



Last updated January 2024

STATEMENT OF PRINCIPLES

of the Rottendorf Group

www.rottdorf.com



ROTTENDORF
— PHARMA —

I. VISION, MISSION, VALUES

We, Rottendorf Pharma GmbH, are a leading contract development and manufacturing organization (CDMO) in the pharmaceutical industry and have worked for more than 95 years in production and packaging of, and development of formulations and analytical methods for, solid oral pharmaceutical forms for the international pharmaceutical industry.

We have top-notch production facilities and technologies at our two locations in Ennigerloh, in Germany's Münsterland region, and produce a large volume of name-brand and generic medicinal products annually.

Our headquarters is home to an advanced development center, bulk production, and the lab. The second location includes 10,500 square meters of space dedicated to packaging. We have more than 1,300 experienced and capable people working for us. Our production sites comply with GMP requirements and those of the FDA, EMA, Anvisa and other national regulatory bodies, among other rules.

We, Rottendorf Pharma GmbH, are 100% foundation-operated. The sole shareholder is the Rottendorf Foundation, whose primary purpose as a foundation is to support pharmaceutical research. Strict rules set down in the foundation's charter guarantee our company's ongoing existence, complete freedom to do business, and sustainable and exemplary actions in the field of corporate social responsibility.

These aspects bring significant advantages for customers, which means they constitute a huge competitive advantage for our international high-tech company. Because we are backed by the foundation, our employees can concentrate entirely on customers' needs and concerns.

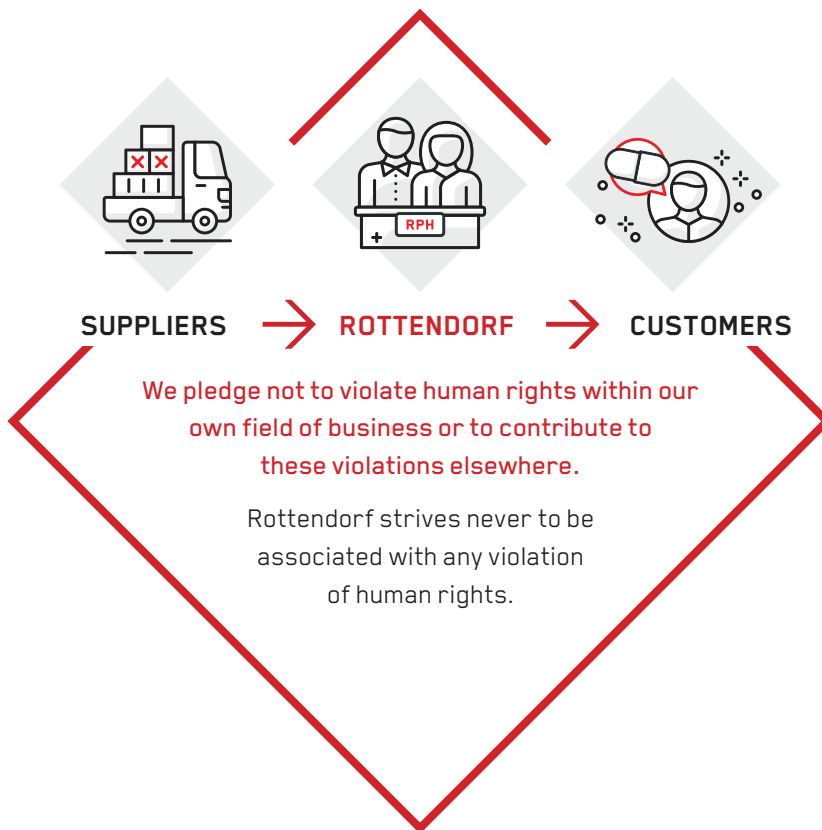
The Rottendorf Group embraces several key values:

- ◇ **Customer focus**
- ◇ **Quality consciousness**
- ◇ **Entrepreneurial spirit**
- ◇ **Belonging**
- ◇ **Empowerment**
- ◇ **Integrity**

These values are all defined in our Code of Conduct. The code also contains guidelines and requirements pertaining to ethical conduct on the part of all employees, managers, contractors, partners, and our executive management.

We, the Rottendorf Group, view protecting human rights as a key element of our responsibility for giving back to society. We make every effort to observe internationally acknowledged human rights in our own activities and to strengthen them in our relationships with business partners along the value chain as well.

We base our efforts to uphold human rights on the United Nations (UN) Universal Declaration of Human Rights and on the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work. This includes prohibition of child labor and forced labor, establishment of safe, healthy, and respectful working conditions, prohibition of all forms of slavery and discrimination, strengthening of freedom of association, and compliance with all applicable laws and regulations on data protection and privacy.



As part of our duty of care, and within our established complaint management structures and processes, we strive to identify and prevent potential adverse impacts on human rights along the value chain.

II. OUR PLEDGE

We also pledge to comply with occupational safety and health rules, to pay fair wages, and to observe the prohibitions on pollution, eviction, and the use of security forces, in the latter case subject to a risk of violation or restriction of human rights.

We pledge to uphold the Minamata, Stockholm, and Basel Conventions and the regulations and national laws adopted on the basis of these conventions.

As a signatory to the UN Global Compact, we pledge to align our business activities and strategies toward the ten universally acknowledged principles in the fields of human rights, labor standards, environmental protection, and the fight against corruption and to support the Sustainable Development Goals (SDGs) associated with this.

III. GUIDELINES

This declaration clarifies our fundamental commitment to respect for human rights, which is already reflected in other corporate policies.

These include:

- ◇ **Code of Conduct**
- ◇ **Supplier Code of Conduct**
- ◇ **Human Rights Strategy**
- ◇ **Management Guidelines**
- ◇ **Company Policy on Discrimination**

IV. SCOPE

The principles outlined in this document apply to our own business activities and to all employees of Rottendorf GmbH, Rottendorf Pharma GmbH, Rottendorf Immobilien GmbH, Rottendorf Service GmbH, and Rottendorf Inc., USA.

Beyond that, we also expect our suppliers and other business partners to commit to uphold the principles set down in this document and to implement appropriate processes to respect human rights. This also includes providing information on how these principles are being observed when requested.

V. COMPLIANCE

We comply with applicable national laws at all times. In cases in which international human rights are restricted by local laws, we strive to support the principles underlying the international standards without coming into conflict with local laws. Where local laws are more stringent than the international standards, we follow the stricter rules.

As a chemical and pharmaceutical industry company, we have the opportunity to strengthen protections for human rights in a variety of ways. However, we are also aware of the possible human rights risks that can be associated with our business activities.

VI. RISK ANALYSIS

We strive to analyze, document, and better understand our risks and the concrete connections between those risks and our company, step by step and at regular intervals, through structured risk assessments of our own business activities and the supply chain and in relation to our products and services. With this in mind, we plan to perform an abstract and concrete risk analysis within the organization in 2024. In 2023, we developed the necessary measures and began introducing a digital system that supports and documents the risk analysis process.

VII. PREVENTIVE MEASURES

To live up to our voluntary pledge to respect human rights, we implement suitable due diligence processes. Through these processes, we work to identify and reduce risks and impacts. We plan to adjust our statement of principles accordingly from time to time.

We also plan to incorporate the results of our risk analyses into relevant business processes, especially in our supplier management system. We implement suitable preventive measures where risks exist.

VIII. CORRECTIVE MEASURES

We pledge to implement effective corrective measures in cases in which, through our business activities, we cause actual human rights violations or contribute to these violations.

IX. WHISTLEBLOWING SYSTEM

Potential compliance or human rights violations can be reported via the complaint management system that we have established.

X. GOVERNANCE STRUCTURE

Responsibility for observing the human rights obligations set out in this document rests with the executive management and the human rights officer. The human rights officer is responsible for implementing our human rights strategy in our operations.

We live up to our duties of care in the areas of human and environmental rights as an ongoing and agile process. We review the effectiveness of our measures and complaint mechanisms annually and as specific occasions arise. We use the results and insights gleaned from the risk analyses to continue to develop and refine our risk management system. As part of our reporting obligations, we will give an account of our fulfillment of our duties of care annually and publish the results. We comply with our obligations of documentation and archiving at all times within the scope of the legal requirements.

This declaration of our intention to comply with human rights is reviewed annually and adjusted if necessary to ensure that its content is aligned to possible changes in our business model or fields of activity and is always up to date.