**Speak-Up Policy**
**Regarding the Reporting Process at Rentschler Biopharma**

**Status: September 2026**

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## 1. Introduction

Rentschler Biopharma SE and its subsidiaries including Rentschler Biopharma Inc., U.S.A (hereinafter jointly referred to as **"Rentschler Biopharma"**) are subject to various laws and regulations as well as internal compliance policies. In addition, Rentschler Biopharma has an ethical responsibility towards its customers, employees and business partners.

If applicable laws and regulations are violated, this can lead to considerable risks for Rentschler Biopharma and its employees. It is therefore not only Rentschler Biopharma's culture to ensure that all employees behave in accordance with applicable laws and regulations, but also to ensure that compliance violations are identified, investigated and prevented in the future.

Rentschler Biopharma has implemented a speak-up process as a key element of an early warning system. Anyone inside or outside Rentschler Biopharma may file a report. Such reporting allows Rentschler Biopharma to identify potential breaches or risks early and to initiate appropriate remedial or preventive actions. Rentschler Biopharma establishes an open and reliable working environment where questions, doubts and concerns can be raised without fear of retaliation. As part of this effort, Rentschler Biopharma issues this Policy (hereinafter referred to as **"Speak-Up Policy"**).

This Speak-Up Policy should be read and observed in conjunction with the most recent version of Rentschler **Biopharma's Code of Conduct** which can be found at www.rentschler-biopharma.com in the "Legal and Compliance" section or on the intranet site MyRentschler, Code of Conduct.

## 2. Scope of Application

### 2.1. Personal Scope of Application: Who can be a reporting person?

Reports can be made by both internal employees and external individuals. Employees include members of management, executives, trainees, interns, part-time employees, temporary and agency workers (hereinafter jointly referred to as **"Employees"**).

The reporting system is particularly aimed at Employees, business partners and their respective staff.

### 2.2. Material Scope of Application: What types of reports can be submitted?

This Speak-Up Policy applies to all reports received via one of the reporting channels listed under section 3 below that relate to the following topics:

a) Reports may relate to actual or potential breaches of applicable law committed by Rentschler Biopharma or its Employees in connection with their professional activity, where there are reasonable suspicions or corresponding knowledge.

Such breaches of law particularly include criminal offenses to the detriment of Rentschler Biopharma or its Employees, as well as business partners and their employees. Examples of such criminal offenses include bodily harm, sexual offenses, corruption, theft, embezzlement, fraud and breach of trust.

Furthermore, a report falls within the scope of this Speak-Up Policy if it concerns actions subject to a fine, provided that the violated regulation serves to protect life, physical integrity, or health, the rights of employees or their representative bodies (works council), or involves violations of federal and EU legal provisions, including but not limited to anti-money laundering and counterterrorism, product safety, environmental protection, quality and safety standards for pharmaceuticals, privacy protection in electronic communications, information technology security, accounting including bookkeeping, tax evasion and antitrust law.

In addition, the provisions on the material scope of application set out in Section 2 of the German Whistleblower Protection Act (**"HinSchG")** apply.

(Potential) violations of Rentschler Biopharma's internal policies can also be reported.

b) Reports may further concern actual or potential breaches of human rights-related or environment-related duties and obligations, including under the German Supply Chain Due Diligence Act (**"LkSG"),** caused by the commercial activities of Rentschler Biopharma or of a direct or indirect supplier. Threatening risks of such a breach may also be subject to reporting.

Protected legal positions are, in particular, the following:

- Prohibition of child labor, child trafficking, child prostitution and child pornography;
- Prohibition of forced labor;
- Prohibition of slavery and practices similar to slavery;
- Occupational health and safety in the workplace;
- Prohibition of preventing union formation, membership, or union activities;
- Prohibition of discrimination against employees, including equal pay;
- Prohibition of withholding adequate wages/minimum wages;
- Prohibition of causing harmful soil, water, or air pollution, harmful noise emissions, or excessive water consumption that could have significant impacts on health, natural food supplies, access to drinking water, or sanitation facilities;
- Prohibition of unlawful forced evictions and unlawful dispossession of land, forests and waters;
- Prohibition of employing security forces that engage in torture or practices violating life, physical integrity, or freedom of coalition;
- Prohibitions concerning environmental risks, e.g., the production/use of mercury and certain chemicals, improper handling/(export/import) of (hazardous) waste.

The reporting process shall not be used for matters outside the scope of the above listed areas. Regarding such matters please directly address your competent Rentschler Biopharma contact person for the respective topic.

### 2.3. Reports made in good faith

All reports should be made in good faith.

- Reporting people act in good faith if, at the time of the report, they have reasonable grounds to believe that the reported information is true.
- Reporting persons do not act in good faith if, at the time of the report, they intentionally or with gross negligence provide false or misleading information.

In the case of a report not made in good faith, or in instances of unlawful misuse of the reporting procedure, Rentschler Biopharma reserves the right to take appropriate action in accordance with the applicable legal regulations.

## 3. Reporting Channels

Reports can be made to Rentschler Biopharma's internal reporting office via the following reporting channels:

- Our electronic reporting system is accessible externally on the internet on https://www.rentschler-biopharma.com/de-de/metaseiten/speak-up-line or via Rentschler Biopharma's intranet. It is available in German and English.
- In addition, Employees can contact the internal Legal and Compliance Department contacts via email, phone or face-to-face. Contact data of the respective contacts are published on the intranet.

Reporting via the electronic reporting system can be done either anonymously or non-anonymously.

Rentschler Biopharma encourages everyone to submit reports directly and internally as compliance violations can jeopardize Rentschler Biopharma's core business values and high standards of ethics and integrity and therefore require internal investigation. However, individuals are permitted to report certain violations to competent external authorities subject to the limits set by applicable law.

Further information on the respective external channels is available in the Annex to this Speak-Up Policy.

## 4. Content of report

For processing a report, an adequate description of the facts and circumstances is required. The more of the following information the report contains, the more effectively the report can be processed:

- What has happened? (Description of the incident / matter at hand)
- What persons are or were affected by the incident or involved in the incident?
- When did the incident happen? (Start and duration of the incident)

- Who (potentially) caused the incident?
- Are/were there any witnesses or other evidence?
- How and when was knowledge gained about the incident?
- Has anybody been notified about the incident?

Existing evidence (such as documents, photographs, etc.) should be attached to the report. The electronic reporting system offers the possibility to upload the corresponding files.

## 5. Process

### 5.1. Receipt of a report

Upon receipt of a report, the receipt will be documented by the persons in charge of the reporting office and the reporting person will receive an acknowledgment of receipt at the latest after seven days.

### 5.2. First verification of the report

The persons in charge of the reporting office will first verify whether the report falls under the scope according to section 2 and whether it is not obviously unfounded. If necessary, further fact-finding by the reporting office can be conducted. In case a report is rejected, the reporting person will be notified of the rejection, including the corresponding reasons.

### 5.3. Processing of reports and information

If a report is not rejected pursuant to section 5.2, the persons in charge of the reporting office will investigate the reported case. To the extent necessary for processing the case, the reporting office only may involve further persons in the company to clarify the matter while maintaining the principles of confidentiality and data privacy. If necessary, the reporting person can also be asked for additional information. In all other respects, the reporting office complies with the procedure set out in Section 17 HinSchG.

Once the reporting process is concluded, the reporting person will, to the extent required by law and legally possible, be notified about the conclusion of the procedure, about follow-up actions taken or intended and the reasons for them.

### 5.4. Implementation of remedial actions

If, and insofar as, preventive or remedial actions become necessary and are decided based on the investigation results, these will be implemented by the respective departments concerned in consultation with the reporting office.

## 6. Data Protection, Confidentiality

Reports in the context of the reporting process are processed in accordance with applicable laws and in strict compliance with confidentiality and observation of all applicable data privacy rules. We refer to the data protection information on the Rentschler Biopharma reporting system in this regard.

## 7. Protection of the reporting Person and affected Persons

Rentschler Biopharma is committed to a policy of non-retaliation.

Therefore, Employees and any third parties who are awarded protection by applicable laws do not have to fear any negative consequences of discriminatory or disciplinary nature for making a report or raising questions, doubts and concerns. Rentschler Biopharma does not tolerate any kind of threats, detrimental behaviour or acts of retaliation. Such conduct is itself a breach of our values and can result in disciplinary actions.

This policy of non-retaliation also applies if reporters are not absolutely certain about the facts, provided that they act in good faith.

However, intentionally misusing the reporting system and this Speak-Up Policy for abusive practice (i.e., filing reports in bad faith) is strictly prohibited. An Employee who knowingly reports incorrect information is not protected by this Speak-Up Policy and may face disciplinary, criminal and civil sanctions.

Persons affected by a report are protected by applicable laws, such as the principle of confidentiality, subject to legally stipulated exceptions.

## 8. Implementation / Responsibility

Rentschler Biopharma ensures that this Speak-Up Policy is made known and implemented, including regular communication of the reporting system to all Employees.
Management of the respective Rentschler Biopharma affiliate is tasked with addressing violations identified through the reporting system.

## 9. Change History

| Date | Version | Department - Revision Ownership |
|---|---|---|
| 09/10/2026 | 1.0 | Legal and Compliance |

## 10. ANNEX: EXTERNAL REPORTING CHANNELS

The table below provides external reporting channels for the EU and Germany.

| **1. External reporting channels of the EU** |
|---|
| • European Commission: Whistleblower (europa.eu)<br>• European Anti-Fraud Office ("**OLAF**"): Fraud Reporting Home (europa.eu)<br>• European Securities and Markets Authority ("ESMA"): \| European Securities and Markets Authority (europa.eu)<br>• European Medicines Agency ("EMA"): European Medicines Agency \| (europa.eu)<br>• European Data Protection Supervisor ("**EDPS**"): Complaints \| European Data Protection Supervisor |

| **2. External reporting channels in Germany** |
|---|
| • External Federal Reporting Office at the Federal Office of Justice:Startseite - Externe Meldestelle (Bundesamt für Justiz Schlichtungsverfahren)<br>• German Federal Cartel Office in the event of violations of the law against restraints of competition or reports about the External Federal Reporting Office: Home - BKMS System<br>• Federal Financial Supervisory Authority in the event of violations of the German Financial Services Supervision Act ("**FinDAG**"): https://www.bafin.de/DE/DieBaFin/Hinweisgeberstelle/hinweisgeberstelle_node.html |