EMD Group Policy Statement on Compliance with Human Rights and Environmental Due Diligence Obligations

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1. Our commitment to human rights

At Merck KGaA, Darmstadt, Germany and the Group companies (hereinafter referred to as "**EMD**"), our requirements for responsible corporate governance are based both on our company values and on regulations, external initiatives and international guidelines to which we are committed. We take these requirements into account in our sustainability strategy and in our group-wide rules and regulations. These rules and regulations comprise charters and principles that apply to the company as a whole and specific standards and processes for individual business sectors or locations.

EMD respects human rights and supports compliance with them. We consider it our responsibility to respect the rights of others when conducting our business activities and to prevent, as far as possible, and end adverse effects on human rights in our business activities. In doing so, not only do we uphold legal requirements such as the German Act on Corporate Due Diligence Obligations in Supply Chains (hereinafter referred to as the "**LkSG**"), we also act in line with our own values. We regularly, review our internal guidelines, standards and instructions and amend these to always reflect regulatory changes.

We have described our basic understanding of human rights in our Human Rights Charter. Our Human Rights Charter is binding for all employees, and we expect our suppliers and business partners to respect and uphold human rights. These obligations cover a wide range of human rights issues, including product safety, conducting clinical studies and data privacy. In this policy statement, we also undertake to comply with and support human rights and environmental due diligence obligations at our own business operations worldwide and throughout our supply chain.

This policy statement was approved by the Executive Board and management of Merck KGaA, Darmstadt, Germany, Merck Life Science KGaA, Darmstadt, Germany, Merck Healthcare KGaA, Darmstadt, Germany and Merck Electronics KGaA, Darmstadt, Germany. It applies to all EMD Group companies and to all managers, members of the Executive Board and all other employees at the entire EMD Group. This policy statement is reviewed at least once a year and on an ad hoc basis and is updated where required.

2. Our understanding of human rights and environmental due diligence obligations

Respect for human rights in our business area and supply chains is a core element of our human rights and environmental strategy. We have been a member of the United Nations Global Compact since 2005.

We are committed to respect the following international standards:

- Universal Declaration of Human Rights
- International Covenant on Civil and Political Rights
- International Covenant on Economic, Social and Cultural Rights
- International Labor Organization (ILO) Declaration
- United Nations Guiding Principles on Business and Human Rights
- The Ten Principles of the UN Global Compact
- OECD Guidelines for Multinational Enterprises

The standards and values enshrined in these rules and regulations are also reflected in our own guidelines and principles. For example, our Human Rights Charter is based on the United Nations Guiding Principles on Business and Human Rights.

Human rights and environmental due diligence obligations are implemented based on the national and international standards and general conditions listed above and, in particular, in line with the requirements of the LkSG.

Our expectations with regard to human rights and the environment as per the LkSG must be acknowledged and adhered by all of our employees and suppliers:

- **Ban on child labor**[1]**:** We take a zero-tolerance approach to any form of child labor;
- **Ban on discrimination**: We do not tolerate discrimination against anyone based on inter alia, gender or gender identity, culture or national origin, ethnic origin, race, color, religion or beliefs, disabilities, age, sexual orientation, family or marital status, military or veteran status;
- **Ban on forced labor**[2]: We take a zero-tolerance approach to any form of forced or compulsory labor, slavery and human trafficking;
- **Freedom of association**: We respect the right to form employee representative bodies and engage in collective bargaining (in accordance with the law in the place of employment);

[1] As set out in Conventions no. 138 and 182 of the International Labor Organization.
[2] As set out in Convention no. 29 of the International Labor Organization and the International Covenant on Civil and Political Rights.

- **Compliance with legal requirements on pay and working hours**: We comply with national legislation on working hours, pay, minimum wage and social security benefits or the international standards of the ILO where there are no national regulations;
- **Security personnel monitoring**: Regardless of the type of contract, we observe applicable national law when using external personnel (e.g. security personnel) in contractual and labor relations. We put appropriate measures in place to inform and monitor external personnel, especially with regard to human rights risks;
- **Occupational health and safety**: We conduct suitable occupational health and safety management measures to prevent accidents and work-related illness wherever possible;
- We observe the **ban on soil contamination, pollution of bodies of water, air pollution, harmful noise emissions and excessive water consumption** that may be harmful to human health and limit or remove access to natural resources (such as drinking water and food) or access to sanitary facilities;
- We observe the **ban on illegal appropriation of land, woodland and bodies of water** used to support people's livelihoods;
- We observe the **ban on illegal eviction;**
- We observe the **ban on violations of specific environmental obligations** resulting from the use, storage, transboundary movements or disposal of mercury (compounds), persistent organic pollutants or hazardous waste. We observe the Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and Their Disposal dated March 22, 1989, when importing and exporting hazardous waste. We comply with the bans on the production of mercury-added products, use of mercury and mercury compounds in production processes and the treatment of mercury waste under the Minamata Convention on Mercury dated October 10, 2013. This also applies to the applicable laws on the environmentally sound handling, collection, storage and disposal and the ban on the production and use of persistent organic pollutants (Stockholm Convention on Persistent Organic Pollutants dated May 23, 2001).

3. How we meet our human rights and environmental due diligence obligations

We have a number of different measures in place to meet our human rights and environmental due diligence obligations. The aim is to protect people who are or may be potentially affected and prevent, end or at least minimize adverse effects on human rights. We have established standardized processes to ensure this.

Responsibilities and risk management

We have defined clear responsibilities for carrying out and complying with our human rights due diligence obligations. Overarching responsibility for human rights in our sphere of influence lies with our Executive Board. The Executive Board requires binding compliance from our Managing Directors[3]. Our human rights officer is responsible for monitoring human rights and environmental due diligence obligations. The Executive Board is informed of the work of the human rights officer and the implementation status of the due diligence obligations regularly and at least once a year.

We consider respect for human rights an interdisciplinary issue at EMD and so we collaborate systematically with various functions. The responsible persons in the respective Group Functions, business sectors and local units implement the specific human rights measures, for instance by integrating human rights due diligence into existing processes.

In line with our Human Rights Due Diligence Group Standard, we carry out a risk-based, systematic review on human rights and specific environmental risks at our Group companies and in our supply chains and have a wide range of measures in place to prevent and, where possible, end or at least minimize adverse effects on human rights around the world in connection with our business activities. We continue to develop our processes on an ongoing basis. Our focus when further developing our due diligence processes is on stakeholder collaboration, for example through the UN Global Compact and its local networks and as part of sector-specific initiatives.

Other key components of our human rights strategy to uphold human rights and environmental due diligence obligations are, for example, set out in:

- our Code of Conduct,
- our Social and Labor Standards Policy and
- our EHS Policy (Corporate Environment, Health and Safety Policy)

[3] The Managing Directors are responsible for ensuring that our subsidiaries, including the R&D and production centers, comply with all applicable laws and regulations, including internal guidelines.

Our Supplier Code of Conduct describes the expectations we place on suppliers regarding minimum requirements for human rights and labor law, occupational health and safety, corporate integrity, environmental protection, continuous improvement and supplier management.

Risk analysis

Protecting people and the environment is a top priority at EMD and our objective is to continuously improve ourselves. As a global company with more than 60,000 employees worldwide, we inevitably face some human rights risks as well as certain environmental risks. This is particularly the case in countries with higher human rights risks based on publicly available data for human rights. We have developed processes to appropriately identify and address these risks.

To identify further human rights and certain environmental risks, we carry out risk analyses for our own business and for our direct (tier-1) suppliers once a year and on an ad hoc basis like in cases of mergers and acquisitions. Risks relating to indirect (tier-n) suppliers are generally assessed on an ad hoc basis. The results of the risk analysis and their impact are taken into account in our company decision-making processes, e.g. in terms of supplier selection. We use the results of the risk analysis to establish and adapt internal regulations, processes and trainings to keep up with changing requirements for our due diligence processes. The results of the risk analysis are communicated internally to the Executive Board and to the Sustainability Board of Merck KGaA, Darmstadt, Germany.

At EMD, the risk analysis process for our own business is carried out by the respective functions and is generally divided into the following steps: At the first stage we assess our risks in abstract terms. To do so, e.g. we use country risks identified with the use of external sources to create a comprehensive risk profile of our operations. The second stage is to evaluate our specific risks by examining the results of the initial abstract risk assessment and subjecting them to further analysis. It is important to us that risks in the relevant processes are evaluated from the perspective of the affected parties.

Risks regarding our suppliers are also analyzed in two phases, in an abstract way followed by a concrete analysis: Firstly, we determine abstract risks for our direct (tier-1) suppliers using country and sector indices based on external data and also consider the extent of our business activities with the respective suppliers. Following this, the second phase involves analyzing concrete human rights and environmental

risks. We mainly use questionnaires to further increase transparency. We draw on the internal expertise of our employees who communicate directly with the suppliers.

Within the scope of the regular risk analysis in our own operations for the fiscal year 2025 we have prioritized the risks of unequal treatment in employment, environmental degradation, excessive working hours and occupational health & safety.

At our direct suppliers we prioritize the following potential risks: Inadequate wage, unequal treatment in employment, forced labor, disregard for freedom of association, slavery, child labor, contracting security companies with risk of violations and environmental degradation.

The results of the risk analyses are evaluated on an ongoing basis and integrated into our company decision-making processes and business processes. The risk analysis is the basis for appropriate preventive or remedial action within our own operations as well as at our direct (tier-1) suppliers.

Preventive measures

EMD has instigated various preventive measures in its own business operations and with regard to suppliers to avoid human rights and environmental risks. We review these for effectiveness on appropriateness on an ongoing basis and adjust them where required. This involves adjusting and improving existing measures and developing new approaches.

Preventive measures in own business operations

In addition to the existing group-wide standards implemented in our rules and regulations, EMD uses various other measures. These preventive measures include the following:

Code of Conduct: EMD expects all its employees to comply with our Code of Conduct. To ensure this, our employees receive regular training on the content of the Code of Conduct. It is available to all company employees worldwide in 22 languages.

Expanding capacities and training: Training sessions explain our approach to upholding and respecting human rights and the requirements of the LkSG to be complied with by our specialist areas. Our Managing Directors and senior management are trained in how to meet the requirements of our Social and Labor Standards Policy in their area of responsibility. We are constantly expanding our internal communication to further establish our commitment to human rights across the Group. This raises awareness of human rights, diversity, equality, and inclusion. Through our global sustainability network, for example, we run webinars on human rights in a corporate context. Training courses to help leaders reflect on how they can lead more inclusively

bolster our efforts to create an inclusive culture for all employees. Furthermore, regular virtual information events and training sessions on implementing the LkSG are held for selected target groups.

Controls and audits: We assess security-related human rights aspects at our sites through security assessments and audits. These are part of the control mechanism in our security governance framework. Increased risk transparency and central evaluation of completeness, quality and efficiency of the preventive and remedial measures ensure that our sites comply with security-related human rights aspects. Local EHS managers and their teams ensure that our individual sites comply with all our internal EHS standards as well as local occupational health and safety laws and regulations. They are also responsible for EHS related local projects, campaigns, and programs.

Preventive measures at direct suppliers

EMD considers protection of human rights a central element of its corporate responsibility and expects its suppliers to respect human rights, meet environmental expectations and appropriately address these throughout the supply chain. To this end, we adopted a Supplier Code of Conduct which clearly expresses our expectations towards our direct suppliers. High risk suppliers have to actively acknowledge our Supplier Code of Conduct and further preventive, or remedial actions are established.

Contractual assurances and training: A specific contractual clause reiterating the obligation to comply with our Supplier Code of Conduct was applied to all new contracts since January 1, 2023.

We also conduct (further) training sessions for our suppliers on how to meet this contractual assurance. This involves the use of an interactive eLearning tool that we have developed in various language formats based on our Supplier Code of Conduct.

In addition to our Supplier Code of Conduct, we introduced the training platform TfS Academy together with Together for Sustainability (TfS). Through the platform, employees at TfS member companies and their suppliers can access a total of 181 courses in up to eleven languages. The module on human rights due diligence covers issues including prevention of child labor, forced labor, human trafficking, discrimination, and harassment.

Controls and audits: The internationally renowned sustainability consultancy firm ERM was tasked with carrying out audits for our mica supply chain. The Indian non-governmental organization IGEP and auditors instructed by the Responsible Mica Initiative (RMI) conduct additional controls. These control measures involve unannounced on-site inspections as well as audits and improvement plans agreed upon with our suppliers. Implementation of corrective measures is monitored.

In addition, in case of substantiated knowledge of potential human rights violations, EMD takes appropriate preventive measures against the supplier concerned. This involves agreeing on suitable controls to check compliance with these measures.

Supplier selection process: Human rights and environmental criteria are part of our supplier selection strategy. Accordingly, these criteria have to be taken into account in the tendering process when selecting suppliers. We have modified our standard operating procedures accordingly and trained employees in the Procurement department on these amendments.

Suppliers are informed of our expectations both during the tendering process and when negotiating contracts. We ask all our suppliers with a defined risk profile comprising the country risk and sector risk to confirm compliance with our Supplier Code of Conduct before they are added to our management systems and receive an order. Furthermore, a clause on observing compliance principles, taking account of our Supplier Code of Conduct, is included in all new contracts and whenever any changes are made to existing contracts.

Remedial actions

In the event that we identify any violation of a human rights or environmental obligation at EMD or in our supply chain, we will immediately initiate appropriate measures to resolve these violations. We differentiate between violations in our own business operations and in the supply chain.

In our own business operations, we immediately implement measures to resolve violations. For violations in the supply chain, we work closely with our suppliers and use our influence to help resolve the violation. A particularly severe violation at a supplier may result in the business relationship being temporarily suspended or immediately terminated in cases where a remedial action was not successful.

We are aware that in some cases we can exert only limited influence over complex supply chains and that we cannot resolve systematic violations and risks alone. This is particularly true for our influence over indirect (tier-n) suppliers. To ensure that we meet industry standards, we work alongside other companies in sector initiatives. For example, we are a member of Together for Sustainability (TfS), the Pharma Supply Chain Initiative (PSCI) and the Responsible Minerals Initiative. We also expect our suppliers to let us, or our trustworthy partner companies carry out evaluations or audits. Corresponding obligations were integrated into our contracts with suppliers. These evaluations and audits make our supply chain more transparent and show where sustainability can be improved and the risk of violations can be reduced.

Complaints procedure

We have a group-wide complaints system for reporting human rights and certain environmental risks and violations. Our employees and external stakeholders can anonymously report suspicions free of charge in various languages using this group-wide complaints system, either by telephone or using a web-based app. We follow up on all complaints received and take corresponding measures where required.

All reports and complaints are treated in confidentiality and are carefully assessed and handled in a clear and transparent process. The persons responsible for the investigation are independent and autonomous.

If the investigation confirms human rights or certain environmental risks or violations at EMD or at its suppliers, appropriate follow-up measures (preventive measures and remedial action) are initiated. At the same time, we take reports and complaints as an opportunity to scrutinize and improve our internal processes and structures.

To the extent possible and within our control, we ensure that whistleblowers are protected from discrimination or penalties as a result of their justified complaints. Our systematic approach to complaints and the resulting findings allows us to continually improve our human rights due diligence processes.

Further details on our complaints procedure and other channels can be found in our Rules of Procedure.

Documentation and reporting obligations

We document our efforts to effectively meet our due diligence obligations on an ongoing basis. The documentation of the processes described in this policy statement is retained as required by law.

Under the European Corporate Sustainability Reporting Directive (CSRD), we are required to publish information on our material environmental, social, and governance impacts, risks and opportunities as of year 2024. Our first Sustainability Statement under the CSRD was published in March 2025 as part of the Management Report in the Annual Report. The Statement also details our progress in implementing our human rights and environmental risk management systems and fulfilling our due diligence obligations.

Under the law in Australia and the United Kingdom, we are additionally required to publish information on our measures to combat modern slavery. Both the UK Modern

Slavery Statement and the Australia Modern Slavery Statement are signed by the Chair of the Executive Board and CEO and published on our website.

Effectiveness checks

We evaluate the effectiveness of our risk management and of our due diligence processes once a year and on an ad hoc basis. We place particular focus here on checking the effectiveness of our complaint's procedure, risk management, remedial action, and preventive measures.

4. What we expect from our employees and suppliers

The principles set out in this policy statement apply both to our own business, i.e. to all our employees, and to our suppliers.

Our Code of Conduct outlines what we expect from our employees. In addition, in our Supplier Code of Conduct we expect our suppliers and business partners to likewise commit to upholding our principles and to develop and incorporate appropriate, effective processes to address and prevent potential risks and violations we have identified and to identify further potential human rights risks via own processes/analysis. The Supplier Code of Conduct does not prevent EMD or its suppliers from setting more precise and stricter requirements, either contractually or individually through internal governance documents.