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HUMAN RIGHTS STRATEGY

of the Rottendorf Group

www.rottdorf.com



ROTTENDORF
— PHARMA —

HUMAN RIGHTS STRATEGY OF THE ROTTENDORF GROUP

We observe and safeguard human rights worldwide – both within our own company and in our relationships with business partners along the value chain.

To us, respecting international human rights standards is an essential and fundamental part of our business and a transparent, sustainable supply chain. Our executive management and all employees of the Rottendorf Group expressly pledge to uphold the ten principles of the United Nations (UN) Global Compact and the Universal Declaration of Human Rights.

The Rottendorf Group management approach is based on:

- ◇ **Our Governance Model**
- ◇ **Our Statement of Principles**
- ◇ **Our Code of Conduct**
- ◇ **Our Supplier Code of Conduct**

HUMAN RIGHTS AT ROTTENDORF

All Rottendorf employees are responsible for ensuring that human rights are upheld within our company. Our human rights officer monitors our human rights risk management system and reports regularly to the executive management about these activities.

This role is supported by specialists in the fields of human resources and EHS and by legal counsel. This team works on issues of human rights and our human rights strategy and on reviewing and continuously refining and further developing internal processes. The supply chain management and procurement teams dedicate special effort to all ESG aspects along the supply chain. Depending on the topic, the human rights officer may involve the executive management.

RESPONSIBLE SUPPLY CHAIN

Strengthening human rights along the value chain is only possible if all concerned work together in a spirit of partnership. With this in mind, we expect our suppliers to meet our minimum environmental, social, and governance standards, apply high ethical and moral business standards, and ensure compliance through specific processes. These standards, which apply to all our suppliers, are set down in our Supplier Code of Conduct.

We verify compliance with these specifications through a systematic, integrated, and risk-based approach that considers both country-specific and industry-specific risks alongside other factors. If a supplier is potentially at risk, we take further steps, identify actions to take, and monitor compliance.

In addition to audit activities, we engage in continuous risk monitoring on the market. The goal is to identify and address risks, reports, and incidents involving human rights violations in our supply chain right away.

OBSERVATIONS AND COMPLAINTS

We respect human rights and have introduced numerous measures to better safeguard these rights. However, even at Rottendorf, incidents that do not align with our values may occur. Observations and reports help us to uncover and eliminate potential risks.

Rottendorf maintains a whistleblower ([RPHint](#)) and complaint management system for anonymous internal and external reports of things such as possible human rights and environmental violations. The system is open to employees and to our business partners, their employees, our suppliers, and other third parties.