

# **SYNLAB AG**

Supplier Complaints Procedure



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### I. Supplier Complaints Procedure

#### Protection from Retaliation and Prohibition of Misuse

SYNLAB is committed to a policy of non-retaliation. Therefore, you and any third parties who are awarded protection by applicable laws do not have to fear any negative consequences of discriminatory or disciplinary nature for making a report or raising questions, doubts and concerns. We do not tolerate any kind of threats, detrimental behaviour or acts of retaliation. Such conduct is itself a breach of our values and can result in disciplinary action.

This policy of non-retaliation also applies if you are not absolutely certain about the facts, provided you act in good faith. Acting in good faith means that you have reasonable grounds to suspect that, in light of the circumstances available to you at the time of reporting, the information reported is true.

However, intentionally misusing the Supplier Complaints Procedure reporting system for abusive practice (i.e., filing reports in bad faith) is strictly prohibited. Anyone who knowingly reports incorrect information is not protected by our Supplier Complaints Procedure and may face contractual, criminal and civil sanctions.

## Confidentiality and Anonymity

Confidentiality of the reporting as well as the accused persons and any third parties mentioned in their reports will be preserved as much as possible.

Our reporting system allows anonymous reports to the extent this is permitted by applicable laws and regulations, in particular by applicable data protection and labour laws and regulations. Despite this, it may be possible that your role as a reporting or the accused person or any third party might become apparent to others during later investigations. In any case, SYNLAB will make every effort to keep your identity and your reports confidential unless:

- You have given your consent;
- Disclosure is necessary for compliance with a legal obligation to which SYNLAB is subject;
- Disclosure is required for SYNLAB to effectively investigate the report and take related measures;
- Disclosure to law enforcement authorities is required or the disclosure is carried out by SYNLAB as part of its cooperation with law enforcement authorities.



Please keep in mind that investigating your report and therefore addressing your concerns is usually facilitated if you do not submit the report anonymously and we can contact you in case of any questions.

#### Reporting Procedure and Follow-Up

You are encouraged to submit reports of suspected irregularities, concerns, doubts and suspicions, at any time.

When submitting a report, we ask you to submit a description of your report. Please note that the more information you provide, the better we can understand and investigate the information reported. Therefore, please submit all relevant information on the facts in question, including on the people involved and relevant background information as well as supporting documents or other evidence that could be helpful in investigating your report.

When submitting information, you are free to choose whether you would like to disclose your identity or remain anonymous, provided that this is permitted by applicable laws.

If you would like to submit a report, you can do so in person, by telephone, by email or by regular mail to one of the following reporting channels:

- You can submit your report by contacting your point of reference at SYNLAB.
- You also can choose to make your report in any language via email or via the regional telephone numbers, as set out in the following sections. The email-address and the regional telephone numbers are operated by the law firm Hogan Lovells International LLP.

After receipt of your report, the persons competent for the review of your report will be informed. They will follow-up with you and keep you informed about the status of the review of your report in accordance with applicable laws. In particular, the persons competent for the review of your report might reach out with follow-up questions or to discuss your report in more detail.

#### Reporting via Email

As laid out above you can make your report in any language via the following email-address: SYNLAB-Compliance@hoganlovells.com.

#### Reporting via Telephone

If you choose to make your report via telephone, you can do so by using one of the following regional telephone numbers in the languages indicated below:

Country	Telephone number
Austria (German/English)	+49 8929012812
Belarus (Russian/Belarussian/English)	+7 495 933 81 21



Belgium (French/English)	+33 153672367
Brazil (Portuguese/English)	+55 0800 009 0016
Colombia (Spanish/English)	+525 550910291
Croatia (Croatian/English)	+385 (0)1 2100 800
Ecuador (Spanish/English)	+525 550910291
France (French/English)	+33 153672367
Germany (German/English)	+49 8929012812
Ghana (English)	+49 8929012812
Ireland (English)	+49 8929012812
Italy (Italian/English)	+39 02720252250
Mexico (Spanish/English)	+525 550910291
Nigeria (English)	+49 8929012812
Panama (Spanish/English)	+525 550910291
Peru (Spanish/English)	+525 550910291
Poland (Polish/English)	+48 225298650
Spain (Spanish/English)	+34 91 349 8045
Switzerland (German/English)	+49 8929012812
United Arab Emirates (Arabic/English)	+971 4 3779 330
United Kingdom (English)	+49 8929012812

#### Data Protection

SYNLAB attaches great importance to data protection and privacy as well as data security requirements. We therefore adhere to applicable data protection laws and regulations as a minimum standard particular in relation to the Supplier Complaints Procedure function.

Informing Individuals subject to Supplier Complaint Procedure Reports

SYNLAB will inform the accused persons whose behavior has been reported after receiving the respective complaint in compliance with applicable data protection laws and regulations.

Accused persons will generally be informed of the alleged facts and of the person in charge of handling the report within one (1) month.

However, when such information may jeopardize the effectiveness of the investigation, the protection of evidence or the reporting process, it must only be provided if and when those risks no longer exist. This requires a case-by-case analysis.

In any case, the identity of the reporting person will not be disclosed unless this is strictly necessary for compliance with a legal obligation to which SYNLAB is



subject or for other legitimate purposes and furthermore permitted by applicable data protection and labor laws and regulations.

#### Retention of Records

Records of your reports and the related investigations will be stored in accordance with applicable laws as long as this is necessary for the achievement of SYNLAB's legitimate purposes, including the establishment, exercise or defense of legal claims or to ensure compliance with legal obligations to which SYNLAB is subject. Records will then be deleted in accordance with applicable data protection laws and regulations unless further storage is legally required.

In line with this, records that relate to pending disputes or investigations are not deleted as long as data storage is necessary for achieving the purposes of such proceedings. In such cases, the information will be stored for the duration of the respective dispute or investigation or even longer, if required and permitted under applicable data protection laws and regulations.

Personal data in reports out of scope of this Supplier Code of Conduct as well as personal data relating to reports found to be unsubstantiated will be deleted immediately in accordance with applicable laws and regulations.

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Mathieu Floreani

Chief Executive Officer

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