



Declaration of Principles on Respect for Human Rights

Preamble

In the Vetter Pharma group of companies (Vetter), we are fully committed to respecting human rights and taking responsibility within our global supply chains. We respect internationally recognized conventions, implement applicable laws, and ensure that human rights abuses in the context of our business activities are effectively prevented by our business processes. This declaration of principles includes all direct or indirect subsidiaries and majority shareholders of Vetter.

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Our principles, standards and expectations

As a global contract development and manufacturing organization (CDMO), Vetter works for pharmaceutical and biotech companies of all sizes. We fill active ingredients into syringes and other injection systems. These are used to treat diseases such as multiple sclerosis, severe rheumatoid arthritis and cancer.

As a successful partner to global pharmaceutical companies in the production of medicines, some of which are vital to life, we are committed to operating in an economically, socially and environmentally responsible manner. The focus of our business activities is to sustainably improve the quality of life for millions of people around the world.

We are convinced that sustainable business is only possible in harmony with people and the environment. With this in mind, we are committed to promoting human rights and environmental protection and minimizing the risk of violations. This commitment applies both to our own operation and to our global supply chains.

We conduct our business in accordance with internationally recognized standards and guidelines, such as the United Nations Guiding Principles on Business and Human Rights, the United Nations Sustainable Development Goals and the OECD Guidelines for Multinational Enterprises. As a signatory of the Charta der Vielfalt e.V. and the United Nations Global Compact, we support their goals.

The principles set forth in this declaration apply both to our own business, including all our employees, as well as to our suppliers in our global supply chains.

For many years, the Vetter Code of Conduct has been a binding framework for all Vetter employees. We also expect our suppliers to commit to the principles outlined and to develop and implement appropriate and effective processes to address and prevent the risks and violations we have identified and to identify any other potential risks. To communicate our expectations of our suppliers transparently, we have introduced a Vetter Business Partner Code of Conduct.

Our approach to implementing human rights due diligence

2.1 Company-specific risks

In our role as a service provider, we can influence some issues with great sustainability potential only to a more limited extent than is consistent with our corporate philosophy. For example, in the selection of materials or products for the manufacture of pharmaceuticals, we are bound by regulatory requirements. Nevertheless, we seek to work in partnership with our business partners to find more efficient and sustainable ways of working together.

2.1 Risk analysis

In furtherance of our contribution to compliance with international human rights standards and national laws, we continually assess whether and where in our own business operations and in our supply chain there may arise risks of human and environmental rights being violated. For this purpose, we use an annual and data-driven analytical risk process for our own business area and for our direct suppliers. We also conduct this process on an ad hoc basis for indirect suppliers.

We use the following risk-based approach: In a first step, the abstract country-specific and industry-specific risks in our own business area and those of our suppliers are determined. In a second step, suppliers or Vetter's business units with an increased risk identified in this way are specifically examined regarding the existence of human rights and environmental risks. The results of the risk analysis are integrated into the selection and management processes and form the basis for the description of appropriate preventive and remedial actions.

2.3 Preventive actions

Our commitment to human rights is part of our company-wide Code of Conduct, which applies to all Vetter employees. Through regular internal training focusing on awareness-raising measures, the contents of the Code of Conduct are communicated, discussed together using examples, and thus taken into account in our daily business.

We have included our expectations of our suppliers regarding human and environmental rights in our Business Partner Code of Conduct. Our goal is to require all our suppliers to comply with these expectations and to agree on various control mechanisms (such as information rights and audits) to ensure the implementation of our expectations.

2.4 Complaints Management

We encourage our employees and expect our suppliers to report suspected violations of this declaration using the complaint procedure described in this document. Vetter maintains a complaint system to which employees and third parties (such as suppliers and their employees or other business partners) can report complaints regarding human rights and environmental issues. The following contact options are available:

Corporate Compliance Office

Phone: +49 (0)751 3700 1009

E-Mail: compliance@vetter-pharma.com

Whistleblowing Hotline (especially for submitting anonymous reports)

Phone: +49 (0)6172 138 83 0

E-Mail: compliance.vetter@oehmichenlaw.com

In writing to:

Vetter Pharma-Fertigung GmbH & Co. KG

Corporate Compliance Office

Schützenstraße 86

88212 Ravensburg

All reports are treated in the strictest confidence and are handled according to a clearly structured process set out in our Complaints Procedure Rules regarding the Supply Chain Due Diligence Act within our company. We expect whistleblowers to make their reports only in good faith and with good intentions. Vetter thereby ensures, for whistleblowers acting in good faith, protection from reprisals or other negative consequences.

2.5 Handling violations

If we have reasonable grounds to suspect or have concrete evidence of human rights or environmental violations taking place in our own business area, we take prompt action to end the violations and minimize the risk of recurrence.

If we determine that human rights or environmental violations are occurring with one of our business partners, we will take appropriate action based on the severity of the violation (such as cease-and-desist orders, audits, jointly agreed remedial actions and, as a last resort, termination of the contractual relationship).

3 Monitoring and responsibility

Our management is responsible for implementing and complying with this Declaration of Principles on Respect for Human Rights. The operational implementation of our human rights due diligence processes is carried out by the relevant departments, including Corporate Compliance, Purchasing, EHS and Human Resources.

The implementation of human rights and environmental due diligence in our company is an ongoing process. We therefore review the effectiveness of our actions and grievance mechanism through annual and ad hoc effectiveness reviews. Based on the results of these reviews and the results of our risk analyses we will continuously improve our risk management system and develop it further. As part of our documentation and reporting obligations, we and all other entities falling within the scope of these programs will regularly report on the progress of the implementation and development of our system.

Ravensburg, January 2025



Henryk Badack



Titus Ottinger



Thomas Otto



Carsten Press



Peter Sölkner