

# DECLARATION OF PRINCIPLES FOR THE RESPECT OF HUMAN RIGHTS

## Taking responsibility

A responsible mindset and sustainable operations have been key pillars of the STRATEC Group's corporate culture since its foundation more than 40 years ago. These factors have acted as guarantors for STRATEC's growth from a small startup into a company with global operations. As a developer and manufacturer of automation solutions for in-vitro diagnostics, STRATEC supports its partners in their mission to improve people's health worldwide. Providing innovative, reliable, and high-quality products for people's healthcare forms part of STRATEC's core business.

In view of this, STRATEC is aware of its responsibility towards society and aims to meet this actively. As an innovation leader, STRATEC has set itself the goal of ensuring that its actions are sustainably, ecologically, and socially responsible. STRATEC is committed to avoiding, terminating wherever possible, and otherwise minimizing any negative impacts of its business activities on human rights. Not least for this reason, STRATEC is a signatory to the United Nations Global Compact. STRATEC's commitment to upholding human rights is based on the UN Guiding Principles on Business and Human Rights (UN Guiding Principles) issued by the United Nations and the OECD Guidelines for Multinational Enterprises. Its approach is guided by the Universal Declaration of Human Rights and the Declaration on Fundamental Principles and Rights at Work of the International Labour Organization.

Responsibility for implementing this Policy Statement is managed by the Chief Executive Officer of the STRATEC Group, managing directors of company divisions, heads of group functions, and the ESG Board. Responsibility is also coordinated with the representatives of company employees. This ensures that each company division is also aware of its own responsibility for upholding and protecting human rights and for meeting this responsibility in its day-to-day operations.

### Anchoring human rights protection

One core element of STRATEC's corporate culture is the fairness, appreciation, and respect shown among colleagues, also between different levels of the hierarchy. There is no place for discrimination or intolerance at STRATEC. By anchoring its own value-based approach to human rights, namely the Human-Rights-Approach@STRATEC, the company has on the one hand formulated its expectations in all those who work at STRATEC. On the other hand, with the Human-Rights-Approach@STRATEC, which supplements and specifies the existing Corporate Compliance Policy in respect of human rights,



STRATEC also shows how the Group aims to make an active contribution to upholding and protecting human rights. STRATEC involves various relevant stakeholders in this process. It is convinced that social responsibility is a key factor in the company's long-term success. For this reason, shared responsibility for human rights and sustainability is a constituent component of the corporate culture.

Consistent with the basic principles outlined above, STRATEC endeavors to ensure that its partners outside its own group companies, and here in particular its direct suppliers, also respect human rights and support STRATEC in achieving its objectives. STRATEC is committed to ensuring that this responsibility is met along the whole of its supply chain, also at indirect suppliers, and has put corresponding measures in place.

#### Identifying and assessing risks

If it is to take preventative and proactive measures aimed at avoiding any violations of human rights, the company has to be aware of its potential risks. In view of this, STRATEC regularly reviews its own organization and its direct upstream value chain to identify any risks relating to compliance with human rights. The risk analysis to identify, assess, and classify any potential or actual negative impacts of the STRATEC Group's business activities, including those in its value chain, on human rights is performed at least once a year and whenever specific events require.

Furthermore, STRATEC encourages its employees to report any suspected infringements of this Policy Statement on Human Rights using existing complaints procedures. These also include local management, the relevant HR departments, and the Compliance Officer. Moreover, all STRATEC employees, all its partners, and all third parties also have the option of reporting potential infringements anonymously via STRATEC's whistleblowing system.

If either STRATEC's own analysis or specific suspected cases reported show that business activities either at STRATEC or in its supply chain involve a risk, or that these business activities cause or help to cause negative impacts on human rights, then STRATEC has a process in place to assess, amend, discontinue, or correct the respective activity.

One factor within the risk analysis performed for locations and group companies involves assessing the risk for employees; the focus here is on occupational health and safety and antidiscrimination. Locations within the EU and the EEA generally involve a lower risk of infringement of occupational health and safety standards or the principle of equal treatment. Due to their respective functions, locations outside the EU and the EEA are also exposed to lower levels of risks.

Irrespective of this risk, which is basically assessed as low, various preventative measures have been implemented. All employees, for example, are obliged to adhere to the Corporate Compliance Policy,



which forms the basis for STRATEC's compliance with human rights. Regular training of managers and employees on the principles underlying the Corporate Compliance Policy and continuous on-site supervision of compliance by the managers responsible for compliance on location ensure that any problems can be identified and solved at an early stage of developments. Furthermore, the Group's management and the Group Work Council regularly exchange information, thus enabling the interests of employees to be accounted for at all times. With regard to occupational health and safety, STRATEC complies with international and national regulations and laws as a matter of course. Where the deployment of a Work Safety Officer is not required by law, the relevant assessments and reviews are conducted by external service providers.

STRATEC aims to meet its responsibilities outside its own organization as well. As a company with activities in the medical technology sector, STRATEC operates in a highly regulated environment. To be able to satisfy customers' requirements, the selection of reliable and responsible suppliers is crucial. Here too, the relevant audits and assessments focus on working conditions for employees at suppliers to the company. The vast share of STRATEC's direct suppliers, particularly those with the highest volumes, are based in industrialized economies in Western Europe. This means that, due to statutory requirements and the ordinance which suppliers are required to comply with, there is already a high degree of certainty that human rights are upheld and a low risk of any violations.

Although this risk is classifiable as low, STRATEC has implemented a range of preventative measures aimed at upholding human rights, particularly in respect of fair working conditions and pay, and avoiding any violations of such rights. These measures include supplier classification and qualification and the Code of Conduct for Suppliers. Furthermore, STRATEC aims to obtain commitments from indirect suppliers that they will uphold human rights. With its Code of Conduct for Suppliers, STRATEC communicates its expectations in respect of due diligence obligations for human rights, also for indirect suppliers, and thus conveys its standards to its suppliers.

#### Staying alert

The conditions and challenges involved in upholding human rights are permanently changing. STRATEC has therefore set itself the goal of continually reviewing its human rights position, and its implementation, to ensure that this is up to date and effective. This enables the company to account for any changes and take any necessary measures. Here, STRATEC also critically reviews its own activities and seeks to maintain a constructive dialog and exchange of information with all relevant stakeholders.

Respect for human rights and the upholding of such rights are constituent components of the group-wide Corporate Compliance Policy, the Human-Rights-Approach@STRATEC, and the Supplier Code of



the STRATEC Group. These key pillars are permanently reviewed to assess whether they adequately account for and address the current risk situation. As important multipliers of the company's principles, STRATEC's employees and managers receive regular training on the Corporate Compliance Policy aimed at further raising everyone's awareness concerning the upholding of human rights. The respective training units have been extended to cover relevant topics. Here too, STRATEC has to be alert at all times and adapt the contents, topics, and participants of this training to changing requirements. To account for this, further training on the topic of human rights is being planned, particularly for employees in the procurement department.