# SARSTEDT Group policy statement

on compliance with human rights and environmental protection in the supply chain

As a partner for medicine and science, the SARSTEDT Group of Companies (SARSTEDT Group) is committed to meeting the highest requirements with both our products and our service as well as setting high standards for the conduct of our employees<sup>1</sup> same as our social and societal engagement.

In order to meet the justified expectations of trust in our area, we require trusting collaboration from our employees through responsible action.

The SARSTEDT Group is expressly committed to managing the company in an ecological and socially responsible manner and in particular while safeguarding human rights.

We don't just require this from our corporate bodies, executives and employees through the regulations defined in our Code of Conduct (CoC), but from suppliers of the SARSTEDT Group as well. This Supplier Code of Conduct (SCoC) serves this purpose.<sup>2</sup>

Our actions are based on international standards such as the UN Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises, the United Nations Con-vention on the Rights of the Child and the Con-vention on Women, the National Action Plan for the "Economy and Human Rights" (Germany), the Minamata Convention, the Basel Convention, the Stockholm Convention on Hazardous Substances (POPs Convention), the Declaration on Fundamental Principles and Rights at Work (ILO), the Ten Principles of the UN Global Compact same as the German Supply Due Diligence Chain Act (Lieferkettensorgfaltspflichtengesetz - LkSG, Germany).

# Risk management and analysis

We have established a LkSG-related risk management that takes into account the requirements of the SARSTEDT Group and is established in all relevant business processes. The risk analysis includes all human rights and environmental obligations of our business activities (§ 2 LkSG).

The following risk areas were identified during the analysis:

- Human rights,
- Working conditions and practices, such as child and forced labour, equal treatment, safety and
- Environmental protection.

The SARSTEDT Group analyses the impact of its economic activities in its own business area and along the supply chain on human and environmental rights.

In the first step, the SARSTEDT Group determines the industry-, productand country-specific human rights and environmental risks in its own business division and supply chain. This is done by an annual or eventrelated detailed index and text-based risk analysis of all supplier countries and countries in the Group's own business division. In a second step, the risk positions are prioritized and weighted. For example, the possibility of the SARSTEDT Group exerting influence on the direct supplier or the product's country of origin, if this does not correspond to the supplier's country of origin, can be included in the risk assessment. The results form the basis for the identification of effective preventive and corrective measures.

Risks in the own business unit are evaluated with the relevant departments and the human rights officer. Preventive and corrective measures are integrated into the corporate processes.

The risk analysis is carried out annually for the direct suppliers. It is carried out on an event-related basis for the entire supply chain if SARSTEDT Group must expect a significantly changed or significantly expanded risk situation in the supply chain. Findings from the processing of notices are also taken into account.

## Prevention and corrective measures

In order to reduce the human rights and environmental risks identified in the risk analysis, preventive and corrective measures are implemented in the company's own business unit and in the upstream direct supply chain.

Preventive measures include, in particular, confirmation of awareness of and compliance with the regulations defined in our SCoC in accordance with the LkSG as well as supplier self-disclosures based on questionnaires. Further preventive measures in accordance with the SCoC may include:

- implementation of training sessions and further training measures
- certification of the supplier according to recognised standards and norms
- agreeing and implementing appropriate contractual monitoring mechanisms and
- risk-based implementation of appropriate checks by the SARSTEDT Group on the supplier's business premises.

The corresponding principles of behaviour in our own business division are ensured by the SARSTEDT CoC, which compliance is guaranteed by internal business processes.

The corrective measures depend on this,

- whether the adverse effect was caused by the SARSTEDT Group itself, the SARSTEDT Group contributed to it (at least recklessly) or is involved in it and the effect arose directly in the course of its business activities, or
- whether the SARSTEDT Group can exert corresponding influence on direct or indirect suppliers

Corrective actions will be determined on a case-by-case basis. Corrective actions in the upstream supply chain are determined, regulated and monitored in close consultation with the supplier in order to prevent, end or reduce the violation or breach of human rights and/or environmental



obligations. The procedural principles are regulated in our SCoC.

As part of the annual or event-related audit, the SARSTEDT Group also plans to review the effectiveness or efficiency of the prevention and remediation measures in its own business area and within its supply chain in order to be able to continuously improve and develop. This audit review is based on the results of our risk analysis, reports from the complaints reporting system and the legal requirements.

## Reporting

The SARSTEDT Group provides an independent complaint reporting system, that can also be used anonymously. The reporting channels defined in the CoC beyond this can also be used to submit reports and information. Our SCoC obliges the supplier to inform its own employees about the possibility of using the SARSTEDT reporting system. In addition, the supplier shall endeavour to implement its own whistleblowing system. Further information can be found on the company website. Reports can also be submitted there via the reporting system.

We review the effectiveness of our existing complaints mechanisms once a year and on an event-related basis in the event of significant changes in the risk situation or concrete indications of restrictions in complaints management.

#### **Documentation and legal reporting**

Our company will prepare an annual report on the fulfilment of our due diligence obligations from the previous business year. This will be publicly available on our company's website no later than four months after the end of the financial year for a period of seven years.

### **Human Rights Officer**

The SARSTEDT Group has appointed a Human Rights Officer. This officer will independently and impartially monitor the implementation of the requirements of the LkSG as well as the execution of risk management and report annually to the board of directors.

#### **Summary**

The SARSTEDT Group is aware that the implementation of human rights and environmental obligations in its own business area as well as in the supply chain is an ongoing process. The SARSTEDT Group is committed to this responsibility and accepts the challenge of reviewing the supply chain regularly and on an event related basis, beyond the requirements of the LkSG, in order to sustainably optimise the supply chain.

The Executive Board of SARSTEDT AG & Co. KG bears explicit responsibility for the implementation of the policy statement within the SARSTEDT Group.

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