

Because we care

Declaration of Principles on
Respect for Human Rights



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Foreword by the Management Board

As a globally oriented family business, we have always been committed to the basic values that are expressed in our corporate culture.

We are a company that operates worldwide in a wide variety of countries and cultures. RAUMEDIC is aware of this and expects the different regional mentalities to be treated with respect. We act locally, but always against the background of a uniform corporate culture and values and maxims that are common to the entire group.

Commitment to Respect for Human Rights

We as RAUMEDIC AG are committed to respecting human rights and environmental obligations within our supply chain and regard the protection of human rights as a central element. We implement applicable law, respect internationally recognized human rights and environmental obligations and take care to prevent human rights violations and environmental pollution in the course of our business activities.

In particular, we condemn all forms of child labour and forced labour, all forms of slavery and (modern) human trafficking as well as all forms of discrimination. We are also committed to compliance with the occupational health and safety regulations applicable at the respective place of employment, the payment of appropriate wages and the protection of our employees' freedom of association.

We base our entrepreneurial behaviour on nationally and internationally applicable standards and guidelines. We continuously derive current directives and guidelines from these standards and the findings of our own risk analyses.

These findings and guidelines form the binding framework of action for all employees and business partners.

We specify our strategy for respecting human rights and environmental obligations in our Declaration of Principles which, in addition to a description of our risk management and any priority human rights and environmental risks identified, also contains expectations of our employees and suppliers.

All processes, measures and responsibilities described in the Declaration of Principles are anchored and implemented in RAUMEDIC Group's relevant business processes.

Statement

This Declaration of Principles of RAUMEDIC AG was adopted by the Management Board of the RAUMEDIC AG on 21 June 2024.

In order to comply with our obligations under the German Act on Corporate Due Diligence Obligations in Supply Chains (Lieferkettensorgfaltspflichtengesetz – LkSG), we have established the following processes in our own business department and, where necessary or required, with our direct and indirect suppliers.

Human Rights Strategy

Our business activities are based on our Code of Conduct and our values with regard to human rights and environmental due diligence requirements. These were already integrated into our existing management systems and processes, for example via our Compliance Management System including the Code of Conduct, Supplier Code of Conduct and Whistleblower System, our Risk Management System and sustainability processes.

We have appointed a human rights and complaints officer.

Further information on our commitment to human rights, the environment and sustainability can also be found in our sustainability reporting. In future, we will continue to publish an annual report on the fulfilment of our due diligence obligations in accordance with Section 10 LkSG.

Human Rights in the Supply Chain

Compliance with human rights and environmental obligations is a key element of our human rights strategy. RAUMEDIC expects all suppliers to undertake to comply with RAUMEDIC's Supplier Code of Conduct and to pass these obligations on to their suppliers.

Description of Procedure

We have systematically incorporated the findings from our human rights and environmental risks into our risk and compliance management.

With systematic support for evaluating integrated suppliers, we are able to identify and assess risks within our supply chain and take measures to avoid potential risks and/or minimize or eliminate identified risks through appropriate measures. To ensure this, RAUMEDIC uses a supplier risk assessment database with the aid of real-time analysis to identify potential breaches of due diligence obligations through real-time information and counteract them accordingly.

On this basis, we aim to continuously derive measures to avert potential risks and further align our management processes accordingly in a continuous improvement process. Our risk management is supplemented by appropriate monitoring of our suppliers. Like all processes, our risk and supplier management process is also subject to monitoring by our internal auditors.

Risk Analysis

We take a risk-based approach to risk analysis. We have integrated the risk analysis for our own business department into our existing risk management system. We have integrated risk management for our suppliers into our procurement processes. This software solution evaluates the supplier's risk on the basis of country, publicly available reports, reported complaints and the supplier's influence (ratio of purchasing volume to the supplier's total sales). Based on the risk assessment, each supplier is assigned a "low risk", "medium risk" or "high risk". We prioritize risks for suppliers with high sales volumes. We are now further developing our internal processes for effective implementation based on the results of the analysis. The risk analysis is updated once a year and on an ad hoc basis.

Preventive Measures

If a risk is identified, our business departments must immediately establish appropriate preventive measures within their own department and monitor them in a risk-based manner. Our procurement department PURCHASE must develop and implement appropriate purchasing practices and monitor them in a risk-based manner. If a risk is identified at a direct supplier, appropriate preventive measures must be established immediately with the direct suppliers and their implementation monitored in a risk-based manner. As part of the implementation of suitable procurement strategies and purchasing practices, we have adapted our Supplier Code of Conduct. This contains clear guidelines that our suppliers must observe. Suppliers must countersign the Supplier Code of Conduct. Appropriate preventive measures are also taken if we have substantiated knowledge of actual indications that a breach of duty by an indirect supplier is possible. All measures taken must be suitable for preventing or

minimizing human rights risks and environmental risks. We also ensure that defined measures are implemented.

6 Training Courses and Further Education

All our employees receive training on our Code of Conduct. Our corporate culture is also based on human rights and environmental and sustainability-related principles. Our values are accessible to every employee and business partner. We have anchored sustainability in our corporate strategy for several years now, and our efforts in this regard are tangible and lived practice for every employee and business partner. Our procurement department has trained all employees to implement the requirements of the LkSG in the procurement department. With our own specialist departments, we support all departments of the company in complying with material-related environmental requirements. Our Sustainability, HR and HSE officers also receive ongoing training on the relevant principles and values. With our Supplier Code of Conduct, we sensitize and support our suppliers with the aim of implementing human rights, environmental and sustainability-related values themselves and in their own supply chain.

Further training documents for suppliers are currently being prepared.

Implementation of Risk-Based Monitoring Measures in the Supply Chain

If we identify a risk in the supply chain, we immediately take appropriate preventive measures against the relevant suppliers on the basis of the established processes and monitor the implementation of these measures to ensure that they are implemented. Suppliers are monitored according to the results of the risk analysis.

We obtain risk-based supplier self-assessments and initiate further measures if necessary. We pursue internal quality audits and, if necessary, external audits.

Remedial Measures

We will take immediate remedial action if we become aware of possible imminent or actual violations of the prohibitions of the LkSG or our Supplier Code of Conduct. We do this with the aim of preventing, ending or minimizing such violations. In this context, we ensure that incoming or known indications of possible violations in our own business department or at suppliers are immediately passed on to the responsible employees. The aim of remedial measures in our own business operations in the event of a violation is to prevent or stop it.

In the event of (imminent) violations in the business department of direct suppliers, the responsible employees in Purchasing must immediately draw up a corrective action plan (including a timetable) together with the relevant suppliers to end, minimize or avoid the violation and monitor its implementation. In the event of substantiated knowledge of an (imminent) violation case of indirect suppliers we draw up a concept for the prevention, termination or minimization of human rights violations or environmental violations and ensure its implementation. We reserve the right to terminate the business relationship as a last resort in accordance with the provisions of the LkSG, at least in exceptional cases such as serious violations and lack of remedial action by suppliers.

Complaint Mechanisms

RAUMEDIC operates a Whistleblower Hotline that meets the highest standards of data protection and security and is open to employees and third parties, such as suppliers and their employees,

to report any unethical behaviour or illegal actions. In particular, the Whistleblower Hotline can also be used to report human rights risks or environmental risks and violations of human rights or environmental obligations. Reports can also be made by e-mail. All reports are handled in accordance with a binding, impartial procedure, and those responsible for processing a report are not bound by any instructions. Reports can be submitted anonymously. Proven violations will be appropriately sanctioned. RAUMEDIC does not tolerate any form of retaliation against a person who makes a report in good faith. The rules of procedure for our Whistleblower Hotline are published on our website.

Reporting Obligations

Our commitment to human rights and the environment is monitored by our Management Board. Our company's representative in accordance with Section 4 (3) LkSG reports to the Management Board on an annual and ad hoc basis on the fulfilment of due diligence obligations in accordance with the LkSG. We regard the further development and at least annual or ad hoc review of the procedures described as a continuous process. We will publish the annual reports in accordance with Section 10 LkSG on our website, where our sustainability reports are also available.

Risk Management

We have established an LkSG-related risk management system and anchored it in all relevant business processes, which takes full account of the special features of the medical devices sector.

With systemic support for the evaluation of integrated suppliers, we are able to identify and assess risks within our supply chain and take measures to avoid potential risks and/or minimize or eliminate identified risks through appropriate

measures. To ensure this, RAUMEDIC uses a supplier risk assessment database with the aid of real-time analysis in order to identify potential violations of due diligence obligations through real-time information and take appropriate countermeasures.

In addition, as part of risk management, we carry out an annual and ad hoc risk analysis to identify human rights and environmental risks along our supply chain, in which we pay particular attention to those risks that are prevalent based on our experience in the medical device sector.

We proceed as follows: We check all existing suppliers as well as all potential new suppliers - as part of our risk analysis to be carried out - supported by the software solution described above.

If we identify human rights or environmental risks along our supply chain as part of our annual or ad hoc risk analysis, we immediately take the following measures, among others:

1. Detailed questionnaires to the recognized departments
2. Reference to our established "Supplier Code of Conduct" and, if applicable, to individually designed contractual relationships
3. If applicable, training of suppliers with regard to the "Supplier Code of Conduct"
4. Weighing of interests and adequacy test of the contractual relationship with affected suppliers

We ensure at all times that these guidelines as well as human rights and environmental concerns are taken into account both in our own business department and in all purchasing decisions. This enables the use of "real time analysis" through the software support described above.

We raise awareness of human rights and environmental issues among our employees through regular attendance and reading training, procedural instructions and guidelines.

Regardless of the risk analysis, we have an internal complaints procedure that enables all affected persons to report human rights risks and environmental risks. The complaints procedure is publicly accessible on our website at <https://www.raumedic.com/whistleblower-system>

If we receive notices or complaints via this complaints portal, we will immediately take the following remedial measures:

1. Detailed questionnaire regarding the complaint to the notified body
2. Notes on the "Supplier Code of Conduct" and on individual contractual relationships
3. Training courses on our "Supplier Code of Conduct"
4. Assessment of appropriateness and necessity of further steps according to individual case design

The effectiveness of the complaints procedure is continuously validated and further developed by us, at least once a year, in order to ensure an effective procedure.

We document our efforts to effectively implement our due diligence obligations on an ongoing basis. In addition, we publish an annual report on the fulfilment of our due diligence obligations.

This will be published on our website no later than four months after the end of our financial year and will be made available free of charge for a period of seven years.

Expectations

The guidelines presented and pursued by us apply both in our own business department, i.e. for all our employees, as well as for our suppliers in the supply chain. In addition to our internal Code of Conduct, we have implemented a procedural instruction specifically for selective compliance with due diligence obligations, which clarifies the presentation of our guiding principles.

We also expect our suppliers and business partners to commit to complying with our principles and to develop and embed appropriate and effective processes to address and mitigate the risks and violations we identify and to enable them to detect potential risks.

To communicate our expectations of our suppliers and business partners transparently, we have developed a Supplier Code of Conduct. This is a binding requirement for us. We use it as a contractual basis.

Helmbrechts, June 25, 2024

RAUMEDIC AG



We develop solutions for life together with people who care.



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