



Eppendorf Group –  
Human Rights Policy  
Statement

# Contents

1. Statement of the Management Board .....	3
2. Commitment to Respecting Human Rights .....	4
3. Risk Management System .....	6
4. Risk Analysis.....	7
4.1. Results of the Risk Analysis and Prioritized Risks .....	8
4.2. Expectations towards our employees and suppliers.....	8
5. Preventive Measures .....	9
6. Remedial Measures .....	11
7. Complaints Procedure .....	11
8. Effectiveness Review and Continuous Improvement .....	12
9. Documentation and External Reporting.....	12

# 1. Statement of the Management Board



Dear Readers,

As an internationally operating company, the Eppendorf Group bears a special responsibility towards people and the environment – both at our own sites and throughout our global supply chains. We firmly believe that sustainable economic success is only possible when social and environmental responsibility are firmly anchored in our daily actions.

Respect for human rights and the promotion of fair working conditions are therefore non-negotiable core values for us. We are committed to identifying risks to human rights and the environment at an early stage, preventing or minimizing negative impacts, and taking decisive

action in the event of violations. Our goal is to create transparency and implement continuous improvements. We strive to make a positive contribution to society and the environment.

This policy statement sets out our principles and measures for respecting human rights and protecting the environment. It reflects our self-conception as a responsible company and provides the framework for our business activities – today and in the future.

Sincerely,

**Dr. Christine Munz**  
Chief Executive Officer

**Hans-Christian Stuff**  
Chief Financial Officer

# 2. Commitment to Respecting Human Rights

At Eppendorf, we respect internationally recognized human rights. In this context, we are committed to upholding, among others, the following international standards:

- > Universal Declaration of Human Rights of the United Nations (UDHR)
- > International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work
- > United Nations Guiding Principles on Business and Human Rights (UNGPs)
- > OECD Guidelines for Multinational Enterprises

We also endorse the ten principles of the United Nations Global Compact (UNGC), which we have supported as a member since January 31, 2022.

This policy statement applies to the entire Eppendorf Group and explains how we respect human rights and relevant environmental concerns in our own business operations and supply chain and monitors compliance with the relevant standards and frameworks. The following sections describe the essential focus topics for Eppendorf regarding human rights, working conditions, and environmental concerns.

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## Prohibition of Child Labor

Eppendorf does not tolerate any form of child labor as defined by the relevant ILO conventions<sup>1</sup> and strictly prohibits it.

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## Prohibition of Forced Labor

Eppendorf does not tolerate any form of forced or compulsory labor as defined by the relevant ILO conventions<sup>2</sup> and strictly prohibits any form of slavery, in particular modern slavery and human trafficking.

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## Right to Health and Safety at Work

The protection and promotion of employee health is of the highest priority for Eppendorf. In line with relevant ILO conventions<sup>3</sup>, we are committed to an effective prevention culture in order to avoid accidents, injuries, and illnesses.

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<sup>1</sup> ILO Conventions No. 138 and No. 182

<sup>2</sup> ILO Conventions No. 29 and No. 105, as well as the 2014 ILO Protocol to ILO Convention No. 29

<sup>3</sup> ILO Conventions Nos. 155, 161, and 187, as well as the 2002 ILO Protocol to ILO Convention No. 155

### **Working Hours**

We are committed to safe and healthy working conditions, adequate breaks, reasonable limits of working hours, and regular paid vacation in accordance with applicable international standards on working hours and the relevant ILO conventions applicable at the place of employment.

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### **Freedom of Association and Collective Bargaining**

Eppendorf recognizes – in accordance with relevant ILO core labor standards<sup>4</sup> and applicable law - the right of all employees to form employee representations and to conduct collective bargaining to regulate working conditions.

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### **Equal Treatment in Employment**

Equal treatment of employees is a fundamental principle of our corporate policy. In line with relevant ILO conventions<sup>5</sup>, we continuously strive to ensure a workplace free from discrimination.

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### **Payment of Fair Wages**

Eppendorf is committed to paying fair wages, at least equal to the minimum wage required by applicable law, and sufficient to enable our employees to secure at least their livelihood.

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### **Protection of Local Communities and Indigenous Peoples**

At Eppendorf, we respect the rights of local communities and Indigenous Peoples. Where our business activities or those of our suppliers have negative impacts and local legal systems are insufficient, we refer to international standards.

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### **Human Rights Protection in the Use of Security Forces**

Eppendorf rejects any use of excessive force, torture, or violations of freedom of association and coalition by private or state security forces.

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### **Protection of Environmental Concerns**

Eppendorf recognizes – in accordance with relevant international agreements<sup>6</sup> – that many environmental risks, such as the handling of mercury, persistent organic pollutants (POPs), or hazardous waste, can also negatively impact human health.

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<sup>4</sup> ILO Conventions No. 87, No. 98, and No. 135

<sup>5</sup> ILO Conventions No. 100, No. 111, and No. 190

<sup>6</sup> Minamata Convention, Stockholm Convention, and Basel Convention

# 3. Risk Management System

To fulfill our human rights and environmental due diligence obligations, Eppendorf has established a risk management system that is continuously evaluated and further developed. The core elements are risk analysis, prevention, remediation, and complaints mechanisms, each subject to regular effectiveness reviews and adjustments. Due diligence obligations are integrated into relevant business processes. The scope of due diligence covers the supply chain and our own business operations, including controlled group entities.

Responsibility for compliance with human rights and environmental due diligence obligations lies with the Chief Financial Officer (CFO). The CFO delegates his tasks to the Human Rights Officer (Senior Manager Human Rights, appointed on January 1, 2023), who reports to the Head of the Legal, IP & Compliance Department and informs the Management Board directly at least once a year

The tasks delegated to the Human Rights Officer include in particular:

- > Designing and implementing processes for human rights and environmental due diligence
- > Compiling information for annual reporting and the policy statement
- > Conducting communication and training measures
- > Monitoring the adequacy and effectiveness of risk management

Human Rights Coordinators and Ambassadors have been appointed for the relevant business functions and departments to implement risk management within their respective domains.

# 4. Risk Analysis

Identifying potential and actual negative human rights and environmental impacts is a central element of due diligence. We conduct annual and ad hoc risk analyses in our own business and with direct suppliers. For indirect suppliers, risk analyses are conducted on a case-by-case basis.

For our own operations, we begin with an abstract risk analysis based on location (country) and industry, utilizing publicly available information and indicators. If entities are identified as having an elevated level of abstract risk, a concrete analysis is conducted. This includes gathering information on existing global and local management systems through self-assessments and interviews. Additionally, risks are further specified, and relevant target groups are identified using supplementary qualitative and quantitative data. As a general principle, for concrete risks, the perspectives of relevant target groups are incorporated through comprehensive stakeholder engagement, such as through works councils, employee networks, or individual consultations.

For direct suppliers, an abstract risk analysis is conducted based on location (country) and industry. Suppliers with increased abstract risk undergo a concrete risk analysis via self-assessments. Based on the information, we determine an individual risk score for each supplier and identify risk general patterns across the supplier base.

For indirect suppliers, an ad-hoc risk analysis is initiated if Eppendorf obtains substantiated information about possible or actual human rights or environmental violations as a result of complaints or negative media reports. As a first step, we seek to engage with the relevant direct supplier. If the suspicion is confirmed, further individual measures are taken, each with the aim of preventing, ending, or minimizing the violation.

Risks or violations are documented in a risk inventory and prioritized based on the probability of occurrence, the (potential) severity, the number of people (potentially) affected, the (potential) irreversibility and the contribution to causation. A points system and a heat map are used for this purpose.

Based on the risk analysis, the responsible Human Rights Ambassadors derive preventive measures or – if violations are identified as part of the risk analysis – remedial measures.

## 4.1. Results of the Risk Analysis and Prioritized Risks

In the risk analysis of our own operations for 2025, 52 entities in 31 countries were assessed. Most of these subsidiaries are sales and service organizations. The nine Technology Centers, which are Eppendorf's production sites, are spread across five countries: Germany, the United States, the United Kingdom, China, and Japan. The majority of employees work in entities located within the European Union, with another significant share employed in entities in the United States.

Given this company structure, the overall risk exposure in our own operations is generally considered low to moderate. However, based on the comprehensive risk analysis described above, discrimination has been identified as a concrete risk. This is due to the widespread abstract risk of discrimination – even in many developed countries – and the fact that promotion of inclusion, diversity, and equality are not yet systematically embedded in all global processes. No violations were identified.

The supply chain risk analysis covered more than 8,000 direct suppliers. Most of these suppliers are based in the European Union, with the majority located in Germany. The concrete risk analysis focused on those suppliers identified as having a high level of abstract risk.

Given the large number of suppliers in Germany, the overall risk exposure with regard to direct suppliers is generally considered low to moderate and no concrete risks or violations were identified.

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## 4.2. Expectations towards our employees and suppliers

Expectations towards our employees are set out, among other things, in our Code of Conduct, which applies to all employees of the Eppendorf Group. In addition, internal processes and procedural instructions aim at preventing human rights or environmental violations. In addition to the clear requirement that all employees comply with these guidelines, it is also expected that established complaints channels are used if violations are identified. Furthermore, when risks or violations are identified, employees responsible for these areas are expected to contribute to creating transparency and developing and implementing appropriate management systems, preventive measures, and corrective actions.

Expectations towards our suppliers are set out in particular in the Code of Conduct for Business Partners and include compliance with human rights, especially the ILO core labor standards, the principles of the UN Global Compact, and the UN Guiding Principles on Business and Human Rights. Our suppliers are also expected to promote compliance with these standards among their own suppliers. Accordingly, our suppliers are expected to contribute effectively to creating transparency regarding risk exposure in their own operations and to strive for transparency within their own supply chains. Furthermore, suppliers are expected to develop and implement preventive measures when concrete risks are identified. If suppliers become aware of (potential) violations within their own company or in their downstream supply chain, they are expected to disclose this transparently and to end the violation or develop and implement a plan to end or minimize it. In general, the importance of effective communication is emphasized, as only in this way can appropriate solutions be developed together.

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## 5. Preventive Measures

To counteract risks, we implement preventive measures both within our own operations and throughout our supply chain.

The preventive measures implemented in our own business area include in particular:

- > Code of Conduct
- > Risk-based certifications in accordance with ISO 14001 and ISO 45001
- > Additional health, safety, and environmental protection processes
- > General and risk-specific training and communication programs

The Eppendorf Code of Conduct is binding for all employees of the Eppendorf Group, i.e., for Eppendorf SE and its affiliated companies both in Germany and abroad. In our Code of Conduct, we have set out our expectations for our employees. With regard to human rights and environmental due diligence, it covers the areas of equal opportunity and respect, occupational health and safety, human rights and labor standards, environmental protection, and the selection of business partners.

With regard to certifications, we have so far focused – based on the number of employees and the processes carried out – on sites with the highest risk. We have already certified the majority of our production sites according to ISO 14001. Eppendorf SE has been certified according to ISO 45001. Certification of additional locations is planned for the coming years based on a risk-based approach.

For non-certified sites, our Eppendorf HSE (Health, Safety, Environment) Mission generally applies. This mission sets out our requirements regarding environmental and health protection, as well as occupational safety, which are implemented through local policies and processes. In all our activities, we consistently apply the precautionary principle: any conceivable burden on the environment or human health should be avoided or minimized through preventive action.

We consider raising awareness among our employees to be an important part of our due diligence obligations. We have therefore launched various communication and training programs to inform employees about our due diligence obligations and train them in accordance with their respective areas of responsibility. In particular, context-specific training and instructions are conducted on topics such as environmental protection and occupational safety. In addition, employees in purchasing and supplier quality received training and comprehensive guidelines on evaluating suppliers with regard to human rights and environmental aspects.

With regard to the risk of discrimination identified in the risk analysis, mandatory training on equality, non-discrimination, and unconscious bias for relevant groups of employees is planned. To achieve a sustainable impact, this training is to be made mandatory not only for existing roles but also firmly integrated into the onboarding process. In addition, an awareness campaign – including themed events in cooperation with employee networks – is planned to raise awareness of diversity, inclusion, and equality at different levels: on the one hand, for those who may be affected, so that they can recognize discrimination and know whom to contact; on the other hand, for those who – often unconsciously – exhibit discriminatory behaviors, so that they can reflect on and change these behaviors. Further, a multi-channel information campaign about the whistleblower system will be carried out. The aim of this campaign is to raise awareness of the Eppendorf whistleblower system as a safe and confidential reporting channel. The initiative is intended to ensure that all employees are familiar with the whistleblower system and have confidence in its confidentiality and protective mechanisms.

Preventive measures implemented in the supply chain include, in particular:

- > Code of Conduct for Business Partners
- > Risk-based control measures as part of our supplier quality audits

The Eppendorf Code of Conduct for Business Partners forms the basis of our collaboration with suppliers. Accordingly, we provide our suppliers with the Code of Conduct and incorporate corresponding clauses into our framework agreements.

Risk-based control measures on human rights and environmental issues at our direct suppliers were integrated into our supplier quality audits. During the on-site visits, information provided as part of the risk analysis is checked for plausibility and compliance with preventive measures is verified, if applicable.

Eppendorf also engages in cross-industry initiatives and networks.

## 6. Remedial Measures

If a human rights violation occurs, we work to resolve it as quickly as possible. Each case is addressed individually, with attention to the needs of those potentially affected. If the party responsible for the violation is a direct or indirect supplier and the violation cannot be remedied immediately, we work together with the responsible party to develop a plan with clearly defined measures and deadlines. In addition, we strive to restore conditions to their state prior to the violation.

No violations were identified in our own operations or in the supply chain, so no corrective measures were needed.

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## 7. Complaints Procedure

Our complaints procedure is an essential element of our due diligence processes. It enables us to effectively prevent adverse human rights and environmental impacts caused by our business activities or those of our suppliers, and to take effective remedial action. In addition, it serves as another potential source for assessing the risk situation and the effectiveness of our risk management system.

Eppendorf has implemented a system-based whistleblower system that provides internal and external stakeholders, as well as all potentially affected parties worldwide, with a confidential communication channel to report possible violations of human rights and international agreements – anonymously if desired.

All reported indications and substantiated suspicions of possible human rights violations are processed in a transparent and balanced procedure for all parties involved. The rules of procedure, with clearly defined process steps, are publicly accessible. The confidentiality and anonymity of whistleblowers are maintained.

If we receive substantiated complaints concerning one of our suppliers, we work together to develop a binding action plan that will bring the violation or risk to an end.

## 8. Effectiveness Review and Continuous Improvement

We review the effectiveness of our measures, the complaints procedure, and the risk management system at least annually and additionally on an ad hoc basis. We also verify internal compliance with all requirements and processes.

To assess effectiveness of the measures, we define objectives and impact hypotheses for each measure when deriving the measures. We use the IOOI logic (Input – Output – Outcome – Impact) and develop qualitative and, where possible, quantitative indicators to verify the impact. If measures are found to be ineffective, we analyze the reasons and make adjustments as needed.

The effectiveness of the complaints procedure is regularly evaluated based on the eight effectiveness criteria of the UN Guiding Principles on Business and Human Rights (legitimacy, accessibility, predictability, equitability, transparency, rights-compatibility, source of continuous learning, and based on engagement and dialogue). The most recent effectiveness review identified further potential for development, particularly in the areas of transparency and engagement and dialogue.

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## 9. Documentation and External Reporting

We continuously and consistently document the fulfillment of our due diligence obligations. The documentation is stored internally for seven years in a tamper-proof document management system.

We report externally on our human rights commitments, due diligence processes, and their effectiveness in this policy statement and in our sustainability reports.

This policy statement is reviewed and updated at least annually.



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