

## Declaration of principles of Haema AG

within the meaning of the Supply Chain Due Diligence Act

### 1. Preamble

Haema AG is the largest private-sector blood and plasma donation service in Germany. Haema operates 40 blood donation centres nationwide in Bavaria, Berlin, Brandenburg, Mecklenburg-Western Pomerania, North Rhine-Westphalia, Saxony, Saxony-Anhalt, Schleswig-Holstein and Thuringia.

Haema is a partner of Grifols, a global leader in the healthcare industry that develops and supplies plasma-derived medicines and other innovative biopharmaceutical products. Grifols processes the plasma collected by Haema into important medicines for the treatment of serious, chronic and life-threatening diseases.

With over one million blood and plasma donations collected each year, Haema makes an important contribution to the supply of hospitals, clinics and blood banks as well as to the production of blood and plasma-based medicines.

We face up to the resulting responsibility by always acting in an ethically and legally impeccable manner. We are committed to this in the Grifols Code of Conduct. This is supplemented by our Declaration of Principles, with which we fulfil our obligation with regard to human rights and environmental due diligence in accordance with the German Supply Chain Due Diligence Act (LkSG).

### 2. Our commitment to international standards and human rights

Haema AG is committed to responsible corporate governance in accordance with internationally recognised standards, in particular the Universal Declaration of Human Rights of the United Nations (UN), the ten principles of the UN Global Compact, the Guidelines for Multinational Enterprises of the Organisation for Economic Co-operation and Development (OECD), the European Convention for the Protection of Human Rights and Fundamental Freedoms, the tripartite Declaration of Principles of the International Labour Organisation (ILO) on Multinational Enterprises and Social Policy and the ILO Declaration on Fundamental Rights and Principles at Work. Haema calls on all its employees to always behave in accordance with this voluntary commitment.

We are committed to respecting these internationally recognised human and environmental rights and focus our due diligence processes in particular on the following human rights and environmental issues, which we have identified as material for our company through an initial risk analysis:

- Ban on child labour
- Prohibition of forced labour and all forms of slavery
- Freedom of association and the right to collective bargaining
- Protection against discrimination
- Protection from land grabbing
- Right to health and safety at work
- Right to fair pay and working hours
- Compliance with the principle of equal opportunities and equal treatment

- Environmental protection

We are committed to preventing, mitigating, remediating and contributing to human rights abuses that we have caused or contributed to, and we endeavour to promote or contribute to the mitigation and remediation of human rights abuses where we are linked to them through our business relationships.

### **3. Scope of application**

The principles set out in this policy statement apply both to our own business and to our suppliers.

This commitment on the part of our suppliers to fulfil their social responsibility is an essential prerequisite for any form of cooperation. We have developed a Supplier Code of Conduct to communicate our expectations of direct suppliers in a transparent manner. The Supplier Code of Conduct forms the basis for supplier relationships. It is an integral part of all supply contracts. We expect our business partners to also commit to respecting human and environmental rights. By signing the Supplier Code of Conduct, our suppliers commit to establishing appropriate due diligence processes and pass on this expectation to their own suppliers.

### **4. Realisation of responsibility**

For the purpose of implementing our due diligence obligations, we have developed a procedure with the following content.

#### **4.1 Risk management and risk analysis**

We are committed to establishing and embedding appropriate and effective risk management. Risk management encompasses the entire process of identifying, analysing and assessing human rights and environmental risks in the supply chain.

As a first, essential part of risk management, we carry out an annual and event-driven risk analysis to identify human rights and environmental risks at our suppliers and in our own business division. In particular, we analyse country-specific and industry-specific risks. The risk-related results obtained are prioritised using the criteria of appropriateness and influence, as well as according to the specific nature of the risk and the degree of our own responsibility (own business area versus suppliers).

The resulting findings on human rights and environmental risks and impacts are crucial for our further decision-making processes. The risk analysis is reviewed annually.

#### **4.2 Preventive measures**

If a risk is identified, we have undertaken to develop and implement appropriate preventive measures in our own business area and in relation to direct suppliers and to monitor them on a risk-based basis. The measures must be suitable for preventing or at least minimising human rights and environmental risks.

Our prevention measures include, among other things

- Development and implementation of suitable procurement strategies and purchasing practices through which risks can be prevented or minimised.
- Measures to record human rights and environmental risks (e.g. by sending out questionnaires and conducting supplier meetings)
- The consideration of human rights and environmental expectations in the selection of direct suppliers in accordance with the results of the aforementioned survey.
- The contractual assurance of a direct supplier that it will endeavour to comply with all human rights and environmental expectations required by us (including training, concepts, etc.) and to address these appropriately along its supply chain.
- Organising training courses in the company's own business areas and communicating the expectations of the Management Board to its own employees.
- The introduction of appropriate control mechanisms and their risk-based implementation in order to verify compliance with the human rights strategy at direct suppliers and in the company's own business area. These risk-based controls can be carried out at direct suppliers on site (or through online assessments) or by means of audits.

If we have substantiated knowledge that an indirect supplier has violated human rights or environmental obligations, we will also take appropriate preventive measures in this respect.

The effectiveness of the preventive measures is reviewed once a year and on an ad hoc basis.

#### **4.3 Remedial measures**

If, as part of the risk analysis, we determine that the business activities of Haema AG cause, contribute to or are about to cause human rights or environmental risks, we will immediately take appropriate remedial action to end the violation or prevent its occurrence.

We expect our direct suppliers to cooperate in clarifying and ending any human rights and environmental violations that may have occurred.

In the case of indirect suppliers, if we have substantiated knowledge of an (imminent) violation, we draw up a concept to prevent, end or minimise human rights or environmental violations and ensure its implementation.

In the event of very serious violations, if suitable remedial measures have not been implemented after the expiry of an agreed implementation period or if no other milder means are effective, we reserve the right to take further steps up to and including termination of the business relationship.

#### **4.4 Complaints procedure**

Appropriate complaints management is an important part of our due diligence processes. In order to prevent or counteract violations, we have established a channel through which employees, customers, business partners in the supply chain and all other stakeholders can report irregular behaviour with regard to human rights and environmental violations in connection with our own business activities or express concerns. Complaints can be reported confidentially by e-mail to [compliance.lksg@haema.de](mailto:compliance.lksg@haema.de).

## **5. Continuous development and responsibilities**

It is very important to us to improve the human rights situation within our supplier network. We are committed to continuously developing our human rights and environmental due diligence processes. Safeguarding human rights and the associated environmental rights in our business activities and with direct suppliers is of material importance to the Management Board of Haema AG. The Management Board therefore receives regular and ad hoc information on the measures taken to implement and comply with the law.

The Management Board of Haema AG has appointed a Human Rights Officer to monitor the due diligence requirements and processes. This officer is responsible for monitoring Haema AG's risk management. He is also the first point of contact for employees and business partners with questions regarding the implementation of supply chain due diligence obligations at Haema AG.

## **6. Reporting**

From the 2024 financial year, we will report annually to the German Federal Office of Economics and Export Control on the main human rights and environmental risks identified and on preventive and remedial measures. This report will be published on our website no later than four months after the end of the financial year.

This policy statement has no retroactive effect and comes into force on 1 January 2024. We review this policy statement annually and on an ad hoc basis and will update it immediately if we identify any changed or expanded risks.

Haema AG

The Management Board