

MERZ GROUPWIDE COMPLIANCE POLICIES

NO. 13
THE GERMAN
SUPPLY CHAIN DUE
DILIGENCE ACT



MERZ COMPLIANCE

MERZ GROUPWIDE COMPLIANCE POLICIES

NO. 13 – RULES OF PROCEDURE

FOR THE COMPLAINT MECHANISM PURSUANT TO SEC. 8 (2) OF SUPPLY (LIEFERKETTENSORGFALTSPFLICHTENGESETZ)

I. PREAMBLE

The success of the Merz Group¹ and our ethical conduct go hand-in-hand. The Merz Group is therefore unequivocally committed to respecting applicable laws, regulations and human rights as well as protecting the environment. The Merz Group has implemented a comprehensive set of measures in this regard, which are described in the Policy Statement on the Human Rights Strategy.

Merz fosters a “speak up” culture where Merz Group employees, direct and indirect suppliers and their employees and persons affected by the economic activities of the Merz Group or its suppliers (or their representatives) can ask questions or report potential instances of an inappropriate activity without fear of retaliation. Everybody is encouraged to openly communicate with respect to issues and concerns in a timely manner. This early-warning system puts the Merz Group in the position to counter impending risks or violations at an early stage by appropriate means such as preventive measures or remedial actions.

The Merz Group has implemented a complaint mechanism to enable individuals to report human rights and environmental risks and violations of human rights or environmental due diligence obligations under the SCDDA, which have arisen as a result of the economic activities of the Merz Group or its direct and indirect suppliers. The complaint mechanism is open to every individual, i. e. potentially affected parties, our employees and all other persons along the entire supply chain. The Merz Group will consider complaints (and the outcome of the complaint procedure) during the risk analysis and when implementing preventive measures and remedial actions in line with applicable laws and regulations such as the SCDDA.

The purpose of these rules of procedure is to transparently explain the key characteristics, the accessibility, the process flow and the responsibilities for the complaint mechanism pursuant to Sec. 8 (2) SCDDA.

¹ “Merz Group” includes the businesses Merz Aesthetics, Merz Therapeutics, Merz Lifecare, Merz Real Estate and Merz Financial Investments and all worldwide legal entities, branches and representative offices.

II. RULES OF PROCEDURE FOR THE COMPLAINT MECHANISM PURSUANT TO SEC. 8 (2) OF SUPPLY (LIEFERKETTENSORGFALTSPFLICHTENGESETZ)

Policy

1. Introduction

The complaint mechanism is accessible to everyone, e.g., Merz Group employees, direct and indirect suppliers and their employees and persons affected by the economic activities of Merz Group or its suppliers (or their representatives such as works council or NGOs).

2. No Retaliation

Retaliation violates Merz Group's policy. Merz Group strictly prohibits retaliation by its employees and or third parties (including direct and indirect suppliers) against anyone for submitting a complaint in good faith or for helping to submit a complaint. Retaliation provides grounds for disciplinary measures up to and including dismissal. The Merz Group will appropriately make use of its influence to prevent and act on retaliation exerted by third parties.

3. What can be reported?

The complaint mechanism can be used to report any potential violation of applicable laws and regulations, human rights- or environment-related risks or violations along the supply chain or Merz Group policies and guidelines.

This includes, inter alia, (suspected) incidents in Merz Group's own business area as well as along its supply chain of

- human rights or environmental risks or violations,
- occupational health and safety,
- contamination of soil, water, air and excessive use of water,
- conflicts of interests,
- bribery or kickbacks,
- harassment,
- discrimination, and
- retaliation.

Human rights or environmental risks or (imminent) violations may in particular relate to

- prohibition of child labor,
- prohibition of forced labor and all forms of slavery,
- disregard of occupational health and safety and work-related health hazards,
- disregard of freedom of association, freedom of organization and the right to collective bargaining,
- prohibition of unequal treatment in employment,
- prohibition of the withholding of a fair wage,

- destruction of natural resources (soil change, water pollution, air pollution and harmful noise emissions or excessive water consumption) through environmental pollution,
- unlawful eviction of land rights and water,
- prohibition of hiring or using private / public security forces that may cause harm due to lack of instruction or control,
- prohibited production, use and / or disposal of mercury (Minamata Convention),
- prohibited production and / or use of substances within the scope of the Stockholm Convention (POPs), as well as non-environmentally sound handling of waste containing POPs,
- prohibited import / export of hazardous waste as defined by the Basel Convention.

4. How to submit Complaints?

The Merz Group has implemented two reporting lines which are available 24/7: The reporting channels are available in several languages, including German, English, Spanish, French, Mandarin, and others. A complete overview of the languages available can be found on the reporting platform.:

- Our online reporting platform is accessible via Merz Ethics Helpline (SpeakUp) (<https://ethics-merz-com.speakup.report/en-GB/ethicshelpline/home>) and our Supply Chain Compliance – Merz;
- Our telephone hotline under the following number: <https://ethics-merz-com.speakup.report/en-GB/ethicshelpline/phone-numbers> (e.g., in Germany: 08001818952. Further information can be found under Merz Ethics Helpline (SpeakUp).

Complaints can be submitted anonymously. The complaints will be handled confidentially in line with applicable laws and regulations.

You can also address any concern by post to:

Merz Pharma GmbH & Co. KGaA,
c/o Group Compliance, Eckenheimer Landstraße 100, 60318 Frankfurt am Main.

The complaint mechanism is free of charge for reporters.

5. Who handles the Complaints?

Complaints will be handled by the responsible Compliance Officer of Merz Group or respective business / affiliate. These Compliance Officers are

- impartial,
- independent, i.e., not bound by instructions,
- bound by secrecy,
- specifically trained, and equipped with resources to appropriately handle the complaint.

The responsible Compliance Officer will handle the complaint in an independent, objective and impartial manner.

6. What happens once the Complaint has been submitted?

Once a complaint has been submitted, you will receive a receipt of confirmation. In addition, when using the online reporting platform, you will receive an access number and password you created when you submitted the complaint. By using these credentials, you can check the status of your complaint and communicate with Merz Group at any time.

6.1. Responsibilities

After submission, your complaint will be immediately forwarded to the responsible Compliance Officer of the Merz Group for further review. Merz Group handles all complaints according to applicable laws and regulations and internal policies and procedures taking the rights of the persons concerned into account.

6.2. Immediate measures

As the complaint warrants, the responsible Compliance Officer will dutifully determine appropriate steps to handle the complaint. This may include immediate measures to end or mitigate (suspected) risks or violations.

6.3. Plausibility check and handling of the complaint

The responsible Compliance Officer will check the plausibility of the complaint and will clarify the facts further by appropriate means and in line with internal policies if necessary. The responsible Compliance Officer will contact the reporter in due time to discuss the facts (if contact details have been provided). The reporter will be appropriately involved in the entire handling of the complaint; this may include developing preventive measures or remedial actions.

If the complaint cannot be substantiated, the responsible Compliance Officer will close the complaint and inform the reporter accordingly.

6.4. Preventive measures and remedial actions

If warranted based on the outcome of the complaint procedure, the Merz Group will develop and implement appropriate preventive measures or remedial actions (including personnel measures) to prevent, end or mitigate the risk or violation.

6.5. Evaluation and conclusion of the complaint procedure

The responsible Compliance Officer will inform the reporter about the outcome and will evaluate the outcome of the complaint procedure, if appropriate and possible, with the reporter.

The complaint procedure is concluded upon sufficient remediation of the risk or violation.

7. How long is the Complaint Procedure?

Merz Group endeavors to handle and resolve the complaint as quickly as possible. However, the duration may vary depending the scope and complexity of each individual case.

The responsible Compliance Officer will appropriately inform the reporter of the progress of each of the above steps on a regular basis, in any case after 3 months at the latest and every 3 months (if contact details have been provided).

8. Confidentiality, Data Protection and Documentation

The responsible Compliance Officer and all other persons involved in handling the complaint are obliged to maintain strict confidentiality. Access to information is restricted. Information will only be disclosed to persons who have a compelling need to know the information for handling the complaint or to comply with legal obligations of Merz Group (need-to-know-principle). Merz Group complies with applicable laws and regulations when collecting, processing and storing personal data.

In line with applicable laws and regulations, the Merz Group is obliged to document the complaint mechanism and each complaint procedure. Sec. 10 (1) SCDDA applies. The documents are retained for a period of at least seven years, unless longer statutory requirements apply.

9. Review of Effectiveness

Merz Group will review the complaint mechanism's effectiveness annually and, as the case may be, ad hoc. If necessary, Merz Group will improve the complaint mechanism by appropriate measures.

The rules of procedure have been adopted on 15.01.2026 by Group Compliance and will enter into force on 10.02.2026