

SUSTAINABILITY REPORT

2021/22

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STATEMENTS BY THE EXECUTIVE BOARD



SVEN SEIDEL Chief Executive Officer

» As a leading healthcare provider in Europe, we contribute to people's health and well-being. At the same time, it is our responsibility to make our operations as sustainable as possible. This is why we launched a new sustainability agenda in 2021, which focuses on five main topics: climate action, the circular economy, responsible supply chains, diversity and equal opportunities, as well as community engagement. We're now in the process of enlivening this agenda and developing relevant targets and measures. Our European subsidiaries are currently implementing a number of promising projects in areas such as transport based on alternative drive systems.



STEVE ANDERSON Member of the Executive Board Operations & Logistics/Overall responsibility for sustainability

» We're convinced that the economic success of our company is inseparably linked with social and environmental responsibility. When it comes to sustainability, the expectations of our customers, employees and investors are growing – as are the regulatory requirements. To live up to all of this, we're planning on collaborating even more closely with our business partners and stakeholders along the value chain in the future.

BEST PRACTICE EXAMPLES FROM THE PHOENIX COUNTRIES

CONSERVING RESOURCES BY USING TOTES MADE OF RECYCLED MATERIALS

The PHOENIX group uses recyclable plastic totes to transport medicines and other healthcare products. In the future, almost all of these totes will be made from recycled materials. Our Italian subsidiary Comifar first initiated this changeover: all of its totes, purchased for the Novate site in 2021, are made from 100-percent recycled plastic. This step saved 11 tonnes of plastic in just one year. Four other subsidiaries have successfully tested this approach as well. Step by step, totes made from recycled materials are being tested and introduced at all PHOENIX sites. Once this changeover is completed, the PHOENIX group expects to save 750 tonnes of plastic annually across the group. In the future, discarded totes will also be returned to the recycling loop.



DELIVERING MEDICINES BY SOLAR-POWERED BIKE

Our Dutch subsidiary delivers medicines in Rotterdam with the help of solar power: the SunRider, the first cargo e-bike which charges itself with solar energy while on the road. The SunRider picks up medicines at the BENU Hub in Rotterdam and delivers them to customers. If the sun isn't shining, the SunRider can also be charged via the electricity grid. Since the first SunRider was introduced, four additional solar-powered bikes have taken to the roads in the Netherlands.



WASTE MANAGEMENT TRAINING TOOL



Every year, our Macedonian subsidiary carries out training sessions for all its employees regarding the proper handling of waste. This includes, for example, learning about the types of waste generated at the PHOENIX group and how to dispose and recycle them correctly in order to conserve resources. In this way, every employee can actively contribute to protecting the environment.

🇩🇰 CIRCULAR ECONOMY IN PHARMACIES

Our Danish subsidiary Nomeco is participating in a recycling project of Novo Nordisk in the value chain: since 2020, customers have been able to return used disposable insulin pens to selected pharmacies – and Nomeco collects them at the pharmacies. Since delivery runs are made to the pharmacies in any case, no additional transport emissions arise from the collection. Nomeco stores the pens, and transport companies contracted by Novo Nordisk regularly take them to a special recycling facility. This project aims to reduce the incineration of medical waste and increase recycling; the glass inside the pens and their plastic housings are of the highest quality. The participation of additional subsidiaries in this project is in the planning stage.



PenCycle

🇨🇪 PLANTING TREES TOGETHER

Working together for the benefit of the environment, greening the grounds of the Czech headquarters and having fun at the same time: this was part of the family tree-planting campaign initiated by our Czech subsidiary. All its employees were called upon to participate and, together with their families, the colleagues planted trees and shrubs on the company grounds in Prague.



🇫🇷 SAVING ENERGY THROUGH THE ROOF



Roofs can get very hot in summer, and global warming is exacerbating this further. At one point, the thermometer on the roof of a warehouse in Clermont-Ferrand showed 70 degrees Celsius. To save energy, the French subsidiary implemented various refurbishment measures. Among other things, the roof was overlaid with a reflective membrane that also seals it against moisture. This “CoolRoof Solution” now enables the temperature to be lowered by 6 to 10 degrees, thereby saving 20 to 30 percent of the energy required for air conditioning.

RESPONSIBLE CORPORATE GOVERNANCE

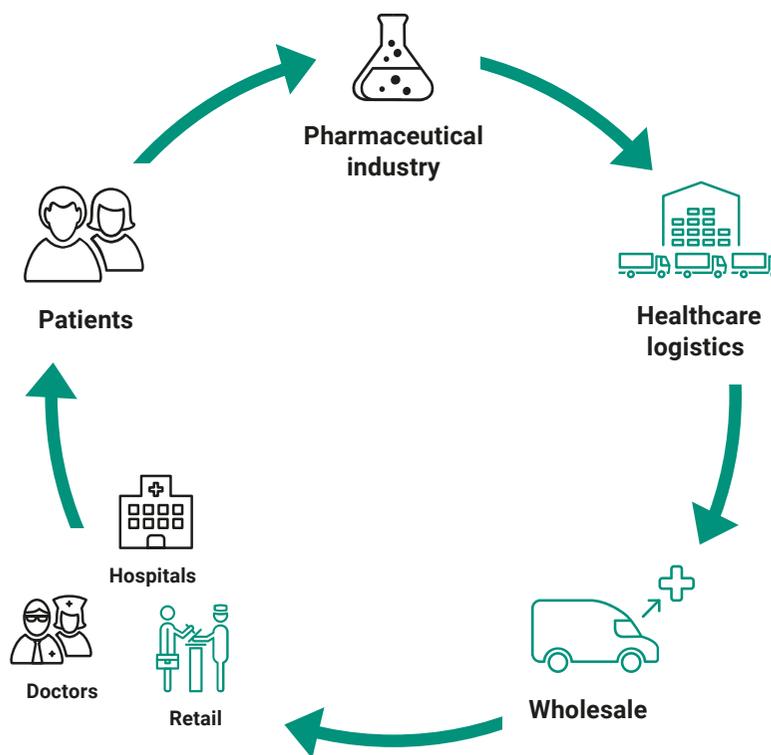
The PHOENIX group is one of Europe's leading healthcare providers. We want to make a contribution to building a healthy future with a good quality of life and are working towards anchoring sustainability more deeply in our processes. This is why we defined a company-wide sustainability agenda with various focus topics during the reporting year.

COMPANY PROFILE

The PHOENIX group, headquartered in Mannheim, is a leading healthcare service provider and one of the largest family-owned companies in Europe. The company's core business is pharmaceutical wholesale, pharmacy retail and healthcare logistics. Subsidiaries are also active in related business areas and offer services for the pharmaceutical industry, logistics solutions and goods management systems for pharmacies. With almost 40,000 employees, the PHOENIX group makes vital contributions to comprehensive healthcare in Europe.

The PHOENIX group is active in 26 European countries. In its core business, it operates 158 distribution centres and more than 2,800 pharmacies of its own. This makes its geographical portfolio highly diversified. As the group's largest market, Germany makes for more than one third of the group's overall revenue, which in the 2021/22 financial year, amounted to some €30.7 billion (previous year: €28.2 billion). This is an increase of 8.9 percent. At the same time, total operating performance grew by 10.3 percent to €39.6 billion (previous year: €35.9 billion) and earnings before interest, taxes, depreciation and amortisation (EBITDA) increased by 2.4 percent to €669 million (previous year: €653.4 million).

THE PHOENIX GROUP: THE LINK BETWEEN MANUFACTURERS AND PATIENTS



In the pharmaceutical wholesale sector, the PHOENIX group ranks first among 13 countries (previous year: 12). Its pharmacy retail business operates mainly in Latvia, Lithuania, Montenegro, the Netherlands, Norway, Romania, Switzerland, Serbia, Slovakia, the Czech Republic, Hungary and the United Kingdom. The group's strong pharmacy brands include BENU, Apotek 1 (Norway), Rowlands Pharmacy (United Kingdom) and Help Net (Romania). In addition, the PHOENIX group also offers services from along the value chain to companies in the pharmaceutical industry. For more information about this go to our » [Annual Report 2021/22](#).

Corporate mission statement and company values

The PHOENIX group's mission statement plays an overarching role in our daily activities. In our strategic agenda WINGS, which we initiated in 2020/21, we have reinforced our corporate mission statement. As a family business, we are independent in our decision-making and pursue a long-term strategy. We can only fulfil our mission, "To deliver health", with motivated and loyal employees. For this reason, we always have our employees and their motivation in mind.

Driving efficiency projects and digitalisation

To ensure a high level of efficiency as well as flexible action, we continuously review and improve our processes, and implement many different initiatives and projects.

Strengthening digital expertise is also an important part of our strategic agenda, which we are pushing forward through various initiatives. The goal is to optimise existing workflows based on a data-driven approach and to pave the way for innovative business models by analysing customer needs more effectively. Another focus is on strengthening digital channels with end customers and patients. For more information on this, please see our » [Annual Report 2021/22](#).

SUSTAINABILITY MANAGEMENT

The PHOENIX group has defined a shared understanding of sustainability, through which we express what responsible business and sustainable company management mean for us.

The PHOENIX group's understanding of sustainability

The PHOENIX group is committed to promoting the United Nations' global Sustainable Development Goals (SDGs). This applies to all company divisions and in all countries where we are active. As a leading European healthcare provider and a family business with a long-term approach, we want to make a significant contribution towards building a healthy future with a good quality of life.

Our commitment to sustainability arises from our corporate mission and values and from our goal of being the best integrated healthcare provider in Europe. We face up to the major tasks and challenges of our time, whether digitalisation or climate change. We strive for growth that creates value – both for our company and for society at large. In particular, we intend and are able to make our contribution to

Vision:	To be the best integrated healthcare provider – wherever we are.
Mission:	To deliver health – across Europe.
Values:	To be reliable, proactive, and respectful.

the health and well-being of people living in Europe through sustainable logistics concepts, the careful use of resources, safe and good working conditions and a supportive stance towards our employees.

High standards of compliance, along with quality, safety and transparency, guide our daily actions. We accept our Europe-wide responsibility, within and across national borders.

Our efforts have been rewarded externally, too. For instance, in 2021 the PHOENIX group won a bronze medal from EcoVadis, a well-known provider of corporate sustainability ratings.

New sustainability agenda

Over the course of the reporting year, the PHOENIX group adopted a company-wide sustainability agenda. As part of a group-wide process, we will define concrete goals for each pillar of the agenda, develop performance indicators and establish a monitoring process. The agenda focuses on the following topics:

- **Climate protection**
development and implementation of a climate strategy
- **Resource cycling**
commitment to reuse, reduce and recycle wherever possible
- **Responsible supply chains**
development and establishment of processes integrating human rights and environmental due diligence along our value chain.

- **Diversity, equal opportunities and inclusion**
promoting social diversity among employees and executives
- **Social engagement**
linking our donation activities more closely with our core business

Anchoring sustainability in our corporate organisation and processes

We aim to integrate sustainability considerations in all relevant processes within the PHOENIX group. This also applies to the activities of our subsidiaries, to newly acquired companies as well as to how we collaborate with our stakeholders. It is how we make clear that company success and social responsibility go hand in hand.

The overall responsibility for sustainability rests with the PHOENIX group's Member of the Executive Board Operations & Logistics. The group's sustainability team resides in Quality Management. This team consults with the PHOENIX group's Member of the Executive Board Operations & Logistics and acts as a central contact point for all sustainability issues within the PHOENIX group in close collaboration with the respective specialist departments.

Within the area of sustainability, we have an established group-wide network in place. Due to different framework conditions in the various European markets, we continue to take a decentralised approach to many sustainability issues. Individual countries also develop their own strategic approaches. For example, during the reporting year, Norway established a sustainability strategy with concrete focus topics, goals and measures.

This is how the companies respond to regional requirements while also contributing to the implementation of the PHOENIX group's sustainability agenda. Non-financial data is collected by local sustainability representatives in the subsidiaries. This process is coordinated by the central sustainability team.

We continue to take a centralised approach to group-wide projects such as pan-European talent management. To promote the company-wide knowledge transfer, networking and the exchange of best practices, the sustainability representatives meet regularly to discuss all overarching topics.

The PHOENIX group's sustainability framework, which has been effective since 2019, supports the subsidiaries as they implement the group's sustainability management system. Among other things, this framework defines the responsibilities, roles and tasks for this process. The framework also provides an overview of the activities taking place in the company as part of the sustainability agenda, guidelines and reporting as well as in terms of dialogue with stakeholders.

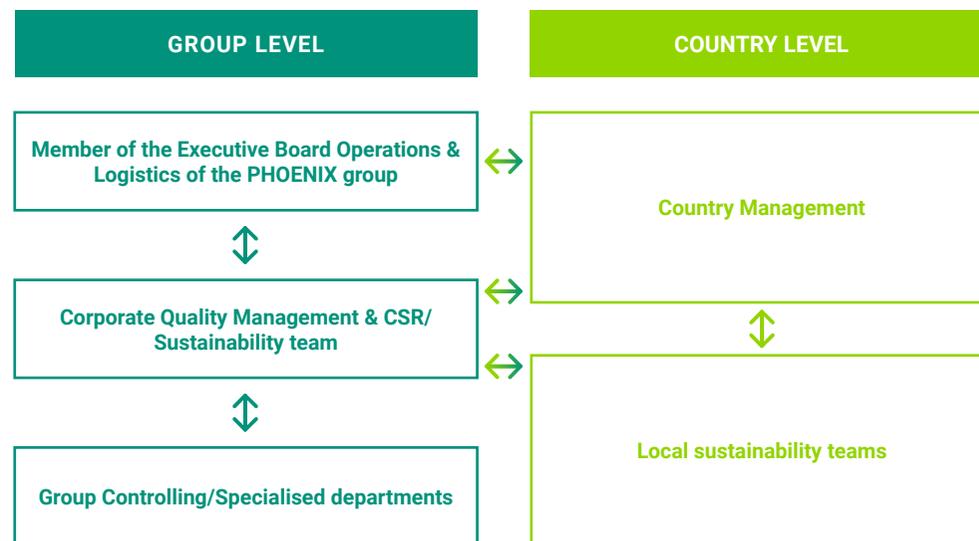
Material topics

GRI: 102-44, GRI 102-46

We regularly conduct a materiality analysis in accordance with the requirements of the GRI Standards of the Global Reporting Initiative. In February 2021, the topics defined in 2018 were reassessed by the sustainability representatives of the countries in dialogue with various specialist departments. The materiality matrix was adjusted accordingly. The topics were assessed both in terms of stakeholder relevance as well as in terms of their economic, environmental and social impact on our business activities (see also [List of material topics](#)).

The topics identified as material were assigned to the corresponding GRI standards on which the PHOENIX group reports. These material topics are also reflected in the focus topics of our new sustainability agenda and provide a chapter structure for this report.

SUSTAINABILITY ORGANISATION



OUR STAKEHOLDERS' REQUIREMENTS – DRIVERS FOR SUSTAINABILITY AT PHOENIX

TOPICS OF INTEREST:

- Health & safety workplace
- Emissions and climate impact
- Community engagement

Growing significance for employee **attraction & retention**
 Increasing relevance in **job interviews**

INDUSTRY PARTNERS

TOPICS OF INTEREST:

- Emissions and climate impact
- Circularity of resources
- Responsible and ethical supply chains

Required sustainability standards by industry partners in tenders
 Increasing requests for **cooperation projects**

EMPLOYEES & TALENTS

PHOENIX group

BANKS & INVESTORS

TOPICS OF INTEREST:

- Emissions and climate impact
- Governance
- Diversity

Increasing request from asset managers for **transparent ESG disclosure**
 Loans increasingly linked to the achievement of ESG targets or good sustainability rating

CUSTOMERS

TOPICS OF INTEREST:

- Product safety & compliance
- Circularity of resources
- Emissions and climate impact

Increasing environmental **awareness** among pharmacy customers
 Municipalities have increasing **expectations**

Stakeholder dialogue

GRI 102-40, GRI 102-42, GRI 102-43, GRI 102-44

We value a partnership-based dialogue with our stakeholders, who are a source of vital inspiration for our sustainability agenda.

Our sustainability team is in constant communication with PHOENIX group employees regarding various topics via the Speakap employee app. In addition, we offer training sessions to raise employee awareness concerning such topics as saving energy and preventing and separating waste. Sustainability topics often play a role at our so-called Townhall Meetings, and workshops are also held on this topic at the top management's annual meetings.

Individual subsidiaries have also launched initiatives to involve employees more closely in sustainability. For example, a "Green Team" project was established in the Netherlands during the reporting year: employees from various departments who are particularly interested in sustainability are involved as so-called sustainability ambassadors.

The PHOENIX group also actively works to promote sustainability as a member of the Association of Pharmaceutical Wholesalers in Germany (PHAGRO), and, at the European level, as a member of GIRP, the European Healthcare Distribution Association. Together with other member companies, we participate in working groups to come up with relevant measures and responses to the climate protection challenges the industry is facing.

01 COMPLIANCE & SUPPLY CHAINS

The success of the PHOENIX group builds on responsible and lawful conduct. Our compliance organisation ensures that guidelines and rules are implemented throughout the group. We also expect this from our service providers. At the legislative level, companies must also fulfil increasing obligations to implement human rights due diligence measures in their supply chains. As a healthcare provider, ensuring the quality of our products along the value chain is our highest priority.

COMPLIANCE

Compliance is a vital cornerstone of the PHOENIX group's corporate culture. Responsible, compliant behaviour is central to our corporate success, while corruption, anti-competitive practices and misconduct have no place in the PHOENIX group or in our collaborations with our customers and business partners. It is our goal to permanently reduce compliance risks and avoid violations. A key measure in this is to empower our employees to behave lawfully and with integrity and to optimise our business processes. To this end, the PHOENIX group has established a group-wide » **compliance system**. The implementation and relevant responsibilities with regard to this system have been laid out in our » **compliance principles**. The overall responsibility rests with the Executive Board, while the Group Compliance Officer is responsible for the ongoing implementation and further development of compliance requirements. In addition, local compliance managers have been appointed in all countries.

Our compliance system is based on the following guidelines:

- » **Code of Conduct**
- » **Anti-corruption compliance**
- » **Competition compliance**
- Sanctions compliance
- Anti-money-laundering compliance

These guidelines lay out our principles of trustworthiness and irreproachable interactions with colleagues, customers, suppliers and competitors.

Group Compliance conducts regular self-assessments as well as risk assessments to ensure that the compliance management system is implemented and emerging risks identified quickly.

In addition to a group-wide sanctions list check for all business partners, the PHOENIX group carries out a risk-based business partner check for selected third parties. Before we enter into a business relationship, potential risks, such as explicit and implicit sanctions, corruption and money laundering,

are analysed and evaluated by means of an IT-supported process. If necessary, remedial measures are also defined and if the risk is considered too high, the business relationship is not established. PHOENIX subsequently monitors the risks of selected business partners by means of a quarterly integrity check.

Dealing with violations

With the full support of the Executive Board, the PHOENIX group pursues a zero-tolerance policy when it comes to violations of its compliance guidelines. Every employee is obliged to follow the guidelines and report any violations immediately. Any violations will be sanctioned. This applies particularly to executives in particular, who must act as role models. Employees of the PHOENIX group can contact their local or the group compliance manager by telephone or e-mail if they suspect a violation. Contact details are provided on the intranet, and for the group-wide compliance manager, also on our » [website](#).

Furthermore, employees and third parties can report any compliance risks or violations via our external web-based » [whistle-blower system](#), and may do so anonymously if they wish. The system is operated by an external service provider. The identity of the whistle blower cannot be traced if the report is made anonymously.

We consistently follow up on any information received. Each case is recorded following uniform group-wide criteria, categorised according to the PHOENIX group "investigation process" specifications and followed up on locally or centrally. If an investigation confirms an internal compliance incident, measures may be taken, ranging from a warning to the extraordinary termination of the employment contract and the assertion of damages claims, depending on the severity of the employee's misconduct.

The PHOENIX group treats reports of a violation confidentially and ensure that employees who report a violation do not suffer any disadvantages. Each report is thoroughly investigated. If the employee acts with good intentions and his or her concerns are not confirmed, he or she will not suffer any negative consequences. Any negative comments made to employees who have reported a violation will be treated as a serious violation of the Code of Conduct.

Violations by third parties, such as business partners, may also result in the termination of contracts, the reporting of the violation to the supervisory authorities or police and, if necessary, civil actions by the respective PHOENIX group subsidiary against the party who has violated the guidelines.

Over the course of the reporting year, a total of 65 cases passed through the compliance organisation.

Staff training

By regularly communicating our compliance content, we also aim to raise awareness of our whistle-blower system. We support employees in acting with integrity and avoiding potential violations from the outset, through needs and target-group oriented training and communication measures. These measures are developed on a continuous basis. We conduct regular e-learning training sessions throughout the group, primarily geared at conveying the compliance system content and at ensuring that all employees behave in a legally compliant manner. Employees from our so-called focus groups receive additional compliance presentation training – these include those who are in particularly close contact with customers and suppliers, those who are authorised to conclude business transactions as well as all executives. In the 2021/22 business year, a total of 10,325 (previous year: 3,401) employees received compliance e-learning training and 1,564 (previous year: 2,077) received in-person training. Training is provided to all new employees. Existing PHOENIX employees receive compliance training every two years.

Due to the restrictions caused by the SARS-CoV-2 pandemic, training sessions that would normally have been held in person also took place online for the most part during the 2021/22 reporting year. In addition to training, we conduct regular communication campaigns, for example in the form of short compliance videos. These campaigns are typically carried out via the intranet or by e-mail.

Focus on data protection

The PHOENIX group attaches great importance to handling the data of our customers, business partners and employees in a legally compliant and trustworthy manner. The group therefore possesses a group-wide data protection organisation: the Corporate Data Protection division is the central point of contact for all data protection matters concerning the group. During the 2020/21 financial year, the

division was expanded to strengthen our data protection organisation. For the 2022/23 business year, we plan on expanding our staff further as part of the digitalisation process within the company.

Furthermore, all PHOENIX group subsidiaries and country organisations have officially appointed data protection officers or contact persons for data protection. These people are responsible for advising the organisation and employees on data protection and for monitoring compliance with data protection legislation.

The new group data protection guidelines came into force on 1 February 2021. They apply to all employees and aim to ensure that personal data is processed in strict compliance with the applicable data protection regulations and the principles of the EU General Data Protection Regulation (GDPR). The reporting and management of data breaches are also laid down and regulated in detail in the guidelines.

Plans to establish a data protection management tool for the whole of the PHOENIX group during the 2020/21 financial year had to be postponed for organisational reasons. A » **web-based reporting tool** is used to report data protection violations. Over the course of the reporting year, an increasing number of phishing attacks was recorded. In the past financial year, the PHOENIX group not only issued technical instructions in response to this, but also placed a core focus of Corporate Data Protection on employee awareness, a fundamental building block in this area. In late January 2022, a group-wide awareness campaign took place for the third time in a row on European Data Protection Day. The main purpose of the campaign was to convey to employees that data protection is not a burdensome duty, but rather a useful aspect of everyday working life. In addition, the company developed a security training programme, which has already been introduced in Germany and is being rolled out to the national subsidiaries over the course of the current business year.

During the reporting year, we initiated the development of a new data protection training course to replace the existing one. Its most important objective will be to provide all employees, regardless of their role in the company, with easily understandable content and to convey to them the principles of data protection. Completion and roll-out to the subsidiaries are planned for the second quarter of the 2022/23 business year.

SAFE PROCESSES

Quality management

A safe and reliable supply of medicines is only possible with impeccable supply chain quality. This extends from product storage in compliance with regulations to targeted delivery to pharmacies and hospitals to the optimal availability of medicinal products for consumers. All PHOENIX group companies follow the EU guidelines for good distribution practice (GDP).

» A safe and reliable supply of medicines is only possible with impeccable supply chain quality. «

Our quality assurance systems are checked through internal audits and external official inspections. The PHOENIX group's quality management is risk-based and process-oriented in accordance with ISO 9001. Of the PHOENIX group companies, 90 percent are ISO 9001-certified.

The PHOENIX group duly implements all EU legal requirements on combating the counterfeiting of medicines. The processes and measures for implementing the new Medical Devices Directive 2017/745, which came into force in 2021, were integrated into the operating processes on time. Among other things, these provide for regular random checks of the medical products supplied, an appropriate level of traceability as well as storage of product identification numbers of Class-III implantable devices.

In addition, various European project groups are working on current GxP ("good practice") topics, such as business continuity and quality risk management, which are incorporated into the development of group-wide guidelines. This serves to create a uniform understanding within the group and to consolidate the quality management systems in the different countries.

Secure logistics

Thanks to transmed Transport GmbH's track & trace system, we are able to track transported items throughout Germany and Austria in real time, all the time. The system benefits both the PHOENIX group and its partners. Thanks to this system, mix-ups, errors and oversights hardly ever occur now when it comes to transport totes. Moreover, transmed enables delays to be dealt with, underlying causes to be eliminated and transparency in logistics to be increased. Comparable track & trace solutions are used in the various countries.

SUPPLY CHAIN MANAGEMENT

Companies must take responsibility for integrating sustainability into their purchasing processes. If, for example, suppliers violate human rights or breach environmental standards, this can cause damage at the place of origin. It also harbours reputational risks. Legal requirements – both national and international – are becoming stricter, and the PHOENIX group is making the relevant preparations wherever these requirements have not already been implemented. In the UK, the UK Modern Slavery Act has been binding for several years already. In Germany, the Supply Chain Due Diligence Act (LkSG), which was passed in 2021, serves as a binding human rights due diligence framework for companies henceforth. In the Netherlands, a law against child labour is due to come into force in 2022, and the EU is also preparing supply chain legislation, a draft of which was presented in February 2022.

In the PHOENIX group, procurement of trade and non-trade goods is organised in a decentralised fashion. Yet, our corporate General Procurement department is responsible for many transnational non-trade goods, such as software licences, office supplies and services. The PHOENIX group has adopted new purchasing guidelines for indirect purchasing, which have already been implemented in Germany and are now also being established internationally.

The national subsidiaries possess their own purchasing departments or purchasing managers for the procurement of trade goods. Our trade goods are mainly prescription and non-prescription medicines and medical devices as well as other standard pharmacy products, such as cosmetics and food supplements. For pharmacy-only medicines and medical products, the PHOENIX group possesses a statutory supply mandate and has little leeway in its choice of suppliers. For these products, strict legal requirements exist regarding safety and quality.

Human rights due diligence

The PHOENIX group is committed to the principles of the United Nations' Universal Declaration of Human Rights. In accordance with our » [Supplier Code of Conduct](#), the PHOENIX group also requires the respective behaviour from its suppliers of non-trade goods. Any violations can be reported anonymously by internal and external parties via the group-wide » [compliance reporting system](#) (for more information, see [Compliance](#)).

To implement the requirements of the German Supply Chain Due Diligence Act (LkSG), PHOENIX Germany has set up a central working group. It analyses all existing processes and develops an implementation plan: some processes must be adjusted, others newly established. The sustainability team regularly exchanges information with the working group and individual country managers, especially with regard to best practices in existing processes. For example, PHOENIX UK already carries out a due diligence check on all new suppliers, which also takes sustainability aspects into account. In addition, PHOENIX UK publishes an annual statement on modern slavery and human trafficking in accordance with the » [UK Modern Slavery Act](#).

THE KEY POINTS OF THE GERMAN SUPPLY CHAIN ACT

What is the objective?

For basic human rights and the environment to be respected in the corporate supply chain.

To whom does the legislation apply?

To all companies in Germany with more than 3,000 employees, from 2023 onwards in Germany. From 2024 onwards for companies with more than 1,000 employees, too.

What are its most important points?

Companies must take responsibility for their entire supply chain, with requirements tiered according to the respective business area, direct and indirect suppliers. Companies must implement or promote the following measures:

- establish a risk management system,
- carry out an annual and event-driven risk analysis in the context of risk management,
- take appropriate preventive and remedial measures to prevent human rights violations,
- publish a policy statement explaining their due diligence approach,
- establish a complaints mechanism,
- report annually and in a transparent manner on the fulfilment of their due diligence obligations.

02 ENVIRONMENT & CLIMATE

Climate change and the increasing consumption of natural resources are among the greatest global challenges of our time. The PHOENIX group recognises its environmental responsibility and seeks to minimise the impact of its business activities on the environment. Important fields of action in this regard include reducing emissions arising from the operation of our buildings and from transport, avoiding waste generation as well as increasing the recycling of materials. In about one-third of our subsidiaries, environmental management is conducted via a management system compliant with ISO 14001.

ENERGY AND EMISSIONS

The PHOENIX group's business activities involve the consumption of electricity and fuels, which results in greenhouse gas emissions. With 158 distribution centres across Europe, the PHOENIX group regards efficient building technology as one of the biggest levers for saving energy and reducing greenhouse gas emissions. When we plan and implement new constructions as well as carry out renovation projects, we follow regional and country-specific efficiency standards as well as internationally applicable norms.

Four of our subsidiaries operate an energy management system compliant with ISO 50001. Other subsidiaries perform energy audits. We account for our energy consumption via an energy monitoring system and record our emissions in the PHOENIX group's carbon footprint analysis. For the operation of our buildings, we use a temperature monitoring system. Transport is another important area in which we aim to reduce greenhouse gas emissions. We are implementing various measures to this end.

Energy consumption and measures at our locations

The subsidiaries of the PHOENIX group have introduced various energy-saving measures and are investing in modernisation, be it in their distribution centres, offices, pharmacies or in the area of transport. For instance, we are switching to efficient and automated lighting in many buildings as well as optimising heating and air conditioning systems. In the Netherlands, for example, new pharmacies were equipped with LED lighting and heat pumps, and our Latvian and Romanian pharmacies were also changed over to LED lighting.

Several subsidiaries modernised their heating systems during the reporting year. Our Austrian site in Graz has been independent of the heating network for several years now thanks to a heat pump. Our French subsidiary has implemented various heat protection and insulation measures (see [Best practice examples from the PHOENIX countries](#)). Compressors and chillers have also been replaced with more energy-efficient systems in some countries.

In Norway, 100 percent of electricity is purchased from renewable energy sources. We are also purchasing an increasing proportion of green electricity in Denmark, Austria and the Netherlands.

Some national subsidiaries are operating solar systems or are planning on installing them. In the Czech Republic, solar panels have been used on the warehouses for many years now. In Vienna meanwhile, the installation of a PV system was initiated during the reporting year. Our Dutch company is currently constructing a modern distribution centre where more than half of the required energy will be generated via roof solar panels. Lithuania is also planning on building a new distribution centre with a PV system in 2023. Both of these new distribution centres are built in such a way as to achieve a BREEAM (Building Research Establishment Environmental Assessment Method) certification.

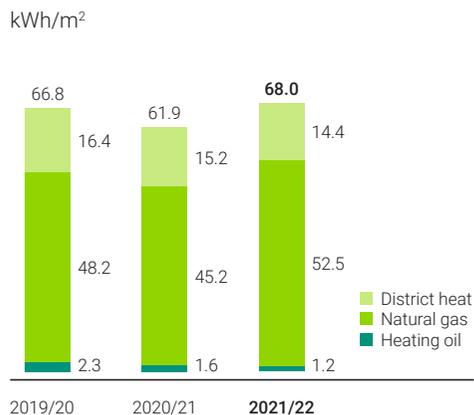
Several subsidiaries are working to raise employee awareness about energy saving, for example by providing regular information on this topic via e-mail.

Over the course of the reporting year, we made significant progress in completing the data from our retail sector.

The subsidiaries of the PHOENIX group largely heat with natural gas and district heating. Specific heating energy consumption increased by about 9.6 percent over the course of the year (previous year: -7.3 percent). This is mainly due to the winter having been colder than in the previous year. Overall, total natural gas consumption increased by 36.5 percent (previous year: -6.2 percent). The change-over in heating energy source in individual countries also contributed to this effect as well as the completion of the data from our retail sector.

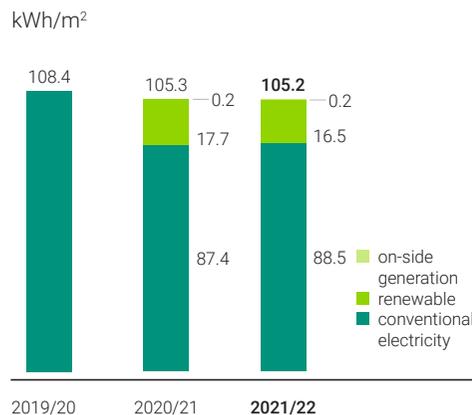
In absolute terms, electricity consumption rose by 7.3 percent compared to the previous year (previous year: -2.8 percent). This is mostly due to the improved data situation in the retail sector described above as well as to increased air conditioning due to higher outdoor temperatures in summer, as well as stricter requirements of the medicines evaluation agencies.

HEATING REQUIREMENT BY INTERNAL AREA AND GENERATION TYPE¹⁾



¹⁾ Due to improvements in data collection, the previous year's values were adjusted retroactively. Individual locations in Serbia, Bosnia and Macedonia use wood pellets to generate heat. During the reporting year, 447 tonnes of wood pellets were consumed for this purpose.

ELECTRICITY CONSUMPTION PER INTERNAL AREA AND GENERATION TYPE¹⁾



¹⁾ Due to improvements in data collection, the previous year's values were adjusted retroactively.

Reducing transport emissions

The PHOENIX group aims to continuously reduce its greenhouse gas emissions from transport. Important levers for efficient and environmentally friendly logistics are our modern vehicle fleet, transparent database and resource-efficient driving style.

The majority of the PHOENIX group's deliveries are performed by freight carriers contracted by transmed and other organisations. The remaining trips are carried out by the individual subsidiaries' vehicle fleets. Short vehicle terms of 30 months on average allow transmed to run a modern, fuel-efficient vehicle fleet, which uses vehicles of the respective current emission classes. The company maintains a detailed overview of its vehicles' features and evaluates the annual mileage per branch, vehicle category information and models, as well as the fuel types used, in order to further reduce fuel consumption.

In order to contribute to greater transparency in the delivery process, transmed determines the greenhouse gas emissions arising from the transport process as well as the average footprint per packaging item, especially in additional business (e.g. for customers from the optics or technology sectors), including for our Health Logistics subsidiary. Upon request, transmed makes the reports available to customers, with the goal of increasing awareness regarding climate emissions.

Several subsidiaries offer training to their drivers regarding fuel-efficient driving. In addition, many PHOENIX countries optimise existing routes, resulting in fewer kilometres driven and lower emissions.

Various subsidiaries are also testing more climate-friendly drive systems. Our French subsidiary is testing various alternative drive types available for vans in cooperation with some manufacturers. Our Norwegian subsidiary carried out a pilot project during the reporting year in which the contracted transport service provider used an electric transporter. Further similar projects are in the planning.

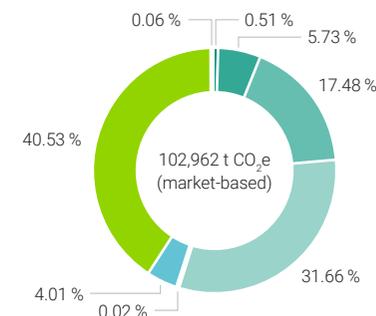
In The Hague in the Netherlands, several cargo bikes are being used to deliver medicines. During the reporting year, a pilot project using the SunRider, a solar cargo e-bike, was also kicked off in Rotterdam (see [Best practice examples from the PHOENIX countries](#)). By now, four more SunRiders are on the road. Our new wholesale location in Amsterdam is also planning to make B2C deliveries using electric vehicles in the future.

Our Finnish subsidiary is collaborating with the logistics partner PostNord for the delivery of medicines. PostNord partly uses vehicles running on biogas. This makes transport cheaper and more climate-friendly.

Greenhouse gas footprint

In calculating our greenhouse gas footprint, we follow the classification of the Greenhouse Gas Protocol (GHG Protocol). It requires companies to take specific emissions into account for their calculation. We fully revised our data basis and calculation method during the reporting year. Among other things, we used a complete data set in the retail sector as well as for our Scope 3 emissions. In doing so, we recorded the material emitted greenhouse gases for the entire upstream and downstream value chain for the first time.

EMISSIONS FROM SCOPE 1 AND SCOPE 2



t CO ₂ e	2019/20 ¹⁾	2020/21	2021/22
Scope 1			
■ Heating oil	902	625	532
■ Volatile gases	-	7,855	5,933
■ Natural gas	14,004	13,227	18,092
■ Fuels ²⁾	16,465	31,460	32,771
■ Biogenic fuels ³⁾	-	-	26
Total	31,371	53,167	57,354
Scope 2			
■ District heating	7,329	4,104	4,149
■ Electricity (location-based)	63,446	58,757	65,532
■ Electricity (market-based) ⁴⁾	-	-	41,398
■ Electricity company cars (location-based)	-	-	61
Total (location-based)	70,775	62,861	69,742
Total (market-based)	-	-	45,608

¹⁾ In 2019/20, company vehicles and coolants were not yet included in the data collection.

²⁾ Combustion of diesel, petrol, gas

³⁾ "Outside of Scopes" emissions: 597.2 t CO₂

⁴⁾ Calculation according to the market-based method was carried out for the first time during the reporting year. The graphic representation in the pie chart includes Scope 2 emissions in line with this calculation method.

EMISSIONS FROM SCOPE 3



t CO ₂ e		2021/22 ¹⁾	
Scope 3	3.1 Purchased goods and services	9,351,340	96.8 %
	3.2 Capital goods	69,779	0.7 %
	3.3 Other energy-related activities	46,832	0.5 %
	3.4 Upstream transport and distribution	144,695	1.5 %
	3.6 Business travel	4,547	0.1 %
	3.7 Travel routes for employees	33,478	0.3 %
	3.14 Franchise	5,624	0.1 %
Total		9,656,296	100 %

¹⁾ During the reporting year, significant Scope 3 emissions were collected in full for the entire upstream and downstream value chain for the first time. Therefore, they cannot be compared to the previous year's values (only collected for Scope 3.4), which are not reported. From the next report onwards, comparative Scope 3 values will once again be reported.

In wholesale, purchased goods and services typically account for the largest share of emissions by far. Other significant sources of emissions include the transport of goods by our own fleet (Scope 1) and by freight carriers (Scope 3), electricity (Scope 2) and capital goods (Scope 3).

MATERIAL INPUTS

The PHOENIX group takes care to use resources as sparingly as possible in its processes. This is true both to our distribution centres and pharmacies. We are also constantly working to reduce resource consumption in our administrative processes, for instance through digitalisation. Many national subsidiaries have introduced digital document management systems. In Italy, for example, paper consumption has been reduced by over two million paper pages per year since electronic invoicing was introduced in 2019.

We have launched Europe-wide projects for the electronic transmission of batch information and, in collaboration with manufacturers, we also aim to accelerate the digitalisation of processes. In Germany, for example, we are working to introduce the "paperless totes", i.e. transmitting delivery notes digitally as far as possible in the future.

More environmentally friendly carrier bags and packaging

In our Retail business area, we use FSC-certified packaging for our own-brand products wherever possible.

During the reporting year, the consumption of carrier bags increased to 51 million units (previous year: 33 million). This increase was mainly due to the data collection – which was carried out for the first time in the previous year – being completed. Also, the plastic films used for our MediPAC packaging system in the UK have also been included starting this year. For carrier bags used in our pharmacies, we are turning away from conventional plastic and switching to alternative solutions. During the reporting year, we were able to increase the share of alternative materials considerably. Of the total of approximately 51 million carrier bags used in our pharmacies, 51.8 percent (previous year: 7.1 percent¹⁾) were made of recycled paper or plastic. Furthermore, 93 percent (previous year: 84.4 percent¹⁾) of the non-recycled paper carrier bags (29.1 percent of the complete carrier bag range) bear the FSC seal. As planned, our UK company MediPAC in particular increased its use of bio-based carrier bags during the reporting year, too. It is our goal to further increase the share of carrier bags made from more sustainable materials.

¹⁾ Values were adjusted retrospectively.

CARRIER BAGS BY MATERIALS



Quantity	2020/21	2021/22	
Paper	11,407,641	15,422,774	30.1 %
■ of which recycled	1,284,343 ¹⁾	503,185	1.0 %
■ of which not recycled	10,123,298 ¹⁾	14,919,589	29.1 %
Plastic	19,309,557	27,759,578	54.1 %
■ of which recycled	1,077,356	26,061,746	50.8 %
■ of which not recycled	18,232,201	1,697,832	3.3 %
Bio-based materials	2,607,894	8,123,752	15.8 %
Other Materials	27,452	6,455	<0.1 %
Total	33,352,544	51,312,559	100 %

¹⁾ Values were adjusted retrospectively.

Recycled material in our distribution centres

We also take care to conserve resources in our distribution centres: for example, we use reusable plastic totes for deliveries to pharmacies. We are planning on switching over to totes made of recycled materials in the future. Our Italian subsidiary already began making this change during this reporting year. Some other countries have successfully carried out material tests for these totes (see also [Best practice examples from the PHOENIX countries](#)).

In Germany, we have switched from disposable to reusable plastic bags for the delivery of narcotics in the past two business years. Some countries have switched to thinner material for the packaging film for pallets. Other subsidiaries have begun reusing the shipping cartons that incoming goods were received in.

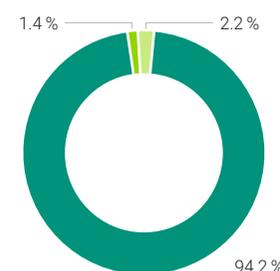
WASTE

Hazardous waste entails environmental risks and also causes high costs for the PHOENIX group. Therefore, we continuously strive to keep hazardous waste to a minimum. In addition, oil sludges and various chemicals – including primarily pharmaceutical waste – are an important issue in our business area. We are legally obliged to remove expired products and products with damaged packaging from the goods cycle and to have them professionally disposed of as hazardous waste. Besides hazardous waste, the PHOENIX group's processes also generate non-hazardous waste. This includes organic waste, paper and cardboard, electronic scrap, metal, wood, plastics, glass and textiles, all of which we recycle wherever possible.

Avoiding hazardous waste

To keep hazardous waste generation – in the form of damaged or expired medicines – to a minimum, the PHOENIX group subsidiaries make use of their individual opportunities for action and undertake a wide range of measures. Alongside other steps, the application of standard practices and operating procedures in the context of quality management, as well as compliance with the guidelines on good distribution practice (GDP), are crucial. Employee training in our distribution centres plays an important role in this. It covers, for example, the careful handling of packages and how to ensure optimal temperatures in cold storage.

HAZARDOUS WASTE PER SALES



kg/€ million	2019/20	2020/21	2021/22
■ Pharmaceutical waste	54.1	47.1 ¹⁾	47.0
■ Oil sludges	0.7	0.7	0.7
■ Other hazardous waste	2.7	2.0	1.1
Total	57.5	49.8	48.8

¹⁾ Due to improved data capture, the previous year's value was adjusted retrospectively.

In absolute terms, the amount of hazardous waste generated increased by 7 percent during the reporting year (previous year: -10.5 percent). Reasons for this include the disposal of unsaleable medicines due to faulty packaging in Norway and the closure and clearance of a warehouse in the Czech Republic. Nonetheless, specific hazardous waste was reduced by 1.9 percent compared to the previous year (previous year: -13.4 percent). This is due to a relative increase in revenue growth.

Recycling waste

In the reporting period, a total of 26,405 tonnes (previous year: 24,435 tonnes) of non-hazardous waste was produced, which is an increase of 8.1 percent (previous year: -4.2 percent). This development is, in part, due to the increased use of packaging and transport materials arising from a higher volume of goods delivered. Furthermore, additional waste was generated in the context of new constructions, building closures and renovations.

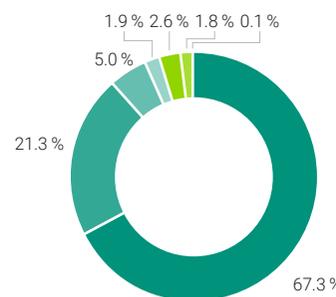
Most of our waste is recycled or composted. During the reporting year, 74.9 percent (previous year: 73.1 percent) of non-hazardous waste materials were returned to the material cycle. We were thus able to increase our recycling rate. All remaining waste – such as waste from power generation or mixed waste – is disposed of in an environmentally friendly manner by specialised companies.

Circular economy projects in the value chain

In various countries, our pharmacies take back expired medicines. Also, since 2020, our Danish subsidiary Nomeco has been participating in a recycling pilot project with pharmaceutical manufacturer Novo Nordisk which allows customers to return used disposable insulin pens to selected pharmacies (see [Best practice examples from PHOENIX countries](#)).

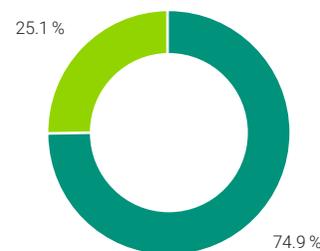
Another recycling project was initiated in Scandinavia: Together with GE Healthcare, our Tamro company in Finland has set up a recycling chain for surplus iodine. GE Healthcare manufactures contrast media and was the first company worldwide to offer a recycling service for the iodine it contains. Tamro now supplies GE Healthcare with surplus contrast agents from hospitals for recycling and in turn receives fresh contrast agents. This helps to save raw materials and avoid waste. By using our existing logistics network, no additional transport emissions arise from this process.

NON-HAZARDOUS WASTE BY TYPE



t	2019/20	2020/21	2021/22
Paper and cardboard	15,537	16,216	17,790
Mixed waste	7,325	5,685	5,612
Plastics	1,038	1,032	1,318
Organic waste	677	453	509
Wood	607	761	676
Metals and (electronic) scrap	317	261	465
Glass	3	28	35
Total	25,504	24,436	26,405

NON-HAZARDOUS WASTE BY DISPOSAL METHOD



t	2020/21	2021/22
Recycling	17,867	19,770
Incineration with energy/heat regeneration	2,061	1,782
Incineration without energy/heat regeneration	1,725	2,052
Composting	411	476
Landfill	397	350
Other disposal methods	1,974	1,974
Total (without Recycling)	6,568	6,634
Total	24,435	26,404

03 EMPLOYEES & SOCIETY

We can only be successful as a company if we have motivated employees with the right qualifications. We want to offer our staff attractive working conditions and career opportunities as well as a working environment that promotes health. An important part of our corporate culture is to engage in trustful dialogue. We value diversity and equal opportunities just as much – and want to expand this topic in the future. The PHOENIX group assumes responsibility beyond its core business and wants to contribute to the common good with its social engagement.

EMPLOYMENT AND EQUAL OPPORTUNITIES

The success of the PHOENIX group is dependent on the commitment of its employees. At the same time, we are faced with significant challenges as demographics and the skills shortage change – to which we must find answers through a coherent personnel strategy. This falls within the responsibility of Corporate HR, which reports directly to the Executive Board.

We attach great importance to providing fair working conditions. The proportion of employees with collective agreements varies from region to region (see [Facts and figures](#)). The PHOENIX group engages in constructive collaboration with employee representatives from within the company and trade unions and is always intent on reaching a fair balance of interests. This is also described in our [» Code of Conduct](#). We respect the principles of equal opportunities (see [Diversity and equal opportunities](#)). Employees receive equal treatment and opportunities in every employment situation. All employees are expected to treat each other with respect.

The PHOENIX group protects the health and safety of all its employees (see [Occupational health and safety](#)). Safe operating procedures serve to prevent illness and injury, and to promote well-being in the workplace.

PHOENIX group employees

At the end of the 2021/22 financial year, the PHOENIX group had 39,773 employees (previous year: 39,532) in 26 European countries (previous year: 27). The staffing level thus increased by 0.6 percent compared to the previous year (previous year: 1.3 percent). At 5,051 (previous year: 5,441), most of our employees were based in the United Kingdom, followed by the Netherlands with 5,042 (previous year: 5,079), Norway with 4,661 (previous year: 4,420) and Germany with 4,574 (previous year: 4,411) employees.

EMPLOYEES BY REGION

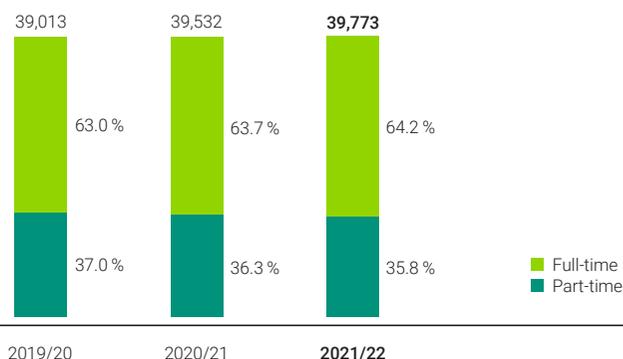


	number	%
Germany	4,574	11.5
Western Europe	13,970	35.1
Eastern Europe	13,068	32.9
Northern Europe	8,161	20.5
Total	39,773	100

The proportion of female employees in the PHOENIX group was around 70.2 percent during the reporting year (previous year: 70.4 percent). Of these, 16,049 were in full-time positions (previous year: 16,011), whereas the number of male employees in full-time positions was 9,498 (previous year: 9,182). Overall, the number of full-time equivalents decreased by 0.1 percent (previous year: +1.7 percent) to 33,169 (previous year: 33,206). Part-time positions were held by 2,370 men (previous year: 2,513) and 11,856 women (previous year: 11,826). The proportion of employees working part-time thus amounted to 35.8 percent (previous year: 36.3 percent).

EMPLOYEES BY EMPLOYMENT LEVEL

as of 31 Januar



Diversity and equal opportunities

We believe in diversity and equal opportunities – and are convinced that diverse teams achieve better results. This is why we want to expand our focus on diversity in the future. In our » [Code of Conduct](#), we commit to the principles of equal opportunities and mutual respect, which apply to all employees. We base the remuneration of our employees on their respective qualifications, professional and personal suitability, as well as performance.

One important aspect is cultural diversity. We plan on working more with international teams in the future and have already taken initial steps to achieve this at our headquarters: for instance, we attach increasing importance to ensuring that our competence centres are staffed by employees from different countries.

» Cultural diversity is an important aspect. We want to work more in international teams in the future. «

Gender diversity is also high on our agenda. There is already an increasing number of women in our talent programmes, and we want to further increase the number of women managers. When filling management positions, we make sure to include a growing number of talented women in the selection process.

Currently, 12 women managers are participating in our new LIFT Top Talent Development Initiative, with 30 participants in total.

Several of our subsidiaries are using additional approaches and measures to promote equal opportunities: our UK subsidiary, for example, has developed a Diversity & Inclusion Strategy to be introduced in 2022, and our Norwegian subsidiary has developed an Equality and Anti-Discrimination Strategy. Several countries are also implementing measures for a better work-life balance: our Italian subsidiary, for instance, has initiated a "Smart Working Project", which, among other things, supports both parents during the initial period after having a baby.

PHOENIX Germany introduced a general works agreement on integrating people with severe disabilities in 2011. At various locations, employees are made aware of the inclusion agreement, through training for example. In Germany, the proportion of employees with severe disabilities was 6.4 percent at the end of the reporting year.

In Denmark, Nomeco has partnered up with a not-for-profit organisation. We offered jobs to two of their clients with disabilities. It only took a few adjustments to our normal requirements for these two employees to be able to remain part of the labour market doing cleaning work in our warehouse.

At the end of the 2021/22 reporting year, the top management of all PHOENIX companies consisted of a total of 15 women (previous year: 13) and 78 men (previous year: 71). This is a 16.1 percent proportion of women (previous year: 15.5 percent). The PHOENIX group's Executive Board is made up of six men.

TRAINING AND DEVELOPMENT

With particular regard to the increasing shortage of skilled personnel, we believe that it is important to motivate our employees and bolster their loyalty to our company. We also consider it essential to recognise their potential and encourage them to systematically develop their skills. To achieve this, we use an efficient and comprehensive continuing education system in all countries, which allows our employees to expand their professional skills and drive forward their personal development. While in the first year of the pandemic many planned in-person training measures were cancelled, during the reporting year, the overall number of training classes was able to be increased again thanks to the implementation of virtual formats.

Induction programmes and training

We run induction programmes and training courses for our employees to suit their particular area of responsibility. Over the course of the reporting year, we also introduced a new Europe-wide learning management system for training courses which are mandatory for all employees. Training on good distribution practice for medicinal products for humans (GDP) is mandatory for our employees who

work in the distribution centres. In the area of compliance, we train all our employees on the Code of Conduct, anti-corruption guidelines, competition compliance guidelines and data protection. In addition, our employees receive regular training in occupational health and safety. Furthermore, local e-learning systems exist in the countries to meet individual training needs.

Depending on their field of work, employees are also given specific training opportunities, for instance in employee management, foreign languages and IT. Some national subsidiaries also have their own training formats in place on special topics. In France, for example, extensive training was conducted with warehouse employees during the reporting year. The training focused on the importance of their work for business relationships with customers. The Czech subsidiary initiated a talent programme offering mentoring for pharmacy staff.

One element of staff development is the annual employee review, whose structure varies between subsidiaries. What all the reviews have in common, however, is that structured feedback and support for professional development is given with a particular focus on the development of the individual employee. Group-wide, 15,220 employees (previous year: 15,764) were given a performance review in the reporting period. This corresponds to 38.3 percent (previous year: 39.9 percent).

Executive development programmes

The PHOENIX group aims to fill managerial positions primarily from within the company. This is why we launched the LIFT Top Talent Development Initiative during the reporting year, with the intention of promoting high potentials in our company. The individualised development programme uses innovative formats to strengthen the participants' leadership skills and interdisciplinary competences.

As part of PHOENIX Germany's development initiatives, executives and talent work on future topics independently. This may include digitalisation and self-organisation.

Apprenticeships and dual study programmes

The PHOENIX group offers young people a wide range of entry-level opportunities such as internships, apprenticeships and dual study programmes. To make interested applicants aware of our company, we regularly participate in various career and study information events as well as apprenticeship fairs. In the 2021/22 financial year, the PHOENIX group employed 78 apprentices (previous year: 107) and 16 dual study programme students (previous year: 13) in its German subgroup. Students in the dual study programme are given the opportunity of completing part of their training at one of our European subsidiaries.

DIALOGUE AND COLLABORATION

Being seen as an attractive employer, i.e. how the PHOENIX group is perceived as an employer both internally and externally, is an important prerequisite for the long-term success of the company. We cultivate a corporate culture based on dialogue, and this is shaped by the values enshrined in our corporate mission and our groupwide leadership guidelines. Exchange takes place during the annual review meetings between managers and employees. In addition, via direct surveys, we aim to find out how satisfied our employees are with their jobs.

Facilitating collaboration

Since 2020, our employees have been able to exchange information across departments and countries via our Speakap employee app. It has made internal communication more interactive, transparent and up-to-date. So far, more than 25,000 employees have signed up.

In the context of our "Digital Workplace Programme" project, the PHOENIX group aims to create uniform digital workplaces to simplify and improve collaboration within the company.

The company headquarters and PHOENIX Germany have also initiated the "Workplace 22" project which includes a variety of different measures. The goal is to enable better hybrid collaboration, both virtually and at the office.

Employee surveys as a measurement tool

The PHOENIX group attaches particular importance to the opinions, satisfaction and motivation of its employees. Our key performance indicator is the Commitment Index, which combines satisfaction and commitment.

In autumn 2021, we piloted a new survey concept in the UK, Serbia, Croatia and Finland, which will also enable flexible pulse surveys in all countries from 2022 onwards. Every country is required to fully carry out this concept once in either 2022 or 2023. Subsequently, the subsidiaries will have flexibility in carrying out the surveys, for instance in terms of timing, frequency and target groups. This helps to better adjust the surveys to the specific situation in each individual country. In Germany, an employee survey is planned for the second half of 2022. Our companies will survey the commitment index once per year. Survey administration will occur in a decentralised fashion based on a tool from our external service provider.

Dialogue with employee representatives

In addition to our direct dialogue with our employees, the PHOENIX group also attaches great importance to a partnership-based relationship with its employee representatives. To this end, we follow internationally recognised standards as well as the legal framework of each individual country. We respect the rights of employees to the freedom of association, freedom of assembly and collective bargaining. The SE works council reflects the international corporate structure. This body has 40 members (previous year: 38) and engages in dialogue with company management on trans-national topics. This also includes sustainability issues. For instance, the works council is committed to further environmental developments in such areas as waste prevention and energy conservation. Sustainable HR management is another focus. This includes such topics as promoting diversity, family-friendly working conditions, company health management and dealing with new and departing employees.

OCCUPATIONAL HEALTH AND SAFETY

We have a special responsibility for the health of our employees and therefore take care to ensure safe working practices. As part of our quality management system, we ensure strict compliance with the relevant national and EU legal provisions and regulations. Carrying out systematic risk assessments for each workplace is mandatory, as is the implementation of suitable preventive measures. During the Covid-19 pandemic in particular, swift and responsible action was – and continues to be – required in order to protect our employees and ensure appropriate healthcare.

Preventing accidents

Occupational safety instructions and regular employee training play a crucial role in the prevention of accidents. The main topics in this area are fire protection, workplace ergonomics, correct lifting techniques and the safe operation of machinery and equipment in our distribution centres, especially of forklift trucks. Close attention is also paid to protective workwear in all our subsidiaries.

The PHOENIX group subsidiaries implement individual measures in the area of occupational health and safety: for example, our Italian subsidiary and our Health Logistics subsidiary have established a certified occupational health and safety management system according to ISO 45001. In Germany, a hazardous substances inspection was conducted during the reporting year. The Hungarian subsidiary established a new occupational safety strategy and Estonia also increased its focus on safety in the workplace during the reporting year. The fact that we have been able to decrease the number of lost-time injuries continually confirms that our occupational safety measures are having an impact across the group (see table below).

Employees can contact their local safety officer or responsible manager in the case of work-related hazards. In Germany, work-related hazards or incidents can also be reported via the occupational safety committee. The respective local contact persons are required to handle such reports anonymously. Reports on any topic can be submitted anonymously via the group-wide » [whistle-blower system](#).

TOTAL RATE OF WORK-RELATED INJURIES

	2019/20	2020/21	2021/22	Δ 2020/21 –2019/20	Δ 2021/22 –2020/21
Actual working hours (million h)	58.2	60.3	60.8	+3.6 %	+0.8 %
Lost-time injuries ¹⁾	409	375	349	-8.3 %	-6.9 %
Total rate of work-related injuries	7.0	6.2	5.7	-11.4 %	-8.1 %

¹⁾ Reporting was carried out in accordance with national legislation and may thus also include commuting accidents. The figures include all accidents that led to at least one day of absence, so-called lost time injuries (LTI).

Safeguarding and promoting health

In view of the ongoing Covid-19 pandemic, we again concentrated our efforts during the reporting year particularly on protecting our employees against infectious disease. As a systemically relevant company, we had introduced measures such as distancing and hygiene rules, mask mandates and closed working groups at an early stage in the previous year. Over the course of the reporting year, we also offered our employees vaccination opportunities. In addition, we enabled and used mobile work as much as possible, and informed our employees about all precautionary and hygiene measures via our Speakap employee app.

In the subsidiaries, a company health management system helps to promote employee health and reduce illness rates. This includes numerous projects such as health days in the distribution centres, which focus on measures such as early cancer detection, advice on stress management and healthy eating. Due to the Covid-19 pandemic, health days could not take place at all our locations during the reporting year. Instead, PHOENIX Germany again provided employees with free memberships to online fitness programmes and conducted online training on mindfulness in collaboration with the Techniker Krankenkasse health insurance company.

Several subsidiaries also offer employees free health checks and optional flu vaccinations. Additional offers exist in various countries, such as a collaboration with the pme Familienservice in Germany, which supports employees through difficult situations in their personal and professional lives by providing counselling and a variety of offers. Employees in Germany and the UK also have the option of leasing a company bicycle.

Effective and appreciative return-to-work and absenteeism talks between supervisors and employees, as well as our company integration management system, play an important role. During the reporting year, the illness rate was 4.69 percent (previous year: 4.46 percent), an increase from previous years which is due to the Covid-19 pandemic.

SOCIAL ENGAGEMENT

The PHOENIX group is committed to assuming responsibility beyond our core business and contributing to the common good. This is integral to our corporate philosophy.

Priorities

“We deliver health across Europe” – this is our mission. From this mission, or, in other words, from our core business, we derive the choice of areas that we want to support as part of our social engagement: above all, we support pharmaceutical research, projects benefiting the common good, not-for-profit institutions including hospitals and children’s day-care centres, as well as schools and universities. Key contributions are made both group-wide as well and at the local level in the countries. We commit to selected long-term flagship projects as well as to smaller social initiatives. Our employees are also engaged for the common good in multiple ways. We support them in their endeavours such as by topping up the donations they collect. Total donations of the entire PHOENIX group in the 2021/22 financial year amounted to €505,878 (previous year: €749,443). This is lower than in 2020/21 due to one-off donations in the previous year that were made in the context of the Covid-19 pandemic.

To make even more targeted contributions, we plan to make our social engagement more strategic in the future. This process was initiated with a transnational workshop that took place during the reporting year. In this context, we developed a framework aimed at providing orientation to the subsidiaries. We recommend, among other things, that our subsidiaries establish a fixed structure as well as a method for measuring the impact of their activities, and that they take the following factors into account for at least 80 percent of their engagement:

- Alignment with the core business,
- Focus on a specific topic area and target group (e.g. children) and choose a strong partner
- Monetary donations
- Implementation of projects at the local level

Ensuring compliant behaviour

The PHOENIX group attaches great importance to ensuring that all donations and sponsoring measures are carried out in accordance with legal requirements. The PHOENIX » [Anti-Corruption Guidelines](#) – which apply to the entire group – must therefore always be adhered to whenever we organise projects. We also have a standard operating procedure with provisions on donations, grants and sponsoring. It contains, in particular, criteria enabling our subsidiaries and our partners to choose suitable projects and also specifies activities which are not supported. This includes events held by political parties and government agencies as well as projects which could generate entrepreneurial benefits for the PHOENIX group or damage our reputation. The most relevant points are summarised in our publicly accessible » [Donation and Sponsorship Guidelines](#).

Diverse activities on site

For over 25 years now, the PHOENIX group has been supporting the KULTURBRAS e. V. charity, which runs a day-care centre for children in a slum in Brazil.

Our European subsidiaries are engaged in local projects in a variety of ways. In Latvia, for example, the BENU pharmacy brand organised a fundraising campaign for the fourth consecutive year in order to draw attention to the issue of childhood cancer and the importance of emotional support in the process. In collaboration with the Children's Hospital Fund, donations were collected for children suffering from cancer whose families lack the funds to cover non-reimbursable costs. During the reporting year, our French subsidiary supported the Association PharmaVie, whose focus is on establishing recreational and educational areas in French hospitals. Our Swiss subsidiary donated to the Theodora Foundation, which aims to bring joy to children in hospitals and organises visits by artists, or so-called dream doctors.

Our Finnish subsidiary continued its collaboration with a not-for-profit organisation which enables children from low-income families to participate in sports activities.

Several countries offer financial support for employees in difficult life situations. During the reporting year, for example, a charity fund for employees in need was established in the Czech Republic and a special Covid-19 support fund for employees and their family members was set up in the Baltics.

Promoting pharmaceutical research

The PHOENIX Pharmaceuticals Science Award One has been one of our flagship projects for over 20 years. Its aim is to retain and publicise cutting-edge research in Germany, Austria and Switzerland, and to thereby strengthen the pharmaceutical value chain. Four original papers were awarded in 2021. This science award, endowed with 40,000 euros, is one of the most prestigious prizes in the German-speaking world and the only prize that recognises the latest work from an entire scientific field.

FURTHER INFORMATION

REPORT PROFILE

Fundamentals and principles of reporting

The PHOENIX group aims to communicate transparently and to engage in direct dialogue with its stakeholders. Through this sustainability report on the 2021/22 financial year, we aim to provide comprehensive information on our company's sustainability activities. The report was prepared in accordance with the GRI Standards: Core option.

The PHOENIX group has published a sustainability report annually since the 2014/15 financial year. Although the data for the 2019/20 financial year was recorded and evaluated internally, no sustainability report was published for that year due to organisational restructuring and new responsibilities.

This report covers the financial year from 1 February 2021 to 31 January 2022 and, wherever possible, also contains comparative data for the previous year or years. In the report, we describe the development and results of the sustainability activities of our company and all its subsidiaries and their affiliates. The figures in the text and some of the tables have been rounded, which means that the totals do not always add up exactly.

Consolidation scope

GRI 102-45, GRI 102-48

The name PHOENIX group refers to the entire PHOENIX group as presented in the 2021/22 Annual Report. In the 2020/21 financial year, the PHOENIX group had acquired two additional pharmacy chains in Romania, Remedia and Ecofarmacia. Furthermore, the previously acquired pharmacy chains and groupings in Romania, the Netherlands, the Czech Republic and Serbia were successfully integrated into our group. These companies were already included in the data collection for the 2020/21 Sustainability Report, although not all relevant data was available yet in the first year. Any deviations from the reporting boundaries for other key figures are explained in the respective footnotes.

Editorial notes

The editorial deadline for the Sustainability Report 2021/22 was 28 June 2022. The Sustainability Report is also available in German and can be downloaded from our [» website](#).

LIST OF MATERIAL TOPICS

GRI 102-44, GRI 102-47

Material topics	GRI topics	Location of the impacts
Responsible and ethical supply chain	Procurement Practices	External
Product safety	Customer Health and Safety, Marketing and Labelling	Internal and external
Access to high-quality pharmaceuticals and healthcare	Indirect Economic Impacts	External
Responsible production of own brands	Customer Health and Safety	Internal and external
Customer satisfaction	Customer Health and Safety, Marketing and Labelling, Customer Privacy	Internal and external
Resource consumption	Energy	Internal and external
Emissions and climate impacts	Energy, Emissions	Internal and external
Energy use	Energy	Internal and external
Waste management	Waste	Internal and external
Employee health, safety and well-being	Occupational Health and Safety	Internal
Diversity, equity, and inclusion	Employment, Diversity and Equal Opportunity, Non-Discrimination, Market Presence	Internal
Long-term talent retention	Employment, Diversity and Equal Opportunity, Training and Education	Internal
Staff development	Training and Education	Internal
Fair working conditions	Employment, Non-Discrimination, Diversity and Equal Opportunity	Internal
Community engagement	Indirect Economic Impacts	External
Compliance	Anti-Corruption, Anti-Competitive Behaviour, Environmental Compliance, Socio-Economic Compliance	Internal and external

FACTS AND FIGURES

Responsible corporate governance

Economic parameters

		2019/20	2020/21	2021/22
Total operating performance	€ m	34,513.8	35,902.0	39,612.8
Revenue	€ m	27,322.8	28,209.1	30,723.4
Total income	€ m	2,941.9	3,052.7	3,270.8
EBITDA	€ m	603.6	653.4	669.0
Profit before tax	€ m	109.0	298.7	298.0
Equity	€ m	2832.4	2,959.7	3,168.2
Equity ratio	%	29.9	28.6	29.5
Net debt	€ m	2,294.9	2,006.9	1,829.8
Company rating (Standard & Poor's)		BB +	BB +	BB +; credit watch negative
Employees (total)		39,013	39,532	39,773
Employees (full-time equivalents)		32,009	33,090	33,205

Environment & climate

Heating energy requirement by energy source

		2019/20	2020/21	2021/22	Δ 2020/21 – 2019/20	Δ 2021/22 – 2020/21
Total area¹⁾	m²	1,439,627	1,439,627	1,690,900	–	–
Fuel oil	MWh	3,299	2,267	1,968	-31.3%	-13.1%
Natural gas	MWh	69,341	65,017	88,759	-6.2%	+36.5%
District heat	MWh	23,540	21,894	24,300	-7.0%	+11.0%
Total heating	MWh	96,180	89,178	115,027	-7.3%	+29.0%
Fuel oil by area	kWh/m ²	2.3	1.6	1.2	-35.0%	-7.7%
Natural gas by area	kWh/m ²	48.2	45.2	52.5	-6.1%	+36.4%
District heat by area	kWh/m ²	16.4	15.2	14.4	-7.2%	+11.6%
Heating by area	kWh/m²	66.8	61.9	68.0	-7.4%	+29.0%

¹⁾ Due to the updated and improved building area data, the previous year's values were adjusted retroactively.

Heating energy requirement by region

MWh	Germany	Western Europe	Eastern Europe	Northern Europe	PHOENIX group
Fuel oil	1,542	59	367	0	1,968
Natural gas	11,681	34,106	30,658	12,314	88,759
District heat	6,388	0	5,017	12,895	24,300
Total heating	19,611	34,165	36,042	25,209	115,027

Electricity consumption

		2019/20	2020/21	2021/22	Δ 2020/21 - 2019/20	Δ 2021/22 - 2020/21
Electricity consumption	MWh	170,635	165,785	177,875	-2.8%	+7.3%
Electricity consumption by area	kWh/m ²	108.4	105.3	105.2	-2.9%	-0.1%

Electricity consumption by region

		Germany	Western Europe	Eastern Europe	Northern Europe	PHOENIX group
Electricity consumption	MWh	27,947	59,490	40,692	49,745	177,874
Electricity consumption by area	kWh/m ²	93.9	101.7	97.8	126.7	105.2

Hazardous waste

t		2019/20	2020/21	2021/22	Δ 2020/21 - 2019/20	Δ 2021/22 - 2020/21
Pharmaceutical waste		1,481	1,330	1,450	-10.2%	+9.0%
Oil sludges		18	21	22	+16.9%	+6.5%
Other hazardous waste		75	57	34	-23.5%	-39.8%
Total		1,574	1,408	1,506	-10.5%	+7.0%

Hazardous waste by region

t		Germany	Western Europe	Eastern Europe	Northern Europe	PHOENIX group
Pharmaceutical waste		93	253	242	861	1,450
Oil sludges		4	0	7	12	22
Other hazardous waste		0	9	12	13	34
Total		97	262	260	886	1,506

Non-hazardous waste by region

t		2019/20	2020/21	2021/22	Δ 2020/21 - 2019/20	Δ 2021/22 - 2020/21
Germany		8,105	8,048	7,705	-0.7%	-4.3%
Western Europe		10,185	8,721	9,479	-14.4%	8.7%
Eastern Europe		3,357	3,688	5,128	9.9%	39.0%
Northern Europe		3,857	3,978	4,092	3.1%	2.9%
PHOENIX group		25,504	24,435	26,404	-4.2%	8.1%

Employees & society

Employees¹⁾

	2019/20	2020/21	2021/22	Δ 2020/21 – 2019/20	Δ 2021/22 – 2020/21
Full-time equivalents	32,652	33,206	33,169	+1.7%	-0.1%
Total number of employees	39,013	39,532	39,773	+1.3%	+0.6%

¹⁾ As of reporting date 31 January.

Employees by gender, type of employment, and region¹⁾

	Germany	Western Europe	Eastern Europe	Northern Europe	PHOENIX group
Female full-time employees	978	2,942	8,636	3,493	16,049
Male full-time employees	1,580	3,292	2,982	1,644	9,498
Female part-time employees	1,583	6,520	1,313	2,440	11,856
Male part-time employees	433	1,216	137	584	2,370
Total	4,574	13,970	13,068	8,161	39,773

¹⁾ As of reporting date 31 January.

Absence due to sickness by region¹⁾

sick hours (in million h)	2019/20	2020/21	2021/22
Germany	0.54	0.53	0.55
Western Europe	1.03	1.20	1.20
Eastern Europe	0.59	0.83	0.97
Northern Europe	0.53	0.61	0.68
Total	2.69	3.17	3.40

¹⁾ Total paid and unpaid hours (million hours).

Employees covered by collective agreement by region

GRI 102-41

	Germany	Western Europe	Eastern Europe	Northern Europe	PHOENIX group
Total	4,300	9,000	3,347	6,133	22,780
Share in %	94.0%	64.4%	25.6%	75.2%	57.3%

GRI CONTENT INDEX

For the Materiality Disclosures Service, GRI Service reviewed that the GRI content index is clearly presented and the references for Disclosures 102-40 to 102-49 align with the appropriate sections in the body of the report.



GRI Standards	Page	Omissions/Comments
GRI 101: Foundation 2016		
GRI 102: General Disclosures 2016		
ORGANISATIONAL PROFILE		
GRI 102-1 Name of the organisation	6	
GRI 102-2 Activities, brands, products, and services		Annual Report, p. 1, 16
GRI 102-3 Location of headquarters	6	
GRI 102-4 Location of operations		Annual Report, p. 1, 16/17
GRI 102-5 Ownership and legal form		Annual Report, p. 8, 12, 16, 37
GRI 102-6 Markets served	7	
GRI 102-7 Scale of the organisation	6, 7, 30	
GRI 102-8 Information on employees and other workers	6, 21/22, 32	
GRI 102-9 Supply chain	14	
GRI 102-10 Significant changes to the organisation and its supply chain		There were no significant changes in the organisation and its supply chain during the reporting period.
GRI 102-11 Precautionary principle or approach	7/8	
GRI 102-12 External initiatives	5, 8, 20, 27	
GRI 102-13 Membership of associations	10	
STRATEGY		
GRI 102-14 Statement from senior decision-maker	3	
ETHICS AND INTEGRITY		
GRI 102-16 Values, principles, standards, and norms of behaviour	7/8, 11	
GOVERNANCE		
GRI 102-18 Governance structure		Annual Report, p. 8-10

GRI Standards	Page	Omissions/Comments
STAKEHOLDER ENGAGEMENT		
GRI 102-40 List of stakeholder groups	10	
GRI 102-41 Collective bargaining agreements	32	
GRI 102-42 Identifying and selecting stakeholders	10	
GRI 102-43 Approach to stakeholder engagement	10	
GRI 102-44 Key topics and concerns raised	9/10, 29	
REPORTING PRACTICE		
GRI 102-45 Entities included in the consolidated financial statements		Annual Report, p. 41/42
GRI 102-46 Defining report content and topic Boundaries	9	
GRI 102-47 List of material topics	29	
GRI 102-48 Restatements of information	28	
GRI 102-49 Changes in reporting		No changes
GRI 102-50 Reporting period	28	
GRI 102-51 Date of most recent report		28.04.2021
GRI 102-52 Reporting cycle		annually (with the exception of 2020)
GRI 102-53 Contact point for questions regarding the report		Imprint
GRI 102-54 Claims of reporting in accordance with the GRI Standards	28	
GRI 102-55 GRI Content Index	33-36	
GRI 102-56 External assurance		A third-party audit was not performed for the reporting period.

GRI Standards	Page	Omissions/Comments
KEY TOPICS		
GRI 201: Economic Performance 2016		
GRI 103 Management Approach 2016 (incl. 103-1, 103-2, 103-3)	6/7	
GRI 201-1 Direct economic value generated and distributed	30	
GRI 203: Indirect economic impacts 2016		
GRI 103 Management Approach 2016 (incl. 103-1, 103-2, 103-3)	26	
GRI 203-2 Significant indirect economic impacts	26/27	
GRI 204: Procurement practices 2016		
GRI 103 Management Approach 2016 (incl. 103-1, 103-2, 103-3)	14	
GRI 204-1 Proportion of spending on local suppliers		In General Procurement, products and services are primarily procured from suppliers in the country in which the company in question is located. The exact proportion of spending on local suppliers has so far not been recorded.
GRI 205: Anti-corruption 2016		
GRI 103 Management Approach 2016 (incl. 103-1, 103-2, 103-3)	11/12	
GRI 205-2 Communication and training about anti-corruption policies and procedures	12	
GRI 205-3 Confirmed incidents of corruption and actions taken	12	Details of compliance incidents are subject to confidentiality.
GRI 206: Anti-competitive Behaviour 2016		
GRI 103 Management Approach 2016 (incl. 103-1, 103-2, 103-3)	11/12	
GRI 206-1 Legal actions for anti-competitive behaviour, anti-trust, and monopoly practices		Details of compliance incidents are subject to confidentiality.

GRI Standards	Page	Omissions/Comments
GRI 301: Materials 2016		
GRI 103 Management Approach 2016 (incl. 103-1, 103-2, 103-3)	18	
GRI 301-1 Materials used by weight or volume		We are unable to report on the weight and volume of input materials at present because this data is not recorded to this level of detail.
GRI 302: Energy 2016		
GRI 103 Management Approach 2016 (incl. 103-1, 103-2, 103-3)	15/16	
GRI 302-1 Energy consumption within the organisation	16, 30/31	
GRI 302-3 Energy intensity	16, 30/31	
GRI 305: Emissions 2016		
GRI 103 Management Approach 2016 (incl. 103-1, 103-2, 103-3)	15-17	
GRI 305-1 Direct (Scope 1) GHG emissions	17	
GRI 305-2 Energy indirect (Scope 2) GHG emissions	17	
GRI 305-3 Other indirect (Scope 3) GHG emissions	18	
GRI 306: Waste 2020		
GRI 103 Management Approach 2016 (incl. 103-1, 103-2, 103-3)	19/20	
306-1 Waste generation and significant waste-related impacts	19/20	
306-2 Management of significant waste-related impacts	19/20	
306-3 Waste generated	19/20, 31	
306-4 Waste diverted from disposal	20	
306-5 Waste directed to disposal	20	

GRI Standards	Page	Omissions/Comments
GRI 307: Environmental Compliance 2016		
GRI 103 Management Approach 2016 (incl. 103-1, 103-2, 103-3)	11/12, 15	
GRI 307-1 Non-compliance with environmental laws and regulations		No incidents of non-compliance with environmental laws were notified through the group-wide reporting system.
GRI 401: Employment 2016		
GRI 103 Management Approach 2016 (incl. 103-1, 103-2, 103-3)	21	
GRI 401-1 New employee hires and employee turnover	21, 32	PHOENIX cannot currently report on fluctuation because the data is not available. Data collection in the reporting year focused on key figures judged to be of greater significance from a management perspective.
GRI 401-3 Parental leave		PHOENIX cannot currently report on parental leave because the data is not available. Data collection in the reporting year focused on key figures judged to be of greater significance from a management perspective.
GRI 403: Occupational Health and Safety 2018		
GRI 103 Management Approach 2016 (incl. 103-1, 103-2, 103-3)	25	
GRI 403-1 Management system for occupational health and safety	25	
GRI 403-2 Identification of hazards, risk assessment and investigation of incidents	25	
GRI 403-3 Occupational health services	25	
GRI 403-4 Employee participation, consultation and communication on occupational health and safety	25/26	

GRI Standards	Page	Omissions/Comments
GRI 403-5 Employee training on occupational health and safety	25	
GRI 403-6 Promotion of employee health	25/26	
GRI 403-7 Preventing and minimising effects directly related to business relationships on employee health and safety	25/26	
GRI 403-9 Work-related injuries	25	
GRI 404: Training and Education 2016		
GRI 103 Management Approach 2016 (incl. 103-1, 103-2, 103-3)	23	
GRI 404-1 Average hours of training per year per employee		Training activities are defined differently in our countries. For this reason, we do not currently have any reliable data on the average annual number of hours of training and education. Data collection in the reporting year focused on key figures judged to be of greater significance from a management perspective.
GRI 404-3 Percentage of employees receiving regular performance and career development reviews	23	
GRI 405: Diversity and Equal Opportunity 2016		
GRI 103 Management Approach 2016 (incl. 103-1, 103-2, 103-3)	22	
GRI 405-1 Diversity of governance bodies and employees	23, 32	
GRI 406: Non-discrimination 2016		
GRI 103 Management Approach 2016 (incl. 103-1, 103-2, 103-3)	11/12, 22	
GRI 406-1 Incidents of discrimination and corrective actions taken		Details of compliance incidents are subject to confidentiality.

- Report profile
- List of material topics
- Facts and figures
- GRI content index**
- Imprint

GRI Standards	Page	Omissions/Comments
GRI 416: Customer Health and Safety 2016		
GRI 103 Management Approach 2016 (incl. 103-1, 103-2, 103-3)	13/14	
GRI 416-1 Assessment of the health and safety impacts of product and service categories	13/14	
GRI 416-2 Incidents of non-compliance concerning the health and safety impacts of products and services		No violations were reported in the reporting year.
GRI 417: Marketing and Labelling 2016		
GRI 103 Management Approach 2016 (incl. 103-1, 103-2, 103-3)	13	
GRI 417-2 Incidents of non-compliance concerning product and service information and labelling		In the reporting year, there were indications of violations in connection with product information in Hungary, the Netherlands and Lithuania. However, all cases were resolved and the respective product information was updated. There were no adverse health effects.
GRI 418: Customer Privacy 2016		

GRI Standards	Page	Omissions/Comments
GRI 103 Management Approach 2016 (incl. 103-1, 103-2, 103-3)	12/13	
GRI 418-1 Substantiated complaints concerning breaches of customer privacy and losses of customer data		As individual countries use their own reporting tools and the incidents are currently not consolidated, it is not possible to report the number of substantiated complaints in relation to the violation of the protection and the loss of customer data.
GRI 419: Socioeconomic Compliance 2016		
GRI 103 Management Approach 2016 (incl. 103-1, 103-2, 103-3)	11/12	
GRI 419-1 Non-compliance with laws and regulations in the social and economic area		No incidents were reported in the reporting year.

IMPRINT

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English translation

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