



Public document

**Rules of Procedure for the  
Complaints Procedure in accordance  
with § 8 of the German  
Supply Chain Due Diligence Act  
(SCDDA)**

December 2023

# 1. Purpose

Bionorica SE is aware of its social and ecological responsibility and attaches great importance to respecting human rights and protecting the environment in its business activities. As a core element of compliance with human rights and environmental due diligence obligations, we have a complaints procedure in accordance with the German Supply Chain Due Diligence Act (SCCDA). This procedure is an important part of upholding our corporate values and commitments. It serves to give persons or groups of persons the opportunity to report human rights or environmental risks to Bionorica SE in connection with their own or their supply chain's business activities.

Such complaints about or reports of human rights or environmental risks enable us to respond at an early stage with remedial and preventive measures to avert imminent damage. In addition, the information we gain allows us to continuously adapt and improve our processes for complying with our human rights due diligence obligations in our supply chain (early warning system).

## 2. Submitting reports or complaints in accordance with the SCCDA

### 2.1 Who can submit a report?

All persons or groups of persons who are potentially affected by human rights or environmental violations in their own business area or within the supply chain of Bionorica SE or who are aware of such violations can submit complaints or information via the complaints procedure. This includes, for example:

- Employees of Bionorica SE and its companies
- Employees of direct and indirect suppliers
- Business partners, e.g. customers
- Residents in the vicinity of local sites
- Relatives of employees
- Trade unions, non-governmental organisations and other organisations that become aware of risks or damage and/or are providing support to those affected by them.

### 2.2 What issues can be reported?

All issues pointing to a potential human rights or environmental risk or a breach of duty can and should be reported

A human rights risk is a situation in which it is likely that prohibited behaviour in relation to one of the human rights listed below is imminent or has already occurred:

- Child labour
- Forced labour and all forms of slavery

- Disregard of occupational safety standards and work-related health hazards
- Violation of freedom to form a coalition, freedom of association and the right to collective bargaining
- Discrimination and unequal treatment of employees
- Withholding appropriate remuneration for work performance
- Destruction of the natural basis of existence through environmental pollution
- Disregard of land rights
- Commissioning or use of private/public security forces that can lead to adverse effects due to lack of instruction or control

In addition, information or complaints can be submitted regarding human rights risks in connection with potential environmental damage, which is often associated with human rights risks. This concerns:

- Harmful soil changes
- Water pollution
- Air pollution
- Harmful noise emissions
- Excessive water consumption

if they impair natural resources, e.g. because they compromise access to food, drinking water or sanitary facilities or impair health in general (e.g. if chemicals are released into rivers and the drinking water for neighbouring residents is contaminated).

In particular, potential reportable environmental risks and violations can take the following forms:

- Prohibited use of mercury in manufacturing processes (as defined by the Minamata Convention on Mercury<sup>1</sup>)
- Violation of the ban on, or restriction of, the production and use of “persistent organic substances” (aldrin, chlordane, DDT, endrin, heptachlor, hexachlorobenzene, mirex, toxaphene) and industrial chemicals as well as two groups of unwanted by-products polychlorinated dibenzodioxins and dibenzofurans (as defined by the Stockholm Convention on Persistent Organic Pollutants<sup>2</sup>),
- Violation of the requirement to minimise the transboundary movement of hazardous waste and environmentally sound disposal close to the place of generation (as defined by the Basel Convention on the Control of Transboundary Movements of Hazardous Wastes<sup>3</sup>).

### **2.3 How can reports be submitted?**

To ensure that the procedure is accessible to everyone, we have created various options for submitting complaints and reports:

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<sup>1</sup> [The Minamata Convention \(Source: BMUV\)](#)

<sup>2</sup> [The Stockholm Convention \(POP Convention\) \(Source: BVL\)](#)

<sup>3</sup> [The Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and Their Disposal \(Source: BMUV\)](#)

- **In person:** If you wish to report in person, please arrange an appointment in advance via [humanrights@bionorica.de](mailto:humanrights@bionorica.de)
- **By post, by internal mail or e-mail** to the person responsible for sustainability management

Bionorica SE  
Sustainability Management Department  
Kerschensteiner Str. 11 – 15  
92318 Neumarkt, Germany  
[humanrights@bionorica.de](mailto:humanrights@bionorica.de)

Verbal complaints and reports can be submitted in German or English, written complaints and reports can be submitted in any language. The report can be made by name or anonymously.

## 2.4 How will my report be handled?

The confidential treatment of all complaints, reports and data submitted to the reporting centre is ensured at all times and in every processing step - regardless of the communication channel chosen. This applies particularly to the identity and personal data of the person making the report and the person(s) affected by it. However, we are obliged to comply with statutory obligations to provide information to authorities and statutory exceptions to the confidentiality requirement.

All information is processed by selected and specially trained employees of the Sustainability Department (hereinafter referred to as the Complaints Office). They are impartial, independent in the fulfilment of their duties and bound to secrecy. They are also obliged to comply with data protection regulations and to ensure transparency and the rights of all persons concerned.

## 2.5 How am I protected as a person making a report?

Protecting people from being penalised or punished for making complaints or providing information is an important part of our complaints procedure. Attempts at intimidation and reprisals against people who report actual or suspected misconduct in good faith will not be tolerated.

If you have the impression that you are suffering intimidation or retaliation as a result of your report/complaint, please contact the Complaints Office; such intimidation or retaliation will also be investigated in accordance with the procedures outlined above and, if necessary, investigated further.

If reporting persons who are employees of a direct supplier are affected, the company will endeavour to make appropriate contractual arrangements with the supplier.

## **3. The complaints procedure**

### **3.1 Receipt of the complaint or report**

Once a complaint or a report has been received, the person making the report receives a confirmation specifying a personal contact person. At the same time, the matter is documented internally.

### **3.2 Examination of the complaint or report**

The Complaints Office first checks whether sufficient information is available to examine and investigate the reported facts. If this is not the case, the Complaints Office will, if possible, contact the person making the report to request further information. If neither sufficient information is available nor is it possible to make contact, the case will be closed.

### **3.3 Clarification of the facts**

The Complaints Office will investigate the facts of the case comprehensively itself or forward it to the competent body, e.g. within the company, for investigation, while respecting the principles of confidentiality and data protection. If necessary and as far as possible in the case of anonymous reports, the Complaints Office or the competent body will discuss the facts of the case with the person making the report and request further information if necessary.

If, after clarification of the facts, discussion and investigation, the Complaints Office or the competent body is convinced that there are no human rights and environmental risks or violations of human rights or environmental obligations in its own business area or with suppliers, the case will be closed.

### **3.4 Development of a solution**

If, in the opinion of the Complaints Office or the competent body, the investigation confirms human rights and environmental risks or violations of human rights or environmental obligations in the company's own business area and those of suppliers, a proposal for further action (in particular preventive and remedial measures) is drawn up. The person making the report will be involved as far as possible and appropriate.

### **3.5 Implementation and follow-up**

Finally, the Complaints Office or the competent body follows up on the implementation of the proposed solution.

### **3.6 Conclusion of the procedure**

The person making the report is informed of the conclusion of the complaints procedure, provided that contact can be made.

The processing time is highly case-dependent and can therefore take anywhere from a few days to several months depending on the complexity of the case. However, we will endeavour to complete the investigation as soon as possible.