



# Anti-Corruption Code

Simplifying Progress

January 2026

# Preliminary Remarks

Corruption has no place at Sartorius and is unacceptable when it comes to our company, our employees, and the entire economic system. Not only does it damage our reputation, but it can also have many other consequences, such as fines, compensation payments, profit skimming,

a ban on engaging in commercial activities, exclusion from contracts, and the termination of business relationships. In addition, those involved face imprisonment, fines, claims for damages, and consequences under labor law.

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# Why Our Anti-Corruption Code Is Important

Our aim is to work with all our employees, including the Executive Board, to prevent, detect, and investigate cases of corruption.

This Anti-Corruption Code ("Code") serves as a basis for raising employee awareness of the dangers of corruption while also providing them with guidance, instructions, and assistance in combating corruption. The Code should make it clear that Sartorius rejects all forms of corrupt behavior, no matter how minor they may seem, and acts ethically even under competitive pressure. Corruption has harmful

effects and often affects the most vulnerable. Results achieved through corruption are neither sustainable nor acceptable. Ignorance is no defense against responsibility, and good intentions do not justify corrupt means. A choice not to engage in corruption can always be made, and this Code is intended to encourage our employees to make that choice in order to promote a culture of integrity and transparency.

Where local laws or regulations impose stricter requirements, those laws or regulations take precedence over this Code.



# What We Mean by Corruption

For the purposes of this Code, corruption is defined as any abuse of a position to gain an advantage for oneself or others, either on one's own initiative or at the instigation of a third party. It can be active (offering, promising, or giving an advantage in expectation of something in return) or passive (requesting, agreeing to receive, or accepting an advantage).

By advantages, we mean tangible and intangible gifts and benefits. Tangible gifts and benefits include, but are not limited to, cash payments, benefits in kind, low-interest loans, discounts, and invitations to events, trips, and meals. Obtaining a professional position or special career opportunities are examples of intangible benefits.

As a rule, even small gifts and benefits are sufficient to constitute corruption. This applies in particular if they are given to individuals who are public officials working for a public authority or organization, or who have been entrusted with public duties by a public authority or organization. Examples of public officials include:

- Members of government (e.g., head of government, Secretaries, and Cabinet members)
- Public servants (e.g., civil servants and other public sector employees)
- Employees of public institutions (e.g., public hospitals and clinics, state universities, and research institutions)
- Employees of companies that are majority state-owned
- Individuals who can influence government decisions as part of their role

In addition to the category of public officials, particular care must also be taken to avoid undue influence in the case of healthcare professionals, namely individuals who are trained and licensed to provide medical, therapeutic, or preventive health services. These include doctors, nurses, pharmacists, therapists, and other related health professionals who diagnose, treat, and care for patients. Facilities and institutions that provide medical services, treatments, and care for individuals (healthcare organizations) also fall within this category and include hospitals, clinics, nursing homes, rehabilitation centers, and other healthcare facilities that provide and coordinate health-related services for the general public.

In principle, every department and individual is vulnerable to corruption. Particularly vulnerable, however, are departments and individuals involved in

- awarding contracts
- concluding contracts and monitoring services
- carrying out checks and supervisory activities
- processing transactions with confidential information or accessing confidential information that may be of significance to third parties
- exercising decision-making powers
- controlling financial transactions
- regular interactions with external parties such as suppliers and customers
- activities where there is high pressure to perform
- regular applications for official approvals

Information on countries particularly vulnerable to corruption can be found in [Transparency International's Corruption Perceptions Index](#).

# Why We Use the Four-Eyes Principle



Everyone makes mistakes. We therefore do not view control mechanisms as a sign of mistrust but rather as a guarantee of diligence and professionalism in our daily work.

At Sartorius, the four-eyes principle is firmly anchored in the company as a central pillar of integrity and transparency. It stipulates that at least two suitable employees must be involved in and approve all business transactions that are critical in terms of decision making or risk.

This shared responsibility is not just for reviewing purposes but also serves to protect each individual and the company as a whole.

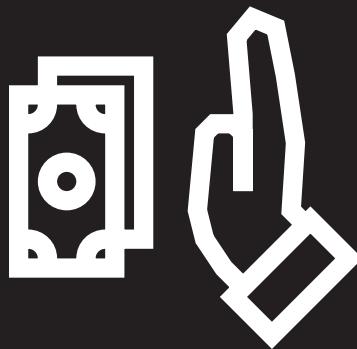
Examples of business transactions that are critical in terms of decision making or risk, and to which the four-eyes principle is routinely applied include:

- Payments
- Actions that are legally binding on Sartorius (e.g., conclusion of contracts)
- Procurement and the selection of suppliers
- Price and discount specifications
- Changes to master data/quality data

This list is not exhaustive. More specific requirements regarding the four-eyes principle and necessary approvals may be defined in Sartorius internal guidelines, which always take precedence in the event of a conflict. Internal guidelines are available in the [\*\*Signavio Process Portal\*\*](#), for example.

If, in exceptional cases, the four-eyes principle cannot be applied (e.g., due to technical restrictions or in emergencies), we use alternative safeguards and document them carefully.

# How We Handle Gifts and Benefits



The line between small favors, tokens of regard/appreciation, other gifts and benefits, and corruption is often blurred. To protect our employees and our company from penalties, the following guidelines apply to gifts and benefits of any kind.

If employees are unsure whether a gift or benefit is permissible, they should contact the Corporate Compliance Team ([Points of Contact & Reporting Channels](#) for contact details).

## Giving or Accepting Gifts

We observe the following when giving or accepting gifts:

### **Giving Gifts**

Unless there are stricter local regulations or internal guidelines to the contrary, it is permissible for us to give gifts to private-sector salaried employees if their total value does not exceed €100 within a calendar year, they are in line with local customs, and they are appropriate in terms of price and frequency. Gifts with a value of more than €100 are only permitted in exceptional cases and must be reviewed on a case-by-case basis by Corporate Compliance.

Regardless of whether these conditions are met, it is not permissible for us to give the following types of gifts:

- Gifts intended to influence decision making or the performance of professional duties, regardless of value
- Gifts to **public officials**, regardless of value
- Gifts to **members of a healthcare profession**, regardless of value
- Gifts involving the cross-border shipment of food
- Gifts that are already prohibited by local regulations, regardless of this Code



## Accepting Gifts

Accepting gifts can also give rise to the appearance of corruption. It is therefore of the utmost importance to us that all employees adhere to the following guidelines when accepting gifts.

Unless there are stricter local regulations or internal guidelines to the contrary, gifts may be accepted if the total value of gifts from the same donor does not exceed €100 within a calendar year, they are in line with local customs, and are appropriate in terms of price and frequency.

Gifts with a value exceeding €100 may only be accepted in exceptional cases and must be reviewed on a case-by-case basis by Corporate Compliance. Regardless of whether these conditions are met, it is not permissible for us to accept the following types of gifts:

- Gifts intended to influence decision making or the performance of professional duties, regardless of value
- Gifts that are already prohibited by local regulations, regardless of this Code

## Prize Draws, Invitations/ Hospitality and Other Gifts and Benefits

We do not permit prize draws, invitations/hospitality and other gifts and benefits if they are not within the usual scope, do not comply with local customs, are inappropriate in terms of price and frequency, or are intended to influence decision making or the performance of professional duties.

In case of doubt, employees should contact the Corporate Compliance Team (**Points of Contact & Reporting Channels** for contact details).

## Donations and Non-Commercial Sponsorship

We focus on three main areas when it comes to donations and non-commercial sponsorship:

- Supporting projects that are in line with the company's mission statement
- Positively influencing the community at our locations around the world
- Disaster relief

Eligible projects are typically in the life sciences sector, promote science and technology transfer, support research and education, or generate public interest in the life sciences. For more details on the approval process and on prohibited donations and sponsorships, please refer to the **Guideline for Donations and Non-Commercial Sponsorships**.

# How We Handle Other Special Cases of Corruption

## Facilitation Payments

Facilitation payments are (minor) payments made to public officials to expedite standard administrative procedures or to ensure the provision of a routine service to which the payer is already entitled. Our company policy strictly prohibits the practice of facilitation payments, as these can be considered a form of bribery and are illegal in many jurisdictions. Our employees are instructed not to make or offer payments of this kind. If employees are confronted with a demand for a facilitation payment, they must report this immediately to the Corporate Compliance Team (**Points of Contact & Reporting Channels** for contact details).

### Examples:

- A Sartorius logistics employee is asked by a customs official for a “small fee” to expedite the release of a shipment of laboratory equipment that could otherwise be delayed by several days.
- A Sartorius employee offers a payment to a local health authority official to expedite the processing of documents required for the approval of a new product.
- A Sartorius employee is told that a “small token of appreciation” to the inspector would facilitate the upcoming routine inspection of the production facilities.

## Kickbacks

Kickbacks are improper payments made by the recipient of a transaction or service to the intermediary in exchange for preferential treatment or the awarding of a contract. Our company policy expressly prohibits any form of kickbacks. Our employees do not participate in practices that involve kickbacks or could give the appearance of payments of this kind. This covers both direct and indirect payments, gifts, benefits, and other forms of consideration intended to influence business decisions in an improper manner. Employees who encounter offers or requests for kickbacks must report them to the Corporate Compliance Team without delay ([Points of Contact & Reporting Channels](#) for contact details).

## Examples:

- A supplier of laboratory equipment offers a Sartorius purchasing manager a percentage of the sales value if she ensures that his company is awarded a major contract.
- A service provider who performs maintenance work on production facilities suggests returning a portion of the payments received to the Sartorius technician responsible in order to be given preference for future maintenance contracts.
- A Sartorius research manager accepts a private donation from a pharmaceutical company for his personal research project after influencing the results of a study he conducted in favor of the pharmaceutical company.

## Commissioning Third Parties

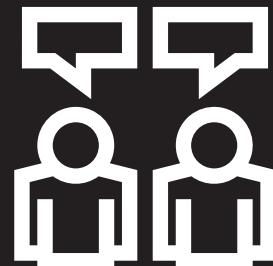
We may use third parties, in particular suppliers, service providers, subcontractors, joint venture partners, sales partners and intermediaries for (international) transactions. Our employees work to ensure that third parties consistently comply with the respective local and internationally applicable laws within the scope of the business relationship. Third parties must refrain from and must not solicit any actions that our employees are prohibited from taking in order to ensure integrity and compliance with the company's anti-corruption guidelines. In particular, inappropriate payments that enable **facilitation payments** or **kickbacks** are prohibited.

### Examples:

- An intermediary working on behalf of Sartorius in Brazil offers a potential customer a hidden commission to secure a contract.
- In Japan, a service provider commissioned by Sartorius claims that he can expedite approvals due to his connections with government officials.
- A consultant in India uses inside information obtained while working for Sartorius for personal investments.

# How We Respond to Suspected Corruption

Sartorius expects all employees to actively combat corruption and to report any suspicion of corrupt behavior or violations of our Code. If they observe any indications of corruption or have any questions about the interpretation or application of the Code, our employees should communicate this without delay via the established reporting channels (**Points of Contact & Reporting Channels** for contact details). We are committed to thoroughly investigating all reports and taking appropriate action to ensure that our business practices always meet the highest ethical standards.



# How We Ensure Compliance and Effectiveness

To ensure compliance with the Code and reinforce awareness of corruption-free business practices, we provide training to all employees. At least once a year, we conduct training sessions through Corporate Compliance to ensure that our employees are familiar with the content of the Code and understand and can apply the principles and procedures for preventing corruption.

In addition, Corporate Compliance continuously reviews the adequacy and effectiveness of the Code and makes adjustments as necessary.

These reviews take place at regular intervals and include, in particular, an assessment of the current risk landscape, feedback from employees, and consideration of changes in relevant legislation and best practice.

Through these measures, we at Sartorius ensure that the Code remains up to date, relevant, and effective at all times. If training is required for their employees outside of regular training sessions, managers should contact Corporate Compliance.

# Points of Contact & Reporting Channels

Employees and third parties can contact the Corporate Compliance Team directly (also anonymously) in several languages and at any time of the day or night to report concerns or ask questions about this Anti-Corruption Code. We have set up various global and local reporting channels for this purpose (see on the right).

The Chief Compliance Officer and the entire Corporate Compliance Team are also available as points of contact.

In addition, all employees always have the option of contacting their manager, who will forward any reports received to the Corporate Compliance Team without delay.



Email to: [compliance@sartorius.com](mailto:compliance@sartorius.com)



[Whistleblower portal](#)



Toll-free number: 00800 22 44 22 11;  
toll number: 0049 551 50 41 99 41



Local reporting channels for individual companies in accordance with legal requirements

# Simplifying Progress

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