Parent SOP	P01.017	**Responsible for content** (only if different from PM)	N/A
Valid from	April 25, 2024	**Template version**	P08VO002 01

1 Contents

1 Contents 1
2 Objective 1
3 Definitions (in accordance with Signavio glossary) 2
4 Applicable Documents 2
5 Preamble 2
6 Procedural Principles 2
6.1 General – Scope and Entitlement to Submit a Complaint 2
6.1.1 Scope of the LkSG 2
6.1.2 Scope of the HinSchG 2
6.1.3 Entitlement to Submit a Complaint 3
6.2 Scope 3
6.3 Complaints Channels 3
6.3.1 Internal Reporting Offices 3
6.3.2 External Reporting Bodies and Disclosure 3
6.4 Safeguarding the Anonymity of the Whistleblower 4
6.5 Confidentiality 4
6.6 Protection against Unequal Treatment or Punishment due to a Complaint/Information 4
7 The Complaints Procedure 4
7.1 How Can a Complaint be Submitted? 4
7.2 What Information Should a Complaint Include? 4
7.3 What Happens after a Complaint is Submitted? 4
7.4 How is the Complaint Checked? 5
7.5 How Long Does It Take to Examine and Process Information or a Complaint? 5
8 Effectiveness of the Complaints Procedure 5
9 Documentation 5
10 Data Protection Information 5
11 Change History 6

2 Objective

The purpose of the complaints procedure is to ensure Richard Wolf GmbH receives information at an early stage regarding potential violations of the law as defined in the German Whistleblower Protection Act (HinSchG) and the German Supply Chain Act (LkSG) so that appropriate preventative and corrective measures can be taken and potential damage to the affected parties, employees, business partners, and the company can be avoided and the whistleblowers can be protected. In addition, all of the findings made will be used for the continuous improvement of our risk management process.

The purpose of these procedural rules is to ensure that the procedure is fair, transparent, and efficient and that all parties involved have the same opportunities and rights. This guideline defines the relevant responsibilities, deadlines, processes, and principles.

3 Definitions (in accordance with Signavio glossary)

Terms / abbreviations
Violation
Risk
Reports, information, or complaints
Whistleblower
Reprisals

4 Applicable Documents

Applicable documents can be found in the parent SOP.

5 Preamble

Richard Wolf GmbH has a long tradition in endoscopy and enjoys an excellent reputation as a reliable and trustworthy business partner. The company develops, produces, and markets product solutions in the field of medical technology that meet the highest standards in terms of quality, customer satisfaction, and patient safety.

Operating on a global scale, Richard Wolf GmbH fulfills its corporate responsibility towards society as a whole. Socially responsible, ethical, and environmentally friendly practices, as well as good and sustainable corporate governance, are firmly anchored in the corporate culture at Richard Wolf.

Interactions between Richard Wolf and employees and all stakeholders around the globe are based on sustainability, transparency, respect, fairness, and integrity.

For Richard Wolf, legally compliant actions are therefore a matter of course, as is the fulfillment of its duties of care relating to human rights and the environment. Accordingly, Richard Wolf has set up a complaints procedure whereby information can be submitted relating to compliance violations as well as human rights-related and environmental risks or breaches.

By setting up this complaints procedure and the whistleblower system, Richard Wolf GmbH is fulfilling its duties in accordance with the LkSG and HinSchG. This complaints procedure is provided by Richard Wolf to all internal and external persons; its principles and the process are described in the following procedural rules.

6 Procedural Principles

6.1 General – Scope and Entitlement to Submit a Complaint

6.1.1 Scope of the LkSG

These procedural rules cover reports relating to suspected or actual violations of human rights or environmental protection legislation in the supply chain of Richard Wolf GmbH, its subsidiaries, its employees, or direct and indirect suppliers in accordance with Sections 8 and 9 LkSG within the framework of the complaints procedure. Such violations in the supply chain may include, but are not limited to: Failure to observe occupational health and safety in the workplace (in accordance with national regulations), child labor, discrimination on the basis of parentage, disability, age, gender, and religion, withholding an appropriate salary (in accordance with national regulations), ground, water, or air pollution, harmful noise emissions, unacceptable water consumption, manufacturing or using certain persistent organic pollutants, as well as impermissible import and export of waste.

6.1.2 Scope of the HinSchG

In addition, these procedural rules apply to all information relating to violations that are covered by the HinSchG and that relate to Richard Wolf GmbH and its subsidiaries and that has become known to the whistleblower in connection with their professional activities or in advance of a professional activity. This includes violations that are punishable as well as violations that are subject to a fine, provided that the regulation that is violated is intended to protect life, limb, and health or the rights of employees or their representative bodies (including occupational health and safety). In addition, all violations of statutory provisions of the Federal Republic of Germany and the federal states that were adopted in order to implement certain European regulations are included, as well as violations of EU legislation with direct applicability in a wide range of areas, such as: Regulations combating money laundering and terrorist financing, product safety requirements, road safety requirements,

requirements relating to the transportation of dangerous goods, requirements relating to environmental protection and radiation protection, consumer protection regulations, regulations for data protection and IT security, regulations relating to procurement law, corporate accounting regulations, regulations in the field of competition law, etc.

6.1.3 Entitlement to Submit a Complaint

All natural or legal persons can therefore submit a complaint relating to human rights risks or violations or specific environmental risks or violations that arise in the business domain of Richard Wolf GmbH or throughout the supply chain as defined in the LkSG or relating to (potential) legal violations as defined in the HinSchG, of which knowledge has been obtained in a professional context. Whistleblowers may therefore include self-employed persons and employees of suppliers, as well as current and former employees.

6.2 Scope

These procedural rules apply to Richard Wolf GmbH and the following subsidiaries, provided that the legal requirements for applicability have been met:

- RIWOspine GmbH
- RIWOlink GmbH
- Kurt Semrau GmbH
- Heynemann GmbH

6.3 Complaints Channels

Richard Wolf GmbH has set up several reporting channels to ensure that complaints and information relating to violations can be followed up in a fair and appropriate way. Employees and external third parties can submit information through these channels relating to environmental or human rights-related risks or potential violations of legal requirements or internal regulations.

6.3.1 Internal Reporting Offices

Information and reports as defined in Section 3(4) HinSchG or complaints in accordance with Sections 8 and 9 LkSG can be submitted via the following channels:

- Online reporting channel DISS CO
- By e-mail to Compliance@richard-wolf.com
- By mail

  Richard Wolf GmbH

  Abteilung Compliance

  Pforzheimer Straße 32

  75438 Knittlingen, Germany

At the request of the whistleblower submitting the report, a face-to-face meeting with a person responsible for receiving reports at the internal reporting office will also be guaranteed within an appropriate period of time.

6.3.2 External Reporting Bodies and Disclosure

Whistleblowers can also submit information relating to violations in accordance with the HinSchG to external governmental reporting bodies. In accordance with Section 7 HinSchG, reports to an internal reporting office are preferable provided that effective actions against the violation can be taken internally and the whistleblower has no fear of reprisals. Richard Wolf GmbH therefore encourages whistleblowers to make use of the internal reporting office as it believes this is a proven way to increase transparency regarding the effectiveness of compliance measures. In addition, complaints procedures can be processed more effectively, efficiently, and quickly than by external reporting bodies.

External reporting bodies may include those at a federal, state, and EU level, depending on their responsibility. The reporting bodies at a federal level are primarily the Federal Financial Supervisory Authority (BaFin), Federal Cartel Office (BKartA), and Federal Office of Justice (BfJ). Further information about the existing reporting procedures for these bodies and about other external reporting bodies and procedures can be found on the website of the BfJ, which can be accessed via the following link:

BfJ – Responsibility of the reporting bodies (bundesjustizamt.de)

The possibility of disclosure is also available to the whistleblower.

6.4 Safeguarding the Anonymity of the Whistleblower

The whistleblower is able to access anonymous complaints channels. Information and complaints can be submitted anonymously via the whistleblower system. The procedure can be completed anonymously. The anonymity of the whistleblower is also safeguarded after the complaints procedure has been completed.

6.5 Confidentiality

The reporting procedure ensures that the information and identity of the whistleblower are handled confidentially. The employees entrusted with the processing of complaints handle the information that they obtain – including the identity of the whistleblower – confidentially. The identity of the whistleblower will not be disclosed, provided that this is requested by the whistleblower and is legally possible. Unauthorized employees are not permitted to access the complaints mechanism. This is achieved by taking appropriate technical and organizational measures, such as restricting access to the information.

6.6 Protection against Unequal Treatment or Punishment due to a Complaint/Information

Richard Wolf GmbH places great value on providing protection against unequal treatment or punishment as a result of submitting a complaint or information.

The procedural rules therefore ensure that the whistleblowers are protected against unequal treatment, reprisals, discrimination, or retaliatory actions. This does not apply to whistleblowers who submit false reports either willfully or through gross negligence. Knowingly submitting a false report about a supposed violation of the LkSG/HinSchG with the intention of willfully and falsely incriminating another person may constitute a violation of the law (including criminal proceedings) and may be pursued accordingly by Richard Wolf GmbH and/or governmental authorities.

7 The Complaints Procedure

7.1 How Can a Complaint be Submitted?

Complaints or information can be submitted via e-mail, by mail, in person, or through the online reporting channel. The online reporting channel offers the option to submit reports anonymously and to receive corresponding feedback.

QR codes posted publicly in all areas of the company allow employees without their own computer workstation to access the online reporting channel easily using their personal smartphone.

7.2 What Information Should a Complaint Include?

It is important to submit as much relevant information as possible: All of the facts including date, time, persons or departments, and any evidence or documents that may support the case. Reports must always be truthful, objective, and unbiased.

7.3 What Happens after a Complaint is Submitted?

For each report, whistleblowers receive a confirmation of receipt after no more than 7 days, provided that this is possible based on the reporting channel chosen by the whistleblower. The Compliance Officer/Human Rights Officer will assign the case to the responsible case handler. The case handler will check whether the matter described in the report can be purely factual (plausibility check) and whether there are sufficient factual grounds for a (potential) violation or a risk that may lead to an investigation (substantiation check).

If the report is plausible and substantiated, it will undergo further processing. If a violation is identified during the internal investigation, measures will be initiated in accordance with the matter at hand. The aim of these measures is, as far as possible, to prevent the violation from having any consequences or, as a minimum, to mitigate the consequences and/or prevent future violations. The Compliance Officer will examine the necessity and the effectiveness of corrective, follow-up, and preventative measures, with the involvement of the responsible department where necessary. The complaints procedure is terminated once the matter has been clarified, considered, and investigated and it can be said with sufficient certainty that there are no human rights-related risks or violations and/or no specific environmental risks or violations and/or no violations of the regulations specified in the HinSchG. The case handler will contact the whistleblower within 90 days to communicate the result of the investigation or the reasons for terminating the procedure. However, the feedback will also take

account of conflicting, legally protected interests of other persons and companies. If measures (corrective, follow-up, or preventative measures) have been derived, the whistleblower will be informed of the next steps or implementation procedures. After completion of the procedure, Richard Wolf GmbH offers the option of remaining in contact with whistleblowers.

7.4 How is the Complaint Checked?

Complaints and information are processed by trained employees of Richard Wolf GmbH. All trained employees are impartial, independent, not bound by instructions, sworn to secrecy, and given adequate resources in terms of time.

7.5 How Long Does It Take to Examine and Process Information or a Complaint?

The duration of the procedure depends on the scale and complexity of the matter. The company will investigate reports quickly.

8 Effectiveness of the Complaints Procedure

The effectiveness of the complaints procedure is examined on an annual basis and where circumstances require. Any necessary adjustments to the complaints procedure or in relation to corrective measures will be made promptly.

9 Documentation

Complaints, reports, or information that fall within the scope of the LkSG or HinSchG are documented in accordance with the confidentiality rules. If consent on the part of the whistleblower with regard to the documentation of the report is required, this will be obtained.

The documentation will be deleted three years after completion of the procedure; the documentation may be stored for a longer period if this is required in order to process the report or if this is necessary and proportionate in accordance with other legal requirements.

10 Data Protection Information

The data protection policy published on the website of Richard Wolf GmbH and the general information on data protection apply to all data processing activities carried out by Richard Wolf GmbH, Pforzheimer Straße 32, 75438 Knittlingen, Germany, e-mail: info@richard-wolf.com as the Controller as defined in Art. 4 of the EU General Data Protection Regulation (“GDPR”). Our data protection officer can be contacted at datenschutz@richard-wolf.com or by mail to our address, marked for the attention of the data protection officer.

The protection of your personal data – and particularly your personal rights when we process and use your information – is important to us.

For more information about data protection at Richard Wolf, please see the Richard Wolf website.

11 Change History

Version	Modified section	Changes
01	2	Objective expanded
	3	Terms added
	5	Wording expanded
	6	New section added and existing wording updated.
	7	Description updated
	8	Wording expanded
	9	New section added
	10	Reference to website added