

# SARTORIUS

## Rules of Procedure for Whistleblowers

Simplifying Progress

## 1. Preamble

The Sartorius Group (hereinafter referred to as "**Sartorius**") is committed to comply with all applicable laws, regulations and human rights principles as well as to ensure environmental protection. Sartorius has taken a number of measures to ensure this commitment. See, for example, the "[Sartorius Declaration of Respect for Human Rights](#)" on the Sartorius website.

At Sartorius, all employees, direct and indirect suppliers, and persons affected by the business activities of Sartorius or its suppliers or their representatives are free to raise questions or report possible cases of misconduct. Sartorius has established various complaint channels for this purpose.

The complaint channels enable **anyone** to report, among other things, human rights and environmental risks as well as violations of human rights or environmental due diligence obligations under the German Supply Chain Due Diligence Act (Lieferkettensorgfaltspflichtengesetz - hereinafter referred to as "GSCDDA"). These risks and violations can arise from the business activities of Sartorius or its direct and indirect suppliers.

Complaints received by Sartorius are taken into account in risk analysis and in the implementation of preventive and remedial measures in accordance with applicable laws and regulations, such as the GSCDDA.

The purpose of these rules is to provide clear and transparent information about the main features, accessibility, procedures and responsibilities related to the complaints mechanism.

## 2. What types of complaints can you file?

You can use our complaint channels to report actual or potential violations of laws as well as internal Sartorius policies (e.g., the Code of Conduct). The reports can relate to various areas, such as environmental and human rights, bribery, corruption, data protection, ethical misconduct, antitrust law.

In connection with human rights or the environment, this includes (alleged) incidents in Sartorius' own business area as well as in the supply chain, e.g., health and safety in the workplace / depletion of natural resources / prohibition of child labor, forced labor and all forms of slavery / disregard of freedom of association, freedom of organization and the right to collective bargaining.

## 3. Who can file a complaint?

Potential violations can be reported by **anyone** through Sartorius' complaint channels. Sartorius employees as well as third parties such as suppliers, customers and other partners have access to various complaint channels.

#### **4. How can you file a complaint?**

Sartorius has implemented various complaint channels that are available at all times and in many languages.

Our [whistleblower portal](#) is available at all times and allows you to complain anonymously.

There is also a toll-free number (00800 22 44 22 11) and a chargeable number (0049 551 50 41 99 41) where you can make your complaint orally.

You can also contact the Compliance Team in Legal Affairs & Compliance directly by sending an e-mail to [compliance@sartorius.com](mailto:compliance@sartorius.com), speaking with them in person or by telephone and describing your concern. In addition, the Chief Compliance Officer is also available.

In addition to the above channels, you may also contact your manager at any time. He or she will immediately forward any complaints received to the Compliance Team.

#### **5. Who handles the complaints?**

Complaints are handled by the Compliance Team. The Compliance Team is

- Impartial,
- Independent, i.e. not bound by instructions,
- Committed to confidentiality,
- Specially trained, and
- equipped with the necessary resources to handle the complaint appropriately.

The Compliance Team will handle the complaint independently, objectively and impartially.

#### **6. How does the complaint procedure work?**

Once your complaint has been received by the Compliance Team, you will receive an acknowledgement of receipt as soon as possible and within seven days at the latest.

If you have used the whistleblower portal, you will receive a reference number and access to a secure mailbox. This mailbox will allow you to track the status of your complaint and communicate with Sartorius.

***a) Responsibilities***

After you have filed your complaint, it will be promptly forwarded to the Compliance Team. All complaints will be handled in accordance with relevant laws, regulations, internal policies and procedures, with due regard for the rights of data subjects.

***b) Immediate measures***

If required by the nature of the complaint, the Compliance Team will take immediate action to mitigate or stop (suspected) risks or violations.

***c) Plausibility check and complaint handling***

Upon receipt of the complaint, the complaint is reviewed to determine if it is plausible and contains sufficient information to be handled. If this is the case, an investigation of the complaint will begin, which may include reviewing documents and interviewing witnesses. If contact information is provided, the Compliance Team may contact the whistleblower to clarify the situation. Throughout the complaint process, the whistleblower will be involved in an appropriate manner and may also participate in the development of preventive or remedial measures, as appropriate.

If necessary, the Compliance Team will also involve the appropriate internal functions or external consultants.

If the complaint cannot be substantiated, the Compliance Team will close the case and inform the whistleblower of the outcome.

***d) Preventive and corrective measures***

If the outcome of the complaint process substantiates it, Sartorius will develop and implement appropriate preventive or corrective measures. This may include personnel actions to prevent, correct or mitigate the identified risk or violation.

**7. How long does it take to handle a complaint?**

The time it takes to handle a complaint varies from case to case. No later than three months after acknowledgement of receipt, you will receive information on the status of the process (if a contact option is provided), even if it is not yet completed.

The complaint process is considered closed when the identified risk or violation has been appropriately addressed and corrected.

## **8. How are you protected as a whistleblower?**

Any complaints received by Sartorius will be treated confidentially. The employees responsible are bound to confidentiality, are impartial and are not bound by instructions. The complaint will be handled on a need-to-know basis. This principle is intended to ensure that only those persons who actually need the information to process the complaint are given access to it. Your identity as a whistleblower will be protected as required by law.

There will be no retaliation against whistleblowers who file complaints in good faith, even if the outcome is unfounded. Such retaliation constitutes serious misconduct at Sartorius and will be punished. Sartorius will also take appropriate measures, if necessary, to prevent or stop retaliation by third parties.

## **9. Data protection and documentation**

Sartorius complies with applicable laws and regulations regarding the collection, processing and storage of personal data. In accordance with the applicable laws and regulations, Sartorius will document the complaint mechanism and any complaint handling procedures. Section 10 (1) of the GSCDDA shall apply.

## **10. Effectiveness review**

Sartorius will evaluate the effectiveness of the complaints mechanism on an annual basis and conduct ad hoc reviews as needed. If necessary, appropriate measures will be taken to expand and improve the complaints mechanism.

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