

THE ACT ON CORPORATE DUE DILIGENCE OBLIGATIONS IN SUPPLY CHAINS  
(LIEFERKETTENSORGFALTSPFLICHTENGESETZ - LkSG)

# Complaints Procedure Rules of EUROIMMUN Medizinische Labordiagnostika AG (hereinafter referred to as "EUROIMMUN")

Our standardized complaints and reporting procedure

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## Introduction

These Rules of Procedure apply to EUROIMMUN's standardized complaints and reporting procedure for human rights and environmental risks and violations of human rights and environmental obligations under the German Act on Corporate Obligations in Supply Chains (LkSG).

In order to understand the Rules of Procedure, the following terms are defined:

- Whistleblowers are persons who can report risks and actual or potential violations via the procedure described in these Rules of Procedure.
- Persons in charge are EUROIMMUN employees entrusted by EUROIMMUN with the implementation of the procedure. They are responsible for discussing the facts of the case with the whistleblower and must observe the requirements of these Rules of Procedure when processing the case.
- Employees in a EUROIMMUN department can be consulted for processing and clarification of the facts, but only receive a minimum of information about the report. The whistleblower remains anonymous to them.

## 1. Does EUROIMMUN have a company-wide procedure?

Yes, EUROIMMUN uses a company-wide, transparent, public, and accessible standardized complaints and reporting procedure.

## 2. Is the procedure subject to a fee?

No. The whistleblower may make use of the procedure described in these Rules of Procedure free of charge. However, EUROIMMUN will not assume any costs and expenses incurred by the whistleblower in connection with the use of the procedure; in particular, it will not assume any travel expenses or costs for legal advice.

## 3. Who can submit complaints and reports?

Everyone. The procedure is accessible to everyone. Employees as well as persons and organizations outside EUROIMMUN can report complaints and tips.

## 4 What can I report?

Any suspicion of human rights and environmental risks as well as violations of human rights and environmental obligations arising from EUROIMMUN's own business activities or those of a direct supplier. The suspicion can be directed either against individual employees or in connection with a specific business activity of EUROIMMUN or a supplier of EUROIMMUN. Please only submit complaints or reports if you are convinced that they are correct. However, the procedure is not intended for product and service-related complaints.

## 5. Are all complaints and reports processed?

Yes, we take every complaint and report that reaches us seriously. The Reporting Office checks whether the complaint or report contains sufficient relevant and concrete information ("substantiated complaint or report") to carry out further clarification of the case facts. If the Reporting Office requires further information, it will contact you as far as possible.

## 6 What are the requirements for a substantiated complaint or report?

### a. "Good faith"

Reports should only be submitted if the person making the report believes in good faith that the facts reported are accurate and true. The person making the report is not in good faith if the person knows that a reported fact is untrue. In the event of doubt, the relevant facts are not to be presented as fact, but as an assumption, assessment or as a statement by other persons. Any doubts must be pointed out.

### b. Reasonable suspicion

The whistleblower should only report cases where there is a reasonable suspicion that a relevant event under these Rules of Procedure has occurred. It will not always be clear to the whistleblower whether a particular act or behavior should be reported in accordance with the principles of these Rules of Procedure. The whistleblower should check this carefully before reporting. In case of doubt, however, the whistleblower must report a suspected case in good faith instead of concealing it.

### c. Concrete and conclusive

Every report should be as specific as possible. The whistleblower should provide as much detailed information as possible about the matter to be reported so that the person in charge can properly assess the matter.

### d. Labeling of experiences, prejudices and opinions

Personal experiences, possible prejudices or subjective opinions must be marked as such.

## 7 What information should a complaint or report contain?

The following information is helpful for processing complaints and reports:

1. Describe the facts of the case in chronological order, if possible, with the following details:
  - *Which business unit is affected?* - Name of the EUROIMMUN company or brand or name of the business partner or supplier in the further supply chain
  - *Which persons were/are involved?*
  - *When did the incident occur?* Is the violation still ongoing? Date or period, time
  - *What happened?* Concrete description of the incident and context - the more detailed, the better.
  - *Where did it happen?* Production site, department, etc.
  - *Who are the persons or groups of persons affected or harmed?* What is the amount of damage? Name(s), number, severity of the grievance, etc.

2. Who could be responsible for the grievance?  
Name of the person/department/position, name of the EUROIMMUN company or brand or name of the business partner or supplier in the wider supply chain where the grievance occurred. In this context, information on the possible motivation of the persons involved may also be helpful. Which law or internal regulation was violated? What is the connection to EUROIMMUN's business activities?
3. Is there any evidence? Photos, videos, documents, possible witnesses, etc.
4. What are the expectations with regard to possible preventive or remedial measures? What is the specific or desired goal of the complaint/report?
5. Has anyone else already been informed about the grievance?
6. How should further contact be made? If necessary, provide contact details for further communication or express the wish for anonymity or the greatest possible confidentiality, e.g. no disclosure of the name of the whistleblower in the course of the investigation.

The above-mentioned information facilitates and accelerates the proper processing of a complaint or report. The list is therefore intended as an aid when formulating a complaint or report. However, it is not a prerequisite for processing that a complaint or report contains information on all of the above points.

## **8. Who will deal with my complaint or report?**

The Reporting Office. It is the central complaints management in the company and receives all complaints and reports in accordance with these Rules of Procedure - regardless of how they were reported. The employees of the Reporting Office are persons entrusted with the implementation of the procedure who offer a guarantee of impartial action. They are subject to a special duty of confidentiality, are independent in their function and are not bound by instructions.

## **9. Will my identity be treated confidentially?**

Yes, all complaints and reports are treated confidentially and can also be submitted without giving your name. It is particularly important for us to treat your concerns confidentially and we will protect you as the person making the report. Confidential data may only be passed on if this is necessary and legally permissible.

## **10. Am I protected as a whistleblower?**

Yes, you are protected as a whistleblower within the scope of the conditions mentioned in these Rules of Procedure.

Whistleblowers who submit complaints or reports in good faith will not be disadvantaged or penalized in any way. EUROIMMUN will not tolerate retaliation of any kind. If you believe that you or any other person

has been retaliated against in any way for filing a complaint, please notify EUROIMMUN immediately through one of the reporting channels mentioned in these Rules of Procedure. We will investigate all plausible allegations of retaliation. Substantiated allegations of discrimination by EUROIMMUN will be dealt with accordingly.

Anyone who intentionally or grossly negligently claims falsehoods is not protected. In this case, your identity is also not protected.

## **11. Will I be notified of the receipt of my complaint or report?**

Yes, as soon as we receive your complaint or report, you will promptly receive a confirmation of receipt.

## **12 How will my complaint or report be examined?**

The complaint or report is first examined by the Reporting Office to determine whether the requirements for a substantiated complaint or report are met. In the event of a rejection, the person making the report will receive a statement of reasons.

If the complaint or report is substantiated, the further procedure and responsibilities are to be determined. The Reporting Office discusses the facts of the case with the person making the report if this is necessary due to incomplete information. The Reporting Office may forward the case to another responsible department within the company for processing and clarification of the facts or to a competent authority. During the investigation, the Reporting Office reviews all relevant documents, talks to witnesses and affected persons and analyzes electronic data if necessary.

The Reporting Office will then prepare a proposal for remedial action. This can be done together with the whistleblower and, if necessary, agreements on compensation can be made. The whistleblower will be informed of the result of the remedial measures finally implemented.

## **13 How long does a procedure take?**

It depends. The duration of the procedure depends on the scope and complexity of the complaint or report. The investigation of the complaint or report is carried out swiftly by the company. Depending on the scope and degree of complexity, a proper investigation of complaints can take a few days or, in some cases, several months.

## **14. Are there requirements for clarifying the facts to a case?**

Yes, the persons in charge will always treat the information they receive confidentially towards other persons. This applies in particular to personal data. The identity of the person making the report will not be disclosed if you so wish and if this is legally possible. Any statutory and official disclosure and reporting obligations are excluded from the principle of confidentiality.

All persons in charge must comply with certain rules of conduct, such as

- Data and information must be treated confidentially. Neither the name nor details from the report may be disclosed without a valid reason.

- The whistleblower must be protected. Retaliation will not be tolerated.
- Any clarification of the facts must be conducted fairly, objectively, without prejudice and with respect.
- The persons affected by the complaint or report have the right to be heard.

## 15. Are there different ways to submit complaints or reports?

Yes, EUROIMMUN has various reporting channels that you can use for complaints or reports. The main reporting channel is the tool "whistly", which you can access via the EUROIMMUN website at <https://www.euroimmun.de/en/legal/sustainability/>. You can use "whistly" to submit complaints or reports 24 hours a day, seven days a week. The procedure is available in various languages and is managed by an independent operator. The data is stored on protected servers in Germany. The content of the complaints and reports is processed exclusively by EUROIMMUN.

You can reach out to us by post at the following address:

EUROIMMUN Medizinische Labordiagnostika AG  
Personal  
LkSG Complaints Management  
Seekamp 31  
23560 Lübeck, Germany

The Reporting Office can also be contacted by e-mail at [lksg@euroimmun.de](mailto:lksg@euroimmun.de).

Complaints and reports are accepted via all channels in text form in all living/spoken languages and - if necessary - translated into the working languages of the procedure (German and English). This also applies to communication with the whistleblower. If requested, EUROIMMUN will endeavor to communicate in the language of the whistleblower but cannot guarantee this. Usually, processing is carried out in German or English.