



Code of Procedure

Complaints Procedure under the German Supply Chain Due Diligence Act



As of 2023

1. Scope of the Complaint Procedure:

The complaint procedure of Sanofi-Aventis Deutschland GmbH (hereinafter referred to as "Sanofi") is applicable to all human rights and environmental risks or breaches of duty that are stipulated by § 2 para. 2 and 3 of the German Supply Chain Due Diligence Act.

Complaints about human rights violations or violation of environmental standards of our organization or in the supply chain may be directed by Sanofi employees, suppliers or third parties to the Sanofi Complaint Channel.

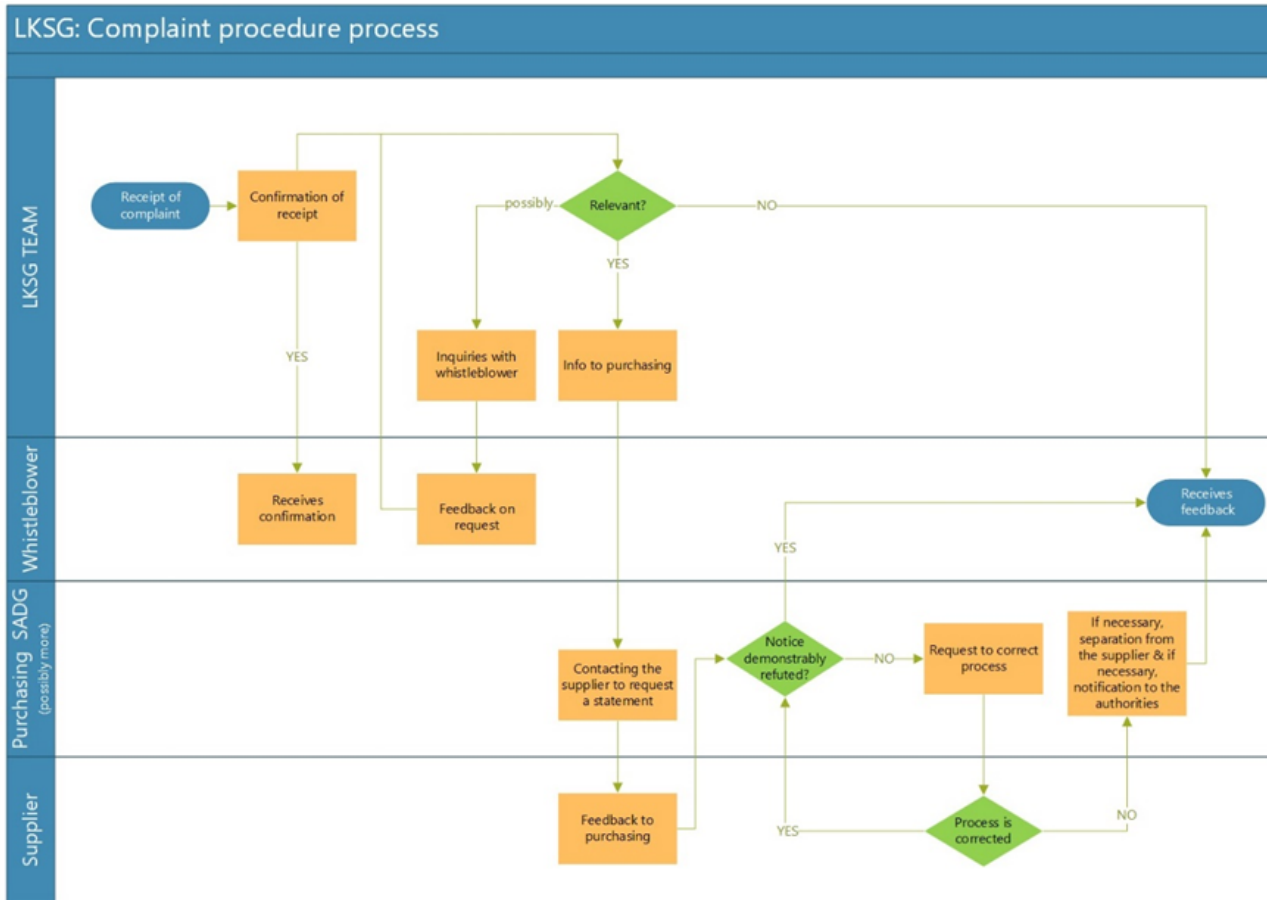
2. Complaint channels:

In accordance with the Sanofi Public Policy Statement and the public available Sanofi Supplier Code of Conduct, which is also attached to each contract entered into with suppliers covered by the German Supply Chain Due Diligence Act, complaints about human rights violations or the violation of environmental standards can be forwarded at any time (also anonymously) to the independent Sanofi Human Rights Officers. The complaint option is accessible to all suppliers, business partners and other whistleblowers at the e-mail address: Menschenrechtsbeauftragte@sanofi.com.

Furthermore, complaints can be made via the available contact forms under [SPEAK UP! Confidential | Trustworthy | Safe \(convercent.com\)](#), [EthicsPoint - Sanofi-Aventis Group](#) or <https://www.sanofi.de/de/kontakt>. Any complaints about human rights violations or the violation of environmental standards that reach Sanofi through these contact forms will be forwarded to the email address: Menschenrechtsbeauftragte@sanofi.com. Sanofi employees are appropriately trained in the requirements of the Supply Chain Due Diligence Act.

3. Procedure for Complaints:

Notification is made via one of the above options and its receipt is documented accordingly. The process goes to the department responsible for the selected channel. After reviewing the complaint, it will be forwarded accordingly to the responsible Sanofi Human Rights Officers and the German Supply Chain Due Diligence Act - Team via Menschenrechtsbeauftragte@sanofi.com. The facts of the case are discussed confidentially with the notifying and other data subject(s) with the aim of better understanding the facts of the case. As can be seen in the following diagram, it is decided which departments, depending on the matter, to clarify the grievance or risk (Procurement; Health, Safety & Environment; Legal; Ethics & Business Integrity; Security; People & Culture or Human Resources; Data Privacy, etc.).



Upon receipt of a complaint, the whistleblower will be informed immediately of the receipt of the complaint and the responsible contact persons. In the further course, an interim report is made on the progress and the expected duration of the procedure, which is variable depending on the complexity. Of course, we always strive to quickly clarify and correct any grievances. Any identified grievances are implemented and tracked. Where possible and reasonable, a joint proposal for remedy will be developed together with the notifying and other data subject(s). Optionally, the procedure is also amicably attached. Any grievances or agreed corrective actions are implemented and tracked. At the conclusion of the procedure, a final report with the result of the procedure and a justification is sent to the person providing the notification.

4. Responsibility for complaint procedures:

- Human Rights Officers: Frank Stein and Claus-Björn Keller
- Purchasing/Procurement GSA: Gordon Fischer
- Health, Safety & Environment: Safoura Rathscheck
- Legal GSA: Stephan Bocks

- Ethics & Business Integrity: Matthias Bothschafter and Antje Hirsch-Hottes

- Contact via E-mail: Menschenrechtsbeauftragte@sanofi.com or
- Via Contact Form: [SPEAK UP! Confidential | Trustworthy | Safe \(convercent.com\)](#)

5. Protection of Sanofi employees from discrimination and punishment:

Pursuant to the Sanofi [Code of Conducts](#), employees who report a grievance in good faith and without malicious intent, even against the background of the German Supply Chain Due Diligence Act, are not subject to disciplinary action due to a robust non-retaliation policy, which is considered to be the case even if the reported facts prove to be incorrect or no further action is taken.



i.A. Frank Stein
Human Rights Officer
Sanofi-Aventis Deutschland GmbH



i.V. Stephan Bocks
Senior Legal Counsel
Legal GSA