



## Policy Statement on Human Rights Strategy pursuant to § 6 (2) LkSG

### Commitment to Respecting Human Rights and Protecting the Environment

As one of the world's leading manufacturers in the field of medical laboratory diagnostics and with more than 3,500 employees in 17 countries, we, EUROIMMUN Medizinische Labordiagnostika AG and its subsidiaries (hereinafter "EUROIMMUN"), have a special responsibility to respect all internationally recognized human rights in our own business activities as well as in our global supply chain, and to providing access to remedy for those affected by human rights violations.

We therefore aim to align our activities with international standards, including applicable environmental protection regulations, the International Bill of Human Rights, i.e., the United Nations (UN) Universal Declaration of Human Rights, and the International Covenant on Civil and Political Rights, the UN Guiding Principles on Business and Human Rights and the Core Labour Standards of the International Labour Organization (ILO) regarding fundamental principles and rights at work (freedom of association, the right to collective bargaining, the elimination of forced and child labor and the prohibition of discrimination in respect of employment and occupation). Furthermore, we are committed to complying with all environmental protection regulations.

Our human rights strategy is aimed at our employees and the entire EUROIMMUN value chain. We therefore expect our business collaborators to respect human rights, to establish appropriate due diligence processes and to pass these expectations on to their own suppliers. We have defined clear responsibilities for complying with our human rights due diligence obligations. The Executive Board is responsible for monitoring our company's respect for human rights in our business activities, including our supply chain and sales channels. The Human Rights Officer ensures the Executive Board is able to make informed decisions regarding appropriate and effective risk management by providing regular and ad hoc internal reports on the results of continuous risk analysis, information from our grievance mechanisms and information on the effectiveness of our remedial and preventive measures and complaints procedures.

### Risk Management

We acknowledge the risk that our business activities and our global supply chains could have an adverse impact on human rights. We strive to respect the human rights of all, including:

- our own employees and trainees at all locations,
- employees of business collaborators,
- employees in our upstream supply chain including raw material production, raw material processing and production of intermediate products, and
- employees in our downstream sales channel.

To minimize the risk to human rights across our supply chain, we embed human rights due diligence processes as an integral part of our operations and our relationships with our business collaborators. We use an established management process to supplement our company-wide risk and supplier management by identifying and assessing relevant human rights issues, and individuals or groups of individuals potentially affected by our direct and indirect business relationships, and our business activities. To this end, we systematically supplement our company-wide risk and supplier management with human rights issues.

Through these processes, we can analyze, evaluate, and take preventive and remedial measures to safeguard human rights and comply with environmental standards. We see the continuous review of risks as central to our human rights strategy, and risk analyses are carried out both annually and on an ad hoc basis in the event of significant changes to the company profile or business activities. The results of these analysis are reflected in new and revised internal policies, processes, and training, as well as corporate decision-making regarding supplier selection and product development. The Executive Board will regularly discuss human rights conflicts of interest and relevant findings from the due diligence process. While compliance with regulations, directives, laws, and guidelines is critical, the goal of these processes is to respect the human rights of each individual contributing to our supply chain.



## Action Planning in the Supply Chain

In order to fulfill our responsibility, we rely on the interaction of various measures, all of which pursue the goal of protecting the (potentially) affected persons from adverse effects on human rights.

Based on information derived from our due diligence and risk management processes, EUROIMMUN develops risk profiles, assessments, weighting, and prioritizations, and then develops and implements preventive and remedial measures.

Our preventive measures include annual and ad hoc review of our continuous analysis of human rights risks and their impact. We also carry out risk-based audits of our direct suppliers, e.g., in the form of document reviews and online assessments. Within EUROIMMUN, we also carry out risk-based audits where necessary, follow up on reports of potential human rights violations and review the effectiveness of training to assess the need for further education measures. We review the effectiveness of the measures in our value chain by monitoring the results of our continuous analysis of human rights risks and their impact. We also carry out risk-based audits of our suppliers, for example in the form of document reviews and online assessments.

If we identify that our business activities have contributed to potential or actual human rights violations through, or are indirectly associated with them, we will endeavor to ensure an appropriate remedy by the responsible parties and to implement remedial measures to prevent recurrence. Depending on the severity of the violation, we may take direct action with our business collaborators, ranging from a request to remedy the violation immediately to legal action and termination of the business relationship.

In the event that we as a company have directly caused the violation of human rights, we endeavor to rapidly identify and stop the business activities that caused the violation, or to make them compliant with human rights, and to work towards redress.

## Grievance Management

Appropriate and effective grievance management is a central component of our due diligence and monitoring process. We use whistleblower mechanisms for information gathering and to enable our employees, suppliers, and their employees, and third parties to report violations of human rights and environmental obligations in our own business area and in the supply chain. Reports can be made anonymously. We actively advertise the availability of whistleblower mechanisms and refer to measures that are adopted to the target group and the local context. Further, we actively involve whistleblowers in the development of mechanisms. The effectiveness of the existing grievance mechanisms is reviewed once a year and on an ad hoc basis in the event of significant changes in the risk situation or specific indications.

## Reporting

In our annual report on the fulfillment of our due diligence obligations, we provide information on our human rights commitments and due diligence processes and their effectiveness.

## Continuous Review

We see the implementation of our human rights strategy as an essential part of the company's risk management. We therefore continuously review the effectiveness of our strategy and adapt it as necessary to respond to changing risks, risk profiles and global circumstances. We are continuously developing, adapting and improving our processes to minimize the possibility that our business is contributing to violations of human rights or environmental standards. This policy statement will be updated regularly.

## Executive Board of EUROIMMUN Medizinische Labordiagnostika AG

**Dirk Beecker**  
Chairman of the Executive Board

**Dr. Bianca Huth**  
Member of the Executive Board (CTO)

**Dr. Lars Komorowski**  
Member of the Executive Board (CSO)