

## Policy statement on respect for human rights

BIOTRONIK is a leading medical technology company that has been developing reliable and innovative cardio- and endovascular therapy solutions for over 50 years. With the goal of perfectly matching technology to the human body, BIOTRONIK innovations save and improve the lives of many millions of patients with cardiovascular diseases. BIOTRONIK is headquartered in Berlin and is present in more than 100 countries.

This policy statement on human rights supplements BIOTRONIK's Code of Conduct. This is the basis and benchmark for all guidelines and regulations that ensure responsible and ethically impeccable conduct within the BIOTRONIK Group.

Dr Alexander Uhl  
Chief Executive Officer

Stephan Schulz-Gohritz  
Chief Financial Officer

Robert Hartan  
Chief Procurement Officer

## Our commitment

BIOTRONIK understands respect for human rights as a fundamental value. We are committed to respecting all internationally recognised human rights that are relevant to our operations and base our Human Rights Policy Statement on

- The Universal Declaration of Human Rights
- The International Covenant on Civil and Political Rights
- The International Covenant on Economic, Social and Cultural Rights
- The International Labour Organization's Five Fundamental Principles and Rights at Work
- The OECD Guidelines for Multinational Enterprises
- The UN Guiding Principles on Business and Human Rights
- The United Nations Sustainable Development Goals
- The ten principles of the UN Global Compact.

We believe that these rights are inherent in all human beings and acknowledge that they are interconnected, interdependent and indivisible. While states have a duty to protect human rights, we recognise that businesses have a responsibility to respect human rights. We take responsibility for our employees and take seriously our responsibility to minimise the impact of our business on the environment. Social responsibility and responsible sourcing in accordance with BIOTRONIK's Supplier Code of Conduct are essential components of our daily activities. The principles of this policy statement are reflected in it. This enables us to generate sustainable and reliable long-term growth and secure jobs worldwide. It is our guiding principle that we always comply with applicable legal regulations in all regions and countries in which we operate. If national laws and international human rights standards differ, we ensure that we comply with national laws as a minimum standard. We then work with our customers and business partners to find ways to comply with these human rights standards as far as possible.

## Scope

This policy statement applies to our employees in all divisions worldwide. With these standards, we commit all employees worldwide to behave appropriately and lawfully towards colleagues, customers and business partners. We expect our partners to pass on our commitment to respect human rights to their business partners and to act ethically and with integrity.

## Responsibility for implementation

Responsibility for the implementation of this policy statement is managed by the BIOTRONIK management. This ensures that each area of our company is aware of its own responsibility for respecting human rights and implementing them on a day-to-day basis.

## Our human rights and environmental expectations

We expect our own employees as well as our business partners and suppliers to comply with the following human rights and environmental principles:

### Child labour

We reject any form of child labour. We do not employ children below the minimum legal working age in the respective country or jurisdiction. We set a minimum working age of 15 years, even if local legislation permits the employment of younger children. Employees under the age of 18 perform work only in accordance with the legal requirements of their country of employment (e.g. regarding working hours and conditions) and subject to education and training requirements.

### Forced labour

We reject any form of forced labour. Work must always be voluntary. We do not tolerate any form of forced labour, including bonded labour, indentured labour, military labour, modern forms of slavery and any form of human trafficking.

### Diversity and inclusion

We promote a work environment that enables inclusion and values the diversity of our employees. We are committed to equal opportunities and reject any form of discrimination or harassment based on gender, ethnic origin, nationality, social origin, religion, age, disability, sexual orientation and identity or other legally protected characteristics. The basis for the selection and promotion of employees at BIOTRONIK is qualification, performance, individual skills and experience.

### Freedom of association and collective bargaining

We respect the right of our employees to join a trade union or workers' representative body of their choice without threat or intimidation. We recognise and respect the right to bargain collectively under applicable laws. Employees who serve as workers' representatives will not be disadvantaged or favoured in any way.

### Working conditions

#### Remuneration and additional benefits

The remuneration of our employees complies with local industry and labour market standards, local minimum wage legislation and is in line with the terms of applicable collective agreements, where such exist. We pay employees on time.

#### Working time

We comply with all applicable local laws regarding working hours, including overtime, rest breaks and paid holidays.

#### Occupational safety and health

The safety, health and well-being of our employees are important to us. of utmost importance. In accordance with BIOTRONIK's occupational health and safety policy, legal requirements and industry standards, we provide a safe and healthy working environment to maintain the health of employees, protect third parties and prevent accidents, injuries and work-related illness.

### Data protection

We respect the privacy of all individuals and the confidentiality of any personal data we have about them. BIOTRONIK's data protection policy provides adequate safeguards for the transmission of personal data

of employees, customers and suppliers. BIOTRONIK's data protection management ensures compliance with the respective data protection regulations.

## Environment

We are committed to protecting the environment. We recognise that our business activities have an impact on the environment and climate and we have implemented measures and specific programmes to minimise this impact.

## Due Diligence

Our commitment to respect human rights is reflected in BIOTRONIK's policies, e.g. the Code of Conduct, the Supplier Code of Conduct and our operations. To comply with international human rights standards, national laws and BIOTRONIK's policies, we conduct appropriate human rights due diligence to identify, assess and address potential and actual adverse human rights impacts in our business activities and supply chain.

## Establishment of a risk management system

In order to adequately implement the human rights strategy in the company and to monitor the due diligence process, specific responsibilities are defined in the company.

For this purpose, the management has appointed a human rights officer who is responsible for anchoring and monitoring risk management and also monitors the fulfilment of due diligence obligations. The management is regularly informed about the work of the responsible person. In addition to the Human Rights Officer, there is a committee from various departments of the company, such as Purchasing, Compliance, Risk Management, CEHS and HR, which ensures due diligence and the implementation of effective measures in all business areas and towards suppliers. This includes conducting annual and ad hoc risk analyses, developing and implementing preventive and remedial measures, establishing an appropriate grievance procedure and documenting all key processes and decisions implemented as part of the due diligence process.

## Risk analysis

In order to identify human rights and environmental risks in our own business division as well as at our direct suppliers, we conduct an annual and event-related risk analysis. The risk analysis includes a two-stage process in which first the abstract risk and then the concrete risk is assessed. The selection of risk factors is based on the requirements of the German Supply Chain Compliance Act (Lieferkettensorgfaltspflichtengesetz). We consider our own business operations as well as our direct suppliers at country level. A risk-based approach is used to select the countries to be considered in the analysis. To determine the abstract risk, we use qualitative as well as quantitative indicators from independent and publicly available sources. The assessment is made per country and risk factor. To determine the concrete risk, the risk of a human rights-related or environmental violation is classified in terms of its severity. The severity level is composed of the extent, scope and irreversibility of the violation. The probability of occurrence of a potential violation is assessed with the help of already existing mitigation measures. This approach enables us to identify high-risk countries for human rights and environmental violations. The majority of our sourcing countries have a low ESG risk profile, yet we have been able to identify some high-risk countries as part of the risk analysis. In line with our risk-based approach, we have therefore prioritised potential risks for these sourcing countries. Priority environmental risks exist with regard to waste and chemical management as well as the responsible use of resources. With regard to human rights-related risks, based on the results of the risk analysis, risks that may have a negative impact on local communities and workers in the value chain have been prioritised. The evaluation of the results of the risk analysis and the derivation of concrete measures is carried out for our own business unit as well as for our direct suppliers.

## Prevention measures

We recognise that we are part of the communities in which we operate. We seek constant dialogue with stakeholders, such as our business partners, to better understand and take into account their views and expectations regarding human rights. We will continue to communicate this policy and raise awareness, train and inform our employees and partners. Preventive measures towards our suppliers also include communicating human rights and environmental expectations through a supplier code of conduct, asking suppliers about human rights and environmental issues during onboarding, and conducting audits.

## Appeals and complaints mechanism

If it is determined that there is a risk that our business activities are causing or contributing to negative human rights impacts, we have a process in place to assess, modify, stop and/or correct the activity. We encourage our employees to report suspected violations of this Human Rights Policy Statement to BIOTRONIK's Compliance Management. Our business partners and third parties have the opportunity to report potential violations of this Human Rights Policy via a web form on [www.biotronik.com](http://www.biotronik.com).

## Consequences of infringements

In the event of reports of violations, we will take appropriate measures for proper clarification. We will take corrective action. Civil and criminal penalties will depend on how and under what circumstances a person has violated this policy statement. If a violation of law is proven, we reserve the right to refer the matter to the appropriate authorities for further action.

## Reporting, monitoring and documentation

As part of our annual report and our reporting to the Federal Office of Economics and Export Control (BAFA), we communicate and report on our commitments, activities and declarations regarding human rights in accordance with this policy statement. We review and monitor the effectiveness of the grievance procedure and measures through audits (conducted by the Internal Audit department) and through KPIs, such as the number of reported violations, the number of potential risks reported through the external supplier risk tool, the completion/implementation rate of adopted measures. BIOTRONIK's compliance with due diligence requirements is logged and stored digitally in a shared cloud storage with access control. This includes decisions on preventive measures, supplier management, and the definition of responsibilities for implementation. We review the progress of the implementation of this policy statement in the business activities of the BIOTRONIK Group.

## Next steps

As part of our culture of continuous improvement, we regularly evaluate and review how we can best optimise and strengthen our approach to human rights in our sphere of influence.

## Final provision

The BIOTRONIK Human Rights Policy Statement was adopted by the Management Board on 23.12.2022.