Statement of Principles

of Richard Wolf GmbH
Pursuant to the German Supply Chain Due Diligence Act (LkSG)

Foreword

Richard Wolf GmbH is an internationally active company with a long-standing tradition in endoscopy. We are known as a reliable and trustworthy business partner and develop, manufacture, and distribute medical technology solutions in accordance with the highest standards of quality, customer satisfaction, and patient safety. Responsible, socially conscious, ethical, and environmentally friendly conduct is firmly anchored in our corporate culture.

Richard Wolf GmbH (including affiliated companies) is committed to respecting the human rights and environmental concerns protected under the German Supply Chain Due Diligence Act ("LkSG") within the supply chain. We comply with applicable law by taking care to prevent human rights violations and environmental violations within the scope of our business activities, including our supply chain.

We condemn child labor, forced labor, slavery, human trafficking, and discrimination. We comply with the occupational safety regulations applicable at our employees' respective workplaces and compensate our employees appropriately and fairly. We expect the same from our business partners.

We recognize that our business activities throughout the entire supply chain can have an impact on natural resources, ecosystems, and the climate. Therefore, we are committed to preventing, minimizing, and—where possible—remedying environmental hazards and damage. This includes the careful use of energy and water, the avoidance of emissions and waste, and the responsible use of raw materials and chemicals.

As part of our due diligence obligations, we continuously analyze and assess the risks of environmental impacts within our own business operations as well as among our direct suppliers. This is based on internationally recognized environmental standards, relevant national and international environmental laws, and internal company guidelines. Internationally recognized standards include the UN Global Compact, the United Nations Sustainable Development Goals, the labor and social standards of the International Labour Organization (ILO), and others. We rely on transparent processes, regular reviews, and the development of effective preventive and remedial measures to sustainably reduce environmental impacts within our supply chains and protect natural resources.

Against this backdrop, we have drafted this policy statement in accordance with the principles of internationally recognized standards for corporate governance.

Knittlingen, 19 May 2026

Jürgen Pfab
Co-CEO

Jürgen Steinbeck
Co-CEO

1. Description of the Procedure for Implementing Due Diligence Obligations Pursuant to Section 6(2) of the LkSG

1.1. Risk Management

Richard Wolf GmbH established internal processes as early as 2022 to ensure that human rights and environmental due diligence obligations are effectively integrated into the supply chain and our own business operations. We have taken various measures to fulfill our human rights and environmental due diligence obligations. Our goal is to identify, prevent, and respond to human rights and environmental risks throughout our entire supply chain in order to avoid, for example, the exploitation of workers, child labor, or environmental destruction. We have defined clear responsibilities for the fulfillment and compliance with our human rights due diligence obligations. The overarching responsibility for respecting human rights and protecting the environment within our sphere of influence lies with our management. Management has appointed a sustainability manager who is responsible for ensuring that risk management is embedded in all relevant business processes through appropriate measures. The sustainability manager is responsible for conducting the risk analysis as well as for deriving, developing, and implementing corresponding preventive and remedial measures and works regularly and closely with other relevant departments. The human rights officer monitors whether an appropriate and effective risk management system has been established within the company to ensure compliance with due diligence obligations and reports regularly to the Executive Board on this matter. In 2023, we established our "Risk Management in Supply Chains" framework process, which enables supply chains to be appropriately reviewed and assessed for potential human rights and environmental risks using a risk-based approach and for preventive and remedial measures to be taken based on the results. This process was integrated into the relevant business units through additional internal processes. The framework process was implemented in close coordination with the relevant business units and operationalized through internal structures. Based on these processes and the systematic collaboration of various functions, human rights and environmental risks can be identified, assessed, monitored, and controlled within our company and throughout the supply chain.

1.2. Risk Analysis

As part of risk management, an appropriate risk analysis is conducted once a year to identify human rights and environmental risks. It covers two areas: our own business unit and our direct suppliers. Ad hoc risk analyses are generally initiated in the event of a significantly changed or significantly expanded risk situation in the supply chain. As part of the risk analysis, particular attention is given to those risks that are already known from many years of experience in daily business operations. The identification of risks is based on indices such as the Global Slavery Index, the UN Global Compact, the United Nations Sustainable Development Goals, the labor and social standards of the International Labour Organization (ILO), as well as the principles of internationally recognized corporate governance standards and our own internally developed criteria for assessing human rights and environmental risks, both within our own business operations and along the supply chains (Guideline for Business Partners: Corporate Social Responsibility (CSR), Self-Disclosure – Environmental and Human Rights Due Diligence Issues). These criteria take into account product and industry risks, country risks, types of employment, impacts on rights holders, opportunities for influence, and the effectiveness of existing preventive measures. Risks are classified into the categories "low," "medium," and "high." For identified high-risk suppliers, the abstract risk analysis is supplemented by a concrete risk analysis to obtain a more accurate picture of the risk situation.
Both the SCR Business Partner Policy and the self-disclosure questionnaire can be found at the following link on our website:
https://www.richard-wolf.com/fileadmin/user_upload/Policy_Statement/P00DO013_Richtlinie_fuer_Geschaeftspartner_Corporate_Social_Responsibility__CSR_.pdf
https://www.richard-wolf.com/mam/data/Typo3/Sonstige_Downloads/AGB/P01FO024_Selbstauskunft_-_Umweltbezogene_und_men-schenrechtliche_Sorgfaltspflichtenthemen.pdf

1.2.1. Risk Assessment

The objective of the risk assessment is to identify human rights and environmental risks. The following risks are prioritized in our risk analysis:

- Prohibition of child labor
- Prohibition of forced labor
- Prohibition of all forms of slavery

- Prohibition of violations of occupational safety
- Prohibition of violations of freedom of association
- Prohibition of unequal treatment of employees
- Prohibition of withholding fair wages
- Prohibition on the impairment of basic necessities (food, drinking water, sanitation) through the causing of environmental damage (soil, water, air, noise, excessive water consumption)
- Prohibition of unlawful eviction
- Prohibition of the violation of fundamental human rights due to lack of training or oversight of security forces
- Prohibition of the manufacture of mercury-containing products
- Prohibition of the use of mercury and mercury compounds in manufacturing processes
- Prohibition on the treatment of mercury waste in violation of the regulations
- Prohibition on the production and use of persistent organic pollutants
- Prohibition on the environmentally unsound management of persistent organic pollutants
- Prohibition of transboundary movements of hazardous wastes contrary to the provisions

1.2.2. Risk Assessment

An internally developed **scoring system** is used to ensure a consistent and comparable assessment of potential risks. This system takes into account both qualitative and quantitative indicators, such as: **the country of origin** and its ranking in terms of human rights and environmental standards based on internationally recognized indices; **industry** and the typical risk profile of the respective supplier or partner; **sustainability measures and goals** that the supplier demonstrably pursues (e.g., CO_2 reduction strategies, resource conservation, social programs); **certifications** such as ISO 37001 (Anti-corruption/Anti-bribery Guidelines), ISO 50001 (Energy Management System)**,** ISO 14001 (Environmental Management), ISO 45001 (Occupational Health and Safety), and SA8000 (Social Responsibility); **transparency and documentation**, e.g., through sustainability reports or participation in voluntary initiatives (e.g., UN Global Compact). **Supplier locations and the company's own production sites are specifically assessed** to analyze location-specific risks in detail and be able to implement targeted measures as needed. The assessment results in a risk profile ("low," "medium," and "high"), which serves as the basis for preventive or corrective measures.

1.2.3. Risk Communication

The results of the risk analysis are communicated systematically and transparently to all relevant management levels and responsible parties within the Richard Wolf Group. This includes the executive board, division and department heads, the compliance officer, and the sustainability manager.
These communication channels ensure that potential risks can be identified early on and appropriately assessed at all organizational levels. The responsible individuals are regularly informed about the current status of risk analyses, identified risk areas, and measures taken or planned. Furthermore, open risk communication promotes interdisciplinary exchange between departments and supports the coordinated and targeted implementation of preventive and remedial measures. In this way, we ensure that risks are not only identified but also effectively managed to guarantee compliance with our legal and ethical obligations throughout the entire value chain.

1.3. Preventive and Corrective Measures

1.3.1. Preventive Measures

Our General Terms and Conditions of Purchase stipulate that our suppliers are obligated to comply with human rights and environmental regulations and must require their subcontractors to do the same. Our contract templates have been supplemented with relevant clauses to ensure compliance with these requirements throughout the entire supply chain. Direct suppliers are assessed using the questionnaire "Self-Declaration – Environmental and Human Rights Due Diligence Issues," the Corporate Social Responsibility (CSR) Guidelines for Business Partners, and CSR country reports. To promote transparency and enable the early detection of violations, we have established a whistleblower system. This system allows employees and third parties to report potential legal violations confidentially and securely in accordance with the German Whistleblower Protection Act (HinSchG) and the Supply Chain Due Diligence Act (LkSG). All incoming reports regarding suspected or actual violations of human rights, environmental protection requirements, or the HinSchG are systematically recorded, analyzed, documented, and processed. Further information on the rules of procedure is publicly available on the Richard Wolf GmbH website at: https://www.richard-

wolf.com/de/unternehmen/menschenrechtliche-sorgfalt-und-hinweisgeberschutz. In addition, we regularly implement training and awareness-raising initiatives for our employees to make sure they understand relevant risks and to train them to identify and prevent potential violations at an early stage.
Our internal processes and guidelines are continuously reviewed and adapted to new findings and changing legal requirements to ensure the continuous improvement of our prevention system.

1.3.2. Remedial Measures

Should violations of human rights or environmental requirements be identified, Richard Wolf GmbH will immediately take appropriate corrective measures. In doing so, we strive for a collaborative partnership with the affected suppliers to jointly develop and implement sustainable solutions.
Remedial measures may take various forms depending on the severity and nature of the violation, such as:

- A commitment to short-term corrective actions
- Support in implementing sustainable improvements
- Monitoring the implementation of measures through follow-up inspections
- In extreme cases, termination of the business relationship if satisfactory improvement is not achieved

Our goal is to ensure compliance with human rights and environmental standards through targeted corrective actions while minimizing negative impacts on a long-term basis.

1.4. Documentation and Monitoring in Accordance with the LkSG

Richard Wolf GmbH continuously documents and monitors the implementation of its human rights and environmental due diligence obligations under the German Supply Chain Due Diligence Act (LkSG). In doing so, all relevant measures, assessments, and results are systematically recorded to ensure transparency and traceability.
As part of regular reviews, processes and measures are evaluated for their effectiveness. If necessary, adjustments or further developments are made to align with changing legal requirements and new insights.
Through this ongoing documentation and monitoring, we ensure the sustainable and responsible management of our corporate due diligence obligations throughout the entire supply chain.

1.5. Complaint Procedures

Richard Wolf GmbH offers all employees and external third parties protected reporting channels to report violations of external and internal rules, including human rights or environmental risks, as well as breaches of human rights or environmental obligations arising from the business activities of a direct or indirect supplier. Reports submitted through these channels are forwarded to the Compliance Department for monitoring and tracking. Further information on how reports are handled, as well as the current complaint procedure guidelines, can be found at https://www.richard-wolf.com/de/unternehmen/menschenrechtliche-sorgfalt-und-hinweisgeberschutz.

2. Our Priorities Within Our Own Business and Among Direct and Indirect Suppliers

In line with our responsibility as a globally operating medical technology company, Richard Wolf GmbH places great importance on the consistent compliance with human rights and environmental laws as well as legal requirements, both within our own business operations and among our suppliers and throughout the entire supply chain. Our goal is to work with business partners who share this same commitment to respecting human rights and environmental protection and strive to ensure this compliance throughout the business relationship.
Our priorities in this regard include, in particular:

- **Protection of human rights:** We ensure that all employees in our value chain are treated fairly, that working conditions are safe and healthy, and that forced labor, child labor, and discrimination are strictly prohibited.
- **Environmental protection:** We are committed to minimizing negative environmental impacts throughout our supply chain. This includes, among other things, measures to reduce emissions, conserve resources, and prevent waste.

- **Sustainable supply chains:** Through careful selection and evaluation of our suppliers, we ensure that sustainable standards are met and continuously improved.
- **Transparency and communication:** Open dialogue and transparent reporting to all stakeholders are essential principles for us to build trust and promote continuous improvement.
- **Continuous improvement:** We are constantly working to further develop our processes, systems, and standards in order to proactively address new challenges and foster sustainable solutions.

Through these priorities, we aim not only to meet legal requirements but also to take a leading role in the medical technology industry with regard to responsible and sustainable corporate governance.

2.1. Our Expectations of Our Employees and Suppliers

2.1.1. People at the Center of our Actions

Our business activities are guided by a clear principle: People are at the center. This guiding principle shapes our daily work as well as our long-term strategic direction. We are convinced that economic success is inextricably linked to social responsibility and environmental sustainability. Accordingly, our stated goal is to develop viable, future-oriented, and sustainable solutions together with our business partners and to implement them with determination and consistency.

2.1.2. Responsibility Throughout the Entire Value Chain

The principles set forth in this policy statement are binding for our entire business. This includes all employees of our company as well as the employees of our affiliated companies. We expect all stakeholders to behave in a responsible, lawful, and ethically sound manner that respects and protects the dignity and rights of every individual.
However, these core values and standards are not limited to our own corporate structures. They also apply to our suppliers, service providers, and other business partners throughout the entire supply chain. We expect them to recognize, implement, and live by our principles in their business activities. Furthermore, we actively encourage our direct suppliers to pass these principles on to their own suppliers and to ensure that they are also committed to social and environmental responsibility.

2.1.3. Partnership-based, Binding, Sustainable

Our goal is to work together with all partners as equals. In doing so, we strive for long-term relationships characterized by mutual trust, transparency, and a shared commitment to continuous improvement. We view sustainability not as a short-term goal, but as an ongoing process that we actively shape for the benefit of people, the environment, and future generations.