

AbbVie Deutschland GmbH & Co. KG

German Supply Chain Due Diligence Act (Lieferkettensorgfaltspflichtengesetz, LkSG) Complaint Procedure

Version 1.1, effective 01-Jun-2023

AbbVie Deutschland GmbH & Co. KG GSCDDA complaint procedure

Establishment and purpose

The complaint procedure for the German Supply Chain Due Diligence Act (Lieferkettensorgfaltspflichtengesetz, LkSG) enables employees and external persons to report potential risks and/or violations of human rights and environmental obligations that are caused by the economic activities of AbbVie Deutschland GmbH & Co. KG (AbbVie Germany) in its own division or of a direct or indirect supplier.

Complaints Procedure

Complaints may be submitted at any time in writing or by telephone via the Global Office of Ethics and Compliance (Global OEC) Helpline Portal. The link and contact details can be found [here](#). Complaints can be submitted anonymously. AbbVie Germany employees can also submit reports directly via local management, Human Resources, the Works Council, Environmental Health and Safety, OEC, Legal or the Human Rights Office (HRO).

The OEC Helpline or the aforementioned internal functions will document the complaint. All complaints within the scope of the LkSG will be forwarded to the HRO. The person submitting the complaint will receive a confirmation of receipt.

The HRO determines whether there is the possibility of a risk or a violation within the meaning of the LkSG. If necessary, the circumstances will be discussed with the person submitting the complaint. If there are sufficient indications, the HRO forwards the reported information to AbbVie's internal functions for investigation. The HRO retains a neutral position and does not conduct any investigation itself.

AbbVie's internal functions review and assess the complaint in compliance with all legal requirements and internal rules while taking into account the legitimate interests of all parties involved. This review should be carried out as soon as possible and without major delays.

A comprehensive assessment of the circumstances under investigation and the determination of appropriate remedial and preventative measures are carried out by AbbVie's internal functions in coordination with the HRO. Appropriate measures may include, for example, changes in work and business processes as well as changes in organizational structures and guidelines on conduct. If required, legal action can also be taken or a competent authority involved.

After the process has been completed, the person who originally submitted the complaint will be informed of the result by the HRO, taking into account legitimate interests and within the scope of what is legally permissible.

Notes

Anyone submitting a complaint in good faith and to the best of their knowledge and belief is protected against retaliation and discriminatory measures as a result of the complaint. Any retaliatory action will not be tolerated by AbbVie Germany and may result in appropriate disciplinary action, up to and including termination of employment.

All personal data submitted as part of a complaint and collected as part of an investigation will be treated confidentially. The [AbbVie Privacy Policy](#) will apply to the operation of the OEC Helpline by AbbVie Inc. and explains how AbbVie handles personal data that it collects and receives via the OEC Helpline websites and phone interactions. In addition, the [AbbVie Germany Privacy Policy](#) applies to processing personal data in the context of the further investigation and management of the complaint by AbbVie Germany, which sets out how AbbVie Germany may handle your personal data in that context and your privacy rights.

The effectiveness of this complaint procedure is reviewed at least once a year.