy, pharmaceutical quality and safety and better healthcare outcomes**
- 3.2 Seamless health journeys**
- 3.3 Responsible marketing and sales practices**

3. Healthier people

Zur Rose Group’s vision is to create a world for everyone to manage their health in one click. The group envisages to enable every chronic patient to receive optimal medical care and organise their health.

Zur Rose Group embraces its role as a reliable and trustworthy interface for customers and as a provider of safe, high-quality pharmaceutical care.

Goals at a glance

Main goal		
2023	Mid-term	Long-term
We commit to increase the number of pharmaceutical information letters. We want to increase the services for chronic disease patients.	We will further expand our chronic disease services and build out our digital health ecosystem platform. As new services are launched, we will commit to specific goals.	We commit to working towards achieving our vision of enabling everyone to manage their health in one click.
Additional goals		
...that represent key areas of focus		
→ We remain below the return rate of packages of 1 %.		
→ We offer customers more possibilities to find a substitution in case of delivery problems of Over-The-Counter (OTC) medicines.		
→ We extend the number of indications available for our chronic care services.		
→ We increase the number of partnerships for chronic care services.		

3.1 Improvement of medication efficacy, pharmaceutical quality and safety and better healthcare outcomes

As Europe's largest online pharmacy, Zur Rose Group is working towards its vision by offering high-quality, safe and cost-effective pharmaceutical care. Zur Rose Group embraces its role as a reliable and trustworthy interface for patients and customers.

Achievements throughout 2022

- Increased disease awareness and access to digital health solutions and product recommendations with our chronic care services
- Successful implementation of the electronic prescription (eRx) project
- Expansion of the range of products for information letters for customers who ordered products from specific groups for the first time
- Continuation of Medi+ (digital medication assistant)
- Development of blistering services (Dailymed)
- Certified, free video consultation with medical practitioners
- Improvement of Drug Safety Management
- Online prescription request for Swiss patients

These achievements are further explained in the section below.

Therapy adherence as the backbone for medication efficacy

Digital health services, such as those provided by online pharmacies, promote higher therapy adherence and minimise medication errors and follow-up costs. To that end, Zur Rose Group aims to simplify healthcare access, improve the effectiveness of medications, and thereby ultimately create better healthcare outcomes.

GRI 203-1, GRI 203-2

Zur Rose Group strives to enhance the experience and health journeys of customers from their first interaction with the healthcare ecosystem throughout the entire journey. This translates into empowering customers with various conditions to better manage their health by providing a network of digital services and personalised treatment options that naturally fit into their lifestyle.

The pharmacies of the Group check every individual order in terms of drug safety. Various databases support these checks. In this way, potential medication errors, such as adverse interactions, can be identified and eventually avoided.

DocMorris' service is particularly useful for follow-up prescriptions: as part of its service offering to customers who participate in specific indication-related support-programmes (e.g. patients with atrial fibrillation), they proactively remind customers via telephone when it is time to obtain a new prescription.

Similarly, Zur Rose Suisse sends reminders via SMS or e-mail and additionally offers home care (i.e., drug administration at home). Zur Rose Suisse has also established a free service called Medi+ for customers of the KPT insurance (a health insurance in Switzerland), in which patients have an overview about their invoiced medication and benefit from multiple services like a dosage schedule and reminder, a prescription request service and a scan and search

feature. In 2023, medi+ services shall be expanded with more convenient information and premium features for customers. Furthermore, Zur Rose Suisse continued in 2022 their Dailymed project, which is a service that allows individual blister packaging according to the usage instructions for each patient. This service also includes coordination with the medical practitioner to receive a new prescription when needed or additional information for the patient. Using a QR-Code, machine-readable dosage instructions can be read on a smartphone. The easily readable dosage instructions, including date and time, help avoiding dosing mistakes and save time for the customer. It is planned to expand the service and the range of customers in the future.

Assurance of qualitative and safe drug therapies

There are numerous ways in which Zur Rose Group ensures that drug therapy is safe. The pharmacies check each individual order for plausibility. These include interaction, double prescription, dosage, age and gender checks. Depending on the urgency, the prescriber or customer will be contacted immediately. The pharmacies also apply maximum quantity restrictions for certain OTC medication (e.g., laxatives, nasal spray).

Additionally, information letters regarding certain indications are sent to DocMorris customers on a regular basis. DocMorris is industry-leading in creating information letters for their customers. Pharmaceutical services, for example advisory services for respiratory medication, complement the service of DocMorris. With its own pharmaceutical teams (Clinical Services and Pharma Operations) DocMorris ensures and further enhances medication safety. For example, customers receive written information about interactions of drugs, double prescriptions between medical products with the same active ingredients or active ingredients from the same group, as well as important information on the use of the medication and on potential interactions between products and food (supplements). In 2022, DocMorris sent 18 million drug safety notes (interaction checks). DocMorris also increased the number of information letters for customers who ordered products from specific groups for the first time, with more than one million sent in 2022. These include important pharmaceutical advisory information on the delivered medication. DocMorris reviews the letters continuously and adjusts them if necessary.

Zur Rose Suisse in a similar way examines the interactions between medication during the approval process of the order using health questionnaires, current prescriptions and history data.

Strict quality measures along the supply chain

Zur Rose Group applies high quality standards along its supply chain. Evaluating suppliers is an important way to determine

safe sources of supply. DocMorris tracks the steps along the supply chain – from procurement to collection at its distribution centres – to ensure the quality and safety of pharmaceutical products and conducts visual inspections of packaging and monitors expiration dates. DocMorris also ensures appropriate drug storage to guarantee safety and uses a special shipment service provider to transport medication that require refrigeration (complying with the regulations of the German AMWHV² and the European GDP³). Customer contact information is carefully kept in case of an event of a drug batch recall.

At Zur Rose Suisse, each prescription for compounding is checked for its suitability and feasibility. This process is guided by Zur Rose Suisse quality management system. The majority of the brands of Zur Rose Group (Medpex, DocMorris, Eurapon, Zur Rose Suisse) fulfil high quality standards and are ISO 9001 certified.

Clear responsibilities to support better healthcare outcomes

Zur Rose Group regularly reviews regulations that pertain to the health and safety impacts of all of its products or services and is working to further improve these outcomes. [GRI 416-1](#)

Within Zur Rose Suisse, the Head of Quality and Pharmacy is responsible for the quality aspects, while a trained pharmacist takes care of quality assurance regarding pharmaceutical decisions. The quality department oversees topics related to the ISO standards and runs the quality management system. PDCA⁴ cycles, CAPA⁵ actions, internal audits and regular meetings guarantee the provision of high product quality and safety.

Within DocMorris, the responsibility for pharmaceutical quality and associated operations lies with the chief pharmacist and pharmaceutical teams that oversee the quality of their processes. DocMorris holds quarterly PQS⁶ meetings, which include representatives from various departments involved in the supply process (e.g. chief pharmacist, logistics, purchasing, operations).

In cases of incidents of non-compliance, the responsible persons such as the Chief Pharmacy Officer for DocMorris, the Medical Director for Teleclinic or the Head of Quality and Pharmacy for Zur Rose Suisse are informed and adequate measures are taken.

² Active Pharmaceutical Ingredients and Manufacturing Ordinance (AMWHV)

³ Good Distribution Practice for the pharmaceutical industry (GDP)

⁴ Plan, do, check, act (PDCA)

⁵ Corrective and preventive (CAPA)

⁶ Pharmaceutical Quality and Safety (PQS)

3.2 Seamless health journeys

Electronic prescriptions as key enabler for a digital health ecosystem

Electronic prescriptions (eRx) were launched in Germany in the summer of 2021. The mandatory roll-out planned for January 2022 was unfortunately delayed due to regulatory reasons. The government now plans for a nationwide launch from the summer of 2023. eRx is an essential building block of the final goal of the German government's plan for end-to-end healthcare digitalisation: the fully integrated electronic health record. eRx is a crucial requirement for patients to manage their health conveniently and seamlessly online. It makes filling a prescription much easier for patients, as it is conveyed digitally to the pharmacy. This increases the convenience for the patient and saves time. Moreover, it allows for the creation of a digital medication plan, in this way it is significantly easier for physicians and pharmacists to assess the patient's medication history. For Zur Rose Group, the eRx introduction in Germany is the enabler to build the preferred digital health ecosystem. Around this, more services such as prescription reminders and further automated processes will be developed by Zur Rose Group.

In 2022, Zur Rose Suisse began automatic subsequent deliveries for permanent prescriptions in Switzerland. Furthermore, the patient is able to request new prescriptions on the website of Zur Rose Suisse and has the possibility to choose generics instead of the original medication. If the doctor approves the prescription, he sends it digitally to Zur Rose Suisse, which delivers the medication directly to the patient. The patient also receives a notification when a new prescription is needed.

A full digital journey from treatment to medication

Zur Rose Group not only supports the customer as a pharmaceutical service provider, but also cares about medical treatment with its brand TeleClinic. By advancing digitalisation, Zur Rose Group can meet customer needs faster and

more effectively, paving the way for seamless health journeys. TeleClinic offers a digital platform for practitioners and patients to allow treatments via telemedicine. It is the aim of TeleClinic to enable self-determined customers quick and comfortable access to a physician online. The introduction of the electronic prescription promotes its endeavour to provide a seamless health journey for its customers. It is expected that the provider of such services ensures a safe and easily accessible supply of medication. Healthcare increasingly relies on supporting platforms that integrate health-related data, allowing better treatment, which in turn leads to healthier people.

In 2022, TeleClinic received certifications for its video consultations, so that the costs can be covered by statutory health insurance. Furthermore, in 2022 the German government introduced electronic sick notes successfully, such that it is possible for patients to receive a legally required sick note via TeleClinic without having to leave their home. Besides, the convenience for the patient to focus on their recovery without leaving their home, this possibility prevents the contagion of other patients, which could occur in the waiting room or public transportation. In addition to treatment services, TeleClinic also works on supporting the relationship of practitioner and patient by offering direct access for already existing patient-practitioner relationships in the future.

Chronic care services at DocMorris

DocMorris continuously aims to expand its services for people living with chronic diseases or health conditions in need of medical care. It supports patients in organising their own health by bringing together high quality information on disease conditions, treatment options, access to a broad network of healthcare providers (e.g. physical doctors or telemedicine consultations), complementary and valuable digital health services (e.g. digital health apps - DIGAs in Germany that are paid for by statutory health insurance) as well as access to medication from DocMorris pharmacy to support patients along their health journeys.

On DocMorris, dedicated, indication-specific landing pages accompany consumers from the awareness of a disease, symptom checks and self-tests, through convenient solutions for medical consultation via telemedicine, to support for therapy through e-prescription services and other health services. DocMorris also offers a wide range of information on the specific indications, so it is possible to inform oneself about new therapy options, medical innovations, concomitant diseases or interrelated health topics.

Omnichannel services to maintain convenience

While digital pharmacies continue to gain popularity around the world, elderly patients remain a key demographic for Zur Rose Group. While data shows an increase in their digital habits, this target group may not be entirely comfortable with technology and digital products and services. To ensure their care experience remains seamless and convenient, Zur Rose Group continues to offer omnichannel options including phone consultations as well as mail order prescriptions.

Responsibilities for development and success of the seamless health journey are inter alia with the teams of Quality Management (Zur Rose Pharma GmbH), Consumers Team (Zur Rose Suisse), the Management Team (Teleclinic) and the units Chronic Care Solutions, Partnerships & Branding as well as Rx & Medication (DocMorris).

3.3 Responsible marketing and sales practices

Ensuring fair and transparent marketing and sales practices is crucial for Zur Rose Group. The Group is committed to provide customers with adequate and sufficient information about the positive and negative effects of its products and services.

Strong regulatory requirements with significant local differences

The pharmacy business is strongly regulated, and regulations differ from country to country. In Germany, for example, product-level advertising is not allowed for prescription medication, while limited and strictly regulated advertising for OTC products is permitted. Zur Rose Group provides important pharmaceutical information to its customers within the regulatory parameters of each country, including the positive and negative effects of individual medication and the benefits and risks of products and services.

The Group focuses outbound marketing on topics of general interest and offered services rather than on specific drugs. Marketing is more educational in nature with an emphasis on topics such as the importance of adherence to a schedule of medication. Marketing activities are reviewed and approved by the legal department before they are released to the public. Zur Rose Group regularly conducts market research to assess the success of brand awareness and uses conversion KPIs to track and report on the performance of specific campaigns.

Safe-use information

The safety of customers is of paramount importance to Zur Rose Group. Accordingly, product information can be found on the package inserts of many prescribed medicines, along with recommended dosage information. Zur Rose Group strictly complies with all regulations pertaining to its products and

services, which include safe-use information, as well as a list of the origins of the products' components and the composition of every product. All products and services are verified to comply with relevant rules and regulations. [GRI 417-1](#) In 2022, there were no incidents of non-compliance concerning product and service information and labelling. [GRI 417-2](#) Similarly, there were no incidents of non-compliance concerning marketing communications. [GRI 417-3](#)

Zur Rose Group aims to continue making its marketing more diverse to be accessible by all.

Optimised usability

Zur Rose Group further optimised usability for new and existing customers and continued communication channels such as an online chat. The Group also worked with specialists to expand the inclusivity of its digital channels to ensure access for all. Zur Rose carried on with the DocMorris blog and implemented several well received multichannel brand campaigns about the focus on holistic health management. These campaigns were centred around key months such as Mental Health Month or Veganuary (plant-based nutrition). The Group also continued to use its communication channels to raise awareness about seasonal topics such as skin care in summer and allergies in spring. Zur Rose Group aims to pursue making its marketing more diverse to be accessible by all and uses inclusive language by adherence to the current guide to inclusive language and imagery.

Looking ahead: Focus on chronic disease patients

For Zur Rose Group it is pivotal to work with highly trained medical professionals (such as pharmacists and physicians) to ensure the highest pharmaceutical quality and healthcare outcomes for its customers. There is a shortage of these professionals, to that end, Zur Rose Group offers attractive working conditions and training.

Zur Rose Group expects multiple legislative changes in the next few years across its key markets accompanied by policy shifts. Notable shifts include Germany's adaptation to electronic prescriptions and an expanded access to OTC medication. Zur Rose Group strives to offer its customers and patients

the best processes to manage their health. A recent example in 2022 are efforts to offer more possibilities for customers to find a substitution in case of delivery problems for non-prescription drugs.

Regarding the information letters for customers who ordered products from specific groups for the first time, DocMorris expanded the range of product groups for information letters by 40 %. A further expansion will lead to a higher number of information letters in 2023.

In 2023, DocMorris will continue to foster new partnerships (see chapter 6.2), with an extended and increasing number of disease areas and associated health services. DocMorris will put a particular focus on patients with chronic diseases, in order to support those people that require the most support with their health and on their way to a healthier life.

4. Sustainable planet



- 4.1 Climate protection actions in 2022 across the Group
- 4.2 Sustainable energy use with additional reporting transparency
- 4.3 Packaging materials and waste decreased due to more sustainable practices
- 4.4 Environmentally friendly logistics

4. Sustainable planet

Climate protection and the sustainable use of energy are crucial for Zur Rose Group’s long-term success. The Group’s priorities include the reduction and management of its energy consumption in operations and along the supply chain, increasing energy efficiency and optimisation, and introducing more efficient processes overall. Zur Rose’s stakeholders also prioritise climate protection and its potential influence on the Group’s business success.

Building on the substantial groundwork already achieved, Zur Rose Group now sets itself clear carbon emissions targets in the short-, mid- and long-term, which are summarised in the “New sustainability goals tied to Executive Compensation” section 2.4. While these specific, ambitious goals are the clear focus, Zur Rose Group is aware that the sustainable planet dimension is far more encompassing and efforts should not stop here.

Goals at a glance

Main goal		
2023	Mid-term	Long-term
We commit to reduce CO ₂ emissions at our sites by 4.2 % per year (Scope 1 & 2).	We commit to reduce CO ₂ emissions at our sites by 25 % until 2030 (Scope 1 & 2).	We commit to work towards net zero by 2050.

Additional goals

...that represent key areas of focus

- We commit to implement additional measures, such as...
 - Set up of a Group-wide travel policy that puts emphasis on sustainability.
 - Start of a pilot project on reusable packaging and smaller parcel sizes.
 - Further reduce filling/paper materials for shipping.
 - Reduction of paper documentation of information letters, drug safety notes and invoices in our shipments.
 - Installation of additional solar panels on our buildings where possible.
 - Raise awareness of employees via training (i.a. on efficient energy use in the office).
- We commit to further refine our measurement and data collection processes.
- We commit to work towards improving measurements of Scope 3 emissions with our external stakeholders.

4.1 Climate protection actions in 2022 across the Group

Responsibilities for environmentally friendly logistics at highest level

Zur Rose Group's Chief Operations Officer (COO) is responsible for ensuring efficient and optimal logistics processes. Each of Zur Rose Group's logistics sites has a site manager who reports to the COO regarding logistics processes and optimisations. With these measures and responsibilities, Zur Rose Group aims to reach its goal of integrating the Group's systems with ecologically friendly carriers in the upcoming years. The significance of the efforts is demonstrated by the fact that the Group's Sustainable Planet efforts are led by Zur Rose Group's Chief Operating Officer along with the Head of Corporate Sustainability.

The Group's environmental efforts have significantly advanced from an early phase in 2021. Due to an ongoing operational consolidation effort of brands into Heerlen, scale benefits are raised, also for the environment. Group-wide functions have been established to track all relevant metrics, including but not limited to: waste management and energy consumption, both in operations and offices. These efforts are a crucial component of continuous improvement processes.

Climate Action Month: Employees share 85 ideas and Zur Rose Group plants 172 trees

In 2022, Zur Rose Group advanced its roadmap by hosting a "Climate Action Month" in September to crowdsource ideas from employees throughout the whole Group on how Zur Rose Group can improve its sustainability. More than 540 participants signed up and shared more than 85 ideas, many viable for immediate testing or implementation. The ideas are reviewed by the corporate sustainability department and are then discussed with the stakeholders to assess which ideas can be implemented. For every idea, Zur Rose Group has planted two trees, in total 172

trees, with our partner, a tropical forest foundation, Oro Verde. This non-profit environmental organisation is working for intact tropical forests worldwide and plants with their ForestValues project trees in the tropical rainforest region.

Energy improvements: Solar panels, LEDs and lowered temperature

Zur Rose Group made progress in relation to its use of energy at its different sites. Various measures were implemented, thereby paving the way for further improvements in 2023 and beyond:

At the new logistics centre in Heerlen, 5,000 solar panels were added on the rooftop as a sustainability measure. DocMorris also switched to efficient LED lighting across their logistics centres.

At Zur Rose Pharma GmbH in Halle, 100 % of the energy use is sourced from green energy. Energy efficiency upgrades include efficient LEDs and skylights as well as a temperature adaptation according to the seasons and adding temperature limits on air conditioning in the office area.

At Eurapon in Bremen, the target temperature was decreased from 21 degrees to 19 degrees Celsius in order to save energy. Light supply was decreased by 50 % in the warehouse and Eurapon renounced outside lighting to save energy. Employees are obliged to switch off their screens and machines overnight. The fusion of late and early shifts in the warehouse led to 23 % savings of energy at Eurapon.

The PromoFarma team in Barcelona moved to a hybrid model with employees working from home 3 days a week, thereby reducing the impact of commuting on pollution.

TeleClinic is a remote-first company, making its operational impact minimal and reducing pollution by commuting. It is furthermore headquartered in a smart building in Munich, certified for its sustainability practices. Their business model of treatment via telemedicine additionally minimises the impact of travel emissions for patients, who do not need to leave their home for their consultation.

DocMorris' new Distribution Centre 2 in Heerlen, the Netherlands



4.2 Sustainable energy use with additional reporting transparency

In line with Zur Rose Group's efforts to improve sustainability governance, sustainability reporting has been improved. Additional Group corporate entities and buildings are now reporting waste, energy use and emissions. For the first time, Scope 3 emissions have been measured. Processes have also been further improved and automated, in order to ensure consistent reporting and sustainable decisions.

Energy Consumption increased but with higher efficiency in larger site

The total energy consumption in 2022 increased by about four per cent and electricity consumption increased by around nine per cent. This is mainly due to the launch of the new Distribution Centre 2 (DC2) in Heerlen. However, renewable energy sources increased by eight per cent. Most of the companies within Zur Rose Group use natural gas as a heating source. It is expected that the heating consumption increased slightly in 2022, mostly because of the new distribution centre in Heerlen (the final data for all sites is not yet available). The use of fuel increased significantly in 2022 compared with 2021 and 2020. In 2022, business travel resumed again. Due to the pandemic a lot of business travels ceased and were replaced with virtual meetings. **GRI 302-1**

Energy Consumption ⁷	2020	2021	2022
Total Energy Consumption in MWh	14,212	14,583	15,213
Electricity Consumption in MWh	8,002	7,818	8,548
Of which from renewable sources	272	894	967
Heat	3,233	3,623	3,002
Fuel Oil	10	0	0
Natural Gas	2,996	3,150	2,865 ⁸
District Heating	217	473	137 ⁹
Fuels	2,987	3,142	3,663
Diesel	2,435	2,613	2,774
Petrol	552	529	889

GRI 302-1

⁷ Due to improvements in data collection the previous year's figures were adjusted retrospectively.

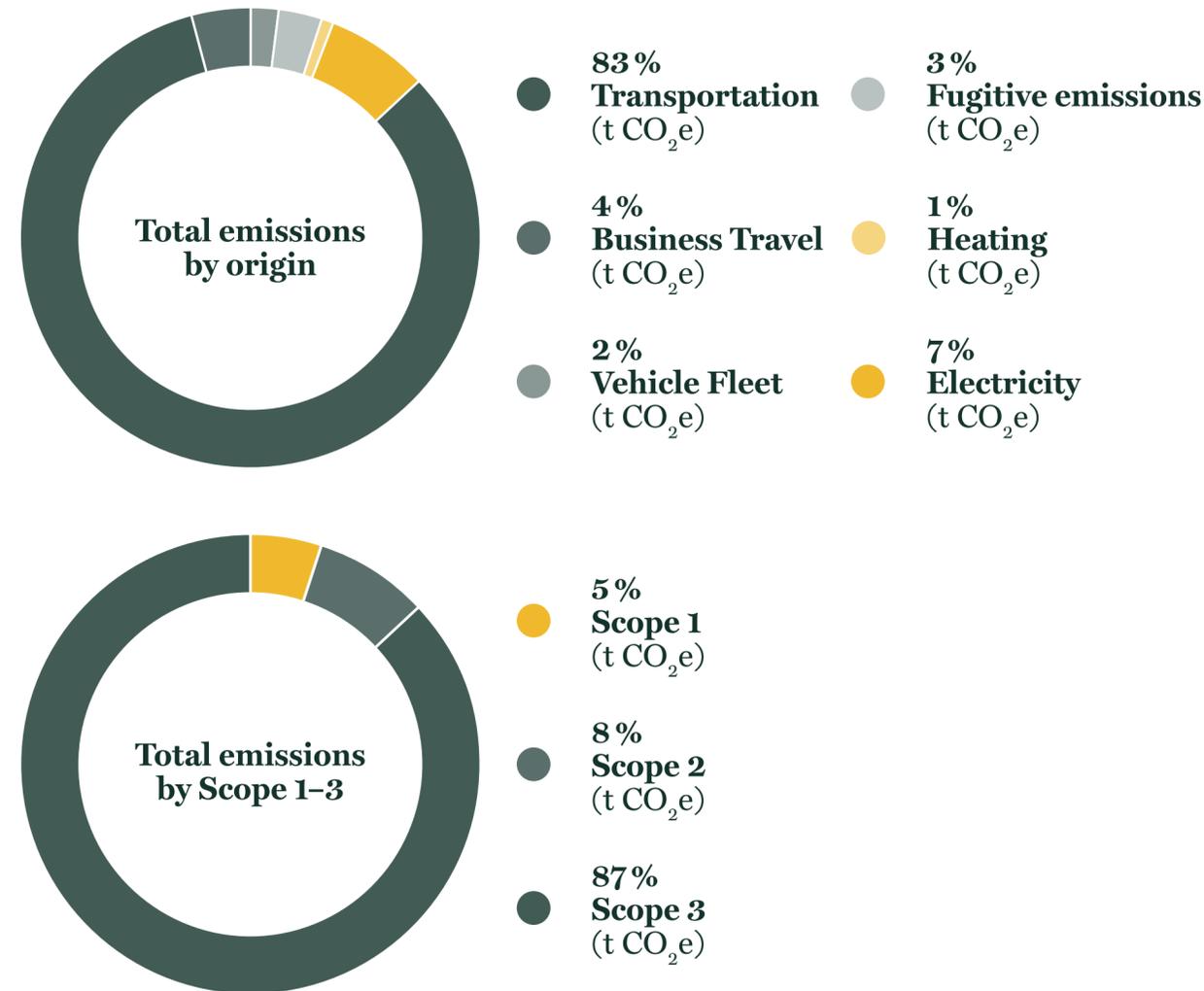
⁸ Data from Zur Rose Pharma GmbH, Halle was not available during the time of publishing.

⁹ Data from Medpex, Ludwigshafen was not available during the time of publishing.

Climate Balance 2022: Increasing transparency

The total GHG emissions in 2022 for Scope 1 and Scope 2 increased compared to 2022. This follows a new measurement procedure to improve reporting and the new Distribution Centre 2 in Heerlen, that went live in May 2022. These changes led to an increase of electricity emissions and likely heating emissions as well, which at the time of reporting were not entirely available. The higher fuel emissions in 2022 for the own vehicle fleet are due to less travel during the pandemic years 2020 and 2021.

For the first time, Zur Rose Group reports Scope 3 emissions in the form of outbound transportation and business travel, see the figures below. Outbound transportation makes up 83% of the total emissions reported in 2022 and Scope 3 therefore accounts for the largest share with 87% of total emissions in 2022. This clearly reflects that our main business activity is to ship medication to our patients and customers. [GRI 305-1, 305-2](#)



	2020	2021	2022
Total Energy GHG emissions in tCO ₂ ¹⁰	3,903	3,969	41,352
Scope 1	773	810	2,011
Fuels	773	810	947
Fugitive Emissions	N. A.	N. A.	1,064
Scope 2	3,130	3,159	3,402
Electricity	2,477	2,420	2,796
Combustibles	605	634	576 ¹¹
District Heating	48	105	30 ¹²
Scope 3	N. A.	N. A.	35,939

¹⁰ Due to improvements in data collection the previous year's figures were adjusted retrospectively.
¹¹ Data from Zur Rose Pharma GmbH, Halle was not available during the time of publishing.
¹² Data from Medpex, Ludwigshafen was not available during the time of publishing.

4.3 Packaging materials and waste decreased due to more sustainable practices

Zur Rose Group is committed to using and designing environmentally friendly packaging and avoiding or minimising waste in its companies and along its supply chain. Since Zur Rose Group distributes pharmaceutical products but does not produce them, the focus of its waste and packaging reduction efforts are on shipping materials needed for these products. The most relevant materials and waste components for Zur Rose Group include cardboard, plastics, electronic components, paper and foil. [GRI 306-1](#)

Responsible waste management and reduction

The mantra of “reduce, reuse, recycle” has been internalised at Zur Rose. The Group has implemented waste management protocols throughout the organisation for packaging materials, logistics waste and domestic waste. Zur Rose Group applies targeted measures to optimise its packaging (e.g., optimisation of cardboard box dimensions) and waste management (e.g., reduction of paper use at the offices). In cases where package fill material is needed, the Group is increasing its use of recycled materials. In addition, all cardboard boxes must bear the Forest Stewardship Council (FSC) seal indicating the pulp was produced sustainably.

Waste has been separated for years at the sites in Switzerland, the Netherlands and Germany (e.g., cardboard, plastic, glass). In Germany, the Packaging Act is implemented and required information about packaging materials is reported. The packaging material used in Germany enters the dual disposal system (German: “duales System”) – a take-back system that supports the closed-cycle economy. At the Heerlen-site, DocMorris’ logistics and domestic waste is separated according to Dutch legislation, and a waste management system was fully implemented with waste separating into pharmaceutical waste, residual waste, plastic, paper/cardboard, e-waste, batteries, scrap iron and construction waste. DocMorris also receives monthly reports from its waste management partner about the materials and the quantity

diverted. PromoFarma started selling direct to customers to streamline orders and deliveries, thereby reducing packaging and pollution. [GRI 306-2](#)

Zur Rose Group in general tries to avoid filling material of any kind whenever possible to reduce the amount of waste. In case of fragile products, e.g. glass bottles, filling material is still used to ensure the integrity of the products. In 2022, the group was able to reduce filling material by 90 %, as it is shown in the table below. Resource consumption was reduced in general, including cardboard boxes, stretch films or LDPE bags. However, generally resource consumption develops in line with the Group’s e-commerce activities and may thus increase in the future. Therefore, the Group may switch to reporting based on emissions and resources per parcel sent, rather than an absolute amount. In any case, the Group puts high importance to its goal of reducing absolute emissions and resources.

Network of expertise on packaging materials and waste to improve processes

The site managers of the respective organisation’s logistics departments are responsible for optimising packaging and, where possible, developing packaging processes to include more sustainable materials or reduce consumption of materials. This is facilitated by regular knowledge sharing between site managers. Zur Rose Group is fully committed to continually address its waste production, despite the costs and the need for extensive process adjustments.

Resource consumption ¹³	2021	2022
Material in t ¹⁴	1,920	1,580
Cardboard boxes ¹⁵	1,759	1,529
Filling materials ¹⁶	103	12
Labels	34	23
LDPE bags	10	7
Stretch films	14	9

Waste ¹⁷	2020	2021	2022
Total waste in t	939	936	746
Non-hazardous waste in t	926	929	738
Incineration	185	211	146
Recycling	741	718	592
Hazardous waste in t	13	7	8

GRI 301-1, 301-2, 306-3

¹³ Due to improvements in data collection the previous year’s figures were adjusted retrospectively.
¹⁴ Resource consumption includes DocMorris (Heerlen, the Netherlands), Zur Rose Pharma GmbH (Halle, Germany), Eurapon (Bremen, Germany) and Promofarma (Barcelona, Spain) Medpex and Zur Rose Suisse data was not available at the time of reporting.
¹⁵ Approximately 75 % from recycled material.
¹⁶ Approximately 70 % from recycled material.
¹⁷ Due to improvements in data collection the previous year’s figures were adjusted retrospectively.

4.4 Environmentally friendly logistics

Zur Rose Group's focus on the environment extends to how the company rethinks and redesigns its logistics processes. The Group pays close attention to how it delivers consignments and maintains a direct dialogue with logistics partners to continuously improve. The Group has also explored how to optimise its own vehicle fleet to minimise environmental impact.

Efficient network of pharmaceutical service providers

Zur Rose Group locations buy the majority of their over 500,000 products from pharmaceutical companies, wholesalers and brand-name manufacturers in the country where they operate. In Germany and Switzerland, Zur Rose Group has around 1,600 suppliers and service providers and counts more than 1,500 sellers (most of them pharmacies) in Spain and France. Products are securely stored in Zur Rose's warehouses and packaged and delivered to customers by transport partners. In Switzerland, approximately 84 % of products go to physician clients with their own practice pharmacy and shop-in-shop pharmacies (B2B). Around 16 % of the products are delivered directly to end-customers (B2C). In Germany, orders are delivered directly to end-customers by Zur Rose's transport partners. In Spain and France, orders are fulfilled by affiliated partners via the marketplace and sent to end-customers.

GRI 2-6

Optimised logistics: Significant integration in 2022 with further plans for 2023

In 2022, Zur Rose Group took significant steps as part of its path to profitability to optimise its logistics:

- Go-live of Distribution Centre 2 (DC2) in Heerlen with a capacity of 15 million parcels per year and automation levels of more than 70 %
- Integration of Medpex operations into DC2, change of Ludwigshafen logistics into the Beauty-and-Personal-Care (BPC) hub for the Germany segment
- Closure of Eurapon logistics and offer to customers to have their orders handled by DocMorris via Heerlen

There are several sustainability efforts among the Group to optimise the supplier collaboration and logistics

Since logistics depend largely on external providers, Zur Rose Group pays close attention to work with partners that are committed to reducing their own environmental footprint.

At Eurapon, products are almost exclusively purchased from local certified suppliers, and suppliers for packaging material must present a FSC certificate. The transport service partner in Austria for Zur Rose Pharma in Halle, Germany is certified for CO₂ neutral transport. DocMorris attaches importance to a network of local suppliers. At Zur Rose Suisse, 40 % of all shipments to customers in 2022 were determined as green deliveries, with 0.21 kg of CO₂ saved per shipment.

The orders of medical practitioners are collected and pooled in order to reduce the number of deliveries and driven miles. In Germany, Zur Rose Group aims to establish a pilot project on reusable packaging materials and reduction of parcel sizes in order to test possible future approaches to more sustainable logistics.

The team of PromoFarma is working with a large network of couriers to ensure the most efficient delivery to the customer. Further initiatives were undertaken in 2022 to initiate a new loyalty programme called "HealthPoints" in the EU Segment for Spain and France. This will be expanded to Germany in 2023. Customers can collect points with their purchases, and then redeem them in the form of a discount on the next order. HealthPoints are additionally provided if customers decide to receive their parcel at a pick up station and not have it delivered to their home. This encourages more sustainable logistics through shorter and fewer deliveries. Throughout 2023, this will be rolled out to cover the vast majority of all Spanish and French post codes.

Looking ahead: Reduce CO₂, enhance efforts and raise awareness

As outlined in the beginning of this chapter, Zur Rose Group sets itself measurable and ambitious CO₂ reduction targets in the short-, middle- and long-term. The Group will therefore continue to identify further opportunities to reduce the energy use across its offices and logistics sites. The Sustainability

Steering Committee and particularly the Working Group “Sustainable Planet” will play an essential role in identifying and evaluating measures to save energy and to enhance the efforts already made.

Aside from CO₂-targets, Zur Rose Group is committed to many additional goals. In 2023, the Group will set up a Group-wide travel policy that takes into account its strengthened focus on sustainability. In logistics, the Group will further reduce filling materials and parcel sizes to make shipping more efficient. In Spain and France, the aforementioned “HealthPoints” projects will be further rolled out and thus contribute to more efficient, environment-friendlier transport. In Germany, a pilot project will be set up in order to test reusable and smaller packaging. By digitising even more of its processes in the future, Zur Rose Group also continues to reduce paper documentation of information letters, drug safety notes and invoices in its shipments. The year 2023 will also be a period in which Zur Rose Group further refines and streamlines its internal processes of measuring and data collection in order to enable an even more precise approach to emission and waste reduction.

An important element constitutes raising awareness across the Group: Employees are informed regularly about energy saving behaviour, such as to switch off their screens at night or the adaption of the screen brightness. Zur Rose Group also developed an online training course for energy-saving behaviour within its “Habit-Series”. This does not only include the economical use of electronic devices but also gives suggestions on how to save heating energy with appropriate airing, or how to save material while printing as well as measures to save water and energy in the office. Similar training will form part of future awareness-building activities. As described above, Zur Rose Group continuously works to implement additional measures to save energy and contribute to a sustainable environment, among them the opportunity to install even more solar panels on its buildings.

5. Caring company

- 5.1 Reliable digital systems and data protection
- 5.2 Business ethics and compliance
- 5.3 Corporate governance
- 5.4 Corporate culture and attractive working conditions
- 5.5 Employees' occupational health and safety
- 5.6 Employees' diversity and inclusion
- 5.7 Talent development
- 5.8 Labour and human rights



5. Caring company

Technology is rapidly changing customer expectations. In response, Zur Rose Group is adapting its ways of working to best suit our patients and customers' needs. Part of this is to track and minimise any customer and employees' risks in their use of our technology. Data privacy and information security are areas of high interest. As such Zur Rose Group acts in compliance with all applicable laws. This approach focuses on reliable digital systems, data protection and compliance principles. Zur Rose Group is also an employer of choice with a high internal promotion rate and a team-oriented culture.

Goals at a glance

Main goal		
2023	Mid-term	Long-term
<p>We commit that > 95 % of Zur Rose Group's management has been trained in our core cultural principles.</p> <p>We will reduce the gender pay gap in all major regions (Germany, Netherlands, Switzerland, Spain) to below 5 %.</p>	<p>We commit to train > 90 % of our extended management in our core cultural principles.</p> <p>We will reduce the gender pay gap in all major regions (Germany, Netherlands, Switzerland, Spain) to below 3 %.</p>	<p>We will train all of our colleagues in our core cultural principles.</p> <p>We will achieve equal pay for all genders in all major regions (Germany, Netherlands, Switzerland, Spain).</p>

Additional goals

...that represent key areas of focus

- We harmonise cybersecurity, enterprise risk management and data protection and establish an integrated management system.
- We set gender diversity targets and aim for following female representation until 2024:
 - Board of Directors 33 %
 - Executive Board 20 %
 - Top Management 30 %
 - Remaining Management 45 %
- Regarding gender diversity, our ambition is equal representation in the long-term.
- We strengthen our talent development, for instance by further rolling out our Group-wide system for employee dialogues #OurJourney.
- We aim to be and stay an employer of choice where people want to work and build a career.
- We aim to be a leader in corporate social responsibility, including human rights.

5.1 Reliable digital systems and data protection

As a leading player in the European healthcare industry, Zur Rose Group recognises its obligation to handle personal data in a compliant way.

Zur Rose Group is aware of future challenges in this area – the importance and relevance of data continues to grow. In this context, Zur Rose Group is committed to apply the necessary measures to protect sensitive data that is processed in the course of its business activities.

Establishing data protection governance and implementing trainings to strengthen the awareness concerning data protection

In 2022, at Zur Rose Group and within the business segments, data protection was further developed in regard to operational activities. A Group Data Protection Policy has been established and implemented, which sets out the requirements and standards applicable for processing of personal data and aims to ensure compliance with applicable data protection laws.

In compliance with the GDPR and in line with the Group-wide approach to data privacy, Zur Rose Group worked on the implementation of training courses which have started at the beginning of 2022. Furthermore, the Group finalised several guidelines and templates in order to establish Group-wide common processes with respect to data privacy.

To achieve this, a Group Chief Information Security Officer has been appointed and a new Group Data Protection Officer joined in February 2023. Management focus and efforts for improved cybersecurity and data protection have been addressed at the highest level within the Executive Board. Zur Rose Group strategy of actively pursuing the best talent also applies to this domain. Additional specialists are being added to the team so that current and future challenges can be met with best-in-class solutions.

Zur Rose Group employs a Group-wide approach with regards to the implementation of data privacy standards. In addition, improved governance and special bodies have been established in order to monitor the success of the implementation.

Ensuring successful compliance

As a provider of online health services, Zur Rose Group is obliged to comply with all information obligations towards data subjects (e.g., data privacy notice on website). Business processes can be organised in such a way as to integrate data protection from the beginning of engagement of suppliers/ service providers.

To ensure positive outcomes with its partners, Zur Rose Group ensures that they are informed on best practices regarding data privacy and handling of sensitive data. The Group also evaluates partners to establish the safeguards that are required in its day-to-day activities.

The Executive Board is ultimately responsible for the success and appointment of the required specialists (such as Group Data Protection Officer, local Data Protection Officers, project managers) to achieve the results that are in line with the Group's business objectives. Development and success are being reviewed through careful auditing and reporting. The project action plan and due dates will be determined and continuously monitored by the Group Data Protection Officer and the respective project managers.

In 2022, Zur Rose Group has recorded several incidents in the area of order and delivery processes as a result of technical and organisational errors. The appropriate authorities have been involved and informed in due form whenever required. Adequate countermeasures have been implemented and are being monitored continuously. Other incidents have been detected and resolved as well; authorities have been informed accordingly. Zur Rose Group is constantly working to further enhance its processes regarding data privacy.

5.2 Business ethics and compliance

At Zur Rose Group, business ethics and compliance are a high priority. All employees must familiarise themselves with legal provisions and regulations as well as internal rules, directives and regulations relevant to their professional activities.

Revised Code of Conduct and set up of whistleblower hotline

Zur Rose Group has a set of policies that define the culture, governance and accountability across the Group. These include:

- [Code of Conduct](#)
- Human Rights Policy (to be launched in 2023 Q1)
- Corporate Governance Report [GRI 2-23](#)

Zur Rose's employees receive regular information about the Code of Conduct, which sets out the binding principles of business conduct. Amongst other topics, the Code outlines that conflicts of interest must be avoided and that corruption and anti competitive behaviour will not be tolerated. The Code forms part of the contract of employment and is signed by each staff member. Employees must notify the legal department of any breaches of the Code of Conduct. As far as possible, reports are treated confidentially. In January 2022, the new whistleblowing system, established in December 2021, as well as the revised Code of Conduct were communicated via e-mail and the intranet in English, German and Dutch. In June 2022, the same information was provided again via the intranet. Here, the document is also uploaded and can be retrieved by all employees at any time. Zur Rose Group plans to make the content also available as an e-learning course in 2023. [GRI 2-24](#)

In accordance with the European Union (EU) Directive on the Protection of Whistleblowers, an online reporting system (the aforementioned whistleblower system) was set up. Employees can report concerns based on sufficient indications regarding potential compliance violations. The report can be made an-

onymously if preferred. Reports made on the basis of sufficient indications of irregularities have no negative consequences of any kind for the person who submits them. Zur Rose Group does not tolerate any action taken against employees who report concerns. Every complaint is accepted and reviewed by the General Counsel of Zur Rose Group. For questions about corporate policies and practices, employees can contact the human resource (HR) or the legal department. External parties can contact the corporate communications department. [GRI 2-25, 2-26](#)

No incidents of corruption, legal proceedings or non-compliance

There were no incidents of corruption concerning Zur Rose Group during the reporting period. This also includes no incidents in which employees were dismissed or disciplined for corruption, no incidents when contracts with business partners were terminated or not renewed due to violations related to corruption, and no public legal cases regarding corruption brought against the organisation or its employees during the reporting period. [GRI 205-1, 205-3](#)

The Group also had no legal proceedings brought against them based on anti-competitive behaviour, cartel or monopoly formation, nor was it in non-compliance with laws and regulations in the social and economic sphere. [GRI 206-1, 2-27](#)

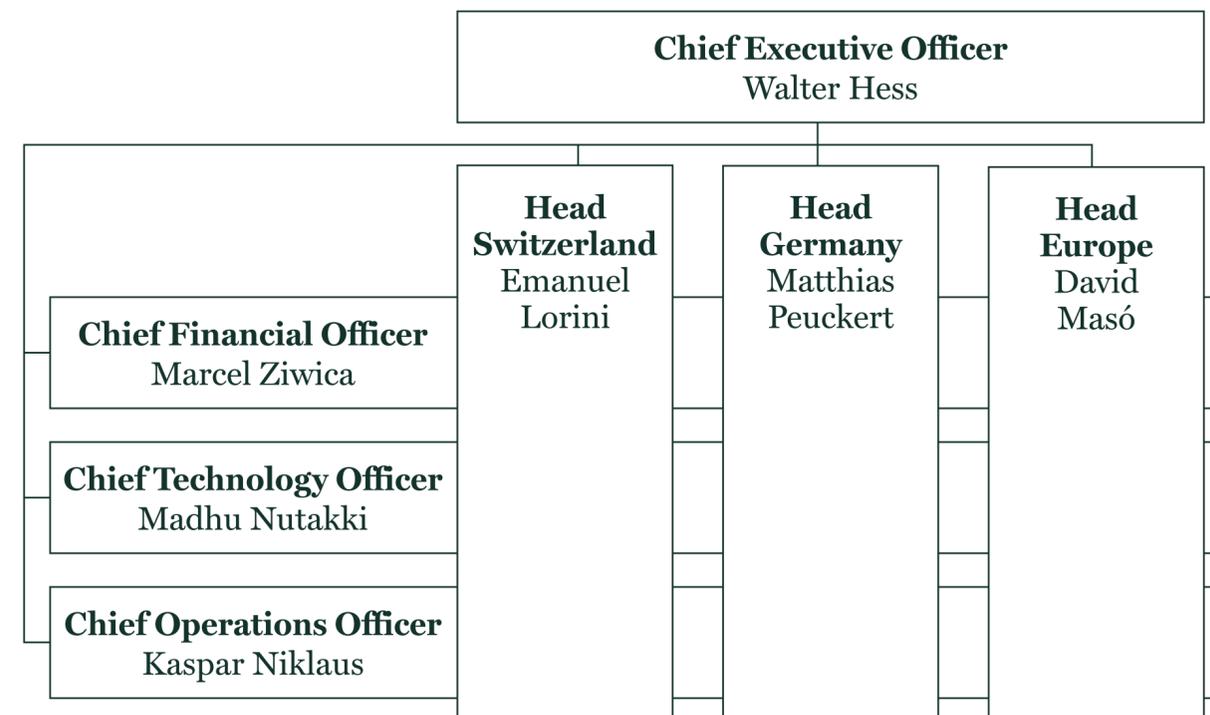
5.3 Corporate Governance

Corporate Governance includes the establishment, implementation and monitoring of internal rules, governance structures, processes and practices that lead to accountability and ensure leadership in the Group’s best long-term interests. This chapter presents a summary of key aspects of Corporate Governance at Zur Rose. More details can be found in the Corporate Governance section of the Zur Rose Group Annual Report.

Organisational structure

Zur Rose Group AG, based in Frauenfeld, is organised as a stock corporation under Swiss law. The registered shares with the security number 4261528 are listed on the SIX Swiss Exchange. The Board of Directors supervises Zur Rose Group, while the Executive Board is responsible for the operational management. The CEO is responsible for managing the business of Zur Rose Group. Under his leadership, the Executive Board deals with all issues of relevance for the Group, takes decisions within its authority and submits motions to the Board of Directors. The Group structure is organised into segments responsible for regions and revenue, patients/ customers, health partners and marketplace partners, business models and the finance, technology and operations

functions. The members of the Executive Board are responsible for devising and achieving their entrepreneurial objectives and running their units independently. People, Legal, Communications, Internal Audit and Strategic Initiatives report to the CEO; Finance and Investor Relations & Sustainability report to the CFO. These provide services for the whole Group. [GRI 2-1, 2-6](#)



Required expertise and resource allocation

The majority of the Board of Directors of Zur Rose Group AG are independent members. The Board uses the criteria in the Swiss Code of Best Practice for Corporate Governance from *economiesuisse*, an umbrella organisation of the Swiss economy, to determine if its members are independent. This states that non-executive members who either never belonged to the Executive Board or did so more than three years ago and who have no or only relatively minor business relations with the company are deemed independent. The term of office of members of the Board of Directors is not a criterion for judging their independence. No members of the Board of Directors act as an executive for Zur Rose Group. Within the past three reporting years (until 28 April 2022), only the former Executive Director and CEO Walter Oberhänsli acted as an executive. The members of the Board do not have any significant business relationships with Zur Rose Group. There are no cross-involvements.

The Board of Directors consists of six members, with Walter Oberhänsli as chair. When members are nominated, the emphasis is on experience in leadership and management roles, e-commerce, technology, digitalisation, law, regulatory issues, healthcare, marketing, finance and accounting, M&A, capital markets, risk management, compensation and sustainability, plus in particular international

experience. The Board of Directors strives to make a balanced allowance for the skills and knowledge that reflect the strategic and operational focuses of Zur Rose Group, the international outlook and the accounting requirements for listed companies. The skills and knowledge needed are broadly covered by the Board. At the Annual General Meeting of Shareholders on 28 April 2022, Rongrong Hu was elected to the Board, making one third of the Board female. The gender diversity targets were thereby achieved one year earlier. Dr. Thomas Schneider and Prof. Dr. Volker E. Amelung did not stand for re-election. [GRI 2-10, 2-11](#)

Managing and monitoring risks carefully

Zur Rose Group has a system in place to monitor and control the risks associated with its business operations. This process includes the identification, analysis, control and reporting of risks, plus risk reporting from the individual organisational units all the way up to the level of the Group. The Board of Directors and the CEO are responsible for creating the necessary organisational framework for the operation of the risk management system. The CFO is operationally responsible for risk management control. He may delegate subtasks. The people responsible for these tasks take concrete measures to manage the risks and monitor their implementation.

Based on the Organisational Regulations (available at ir.zurrosegroup.com) and risk management, Internal Auditing conducts risk-based operational, process and systems reviews and assists the Group's organisational units in regulating, improving and assuring the effectiveness of their risk management

and internal control processes. To preserve its independence, Internal Auditing reports directly to the CEO and the Audit Committee of the Board of Directors, which also approves the audit plan for Internal Auditing. Internal Auditing coordinates its work as far as possible with the external auditors. The Board of Directors may entrust Internal Auditing with special audits, internal investigations or other tasks extending beyond the regular activities of Internal Auditing. In the year 2022 no critical concerns were identified, such as through the whistleblowing system or significant cases of misconduct. The reporting of critical concerns by the CEO is a standing agenda item for each regular Board of Directors meeting. [GRI 2-15, 2-16, 2-18](#)

Remuneration policy

The value and success of Zur Rose Group AG largely depends on the quality and commitment of its employees. Its compensation policy supports the goal of recruiting, motivating and retaining qualified individuals for the Group. The performance-related and share-based components are also designed to align the way of thinking and acting with shareholders' interests. The compensation system is based on the following principles:

- a) The compensation system anchors the strategic growth targets;
- b) The compensation is fair, market-consistent and transparent; and
- c) It supports the recruitment, motivation and retaining of

talented and motivated employees.

The compensation system for the Executive Board is aligned with the corporate strategy and linked to the relevant KPIs for the variable compensation elements. For the first time in 2023, the achievement of Sustainability goals is tied to the Short-Term Incentive (STI). This allows the compensation of the members of the Executive Board to be determined transparently and based on performance. The Board of Directors decides on targets. Criteria such as position, responsibility, experience and market data are used to determine the compensation of the Executive Board. The individual compensation of the members of the Executive Board consists of a fixed and a performance-related salary component limited in amount, as well as pension and fringe benefits (e.g., company car).

Base salaries are determined based on the scope and responsibilities of a given position and the qualifications required to perform the job, the market rate of compensation, and the personal qualifications, experience and performance of each member of the Executive Board. Payment is made monthly in cash.

For more details, see the Compensation Report including its voting results at the last Annual General Meeting in May 2022, see the [Zur Rose Annual Report](#). [GRI 2-19, 2-20, 2-21](#)

Compensation Structure

Element	Purpose	Instrumental	Performance criterion	Performance period	Determinants
Basic annual salary	Recruitment, retention, motivation	Cash compensation	–	–	Position qualification, market rates
Short-term variable compensation	Rewarding performance	In cash	Revenue, EBITDA, individual targets	1 year	Financial result and qualitative performance
Long-term variable compensation	Rewarding sustainable value creation, alignment with shareholders' interests	Shares 2/3 in Performance Share Units and 1/3 in Restricted Stock Units	Revenue growth, relative Total Shareholder Return	3 years	Success of the Group, share price performance, competitive position
Pension and fringe benefits	Protection against risks	Pension plan, insurance plans, fringe benefits	–	–	Market rates and legal requirements

5.4 Corporate culture and attractive working conditions

Zur Rose Group provides an equitable work environment built on a strong culture and attractive working conditions. The Group also provides competitive remuneration, attractive social benefits, flexible working models and an inspiring and inclusive working atmosphere, among other things.

The investments in our employee experience pays off: Five group companies have been awarded the “Top Company 2023” award for the top five per cent of employers from Kununu: DocMorris, TeleClinic, eHealth-Tec, Bluecare and Zur Rose Suisse. Kununu is an independent online platform, where employees as well as applicants can share and rate their personal experience with a company. The portal can be considered as an important source of information for potential applicants, who want to find out more about a potential employer. Moreover, Zur Rose Suisse was voted as the 62nd best employer (from rank 250 in the year before) in all of Switzerland in the leading ranking from Handelszeitung. In the Swiss wholesale industry Zur Rose Suisse was voted the best employer by Handelszeitung.

New employer value proposition: “join the e-health pioneers”

In 2022, Zur Rose launched its employer value proposition which runs under the slogan “join the e-health pioneers”. During the reporting year, Zur Rose worked to integrate this value proposition with its purpose, culture and vision. With the branding in place, the Group launched several new projects

to raise awareness about opportunities across Zur Rose and raise employee engagement. Examples include campaigns on social media such as the corporate LinkedIn accounts as well as merchandise material to hand out to potential candidates. This way, Zur Rose seeks to further strengthen its position as an employer of choice.

Engaging employees and attracting talent

As part of its new value proposition, Zur Rose launched a career website focusing on showcasing the culture, work environment and career opportunities within the Group. Zur Rose also launched the Group-wide referral programme #JoinUs to encourage employees to refer jobs to their personal networks. In addition, Zur Rose Group insourced all recruitment activities instead of relying on external recruitment agencies. The Group supplemented these efforts with several social media campaigns on channels frequented both by high potential talents and by passive candidates, i.e. talents of interest to Zur Rose Group but not actively looking for new jobs. In combination, all of these measures serve the objective of amplifying the employer value proposition to prospective talents.

Zur Rose Group also worked on improving working conditions in 2022 across its operations including introducing improved flexible work arrangements for part-time workers and providing financial support for day-care in selected locations, e.g. in Frauenfeld. By introducing more flexibility across its locations, Zur Rose wants to ensure that its employees can balance their work with their personal lives – and build a healthier life.

Culture principles

Zur Rose believes that a strong culture serves as the basis for effective strategy execution. To define the cultural core of the Group, the Executive Board ran a series of workshops in 2022 in order to define a set of culture principles for the whole Group. These culture principles further support the ongoing cultural transformation of Zur Rose Group and ensure the establishment of a Group-wide cultural core. They will be finalised and communicated in early 2023.

As Zur Rose continues its cultural transformation, the whole Group is pushing forward in 2023 to incorporate the cultural principles across employer branding, onboarding, leadership trainings, learning and development offerings, cultural artefacts and internal communication, selection and assessment criteria, (e.g., leadership hirings) and #OurJourney, the new Group-wide system for employee dialogues.

As Zur Rose makes progress in its cultural transformation, success will become visible and measurable. For example in an increase in the number of new applicants per role, how employees respond to the cultural shift as well as improvements in operative KPIs such as sickness rate, where employee engagement acts as a mediator. Not only developing but truly living a shared culture takes time, purpose and commitment. Learning to live up to the company’s cultural ambitions will be a core focus for the Group for the next few years.

5.5 Employees' occupational health and safety

As a healthcare company, Zur Rose values healthy relationships within the company. Consequently, employee safety and well-being are a high priority for the Group.

The Group consistently complies with all national regulations for occupational health and safety. Due to the high level of occupational health and safety that Zur Rose mandates, the Group has a good reputation and is perceived as a responsible employer. By contributing to its employee's health and safety, Zur Rose fosters motivation among its employees.

Health and safety management system

Zur Rose has a management system for health and safety which is designed to follow regional laws (e.g., ArG) and industry guidelines (e.g., EKAS 6508). The system identifies aspects of the organisation that impact health and safety and lays the foundation for qualification and training, rules, hazard identification, risk assessment, action control, emergency organisation, involvement of the employees, health protection and audit controls. **GRI 403-1** Particularly worthy of emphasis are the following guidelines:

- Hazard identification is performed annually, and actions are defined to minimise the identified risks. The company brings in outside resources to perform the analysis and assessments if necessary. The defined actions are assessed, addressed and implemented.
- Accidents and near-accidents and dangerous situations are reported as they happen and analysed immediately. Serious accidents are addressed immediately as prescribed by law.
- Reports of workplace risks must be sent to the safety officer or the relevant superior. If employees encounter an unsafe situation, they are required to report it.

By following the above guidelines, Zur Rose Group ensures continuous improvements to its health and safety protocols. **GRI 403-2** Safety officers are responsible for the security, safety and health of all units within Zur Rose Group.

Zur Rose Suisse holds a prevention agreement with Switzerland's largest accident insurance, SUVA. For the site in the Netherlands, Zur Rose must undergo a risk inventory and evaluation that describes the risks employees could face at work. Zur Rose works to reduce these risks. Medpex also trains its employees about health and safety issues and coaches the entire management team on the topic. **GRI 403-7**

Customised employee trainings and programmes

All employees receive basic training on occupational health and safety as part of their onboarding and ongoing training is provided as necessary. The training is organised by the HR department, while the security officer is responsible for the implementation. If individuals have special job requirements – such as operating a particular machine, working with dangerous goods, or managing pharmaceuticals – they will receive training appropriate to their position. The responsible teams in every entity, consisting of first aid workers, are re-trained every year to handle first aid, resuscitation and automated external defibrillators (AED). **GRI 403-5**

Occupational health services

While the health and safety management system is separate from the quality management system (QMS), all relevant documents are also included in the QMS. The commitment of the introduction in the QMS is rewarded with increased employee awareness of health and safety in the company. Ideally, this leads to a minimisation of the operational costs for incidents, e.g. in the case of logistics downtime. Employees are encouraged to participate in discussions that impact them, such as the introduction of safety shoes. Relevant information and updates about health and safety are posted internally. **GRI 403-4** The Group also maintains a number of medical rooms (e.g., in Frauenfeld and Heerlen) as well as defined indications of walkways in warehouses, and provides employees with the necessary protection gear (e.g., ear and foot protection). Zur Rose Suisse continued improving its safety efforts in 2022, with projects such as renewing the video surveillance system, upgrading entrance controls, finalising an evacuation concept, implementing new regulations for ladder use as well as flood protection for facilities. **GRI 403-3**

Zur Rose promotes healthy living by emphasising good ergonomics on site. This includes posture and seating position during work as well as the correct use of chairs and desks. The Group also provides massages, sports programmes and prevention programmes (e.g., yoga classes, stress relieving courses). Some healthcare services that are classified to be valuable for all are obligatory, while others are available upon request. In Germany, Zur Rose in Halle organises an annual healthcare day, offering information about nutrition, stress reduction and free skin or heart checks. On offer are also free annual vaccinations for employees and numerous new benefits, including medical check-ups on site, cost-reduced massages, customised work schedules for employees who are caregivers, and mental coaching. [GRI 403-6](#)

Continuous improvement of employees' health and safety
 Maintaining a healthy workforce can be challenging with hybrid work schedules. Zur Rose continues to evaluate how to best provide employees with the right level and combination of support while they work from home. The Group will continue to prioritise regular checks to measure well-being on an ongoing basis. Zur Rose will also continue to conduct internal and external audits, evaluate injury rates at key facilities as well as collect feedback through employee satisfaction surveys in line with industry best practices.

Key occupational health and safety figures GRI 403-9	2021	2022
Injuries ¹⁸	194	49
Fatalities	0	0
Lost work days due to work-related injuries	867	147
Lost work days due to illness	31,649	30,954

¹⁸ Work-related injuries mostly occur within logistics.

Zur Rose continues to evaluate how to best provide employees with the right level and combination of while they work from home.

5.6 Employees' diversity and inclusion

As a healthcare company, it is Zur Rose's responsibility to ensure that its workforce reflects the communities it serves. The Group values diversity and strives for inclusion and a sense of belonging across its subsidiaries alongside working actively to eliminate all forms of discrimination. At the same time, both current employees and external talent and candidates expect Zur Rose Group to actively work towards diversity and inclusion (D&I).

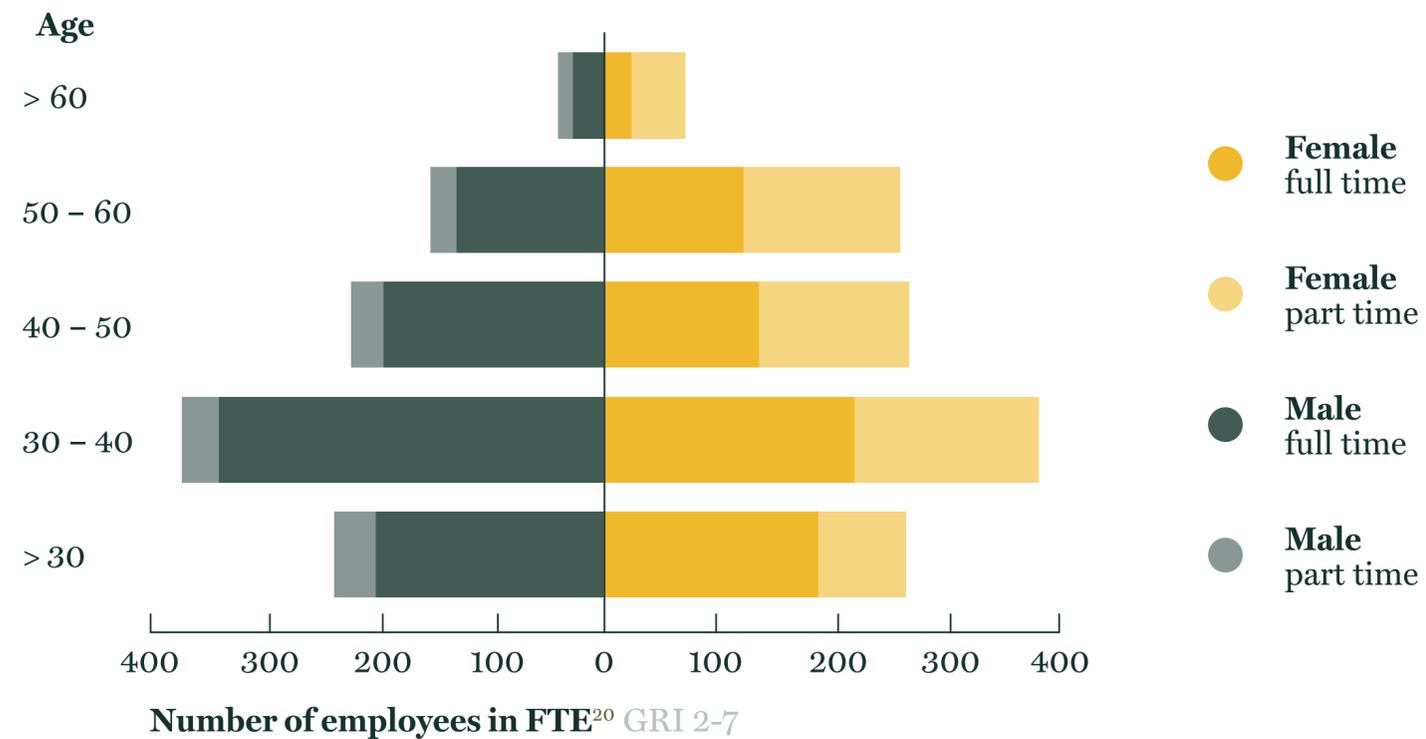
D&I allows Zur Rose to tap into a larger talent pool and enables a positive work environment where people can thrive. The Group seeks to hire people with a passion for their job, the courage to question existing protocols and the will to move things forward. *GRI 2-7*

Workforce diversity

With the introduction of a Group-wide job grading in 2022, Zur Rose established the basis for a more detailed analysis regarding D&I, including gender representation per management level and gender pay gap. The grading system considers four objective criteria (impact, know-how, communication and complexity) to determine the management level of any given function, allowing for a more objective comparison of jobs within Zur Rose Group than previously possible. Key insights of the analysis on workforce diversity are presented in the following sections¹⁹.

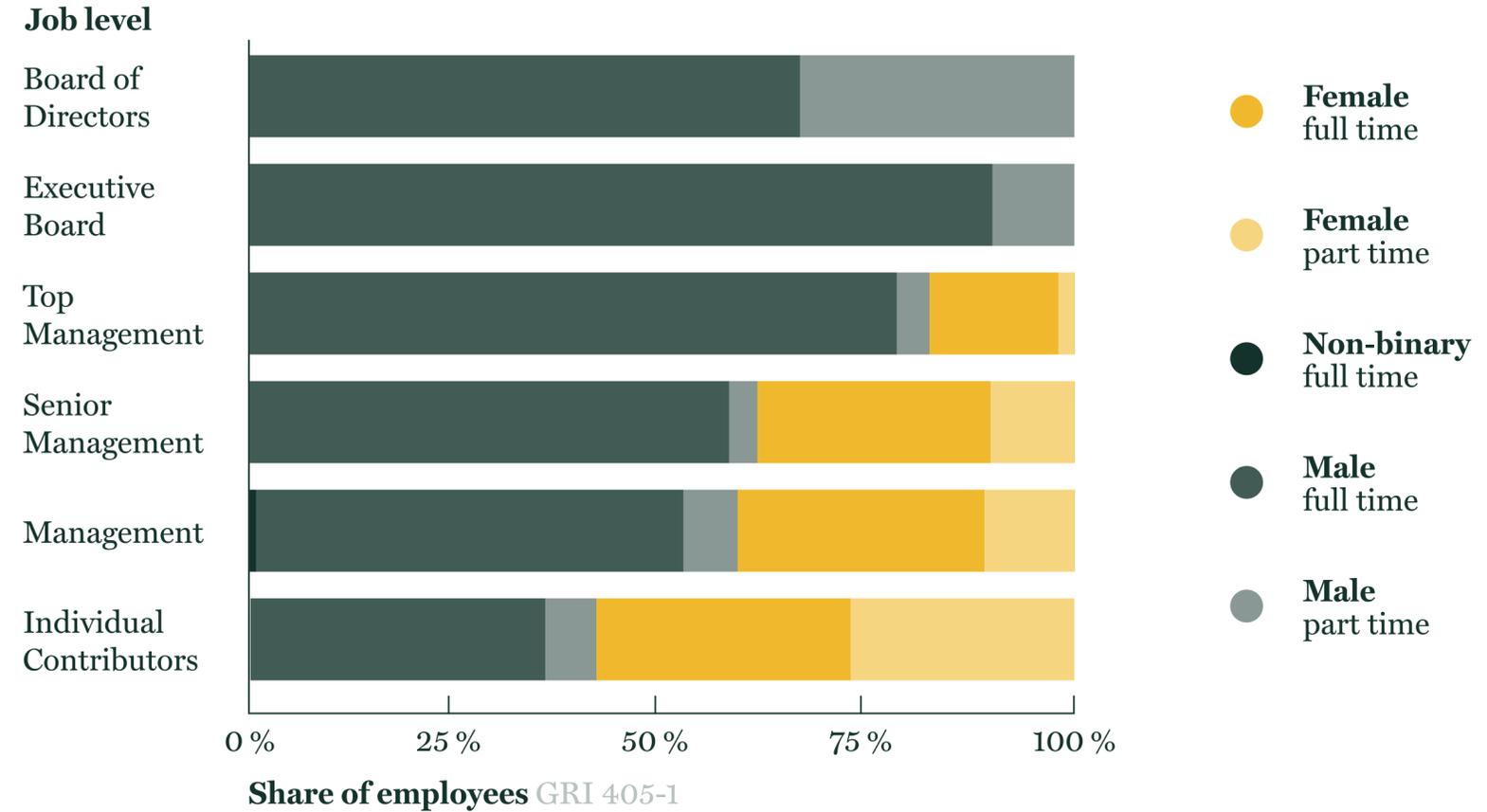
¹⁹ All analyses have been performed with data from December 31, 2022 and include all internal employees under contract, whose HR data is being managed through the Group's primary HRIS system workday. This includes all fully integrated legal entities except AdBest Werbeagentur GmbH, Ultra-Pharm Medicalprodukte GmbH and Dia plus-minus Handels-gesellschaft mbH. In addition, the data includes employees working in Joint-Ventures where a fully integrated company is providing the people administration services.

²⁰ We did not disclose FTEs per region, given that there are only a small number of major regions that the Group has employees in. The Group regularly reviews the potential to enhance disclosures.



Insight 1: The “average” employee of Zur Rose Group is 40 years old and has been with the company for three years and nine months. If they are female and over the age of 40, they are likely to work part time.

The largest demographic group are colleagues between 30 and 40 years old, which represent about one third of the total workforce. Regarding the Board of Directors, 50 % are over the age of 50 and 50 % are between 30 and 50 years old. For the Executive Board, 30 % are older than 50 years and 70 % are between 30 and 50 years old. Before the age of 30, 16 % of male colleagues and 29 % of female colleagues work part time. Amongst male colleagues this share stays more or less stable for the other age groups, fluctuating between nine per cent and 15 %. Amongst female colleagues the share of part-time workers increases significantly to 43 % in the age group 30 to 40, 49 % in the age group 40 to 50 and more than 50 % after the age of 50. Thus, the share of part-time workers is between two and five times as high for female colleagues compared with male colleagues in the same age group. [GRI 405-1](#)



Insight 2: Representation of female colleagues on management level positions, particularly in the top management and on board level does not match the overall share of female colleagues.

Women account for 55 % of the current workforce of Zur Rose Group and 58 % of all employees without a management role. In management and senior management positions this share drops by about 20 percentage points to 41 % and 38 %, respectively. The share of female colleagues in top management positions is another 20 percentage points lower at 18 %. For the Executive Board, the data includes all existing contracts, including two former board members, who are leaving the company in 2023. From January 1, 2023 onwards the share of female colleagues in the Executive Board is zero %.

Insight 3: On all management levels the share of employees who work part-time is two to five times as high amongst female job colleagues compared with their male colleagues on the same level.

27 % of female leaders in management and senior management positions work part-time compared with 11 % and 6 % respectively amongst male leaders on the same level. For senior management positions, the difference is particularly visible with the part-time quota being five times as high amongst female colleagues compared with their male counterparts. The part-time share further decreases in top management positions to 11 % amongst female leaders and 6 % amongst male leaders.

Insight 4: Male and female colleagues receive comparable salaries for comparable jobs. As men occupy more jobs on higher management levels, the average salary of female colleagues is significantly lower than the average salary of male colleagues.

The gender pay gap analysis was done based on the total cash compensation (base salary and bonus) of all employees

with an annual salary above CHF/EUR 15,000. Salaries below this threshold are typically due to employees working on an hourly basis and account for a low one digit percentage of the overall employee population. As the exchange rate of the two currencies is very close to parity we omit the currency hereafter and results hold for both. For the statistical analyses we include all employees with regular or fixed term contracts, but exclude apprentices, working students and mini-jobs. All salaries were normalised to a full time employee (FTE) equivalent of 1.0, i.e. the salary of a worker working 50 % was doubled for the purpose of the analysis. In addition, the differences in salary between different countries are controlled for.

The unadjusted pay gap analysis is based on a linear model to explain total cash compensation. Apart from the control variables mentioned before no other variables besides gender were used. In this model, the gender effect is ~24 %. That is, the average salary of a male employee is roughly 24 % higher than the average salary of a female employee.

The adjusted pay gap analysis is based on the same linear model to explain total cash compensation. In addition, we use two control variables: Job Family Group and Management Level. That is, we control for the fact that male and female colleagues work in different job families and hold positions on different management levels. In this model, the gender effect is reduced to only ~1 % and is no longer statistically significant. On a per country level, results are similar with an adjusted gender pay gap ranging between 0.3 % and 6.6 %:

- Germany 3.7 %, very low statistical significance level
- Netherlands 0.5 %, not statistically significant
- Switzerland 0.3 %, not statistically significant
- Spain 6.6 %, low statistical significance level

These findings are supported by the local analysis on pay parity carried out for Switzerland by Landolt & Mächler Consultants AG, as required by the newly introduced Federal Law on Equality between Women and Men in Switzerland.

In conclusion, it can be stated that all across Zur Rose Group, there is no wage discrimination between men and women. The same salaries are paid for the same work. What the organisation needs to work on is the representation of women in senior and top management positions as well as in the Job Family Group IT²¹. GRI 405-2

²¹ We did not disclose a break-down by employee category because we evaluated the gender-pay gap for the first time. We hope to be able to disclose this in the next report.

A defined Diversity & Inclusion strategy

In 2022, Zur Rose defined a Group-wide D&I strategy with 3 pillars:

- Community engagement through Employee Resource Groups (ERGs), i.e. investments encouraging bottom-up movements, to discuss and engage with D&I related topics.
- Business-driven working groups, i.e. the implementation of D&I related measures in all functional areas, e.g. inclusive catalogue management, inclusive marketing etc.
- Corporate initiatives, reporting and steering, i.e. the implementation of specific D&I related policies and interventions, the inclusion of D&I KPIs in management dashboards and the coordination of all Group-wide D&I activities.

As of 2022, Zur Rose Group employs colleagues with more than 67 nationalities.

Diversity & Inclusion activities drive forward a Group-wide understanding

Zur Rose Group ran the first Group-wide “Diversity & Inclusion Week” in June 2022. The goal of the week was to raise awareness about D&I across the Group and to ensure employees understand that promoting diversity is a business imperative that concerns everyone – working together towards becoming a more inclusive company. The week featured keynotes, workshops and panel discussions diving into different aspects of

D&I. More than 300 attendees across the Group developed a shared understanding of D&I and how to drive change.

Zur Rose Group also began facilitating a bi-monthly D&I roundtable to act as a Group-wide forum to talk about D&I topics concerning the workforce.

In 2022, Zur Rose Group conducted reviews to increase transparency on talent with a focus on retention and development for underrepresented employee groups.

Finally, Zur Rose Group sponsored Switzerland’s largest queer film festival “pink apple” in Zurich as well as in Frauenfeld, where Zur Rose Group’s headquarters is located.

In 2022, Zur Rose Group sponsored Switzerland’s largest queer film festival “pink apple” in Zürich as well as in Frauenfeld, where Zur Rose Group’s headquarters is located.

Responsibility shared at global and local level

Responsibilities for D&I are shared between local and Group-wide HR management. The Group-wide HR function is responsible for Zur Rose Group’s overarching D&I strategy and its implementation in the form of tangible Group-wide measures. This includes Group-wide HR processes, representation in employer branding, stakeholder dialogues, awareness measures and other instruments. Local operational HR management is responsible for putting D&I practices into action on a local level (e.g., in local job advertisements, recruiting processes, internal selection and staffing procedures and fair remunerations). The HR IT system “Workday” enables Zur Rose to run Group-wide D&I data analyses.

Making progress with inclusion

As Zur Rose Group continues to embed its culture principles across the Group, emphasising D&I will remain a focus despite the continued challenging business environment, specifically related to the eRx introduction in Germany. Embedding D&I in daily leadership behaviour is an ongoing pursuit and the HR team is working with management team members on increased awareness of unconscious bias as well as the right policies to help expand diversity at all ranks.

5.7 Talent development

The ability to retain high performers and knowledge carriers is a high priority for Zur Rose's long-term success. In addition, Zur Rose fosters the development of employees' strengths and potentials and aims to provide them with the skills necessary for outstanding performance in their role. All forms of education and training, competence building and career development are of utmost importance for Zur Rose.

Training and engaging talent

Zur Rose established a Group-wide talent development offering in 2022, led by Zur Rose's Group Head of Talent & Leadership Development in collaboration with the HR leadership team and the segment boards.

In 2022, Zur Rose expanded the scope to include training for all interdisciplinary competences (e.g., soft skills, personal development). In Q1 2022, Zur Rose introduced two Group-wide digital learning offerings for all employees: LinkedIn learning & GoFluent language learning. Learning opportunities are promoted all year-round with a variety of campaigns as well as in employee onboarding and employee dialogues (#OurJourney). One such campaign included a "language learning sprint" in December 2022, where employees could participate in a competition to make the most progress in learning one of the business languages (German, English, Dutch, Spanish) of Zur Rose Group. A multi-language Website provides employees with an introduction as well as access to all learning offerings. Wherever possible, employees are provided with the opportunity to invest time in learning activities during their working hours.

Due to these efforts a lot of progress was made over the course of the year:

- Over 50 % of all employees activated their LinkedIn learning account and completed over 25,000 learning nuggets between January and October 2022.
- Over 40 % of all employees activated their GoFluent account and reportedly spent a combined 3,400 hours using the online learning opportunities.
- In addition, all employees had the opportunity to request 1:1 language learning training – with roughly ten % of all employees participating in 2022.

Launch of the leadership academy

Zur Rose Group launched the leadership academy in 2022 with two programmes: "Leading Others" for first level leaders and "Leading Leaders" for senior leaders. By the end of the year, the Group had run four cohorts of "Leading Others" with approximately 70 participants. Zur Rose Group expects to continue running these programmes until the end of 2024 when all leaders have completed them.

The programmes serve three goals:

- Develop a shared understanding of good leadership at Zur Rose Group closely tied to its culture principles.
- Improve leadership competencies for everyday leadership challenges.
- Connect leaders from across different Group entities, job families and countries to develop a Group-wide network among the leadership team.

Supporting culture transformation with #OurJourney

After launching the employer value proposition, Zur Rose Group completed rolling out its new employee dialogue approach called "#OurJourney". #OurJourney is designed to support its cultural shift with a focus on supporting the alignment between shared objectives, ongoing dialogues about performance, development and priorities as well as forward-looking development measures to make the best use of talent. By the end of 2022, the majority of Group-wide employees and 90 % of all people managers had received a training in #OurJourney. Starting in early 2023, #OurJourney will be used for all employees Group-wide to facilitate regular employee dialogues.

Revised job grades and reviews

Zur Rose Group introduced a Group-wide job grading system, considering job families, job levels and job profiles. The job grading allows for comparability and transparency of jobs across all legal entities. The grading system also serves as a foundation for a Group-wide career framework for employees, making it easier for them to consider new roles within Zur Rose Group. The Group followed up with piloting talent reviews in 2 segments: Spain and Switzerland. The focus with the reviews was to better develop and retain underrepresented employee groups. These efforts were launched to build a thriving culture focussed on employee development across the segments and increase internal hiring as a result, helping promote the reputation as an employer of choice.

Going forward, talent reviews will be run per job family to drive internal talent development with the aim to significantly increase the share of internal hirings and reduce attrition. Zur Rose Group will also begin measuring specific KPIs in 2023 such as annual share of internal hires for leadership, activation and engagement rates for internal learning offerings, completion rate for performance dialogues, and qualitative insights from #OurJourney engagement to evaluate where the company needs to evolve the most.

5.8 Labour and human rights

Zur Rose Group assumes its responsibility as the largest online pharmacy in Europe and one of the leading medical wholesalers in Switzerland to enable sustainable development through its actions and is fully aware that entrepreneurial success is only possible in the long-term in harmony with people and environment.

Committed to internationally recognised human rights

Zur Rose Group is committed to respecting internationally recognised human rights and supporting their protection and observance. For example, Zur Rose Group joined the United Nations Global Compact (UNGC) at the beginning of 2022 and actions are guided by globally recognised standards and agreements, such as the UN Charter of Human Rights (Universal Declaration of Human Rights of the United Nations) or the ILO Declaration on Fundamental Rights and Responsibilities at Work. In this context, Zur Rose Group pays particular attention to the requirements regarding working hours, protection against discrimination, fair income, respect for freedom of association, and occupational health and safety.

Zur Rose Group believes that risks related to the violation of workers' rights to exercise their freedom of association or collective bargaining can be considered low, as all sites are in countries with high standards towards workers' rights and operations are managed with a clear focus on providing good

labour conditions. All employees are informed and educated about their rights as part of their onboarding. In addition, they are informed about the processes in place, i.e. consultation with the HR department, consultation with the workers council (if applicable) and, as already mentioned in Chapter 5 ("5.2 Business ethics and compliance"), using the whistleblowing system at any time in case of human rights violations. Those violations can be wrongdoings such as corruption, abuse of authority, discrimination and harassment. Employees can report such incidents anonymously using a website and a secure inbox, that makes the communication safer and easier. [GRI 2-23, 2-30](#)

The Group is also committed to integrate its sustainability agenda in its business relationships with suppliers and is therefore in the process of developing a set of respective guidelines. The guidelines are expected to be introduced in 2023 and will contain key standards in the area of ethics, labour and human rights, health and safety, climate and environment, quality, as well as governance and management systems that suppliers are expected to adhere to. [GRI 407-1](#)

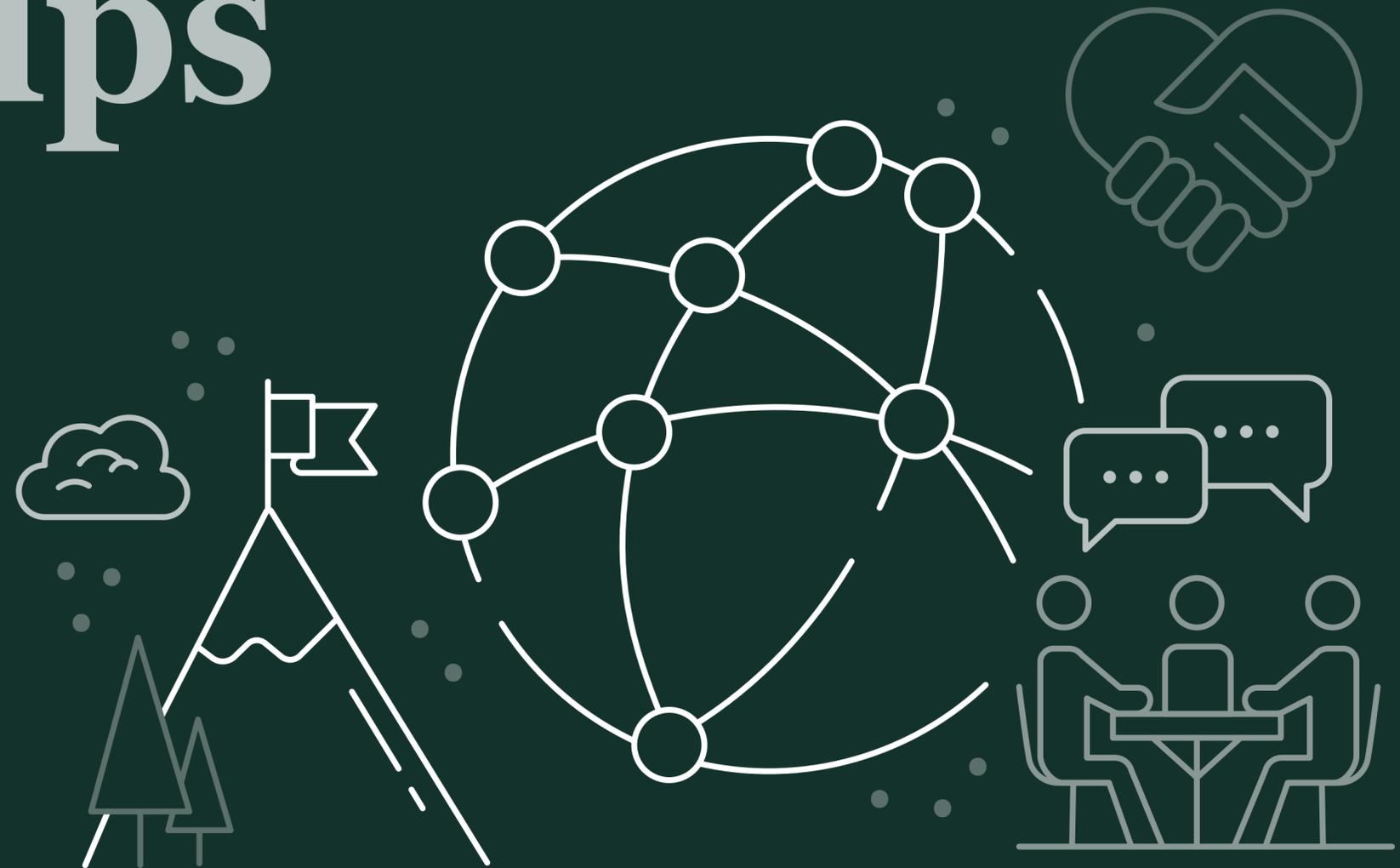
The Group ensures compliance with labour law and human rights based on multiple factors including stakeholder dialogues with workers councils and unions; qualitative insights from employee dialogues, surveys, exit interviews and employer review platforms as well as external studies and reviewing internal KPIs such as attrition rate.

Leadership commitment to human rights

Zur Rose Group's labour and human rights efforts are led by the segment boards and implemented by the local management in partnership with the Group and local HR department.

Given the continued inflationary market conditions, providing good working conditions in operations (e.g., warehouses, customer service) leads to cost-pressure in day-to-day operations. However, Zur Rose Group is committed to remaining an attractive employer and continuing to pay living wages as well as providing good working conditions for all employees. Zur Rose Group maintains positive relationships with all workers councils and workers unions in the Netherlands, since one of Zur Rose Group's largest sites is located in Heerlen. As of 31 December 2022, 649 employees (almost 29 %) were covered by a collective bargaining agreement, which includes all employees of DocMorris N.V. and DocMorris Services B.V. Excluded from the coverage is the management level, which in case of DocMorris N.V. are members of the Board and in case of DocMorris Services B.V. are the Executive Directors. [GRI 2-30](#)

6. Reliable Partnerships



6.1 Stakeholder dialogue

6.2 Partnerships for improved care

6. Reliable Partnerships

Partnerships are an integral part of the success across Zur Rose Group. The Group views strong, reliable partnerships and regular exchange as essential to advance the common mission of sustainable development. With its stakeholders – be it customers, investors, suppliers or employees – Zur Rose Group engages in regular exchange and seeks to further intensify the dialogue as well as extend its successful model of partnerships for improved care.

Goals at a glance

Main goal		
2023	Mid-term	Long-term
Finalise and publish our Supplier Code of Conduct.	75 % of our suppliers have agreed to the Supplier Code of Conduct until 2025.	All of our suppliers have agreed to the Supplier Code of Conduct by 2030.

Additional goals

...that represent key areas of focus

- We commit to intensify and expand our dialogue with our stakeholders.
- We commit to further extend our partnerships for improved care.

6.1 Stakeholder dialogue

Shared responsibilities for stakeholder engagement

Zur Rose Group strives to maintain a continuous and transparent dialogue with relevant stakeholders and to take their interest into account in corporate decision-making processes. Stakeholder dialogues take place in all segments of the Group. The department or function that is in direct contact with the stakeholders is responsible for the respective stakeholder dialogue and therefore responsibilities are shared between HR, Investor Relations, Account Managers, Procurement and Logistics. The Head of Corporate Sustainability is responsible for gradually building and managing the ongoing formal stakeholder dialogue on the topic of sustainability. Many fruitful interactions were held with the Group's shareholders, proxy advisers, sustainability experts and consultants on its sustainability journey. While regular exchanges take place in a more informal way, a structured stakeholder survey on the topic of sustainability is conducted regularly, the latest in 2021.

Continuous interaction with relevant stakeholders

Zur Rose Group encourages an open dialogue with its most important stakeholders through continuous and transparent exchanges. Through the exchange of ideas, concerns and expertise, Zur Rose Group factors in the contributions of all of its constituencies to collectively scale sustainable development. Zur Rose Group is aware of its responsibility to contribute to sustainable development and committed to foster a sustainable future together with its stakeholders.

As part of the materiality analysis (see chapter 2.2 for more details), Zur Rose Group identified and maintained continuous conversations with its most important stakeholders. The Group mapped out relevant stakeholders by determining which stakeholders are significantly impacted by its business activities, and hence crucial for the success of Zur Rose. The dialogue with relevant stakeholders facilitated the finalisation and communication of the most material economic, environmental, social, and governance topics for Zur Rose Group.

GRI 3-1

The following table summarises Zur Rose's most important stakeholders, the way in which Zur Rose engages with them and the key topics and concerns raised.

Approach to stakeholder engagement, key topics and concerns raised GRI 2-29

Stakeholder	Examples for engagement	Topics of concern
Business partners	Individual meetings Group meetings on common topics	<ul style="list-style-type: none"> • Good Corporate Governance as a competitive advantage • Ensure compliance with laws, trust of customers/ investors/ employees in the company • Reliable digital systems and data protection as well as intelligent and efficient use of data
Investors	Regular exchange between investors, analysts and Zur Rose’s Management and Investor Relations team	<ul style="list-style-type: none"> • Business ethics and compliance • Economic performance • Strategy • Reliable digital systems and data protection
Customers	Individual discussions on customer service, regular surveys on relevant topics, comments on popular digital platforms (Trustpilot or similar)	<ul style="list-style-type: none"> • Ensure secure and reliable data protection • Product quality and safety, including instructions for storage and protected fast deliveries if required • Compliance with labour and human rights (in the company and with suppliers) • Future-oriented measures in the area of packaging materials/ waste and climate protection
Suppliers	Individual discussions Group meetings on common topics	<ul style="list-style-type: none"> • Business ethics and compliance • Reliable digital systems and data protection: • evaluation of IT partners and vendors to ensure they are using the best security and privacy practices (including a questionnaire); if necessary, discussions follow to clear up any ambiguities
Employees	Individual meetings, information on important developments by e-mail/intranet	<ul style="list-style-type: none"> • Corporate culture and attractive working conditions • Further development in the area of diversity, equal opportunities and equal treatment • Labour and human rights as a general prerequisite • Occupational safety and health protection • Talent development
Civil society	Regular exchange with various NGOs and patient associations	<ul style="list-style-type: none"> • Corporate Governance • Business ethics and compliance • Product quality and safety • Social and environmental assessment of suppliers

List of industry and member associations and/ or (inter)national organisations of which Zur Rose is a member or plays an important role GRI 2-28

Abbreviation	Association
ApA	Ärzte mit Patientenapotheke (Practitioners with Pharmacies) Kolumbanstrasse 2, 9008 St.Gallen, Switzerland
FMC Forum Managed Care	fmc Schweizer Forum für Integrierte Versorgung (Swiss Forum Managed Care) Zugerstrasse 193, 6314 Neuägeri, Switzerland
SGGP/SSPS	Schweizerische Gesellschaft für Gesundheitspolitik (Swiss Association for Health Policy) Altenbergstrasse 29, Postfach 686, CH-3000 Bern 8, Switzerland
SMG	Schweizerische Management Gesellschaft (Swiss Management Association) Zeltweg 48, 8032 Zürich, Switzerland
SVA	Der Schweizerische Verband Medizinischer Praxis-Fachpersonen (Swiss Association for Medical Practice Experts) Elfenstrasse 19, Postfach 1010, 3000 Bern 6, Switzerland
VSVA	Verband der Schweizerischen Versandapotheken (Association of Swiss Mail-Order Pharmacies) c/o Mutter & Partner Consulting AG Zytgloggelaube 4, 3011 Bern, Switzerland

Abbreviation	Association
Forum Gesundheit Luzern	Forum Gesundheit Luzern (Health Forum Luzern) Horwerstrasse 87, CH-6005 Luzern, Switzerland
IG-eHealth	Interessengemeinschaft eHealth (Interest Group eHealth) c/o Köhler, Stüdeli & Partner GmbH, Amthausgasse 18, 3011 Bern, Switzerland
IG eMediplan	IG eMediplan Ikarusstrasse 9, Postfach, 9015 St. Gallen, Switzerland
Handelsverband.swiss	Handelsverband.swiss (Swiss Trade Association) 3000 Bern, Switzerland
IHK Thurgau	Industrie- und Handelskammer Thurgau Switzerland (Chamber of Industry and Commerce) Schmidstrasse 9, Postfach 396, 8570 Weinfelden, Switzerland
Bitkom e.V.	Bitkom e.V. (Bitkom Digital Association) Albrechtstraße 10, 10117 Berlin, Germany

Abbreviation	Association
FoE	Friends of Europe asbl Square de Meeûs 5-6, 1000 Brussels, Belgium
GWD	Grüner Wirtschaftsdialog e.V. (Green Economic Dialogue) Dorotheenstr. 3, 10117 Berlin, Germany
SPD-Wirtschaftsforum	Wirtschaftsforum der SPD e.V. (Economic Forum SPD) Dorotheenstraße 35, 10117 Berlin, Germany
Wirtschaftsrat	Der Wirtschaftsrat der CDU e.V. (Economic Council CDU) Luisenstraße 44, 10117 Berlin, Germany
EAEP	European Association of E-Pharmacies Erik de Rodeweg 11-13, NL - 5975 WD, Sevenum, The Netherlands
BEVH	Bundesverband E Commerce und Versandhandel (Federal Association for E Commerce and Mail-Order Business) Friedrichstraße 60, 10117 Berlin, Germany
BMC	Bundesverband Managed Care e.V. (German Managed Care Association) Friedrichstr. 136, 10117 Berlin, Germany

Abbreviation	Association
BEVH	Bundesverband E Commerce und Versandhandel (Federal Association for E Commerce and Mail-Order Business) Friedrichstraße 60, 10117 Berlin, Germany
BMC	Bundesverband Managed Care e.V. (German Managed Care Association) Friedrichstr. 136, 10117 Berlin, Germany
BVDVA	Bundesverband Deutscher Versandapotheken (Federal Association of German mail-order pharmacies) Albrechtstraße 13, 10117 Berlin, Germany
bvitg	Bundesverband Gesundheits-IT bvitg e.V. (Federal Association for Health IT) Friedrichstraße 200, 10117 Berlin, Germany
BVL	Bundesvereinigung Logistik e.V. (Federal Association Logistics) Schlachte 31, 28195 Bremen, Germany
Ad Hoc Council	Ad Hoc Council – The European Government Business Relations Council, London, UK

Stakeholder engagement in numbers: Examples show high degree of **interaction**

Dialogue with industry associations and civil society

Membership in different industry associations allows for a fruitful exchange on best practices, latest developments and provides the opportunity to play an active part in shaping the future of digital healthcare. [Bitkom](#), for instance, is one of the leading digital associations in Germany, in which more than 2000 companies from nearly all sectors aim to transform the economy, make Germany a leader in digitalisation and strengthen digital sovereignty. In 2022, engagement included:

- Weekly exchanges with the Bitkom Manager Health & Pharma
- Twice per month board meetings
- Quarterly meeting with working group “Pharma digital”
- Quarterly meeting with working group “E-Health”
- Quarterly meeting with working group “Public Affairs”
- Digital Health Conference 2022 on 30 November, Berlin, Germany

The [European Association of E-Pharmacies \(EAEP\)](#) constitutes another important forum for knowledge-sharing among peers, to discuss relevant policy initiatives on EU level and to make the voice of the sector heard vis-à-vis actors such as the European Commission, the European Parliament, other industry associations and NGOs. The members of the EAEP seek to strengthen the European health sector by ensuring better access to health-related products and services for people across the continent. In addition to the existing e-health and pharmacy committees, a separate new sustainability committee was created in order to account for the accelerating importance of sustainability that members attach to the topic. In 2022, engagement included:

- Weekly exchanges with the EAEP Public Affairs Manager
- Monthly meetings with the pharmacy committee
- Every two months meeting with the e-health committee
- Irregular: meetings with the sustainability committee (newly founded in mid-2022, two meetings in 2022)
- Three board meetings
- Three General Assembly meetings
- EAEP event on the European Health Data Space (EHDS), gathering around 55 stakeholders, on 27 October, Brussels, Belgium

Dialogue with employees

Employees are the core of Zur Rose Group’s operations and each of them contributes to the implementation of the strategy

and, ultimately, to the company’s success. An open and transparent dialogue is therefore vital and important elements of the Group’s approach are already outlined above in the “Caring Company” section. Apart from everyday’s informal or formal exchange in-person as well as via e-mails, telephone and video calls, further tools served to inform and interact. In 2022, this included:

- Twice per year (virtual) Zur Rose Group townhall meetings in which the Board announced important strategic decisions, outlined current and future projects and answered questions from employees. Additionally, on important adhoc topics, townhalls are held on short notice.
- A new intranet that enhanced the dialogue with and among employees via different streams
 - Content: information posts on important announcements and dates, newsletters from departments such as Investor Relations and Public Affairs, location-specific posts (e.g. streams “DocMorris Berlin” or “DocMorris Heerlen”), questions and ideas from employees
 - Figures: More than 1,500 posts and more than 1,400 comments in 2022 (total) demonstrate a high degree of activity and interaction.
- Via an online tool, Zur Rose Group called on employees to share their ideas to combat climate change and contribute to sustainability within the company. More than 540 participants signed up and handed in more than 85 ideas. Participants could also express their support for ideas by pressing like and by commenting on the respective posts.

6.2 Partnerships for improved care

Dialogues with key partners and pooling of expertise can lead to outstanding developments, such as raising awareness and promoting advanced care for specific diseases to improve pharmaceutical care. Healthy partnerships can also advance environmental goals through coordinated efforts regarding packaging materials and waste, while partnerships within the healthcare ecosystem can ensure wider access to treatments and preventive solutions and contribute to cost containment.

The healthcare industry is dynamic due to more people suffering from chronic diseases combined with demographic change. These trends are putting cost pressure on the economy. Zur Rose Group is convinced that the healthcare industry can function more effectively by working together, especially digitally, and that the Group is uniquely positioned to deliver short- and long-term impact.

The success of Zur Rose Group's partnership activities is measured internally via relevant KPIs, such as memberships, patients engaged, revenues, profitability and number of partners and the frequency of interactions.

Multiple partnerships across segments enable progress for patients

The year 2022 was marked by both strengthening existing partnerships and establishing new ones across all of the Group's segments. By using synergies and exploiting the innovative potential, Zur Rose Group is able to create real impact for patients, medical practitioners and staff as well as the healthcare system as a whole. The following paragraphs showcase different partnership models and approaches across the entities of the Group.

Together with doctors, nurses and patients, Zur Rose Suisse and their partner, Specialty Care Therapy Centers AG, have developed services that are tailored to the patient's individual needs. Specialty Care takes over the coordination and care of patients with complex therapies directly in the physician's practice, at the patient's

home or in a therapy centre. The therapies prescribed by the practitioner are carried out according to their specifications by qualified nursing professionals and are documented. This allows a time-saving for the practitioners and also an effective treatment for the patient.

Zur Rose Suisse entered a partnership to create the health app Well.ch, which provides users with access to various health services such as symptom checks, health information and medication orders. Zur Rose Suisse also launched a partnership with the Terz-Stiftung, an advocate for a self-determined, active life for seniors, that determines needs, launches campaigns and implements projects to create intergenerational solutions. Finally, Zur Rose Suisse started a cooperation with Helvetic Care that has the mission to enable a self-determined life for elderly people using advisory and information services for daily life questions.

In Germany, Zur Rose in Halle continued their partnership with DaVita, a dialysis centre. The purpose of this partnership is that prescribed medication can be delivered directly to the centre and not to the patient, which increases the effectiveness of the treatment and the convenience for the patient.

The annual DocMorris Supplier Day was held in September 2022 at the conference centre Eurogress in Aachen, Germany as well as on site in Heerlen, Netherlands. More than 150 guests, among them the

most important pharmaceutical manufacturers and indirect suppliers, participated and the dedicated event website registered more than 800 visitors. The Supplier Day offered the opportunity for suppliers to get to know their person in charge at DocMorris, deepen existing relations and widen the network. Besides a comprehensive business update, DocMorris gave valuable insights regarding new offers, trade marketing and strategic positioning. All in all, the Supplier Day 2022 constituted a fruitful platform for communication.

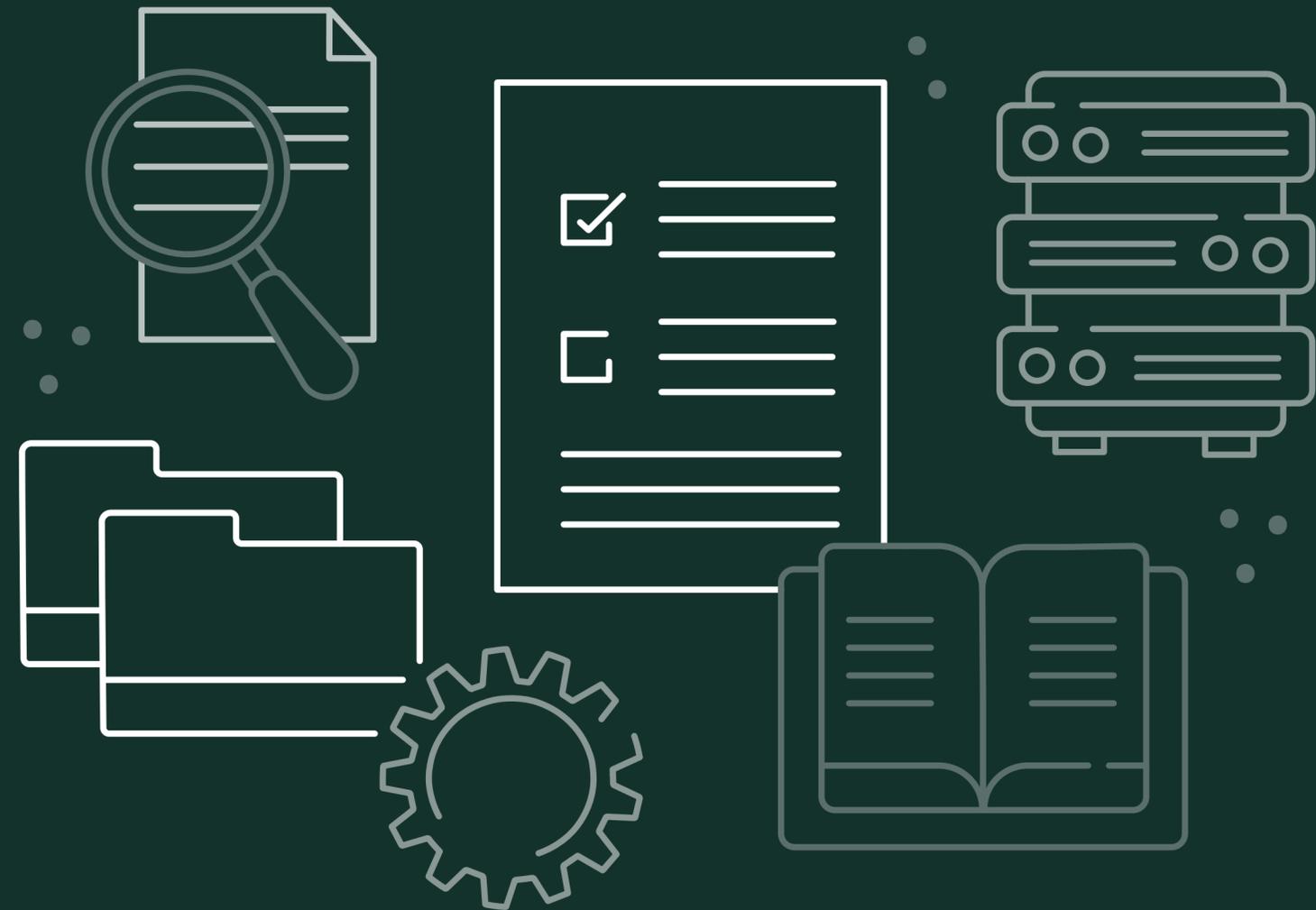
TeleClinic entered a partnership with Cerascreen, a company that develops easy-to-use self-tests and offers selected dietary supplements as well as coaching and courses on the topics of health, nutrition and fitness. Additionally, TeleClinic has partnerships with 15 DiGAs ("Digitale Gesundheitsanwendungen", digital health apps). Those therapy apps support the identification and treatment of diseases, as well as the individual implementation of treatment processes. The costs for the DiGA and any medical services required as part of its application are covered by statutory health insurance. These therapy apps include several indications such as obesity, mental health, sleep disorders or back pain. Furthermore, TeleClinic established the largest doctor on-demand network for video consultations in Germany.

Looking ahead: Intensification of dialogue and partnerships

Zur Rose Group has a deep interest in maintaining and intensifying the strong and open dialogue with all its stakeholders. As stated in the introduction of this chapter, a key objective of 2023 constitutes the finalisation and publication of the Supplier Code of Conduct, which sets out key social, ecological and ethical standards that Zur Rose Group expects its suppliers to share and adhere to. For the future, Zur Rose Group has set clear goals: In 2025, 75 % of its suppliers and in 2030, all of its suppliers have agreed to the Code of Conduct. Zur Rose Group is confident that this will enhance the mutual understanding of sustainability aspects in its business relationships.

This chapter demonstrated the multitude of partnerships Zur Rose Group is already engaged in. In 2023, the Group is committed to both extend and intensify its partnership model and thereby deliver real progress and innovation for our patients.

7. GRI reporting



7.1 About this report

7.2 GRI content index

7.1 About this report

Zur Rose Group uses the GRI Standards to disclose its sustainability efforts.

This report has been published on 23.03.2023 and comprises the calendar year 2022 (same as the annual report). Zur Rose Group commits to an annual reporting process. **GRI 2-3** There are some significant changes from previous reportings in the list of material topics and topic boundaries (due to improvements in the data collection, see chapter 4.2 for the energy consumption). **GRI 2-4** There were no significant changes in Zur Rose’s value chain in 2022. **GRI 2-6** The contents of the sustainability report have not been externally assured. **GRI 2-5** The contact point for questions regarding the report is Dr. Daniel Grigat, Group Head of Investor Relations & Sustainability, Zur Rose Group. **GRI 2-3**

7.2 GRI content index

The Zur Rose Group has reported in accordance with the GRI Standards for the period 01.01.2022 – 31.12.2022. For the Content Index – Essentials Service, GRI Services reviewed that the GRI content index is clearly presented, in a manner consistent with the Standards, and that the references for disclosures 2-1 to 2-5, 3-1 and 3-2 are aligned with the appropriate sections in the body of the report. The service was performed on the English version of the report.

GRI 1 used	GRI 1: Foundation 2021
Applicable GRI Sector Standards(s)	not applicable



GRI Standard	Disclosures	Reference/ information	Omission (Requirements omitted (RO), Reason (R), Explanation (E))
General Disclosures			
The organization and its reporting practices			
GRI 2: General Disclosures 2021	2-1 Organizational details 2-2 Entities included in the organization’s sustainability reporting 2-3 Reporting period, frequency and contact point 2-4 Restatements of information 2-5 External assurance	p. 4, 33 p. 4 p. 56 p. 56 p. 56	
Activities and workers			
GRI 2: General Disclosures 2021	2-6 Activities, value chain and other business relationships 2-7 Employees 2-8 Workers who are not employees	p. 4, 27, 33, 56 p. 4 None	
Governance			
GRI 2: General Disclosures 2021	2-9 Governance structure and composition 2-10 Nomination and selection of the highest governance body 2-11 Chair of the highest governance body 2-12 Role of the highest governance body in overseeing the management of impacts 2-13 Delegation of responsibility for managing impacts 2-14 Role of the highest governance body in sustainability reporting 2-15 Conflicts of interest 2-16 Communication of critical concerns 2-17 Collective knowledge of the highest governance body 2-18 Evaluation of the performance of the highest governance body 2-19 Remuneration policies 2-20 Process to determine remuneration 2-21 Annual total compensation ratio	p. 12 – 13, 33 – 34, AR22 ²² p. 33 – 34 p. 34 p. 12 p. 12 p. 8, 12 p. 34 p. 34 p. 12, AR22 ²² p. 12, AR22 ²² p. 34, AR22 ²² p. 34, AR22 ²² p. 34, AR22 ²³	

²² AR22: Annual Report 2022, Corporate Governance

²³ AR22: Annual Report 2022, Compensation Report

Strategy, policies and practices		
GRI 2: General Disclosures 2021	2-22 Statement on sustainable development strategy	p. 5
	2-23 Policy commitments	p. 32, 45
	2-24 Embedding policy commitments	p. 32
	2-25 Processes to remediate negative impacts	p. 32
	2-26 Mechanisms for seeking advice and raising concerns	p. 32
	2-27 Compliance with laws and regulations	p. 32
	2-28 Membership associations	p. 50 – 51
Stakeholder engagement		
GRI 2: General Disclosures 2021	2-29 Approach to stakeholder engagement	p. 48 – 49
	2-30 Collective bargaining agreements	p. 45
Material topics		
GRI 3: Material Topics 2021	3-1 Process to determine material topics	p. 8, 48
	3-2 List of material topics	p. 8 – 9
Improvement of medication efficacy, pharmaceutical quality and safety and better health care outcomes		
GRI 3: Material Topics 2021	3-3 Management of material topics	p. 16 – 17
GRI 203: Indirect economic impacts 2016	203-1 Infrastructure investments and services supported	p. 16
	203-2 Significant indirect economic impacts	p. 16
GRI 416: Customer health and safety 2016	416-1 Assessment of the health and safety impacts of product and service categories	p. 17
Seamless health journeys		
GRI 3: Material Topics 2021	3-3 Management of material topics	p. 18 – 19
Responsible marketing and sales practices		
GRI 3: Material Topics 2021	3-3 Management of material topics	p. 19 – 20

Responsible marketing and sales practices

GRI 417: Marketing and labeling 2016	417-1 Requirements for product and service information and labeling	p. 19
	417-2 Incidents of non-compliance concerning product and service information and labeling	p. 19
	417-3 Incidents of non-compliance concerning marketing communications	p. 19

Climate protection and sustainable energy use

GRI 3: Material Topics 2021	3-3 Management of material topics	p. 23 – 25
GRI 302: Energy 2016	302-1 Energy consumption within the organization	p. 24
GRI 305: Emissions 2016	305-1 Direct (Scope 1) GHG emissions	p. 25
	305-2 Energy indirect (Scope 2) GHG emissions	p. 25

Packaging materials and waste

GRI 3: Material Topics 2021	3-3 Management of material topics	p. 26
GRI 301: Materials 2016	301-1 Materials used by weight or volume	p. 26
	301-2 Recycled input materials used	p. 26
GRI 306: Waste 2020	306-1 Waste generation and significant waste-related impacts	p. 26
	306-2 Management of significant waste-related impacts	p. 26
	306-3 Waste generated	p. 26

Environmentally friendly logistics

GRI 3: Material Topics 2021	3-3 Management of material topics	p. 26 – 27
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Reliable digital systems and data protection

GRI 3: Material Topics 2021	3-3 Management of material topics	p. 31
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Business ethics and compliance

GRI 3: Material Topics 2021	3-3 Management of material topics	p. 32
GRI 205: Anti-corruption 2016	205-1 Operations assessed for risks related to corruption	p. 32
	205-3 Confirmed incidents of corruption and actions taken	p. 32
GRI 206: Anti-competitive behavior 2016	206-1 Legal actions for anti-competitive behavior, anti-trust, and monopoly practices	p. 32

Corporate governance

GRI 3: Material Topics 2021	3-3 Management of material topics	p. 33 – 35
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Corporate culture and attractive working conditions

GRI 3: Material Topics 2021	3-3 Management of material topics	p. 36
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Occupational health and safety

GRI 403: Occupational health and safety 2018	3-3 Management of material topics	p. 37 – 38
	403-1 Occupational health and safety management system	p. 37
	403-2 Hazard identification, risk assessment, and incident investigation	p. 37
	403-3 Occupational health services	p. 37
	403-4 Worker participation, consultation, and communication on occupational health and safety	p. 37
	403-5 Worker training on occupational health and safety	p. 37
	403-6 Promotion of worker health	p. 38
	403-7 Prevention and mitigation of occupational health and safety impacts directly linked by business relationships	p. 37
	403-9 Work-related injuries	p. 38

Diversity and inclusion (employees and patients)

GRI 3: Material Topics 2021	3-3 Management of material topics	p. 19, 39 – 42
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Diversity and inclusion (employees and patients)

GRI 405: Diversity and equal opportunity 2016	405-1 Diversity of governance bodies and employees	p. 40
	405-2 Ratio of basic salary and remuneration of women to men	p. 41

Talent development

GRI 3: Material Topics 2021	3-3 Management of material topics	p. 43 – 44
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Labour and human rights

GRI 3: Material Topics 2021	3-3 Management of material topics	p. 45
GRI 407: Freedom of association and collective bargaining 2016	407-1 Operations and suppliers in which the right to freedom of association and collective bargaining may be at risk	p. 45

Stakeholder dialogue

GRI 3: Material Topics 2021	3-3 Management of material topics	p. 48 – 52
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Partnerships for improved care

GRI 3: Material Topics 2021	3-3 Management of material topics	p. 53 – 54
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