

Löwenstein Gruppe

Declaration of principle on the human rights strategy

As a globally active family business, the Löwenstein Group (hereinafter also referred to as Löwenstein) is aware of its responsibility to respect human rights and protect the environment. A strong set of values and compliance with legal regulations and established standards are essential for the Löwenstein Group. The values and principles of the Löwenstein Group are anchored in the Löwenstein Code of Conduct. This declaration of principles describes individual elements of the Löwenstein Group's human rights strategy and clarifies the human rights and environmental expectations on employees and suppliers.

I. Expectations on Employees and Suppliers

The Löwenstein Group's human rights and environmental expectations towards employees and suppliers are based on a shared understanding of value-based cooperation. As part of its own human rights strategy, Löwenstein places high demands on itself, its employees and its suppliers. Legally compliant and sustainable behaviour is a prerequisite for successful business relationships within the Löwenstein Group.

As part of the human rights strategy, all employees undertake to comply with human rights and environmental standards. The "Löwenstein Group Code of Conduct" describes the principles and values that apply to all employees. Training and information programmes create a high level of awareness and allow employees to make informed, value-based decisions.

The expectations of suppliers are described in detail in the "Löwenstein Group Code of Conduct for Business Partners". This forms the basis for business relationships. It states that Löwenstein expects its suppliers to respect human rights as set out in the UN Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights of 19 December 1966 and the International Covenant on Economic, Social and Cultural

Rights of 19 December 1966. The Code of Conduct for Business Partners clarifies the expectation of suppliers to comply with the core labour standards of the International Labour Organization (ILO) with its five basic principles on freedom of association and the right to collective bargaining, the elimination of forced labour, the abolition of child labour, the prohibition of discrimination in respect of employment and occupation, and occupational health and safety, and in particular to pay their own employees a fair wage. Löwenstein also expects compliance with the environmental standards set out in the Code of Conduct for Business Partners, including sustainable and resource-conserving behaviour. Suppliers must also appropriately address these expectations to their own business partners.

II. Risk Management

In order to fulfil its own requirements, Löwenstein maintains a risk management system with the aim of identifying, assessing, monitoring and controlling human and environmental risks. Löwenstein has integrated risk management into the existing operating processes in order to be able to deal with the constantly changing risk situation. The management has appointed a Sustainability and Human Rights Officer who monitors risk management for human rights and environmental risks, e.g. through regular audits. The Sustainability and Human Rights Officer reports to the Management Board at least once a year and on an ad-hoc basis on risk analyses carried out and upcoming risk analyses and the fulfilment of human rights and environmental due diligence obligations. There is close cooperation between the Sustainability and Human Rights Officer and other departments in the company which, like Purchasing, play an important role in implementing the German Supply Chain Due Diligence Act (LkSG = Lieferkettensorgfaltspflichtgesetz).

1. Risk analysis

Löwenstein regularly analyses the human rights and environmental risks depending on the changing contextual conditions, the type of business activity and the size and structure of the company. This enables Löwenstein to identify, appropriately weight and prioritise

potential risks. The risk analysis for the company's own business division and direct suppliers is carried out regularly on an annual basis and on an ad hoc basis. Risks relating to indirect suppliers are assessed on an ad hoc basis. The results of the risk analysis are incorporated into Löwenstein's corporate decision-making processes and influence the business strategy and the selection of suppliers. Appropriate remedial and preventive measures are also defined on this basis. The results are communicated internally to the relevant decision-makers. The risk analysis thus forms the basis for appropriate and effective risk management. The risk analysis process at Löwenstein is essentially as follows:

- The regular risk analysis is based on a multi-stage analysis of direct suppliers and the company's own business area. The business activities and structure of the Löwenstein Group, the purchasing structure and the company's own supply chains form the basis for the analysis. As part of risk mapping, certain sensitive areas are initially focussed on. This is followed by a risk assessment in which suppliers are identified and evaluated on a risk basis in accordance with the appropriateness criteria set out in the LkSG. The initial focus here is on industry-, product group- and country-specific abstract risks. The risks are identified and assessed. This is followed by a concrete risk analysis based on the legal adequacy criteria as part of risk prioritisation.

The findings obtained from the processing of information from the complaints procedure, the implementation of preventive and remedial measures and other sources are also incorporated into the analysis.

Löwenstein is aware of its own responsibility with regard to existing risks. The risks are regularly reassessed and taken into account appropriately, particularly with regard to preventive measures.

2. Prevention Measures

In order to minimize human rights and environmental risks in its own supply chain, Löwenstein has implemented various preventive measures in its own business area and with suppliers. Löwenstein continuously monitors the effectiveness of these measures, reviews their appropriateness and effectiveness and adjusts them if necessary. These preventive measures currently include the following regulations in particular:

- Policy statement on the human rights strategy
- Code of Conduct for employees of the Löwenstein Group (available at [https://en.hul.de/wp-content/uploads/sites/2/2023/01/Code_of_Conduct.pdf])
- Regularly organised mandatory training courses
- Department-specific sustainability initiatives
- Code of Conduct for business partners of the Löwenstein Group (available at [https://en.hul.de/wp-content/uploads/sites/2/2023/01/Code_of_Conduct_for_Business_Partners.pdf])
- Onboarding process for suppliers
- We carry out risk-based checks on our suppliers, e. g. in the form of document checks

Löwenstein expects all employees to adhere to the Code of Conduct. At the same time, human rights considerations are taken into account in the procurement of products and services. Löwenstein regularly trains selected employees on human rights and environmental risks. The Sustainability and Human Rights Officer also initiates risk-based control measures.

Löwenstein takes human rights and environmental expectations into account when selecting direct suppliers. Löwenstein also obliges direct suppliers to comply with Löwenstein's human rights and environmental expectations and to address them appropriately along their own supply chain. To this end, Löwenstein uses the Code of Conduct for Business Partners and has implemented an onboarding process for business partners. To

enforce the contractually agreed standards, Löwenstein grants itself the right to carry out inspections and training at direct suppliers.

If Löwenstein has substantiated knowledge of violations of human rights and environmental obligations by an indirect supplier, Löwenstein takes appropriate preventive measures against the perpetrator, such as the implementation of risk-based control measures, support in the prevention and avoidance of a risk or the implementation of industry-specific or cross-industry initiatives.

• **3. Remedies**

• If Löwenstein becomes aware of an actual or imminent violation of human rights or environmental obligations in its own business area or at a direct supplier, Löwenstein will work as quickly as possible to take appropriate remedies to prevent the business activity causing the violation, to minimise the extent of the violation and/or to make it compliant with human rights. If this is not possible, Löwenstein will draw up a plan to end or reduce the violation and implement it as quickly as possible, setting a specific timetable. If the behaviour of Löwenstein employees is not compatible with human rights, appropriate sanctions will be introduced.

In the event that business activities of a Löwenstein Group company contribute to potential or actual human rights violations or are directly linked to them, the Löwenstein company concerned shall endeavour to take appropriate remedial action as quickly as possible. If there is a well-founded suspicion or concrete indication of human rights violations within the Löwenstein Group or along the supply/value chain, the Löwenstein company concerned will investigate the indication carefully and consistently. Business partners are obliged to co-operate in clarifying the facts. Depending on the severity of the violation, the Löwenstein company reserves the right to respond appropriately, from requests for immediate rectification to termination of the business relationship.

4. Efficacy Control

Löwenstein reviews the effectiveness of the preventive and remedial measures once a year and on an ad hoc basis, in particular if Löwenstein has to expect a significantly changed or significantly expanded risk situation in its own business area or at suppliers in order to prevent or mitigate adverse human rights impacts. Preventive and remedial measures are then updated as necessary. The effectiveness of training measures is tested through comprehension questions during or after the end of the training.

5. Complaint Procedure

Löwenstein enables individuals to report human rights and environmental risks and breaches of human rights and environmental obligations via a whistleblowing centre. Reports can be submitted to the Compliance Department (+49 (0) 2603 9600-1155 or compliance@loewensteinmedical.com), the secure Löwenstein Integrity Line (<https://loewensteinmedical.integrityline.com/>) or an ombudsperson appointed by Löwenstein. The reports, which can also be submitted anonymously, are processed here independently and openly in accordance with a transparent process.

The whistleblowing centers are accessible worldwide and at any time and allow the whistleblower to report risks and violations anonymously, confidentially and without fear of being penalised. Löwenstein has laid down binding rules of procedure for dealing with incoming reports. The complaints procedure is reviewed annually and on an ad hoc basis for its appropriateness and effectiveness.

6. Documentation and Reporting

Risk management, the preventive and remedial measures taken and the complaints procedure are continuously documented by Löwenstein in order to identify and realize potential for improvement.

An annual report on the fulfilment of due diligence obligations in the previous financial year is prepared and made publicly available free of charge on the company's website after the end of the financial year.

The declaration of principles can be found on the intranet and can be viewed at any time on the company's own website [loewensteinmedical.com].

Löwenstein Medical

Bad Ems, 22 December 2023