



RULES OF COMPLAINTS PROCEDURE

according to § 8 Supply Chain Due Diligence Act

Preamble

In order to fulfill our social responsibility, the Vetter Pharma Group (“Vetter”) has committed itself to acting sustainably and responsibly. As part of our business activities, we attach particular importance to respecting human rights and protecting the environment. Against this background, we have formulated the most important principles for this in our Policy Statement on the Respect for Human Rights. We regularly review compliance with these principles and work to continuously improve them.

The Complaints Procedure described below is an important tool for safeguarding these principles. It allows reports about risks related to human rights and/or the environment or actual breaches of due diligence obligations arising out of or resulting from economic activities within Vetter’s own business or at any of Vetter’s suppliers. Early detection of any such risks and breaches enables us to remedy misconduct as fast as possible and to take appropriate preventive actions for the future.

1. Scope of Application

The Complaints Procedure enables reporting of risks related to human rights and/or the environment or actual breaches of due diligence obligations arising out of or resulting from economic activities within Vetter's own business or at any of Vetter's suppliers.

2. Persons Authorized to Report

Information and complaints to the Compliance Office may be submitted by Vetter employees as well as by persons outside the company, e.g., business partners, their employees or other third parties.

3. Reporting Channels

Reports may be lodged either anonymously or by providing personal details. All complaints and reports – regardless of how they are received – are dealt with promptly, with the necessary care, transparency and in the strictest confidence.

Vetter has set up the following reporting channels for submitting reports and complaints:

Corporate Compliance Office

Phone: +49 (0)751-3700-1009

Email: compliance@vetter-pharma.com

Whistleblowing Hotline

(especially for anonymous reports)

Phone: +49 (0)6172-13883-0

Email: compliance.vetter@oehmichenlaw.com

In writing to

Vetter Pharma-Fertigung GmbH & Co. KG

Corporate Compliance Office

Schuetzenstrasse 86

88212 Ravensburg

4. Confidentiality and Protection against Discrimination

The more information we receive to investigate a report, the more thoroughly we can investigate the matter and take remedial action. Handling the report openly and transparently is often helpful for solving the problem. In addition, in the case of an anonymized report, any queries that may arise during the processing of the report cannot be resolved or cannot be resolved completely.

Of course, the person providing the information is free to decide whether the report should be made anonymously or by providing their name. Without the consent of the whistleblower to disclose their identity, all information, such as personal data and other information that allows conclusions about the identity of the whistleblower, will be treated as strictly confidential. This also applies after completion of the procedure. We assure that reports made in good faith will not result in any disadvantage for the person making the report. This also applies if a suspicion subsequently turns out to be unfounded.

Direct or indirect retaliations for a (suspected) report will not be tolerated and constitute a violation that can be reported by the person concerned to the reporting channels mentioned above. This also applies to the threat or attempt of discrimination or if a person obstructs the submission of a report or makes it more difficult or impossible to clarify a report.

Intentional false reports are excluded from the protection against discrimination.

5. Course of the Complaints Procedure

The procedure is divided into the following steps:

a) Confirmation of Receipt

The whistleblower will receive an acknowledgement of receipt – provided that contact details are given – within seven days after a complaint or report has been made orally or in writing in German or English language via one of the reporting channels mentioned above. In addition, a contact person for the further procedure will be communicated. If requested and to the extent that contact data is available, Vetter will stay in contact with the whistleblower during the entire procedure.

b) Examination of Complaint

The first step is to check whether the described facts are plausible and involve risks or violations relating to human rights or the environment.

If there is not enough information for further processing, the contact person responsible contacts the reporting person – if possible – to discuss the matter together.

If it turns out that the information provided is not plausible or if the whistleblower and the contact person are unable to gather sufficient specific information, the Complaints Procedure will be discontinued. The whistleblower will be informed about the discontinuation, stating the reasons.

Otherwise, an internal investigation will be initiated by Vetter's Corporate Compliance Office to clarify the facts.

c) Clarification of the Facts

The aim of the internal investigation is to obtain objective facts. Depending on the situation, relevant documents are examined, witnesses are interviewed, and inspections are carried out. The results of the internal investigation are documented in a report.

d) Remedial Actions

If a risk to human rights or the environment or a corresponding breach of duty is identified during the internal investigation, appropriate remedial actions will be taken. These may be both preventive or corrective or may also include sanctions.

e) Completion and Review

The whistleblower will generally be informed of the progress of the procedure within 3 months after receiving the confirmation of receipt, provided that contact details are available. Feedback will only be provided insofar as the internal investigation and the rights of the persons involved are not affected.

The whistleblower has the opportunity to provide feedback on the procedure and the result achieved.

6. Review of the Effectiveness of the Procedure

Vetter strives to continuously improve the processing of whistleblower reports and the conduct of internal investigations. To this end, usage data, experience and constructive feedback from the whistleblowing process are used at least annually, or, if necessary, on an ad hoc basis.

Contact

Corporate Compliance Office for personal messages

Phone: +49 751 3700 1009

Email: compliance@vetter-pharma.com

Whistleblowing Hotline for anonymous reports

Telefon: +49 6172 138 83 0

Email: compliance.vetter@oehmichenlaw.com

In writing to

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