

# SARTORIUS

## Policy Statement on Human Rights Strategy

Simplifying Progress

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# Document Information

## Applicability

Scope	Sartorius Group
Confidentiality	Public

## Ownership

Policy Owner	Executive Board of Sartorius AG
Board Area	Business Development, Corporate Research, Human Resources Management, Legal Affairs & Compliance, Corporate Communications & IR, Corporate Branding & Design, Corporate Sustainability
Board Sponsor	Joachim Kreuzburg
Approved by	Joachim Kreuzburg, René Fáber, and Alexandra Gatzemeyer

## Document information

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Review	Annually and/or ad-hoc

# 1 Introduction

Good health and well-being is – according to the United Nations – considered one of the basic human rights and is a major indicator of sustainable development. It is the company's vision and core business to help improve the health of more people. Consequently, good health and well-being are at the heart of the attempts to achieve more sustainability.

As a part of society and a signatory of the UN Global Compact, the company is committed to running its business operations in conformity with human rights and treating business partners as well as natural resources responsibly. Human rights and environment-related due diligence is an essential tool to reach this goal together with all relevant stakeholders.

When setting up internal guidelines and processes, Sartorius models itself on the core elements of the duty of care regarding human rights of the national action plan for the implementation of the United Nations (hereinafter "UN") Guiding Principles on Business and Human Rights.

## 2 Objective of the Present Policy Statement

With the present Policy Statement on Human Rights Strategy, the Executive Board of Sartorius strengthens its commitment and strategy towards the protection of human rights and the environment for Sartorius and all Sartorius Group companies and complies with its duties under the German Supply Chain Due Diligence Act describing (i) the procedure to comply with its statutory obligations, (ii) the priority human rights and environment-related risks, and (iii) the human rights- and environment-related expectations towards employees and suppliers.

The Policy Statement on Human Rights Strategy is binding and applicable to all Sartorius Group companies under decisive influence. It requires all employees to observe appropriate, fair, and lawful conduct towards other employees, customers, suppliers, business partners, and the local community. Sartorius expects business partners, e.g. suppliers, customers, or cooperation partners, to share the human rights position and operate their businesses in line with correspondingly high ethical standards.

## 3 Commitment to Social Responsibility

In line with applicable supply chain due diligence legislation and the UN Guiding Principles on Business and Human Rights, Sartorius respects and supports the implementation of the values of the International Charter of Human Rights, particularly the Universal Declaration of Human Rights, the UN Covenants on Economic, Social and Cultural Rights and on Civil and Political Rights, the OECD Guidelines for Multinational Enterprises and the International

Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work, by committing to view these internationally recognized human rights as relevant for all operations.

Environmental stewardship is of equal importance. Sartorius is aware that both the protection of human rights and the environment should be considered together, due to the many reciprocities. Human rights efforts may help protecting the environment and vice versa. Thus, Sartorius particularly embraces the importance of the Minamata Convention on Mercury, the Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and their Disposal, and the Stockholm Convention on Persistent Organic Pollutants (POPs Convention).

Sartorius respects the laws of the countries in which the Group operates (including applicable supply chain due diligence legislation). However, where national law and international human rights standards differ, Sartorius follows the higher requirements. If conflicts with a country's laws or national customs arise, Sartorius strives to act in line with its values and internationally recognized principles without breaching the law of the country in question.

## 4 Human Rights- and Environment-Related Impact, Risk & Opportunity Management

To anchor both requirements of applicable supply chain due diligence legislation and the underlying international legal framework described above, Sartorius has implemented a comprehensive, appropriate, and effective human rights- and environment-related impact, risk and opportunity management that comprises several due diligence measures. These measures are designed to enable the identification of impacts and mitigation of relevant risks and to prevent, end or minimize relevant impacts and remediate violations if Sartorius has caused or contributed thereto.

### **Risk Management Based on the 3 Lines Model**

The human rights- and environment-related risk management system is one of several risk management systems established by Sartorius, which are ultimately monitored by the Executive Board. The organizational set-up is structured in line with the well-established Three 3 Lines Model and is applicable to all Sartorius Group companies under decisive influence.

The First Line comprises the functions and employees responsible for day-to-day operations. As such, the First Line is tasked with detecting, analyzing, and managing operational risks for human rights and the environment. The human rights- and environment-related impact, risk and opportunity management is embedded in all relevant business processes and functions to ensure appropriate and effective reaction to the dynamic and ongoing assessment of human rights-related and environmental impacts. Relevant functions are, amongst others, Corporate Sourcing, Environment, Health & Safety and Human Resources Management. The First Line is entrusted with the execution of operative risk management procedures with clear responsibilities and processes in place. To facilitate

this cross-sectional task, all relevant First Line functions participate in regular steering meetings. Sartorius leverages synergies with existing management systems and certifications.

The First Line is supported by dedicated Second Line functions. As Second Line function, Corporate Compliance controls overall compliance with defined processes.

To ensure that the human rights- and environment-related risk management is monitored effectively and independently, Sartorius has appointed a Human Rights Officer. The Human Rights Officer is not bound by instructions and is not involved in the operational day-to-day due diligence measures. The Human Rights Officer is constantly monitoring the risk management including the risk analysis process and actively advises regarding the same. The Human Rights Officer reports both directly to the CEO and the Executive Board on a regular and ad hoc basis as well to the Supervisory Board.

In addition, the Third Line represented by Internal Audit will conduct regular risk-based audits regarding the human rights- and environment-related risk management.

The human rights- and environment-related risk management comprises reporting lines from the First, Second and Third Line to Sartorius' Executive Board. In addition, Sartorius has implemented appropriate and effective measures to ensure that all relevant measures taken are properly documented and retained in order to comply with all applicable documentation and reporting requirements.

### **Risk Analysis Process and Priority Human Rights and Environmental Risks**

Sartorius has defined appropriate and effective risk analysis processes and procedures to identify human rights-related and environmental risks in the own business area and at direct suppliers in line with applicable law.

The risk analysis consists of two steps before weighing and prioritizing the risks identified guided by legal criteria. The abstract analysis considers both country- and industry specific risks. Based on this first indication of risks, Sartorius applies a risk-based approach and validates the results in the concrete analysis. To do so, Sartorius uses self-assessment questionnaires and audits to further assess human rights and environment-related risks. In addition, Sartorius considers real-time adverse media alerts as potential risk-increasing factors.

The risk analysis process is owned by Corporate Sourcing, Environment, Health & Safety and Human Resources Management. Sartorius applies the same logic regarding the risk analysis for the own business area and direct suppliers. The outcome of the risk analyses is communicated, inter alia, to the Executive Board.

The risk analysis is performed at least once a year and supplemented by ad hoc risk analyses, e.g., in case of significant changes or expansion concerning the risk situation in the supply chain. Moreover, Sartorius will consider findings from potential complaints to further shape the risk analysis process.

Based on weighing and prioritization of the identified risks, Sartorius has implemented and continues to implement risk-based preventive measures after consultation of the relevant functions and stakeholders.

The Sartorius Group is committed to continuing to develop the risk analysis process in the future in order to further deepen the existing understanding of human rights and environmental risks throughout the value chain. Sartorius will participate in meaningful stakeholder dialogues and industry initiatives to reach this goal, where appropriate.

### **Preventive Measures Based on Risk Analysis**

To address the weighted and prioritized risks appropriately, the responsible First Line functions have developed various preventive measures for Sartorius' own business operations and direct suppliers. Those measures are designed to prevent and minimize these risks to the best extent possible. All preventive measures implemented are subject to risk-based regular and ad hoc controls for their effectiveness (e.g., by means of internal or external audits) and improved, if necessary.

### **Preventive Measures in Sartorius' Own Business Area**

The present Policy Statement on Human Rights Strategy serves as mainstay for Sartorius' efforts in this regard. As already described above, Sartorius has taken appropriate steps to implement the Policy Statement on Human Rights Strategy in relevant business processes as part of the human rights- and environment-related risk management.

To both raise awareness and consciousness amongst employees and to introduce mandatory guidelines, Sartorius has a Code of Conduct. Both, the Policy Statement and the Code of Conduct, have been communicated to Sartorius employees by the Executive Board. As next step, Sartorius has included both, the present Policy Statement and the Code of Conduct, into the regular training schedule for employees to be rolled out in 2024. Procurement-related functions have been trained already.

As additional safeguard for human rights- and environment-related aspects, Sartorius is constantly revising its procurement strategies and purchasing practices to limit adverse effects. In addition, Sartorius is currently revising its supplier onboarding process to fully integrate human rights- and environment-related aspects in the supplier selection process. All measures taken are subject to risk-based audits conducted by internal and external auditors and monitoring activities of the Human Rights Officer.

Also, when it comes to business acquisitions, Sartorius has implemented appropriate due diligence measures to mitigate potential human rights or environmental risks. With respect to business acquisitions, Sartorius' standard policy is to include non-financial aspects in the due diligence process. These aspects include compliance with applicable legal standards including supply chain due diligence legislation and maintaining effective compliance systems.

### **Preventive Measures Towards Direct Suppliers**

The competent First Line functions have developed a broad set of preventive measures to address identified and prioritized human rights and environment-related risks.

It is in line with Sartorius' philosophy to focus on long-term partnerships built on trust. This applies not just to the company's employees, but also to suppliers. By means of responsible conduct towards its suppliers, Sartorius also aims to minimize human rights-related and environmental risks and establish stable business relationships.

Sartorius expects the same conduct from its suppliers. In particular, the company expects its suppliers to respect human rights as well as protected environmental positions and not permit any complicity in human rights or environment infringements in their sphere of influence. Accordingly, Sartorius has implemented appropriate preventive measures towards direct suppliers. The First Line functions are responsible to implement those measures based on a risk-based approach to address identified and prioritized human rights- and environment-related risks.

Accepting the Code of Conduct for Business Partners is mandatory for all new direct suppliers. The competent sourcing functions are responsible for having all suppliers sign the Code of Conduct for Business Partners. Sartorius' Code of Conduct for Business Partners sets out Sartorius' expectations with regard to the recognition of human rights and environmental stewardship, including the labor rights of workers in the deeper supply chain. It obliges all suppliers to share Sartorius' commitment to high ethical standards and to conduct themselves responsibly towards their own employees and business partners.

All suppliers shall appropriately address Sartorius' human rights- and environment-related expectations along the supply chain, e.g., by submitting adequate letters of commitment. Sartorius sticks to the principle of "engagement before disengagement" and hence, works in partnership with suppliers and appropriately advises them on implementing the Code of Conduct for Business Partners, when necessary. Potential deficiencies should be remedied based on a specific corrective action plan. Risk-based and appropriate trainings are part of this partnership-based approach.

To date, Sartorius' First Line functions engage actively with direct suppliers to inform, train, and support direct suppliers regarding Sartorius' expectations. The toolkit comprises, inter alia, dedicated online trainings or workshops

as well as desktop or on-site audits. Those measures are implemented pursuant to a plausible, risk-based overall concept. Sartorius will implement additional preventive measures for an increasing number of direct suppliers in the future.

### **Remedial Actions**

Sartorius takes its commitment to protect human rights and the environment seriously. This is why the Group understands remedying adverse human rights impacts as an integral part of corporate responsibility. As with other violations, Sartorius applies a zero-tolerance policy in this regard.

Sartorius' responsible First Line functions promptly investigate (imminent) human rights- and environment-related violations (together with suppliers). In substantiated cases, the company will take immediate and appropriate remedial measures. Sartorius will collaborate and support suppliers to prevent, end or minimise those (imminent) violations. This may include drawing up a concept for ending or minimizing the violation without undue delay, particularly if the violation cannot be ended in the foreseeable future.

Sartorius will make appropriate use of all available contractual rights at its disposal, which – as a last resort – may include the termination or suspension of the business relationship.

In light with this approach, Sartorius constantly monitors adverse media alert for potential (immediate) violations. As warranted, Sartorius uses appropriate means to clarify actual indications. To date, however, no (immediate) violation has been identified.

### **Complaints Procedure**

Sartorius encourages open and transparent communication and fosters a speak-up culture with the goal of promptly identifying and addressing any shortcomings and preserving public trust.

Sartorius undertakes to identify and remedy any defects immediately. To achieve this, Sartorius maintains a reliable, user-friendly, and effective complaints procedure. This procedure serves as an early alert system and enables the company to implement preventive measures or remedial actions to end, mitigate, or prevent risks or violations of Sartorius' policies or applicable laws.

Anyone inside or outside Sartorius (including, but not limited to, employees of direct or indirect suppliers) may file a complaint. Whistleblowers may remain anonymous. Sartorius is committed to ensuring that (potential) reporters who submit reports or complaints in good faith do not face retaliation. The company will leverage its influence on business partners along the supply chain to protect their employees, to the extent possible, from any form of retaliation.

Sartorius implemented different reporting channels covering various languages and being available around the clock:

- Compliance inbox: [compliance@sartorius.com](mailto:compliance@sartorius.com)
- Compliance Hotline: +800 2244 2211 (toll-free) or +49 551 5041 9941 (chargeable);
- [Whistleblower Portal](#): available 24 hours a day, seven days a week.

Case handlers are impartial, independent, and not bound by instructions.

Please refer to the [Rules of Procedure for Whistleblowers](#) for further information.

### **Indirect Suppliers**

All of the above due diligence measures are designed to appropriately react in case of substantiated knowledge of a violation of human rights or environmental obligations at indirect suppliers. As appropriate, Sartorius will – in close collaboration and mutual consideration with its direct suppliers – implement appropriate preventive measures and take appropriate remedial actions to immediately end or mitigate such violations.

## **5 Human Rights- and Environment-Related Expectations**

Sustainability, openness, and enjoyment are Sartorius' corporate values that guide work and daily interactions. Through this triad, Sartorius wants to realize its vision and core business, as well as contributing to better health for more people while protecting the environment. This is crucial not only for compliance with applicable laws and regulations, but also for the Groups commitment to the UN Sustainable Development Goals as signatory of the UN Global Compact.

For a long time, it has been an important endeavor for Sartorius to directly support the local communities in which the Group operates. Sartorius targets efficient business operations with a simultaneous reduction of environmental impact and increase in positive social impact. Sartorius pays attention to the influence that all business operations have on the immediate vicinity of production sites, on local communities, and on global society. The company uses natural resources prudently and respects local ecosystems and is aware of its responsibility towards the environment and the human rights it affects. Sartorius always sets high standards for environmental protection. Together with its cooperation partners, the company is actively involved in shaping the social environment near its sites and concentrates on fields linked to the core business, such as promoting research and education. On a regional basis, Sartorius focuses on increasing the attractiveness of the respective region. It is important to Sartorius to be good citizens by providing financial support for projects in education, culture, social affairs, and sports.

Accordingly, Sartorius attaches great importance on living this corporate mission and values both in its own business area and along the supply chain with its suppliers and local communities. Sartorius is fully committed to identify, prevent, and mitigate adverse impacts on human rights and the environment. The company expects its employees and business partners to support it on this journey.

To effectively pursue this corporate mission and commitment, Sartorius has embedded this expectation in all relevant business processes as described above. This expectation is communicated to employees and suppliers via multiple channels such as the Code of Conduct, the Business Partner Code of Conduct, and other appropriate contractual assurances. The relevant First Line functions are constantly monitoring whether guidelines and/or processes need to be adapted in light of the risk analysis outcome.

## 6 Further Action and Review

Sartorius' approach to respecting human rights and the environment is kept under continuous review and adjusted when necessary. Sartorius will comply with all applicable documentation and reporting obligations.

<b>Joachim Kreuzburg</b> Chairman of the Executive Board   CEO	<b>René Fáber</b> Member of the Executive Board	<b>Alexandra Gatzemeyer</b> Member of the Executive Board