



# STADA Grievance Mechanism

*Rules of Procedure in accordance with the German Act on  
Corporate Due Diligence Obligations in Supply Chains  
(Lieferkettensorgfaltspflichtengesetz - LkSG)*

**EFFECTIVE FROM JANUARY 1, 2024**

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## I Who can report?

You can make use of this complaint procedure if you are directly or indirectly affected, but also if you are aware of any potential or actual human rights or environment-related risks and/or violations of human rights or environment-related obligations caused by our business activities in our own operations or of our supplier. For example: STADA Group employees, employees working for indirect and direct suppliers of STADA Group, any business partner, people living in communities in which we operate, or any other third party.

## I What can you report?

You can report any risk of or violations of human rights and environment-related regulations occurring within the STADA Group or its supply chain, as well as inadequate preventive and remedial measures to protect human rights and environment-related matters.



# Protection for Reporters / Non-Retaliation Policy

STADA is committed to safeguarding individuals who report concerns in good faith from any form of retaliation or discrimination. For this reason, the following principles apply during the whole process of reporting and investigation:

- STADA is dedicated to preserving confidentiality, and will protect the identity of a reporter or any other individuals mentioned in the report in accordance with applicable legislation.
- The reporter's personal data will be handled in compliance with relevant data protection regulations, the German Act on Corporate Due Diligence Obligations in Supply Chains (LkSG), and our data protection policy. For additional details, please refer to Compliance - Company | STADA (Data Protection / Germany (according to Art. 13, 14 GDPR).
- STADA strictly prohibits any retaliatory measures or adverse consequences targeting reporters for filing the report.
- If you believe you are encountering retaliatory actions as a consequence of your submitted report, you may report this to our Compliance Department using one of the Reporting Channels mentioned below.
- If there is evidence of retaliation against you, we will take action of remedy. We will deal with each incident on a case-by-case basis considering the specific situation.

We do not tolerate any disciplinary measure or discrimination act made by the STADA Group or any of our suppliers against the reporter as a reaction to reports made in good faith.

We strongly disapprove of reports made in bad faith or the misuse of our reporting channels.



# | Reporting Channels

## 1. COMPLIANCE REPORTING PORTAL:

Our secure and confidential platform allows employees and external parties to report risks or violations from anywhere in the world, around the clock, and in various languages, free of charge. When reporting a risk or a human rights and environmental violation within the STADA Group or its supply chain, please select the relevant option on STADA's Compliance Reporting Portal: "Make a report. Risk or violation of human rights and environment-related regulations inside STADA or along STADA's supply chain" (right button).

The system does not track IP addresses, timestamps, ensuring anonymity.

Whilst we encourage an open dialogue, you can also choose to report anonymously. If you do so, you can engage in a secure dialogue with the relevant department and employees in charge of investigating an allegation within STADA through the system's mailbox (remember to save your login and password details when submitting a report).

## 2. COMPLIANCE DEPARTMENT OR OTHER CONTACTS:

You can also report directly to STADA's Compliance Department via email at: [compliance@stada.com](mailto:compliance@stada.com)

## 3. OMBUDSMAN:

STADA has appointed Dr. Rainer Buchert as a worldwide external Ombudsman, who can be contacted as an independent person regarding suspected criminal offences and serious breaches of laws and regulations, including violations of human rights and environment-related regulations. The Ombudsman will share the information with STADA only with the prior consent of the information provider. If desired, he will protect the identity of the information provider through his duty of confidentiality.

A contact form is available here. Using this consent form ensures safe electronic transfer of the data (via SSL encryption). Dr. Buchert is supported by Dr. Caroline Jacob from the same law firm.

### **Dr. Buchert & Partner Rechtsanwälte**

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# | What Happens After You Submit a Report?

## **1. RECEIPT, REVIEW AND CONFIRMATION:**

Upon receiving your report through one of the Reporting Channels, STADA acknowledges receipt, assesses its relevance to human rights and environment-related risks, and sends a confirmation of receipt to the reporter within seven business days – if communication is possible (i.e. when a reporter provided his contact details). STADA might get in contact with the reporter to clarify open questions if any.

Any information or issues that may be unrelated to the topic of human rights violations or violation of environment-related rights will still be forwarded to the relevant department within STADA, while adhering to data protection regulations.

During the whole process, STADA will grant confidentiality of the reporter's identity and the information provided and process the data on a strict need-to-know basis. Sensitive information, as per data protection laws, will not be shared without your consent.

## **2. INVESTIGATION PROCEDURE:**

When the relevance and initial concerns are confirmed, the Compliance Department will pass on the report for an investigation by the department responsible for Human Rights and Environmental Risks and Violations within STADA. If necessary, further internal departments and/or colleagues as well as external service providers may be engaged to resolve the matter. The investigation will be completed promptly/in due time. The time that will be needed will depend on the individual case but will be treated with high priority by STADA.

During the internal investigation, the reporter may be asked further questions to clarify any open points and will be contacted to provide information on the status as well as on the investigation's outcome.

## **3. PREVENTIVE AND REMEDIAL ACTIONS:**

Upon completing the investigation, STADA will evaluate the need for corrective and preventive actions to halt, reduce, or prevent current or further breaches. These measures may include internal actions such as process adjustments, new guidelines or enhanced training programs, as well as external actions toward third parties. The implementation of these measures will be closely monitored by STADA's responsible department.



## | Documentation

All reports, complaints, investigations and their outcomes are documented, archived and stored in compliance with relevant legal and data protection requirements. Access rights are strictly regulated, ensuring only authorized personnel can access these records.

## | Risk Analysis and Reporting

The information from handling reports is incorporated into STADA's sustainability risk analysis. We also keep statistics on the number of reports and how they were addressed.

## | Effectiveness Review

We conduct periodic reviews of all systems and processes related to our complaints procedure to ensure their continued effectiveness. These reviews are conducted as needed, but at least once a year.

## | Contact

If you have any questions or suggestions regarding the process description of how to report any human rights and/or environmental risk or/and violation within STADA or its supply chain, please contact us at [compliance@stada.com](mailto:compliance@stada.com)