

Policy Statement

Declaration of principles on human rights and environmental standards

Rentschler Biopharma SE

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Erwin-Rentschler-Straße 21
88471 Laupheim
Germany

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1 OUR COMMITMENT TO RESPECT HUMAN RIGHTS

As a leading contract development and manufacturing organization (CDMO), we are passionate about translating innovative ideas into vital biopharmaceuticals. By combining experts, experience, and expertise, we master complexity and achieve the best solutions for our clients. In doing so, we are guided by our four corporate values: respect, progress, reliability, and responsibility. These values are reflected in everything we do and guide our actions in all situations. As one of our core corporate values, responsibility is a key pillar of our business activities. Our understanding of responsibility is not limited to our company, but also includes our environment, our society, and our supply chain.

As Rentschler Biopharma, we expressly acknowledge our responsibility and are committed to fulfilling our legal duties of care regarding human rights and the environment in our company and within our supply chain.

Our commitment is based on national laws and regulations such as the German Supply Chain Due Diligence Act (LkSG) and the following international standards:

- the Universal Declaration of Human Rights of the United Nations (UN)
- the United Nations Guiding Principles on Business and Human Rights (UNGPR)
- the Conventions and Recommendations of the International Labor Organization (ILO)
- the Principles of the United Nations Global Compact (UNGC) as well as
- the 17 Sustainable Development Goals.

We are convinced that this commitment to respecting human rights and environmental standards is a fundamental cornerstone of our business activities and crucial to our success as one of the leading contract development and manufacturing organizations. For us, this is the only way we can be successful in the long term and thus sustainably create value.

Laupheim, January 2024

Benedikt von Braunmühl

Chairman of the Executive Board, CEO

Christiane Bardroff
Executive Board, COO

Dr. Christian Schetter
Executive Board, CSO

Gunnar Voss von Dahlen
Executive Board, CFO

2 SCOPE

This policy statement applies to Rentschler Biopharma SE and its subsidiaries Rentschler Biopharma Inc., USA, and Rentschler ATMP Ltd., United Kingdom. Rentschler Biotechnologie Beteiligungs GmbH and Dr. Rentschler Holding GmbH & Co. KG as superordinate holding companies also fall within the scope of this policy statement.

3 OUR EXPECTATIONS OF EMPLOYEES AND BUSINESS PARTNERS

We expect all employees and business partners to comply with and respect the applicable laws, regulations and internationally recognized human rights and environmental standards. Our internal Code of Conduct provides our employees with the necessary guidance in this regard. We expect our own employees to align their daily actions with this Code of Conduct. This expectation - explicitly set out in our Supplier Code of Conduct - is also directed at our suppliers and we expect them to commit to establishing appropriate due diligence processes and to pass this expectation on to their own business partners.

4 OUR APPROACH FOR THE IMPLEMENTATION OF HUMAN RIGHTS DUE DILIGENCE OBLIGATIONS

4.1 Risk Management, Organization and Responsibilities

To fulfill our corporate responsibility, we have clearly defined the responsibilities for implementation within our company. Responsibility for compliance with due diligence obligations regarding human rights and environmental issues lies with the managers of Rentschler Biopharma SE. As the highest management body, the Executive Board is of particular importance in this regard, which is why it receives information at least once a year on the status quo and on measures taken to implement and comply with the law. To support and monitor the fulfillment of due diligence obligations under the German Supply Chain Due Diligence Act, Rentschler Biopharma SE has established a Human Rights Committee, which is chaired by an officially appointed Human Rights Officer.

4.2 Risk Analysis in our own area of business and in our supply chain

A key element of compliance with our due diligence obligations within our own area of business and within our supply chain is a comprehensive risk analysis. This is carried out once a year and, if necessary, on an ad hoc basis, for example in the event of significant changes to our business operations. Our risk analysis is intended to identify and assess the corresponding potential and actual impacts of our own business operations as well as the operations of our suppliers along the entire supply chain.

Risks in our own area of business

The process for identifying risks in our own business operations is divided into three main steps.

Firstly, country-specific risks, which are defined by global indices, and sector-specific risks, resulting from the industry we operate in, are subject to an abstract consideration of risks. In the second step, a more detailed risk assessment is conducted, in which human rights and environmental risks are discussed together with the relevant specialist departments of the individual divisions based on comprehensive, digitalized questionnaires. The risk values determined in this way for the individual human rights and environmental issues are then subjected to a critical review by the Human Rights Officer and the Human Rights Committee. The final risk score derived from this is then used to define remedial and preventive measures.

Risks in our direct supply chain

The risk analysis in our direct supply chain is supported by an AI-based system and follows a multi-stage process. First, potential risks within the supply chain are identified in an abstract risk assessment based on country risks - starting from the supplier locations - and typical industry risks. In the following concrete risk assessment, these results are supplemented by a supplier-specific screening, which is based on media data and media reports collected and evaluated by the system on the one hand and on publicly available information on certifications or audits carried out by the supplier on the other. All the information is then added up to form a risk score. A priority score is determined by comparing the risk score and the impact of a supplier in a risk matrix, which is decisive for the definition of preventive or remedial measures.

Results

The initial risk analysis (as of 31st December 2023) for our own area of business and our direct supply chain concluded that there are no high or critical risks regarding human rights and the relevant environmental issues in accordance with the German Supply Chain Due Diligence Act. We identified child and forced labor, working hours, discrimination, as well as occupational health and safety as particularly sensitive areas in our own area of business and our direct supply chains. We see a minor risk in the areas of discrimination, child and forced labor, occupational health and safety and environmental pollution since awareness of human rights and environmental issues in the direct working environment is not yet sufficiently developed everywhere. We aim to continuously strengthen this awareness through measures such as more targeted trainings and guidelines.

4.3 Preventive Measures

One of the key preventative measures to ensure compliance with our due diligence obligations in our own business area is our Code of Conduct and the development and implementation of supporting Labor and Human Rights and EHS policies. From 2024 onwards, we will also be conducting trainings for our employees on important human rights and environmental issues. We also intend to address these topics at various internal events, such as the Sustainability Days, to further raise awareness within our company.

When collaborating with our direct suppliers, we require compliance with standards in accordance with our Supplier Code of Conduct, which describes our expectations about compliance with human rights and environmental issues. Through our supporting internal "Sustainable Procurement Policy", we not only strengthen our internal capacity to act, but also promote awareness of human rights and important environmental issues in our supply chain.

4.4 Remedial Measures

If, because of our risk analysis or otherwise, we determine that we as Rentschler Biopharma or one of our direct suppliers have violated human or environmental rights and therefore due diligence obligations have not been met or a violation is imminent, we will immediately initiate appropriate countermeasures to end or at least minimize or prevent the violation.

If there is a suspicion that the (potential) violation of human rights originates from one of our direct suppliers, we will first conduct in-depth analyses. If the suspicion is confirmed, we will immediately seek contact with the supplier concerned and jointly develop appropriate remedial measures. Our suppliers are obliged to cooperate appropriately as outlined in our Supplier Code of Conduct and our General Terms and Conditions of Purchasing. Depending on the extent of the infringement, we reserve the right to terminate the business relationship as a last resort.

4.5 Grievance Mechanism

Our whistleblower system is a central instrument for the early detection of suspected cases and violations of our due diligence obligations and is explicitly aimed at both our internal employees and our external stakeholders. It gives everyone - regardless of the existence and nature of their business or other contractual relationships with Rentschler Biopharma - the opportunity to report information or complaints about potential human rights and environmental violations confidentially and, if desired, completely anonymously.

We follow up on incoming reports - while maintaining the principle of confidentiality - in accordance with the reporting and investigation processes described in the accompanying procedural rules.

Our whistleblower system is subject to an annual effectiveness review.

4.6 Effectiveness Monitoring and Reporting

To ensure that we comply with our due diligence obligations and that the measures we have introduced to mitigate or avoid human rights and environmental risks are working effectively, we conduct a review once a year and, if necessary, on an ad hoc basis. We check the effectiveness of the implemented measures by comparing the results of the annual risk analyses. We also make use of document reviews, interviews, and inspections in our own business area. When collaborating with our suppliers, we reserve the right to carry out risk-based audits.

The results of the risk analysis are reported to the Executive Board once a year, together with the established processes for compliance with our due diligence obligations and a statement on their effectiveness. In addition, we report annually to the German Federal Office of Economics and Export Control (BAFA), which is a key element of the German Supply Chain Due Diligence Act.

5 ABOUT THIS POLICY STATEMENT

This policy statement was approved by the Executive Board of Rentschler Biopharma SE. We have prepared this policy statement in close cooperation with the responsible internal departments. We will review this policy statement annually (and if necessary, on an ad hoc basis) and continuously develop it, taking into account relevant changes.

No rights of individuals or third parties can be derived from this policy statement.

This policy statement has no retroactive effect and comes into force on 1st January 2024.

6 CONTACTS

If you have any questions or suggestions regarding the content of this policy statement, please send an e-mail to humanrights@rentschler-biopharma.com.

Please use our whistleblower system at <https://rentschler-biopharma-se.egs-integrity.org/> for complaints and information on possible violations of this policy statement.