

Rules of Procedure for Complaints Procedure under German Supply Chain Due Diligence Act (§8 LkSG)

Elanco¹ takes responsibility for respecting and strengthening internationally recognized human rights within its own business and through appropriate management of its supply chains.

Elanco has therefore set up the "Elanco Integrity Line" complaints procedure, through which internal and external persons can inform Elanco of human rights or environmental risks or violations in its own business and in the supply chain.

Reporting Person

The complaints procedure enables potentially affected persons ("reporting persons") to point out human rights and environmental risks or violations. Potentially affected persons are persons who are directly affected by economic activities within Elanco's own business area or by economic activities of a direct or indirect supplier of Elanco or who may be violated in a protected legal position as well as persons who have knowledge of the possible violation of a protected legal position or an environmental obligation.

Elanco Integrity Line

Reporting persons can report any complaints or information with the LkSG via Elanco IntegrityLine (<https://www.integritycounts.ca/org/elanco>).

The IntegrityLine is independently owned and operated by a third party (WhistleBlower Security Inc.) and is accessible by phone or internet, along with several other methods (mail, fax, email). Reporting persons are not required to provide their name or any other personal information when submitting a report. Reporting persons may remain anonymous to Elanco or remain anonymous to both Elanco and our IntegrityLine service provider.

When sharing your concern or complaint through the IntegrityLine, we encourage reporting persons to identify themselves and engage with the process to support Elanco's investigation regarding the complaint. Please provide as much information as possible to your report. Your privacy will be maintained in accordance with applicable data protection laws.

Try to provide the following information:

- Circumstances of the concern (names, dates, times, places)
- Who else may be aware of your concern
- If you have previously reported this incident

Anonymous complaints

Reporting persons can report anonymously through the following (unless prohibited by local law):

- Talking with IntegrityLine independent operator but opting not to provide any of your personal information. You will still receive a login and password to follow-up on the status of your report.

¹ Elanco GmbH and all Elanco legal entities within its own business area.

- Making a report via the online reporting process but opting not to provide any of your personal information. You will still receive a login and password to follow-up on the status of your report.
- Sending an anonymous letter to the P.O. Box address.

Please note that we can only act on anonymous reports if sufficient information is provided to carry out a complete assessment.

Complaints need to be made in good faith and be about a specific incident and must, to the extent possible, include details such as who, what, when and where.

Complaint procedure

- The reporting person will receive a confirmation of receipt of the complaint and the complaint will be submitted to the Global Investigation Team and the Elanco Human Rights Officer – once appointed.
- Elanco Global Investigations reviews all reports submitted to the IntegrityLine. All reports will be reviewed as quickly and discreetly as possible.
- The Elanco Global Investigations Team guarantees impartiality and acts independently and not bound by instructions within the scope of its functions.
- Elanco's Human Rights officer – once appointed - checks - if necessary with the support of the Global Investigation Team and/or Elanco Legal - whether the complaint falls within the scope of the complaints procedure under the LkSG.
- Elanco Global Investigations may use IntegrityLine to communicate with you to request more information or to provide updates. You can view those messages and monitor your report by logging into IntegrityLine, selecting the Review Your Report icon, and entering the user ID and password provided when you submitted your report.
- If the complaint does not fall within the scope of the complaints procedure, the person making the allegation will be notified within three weeks of receipt of the complaint.
- If the complaint falls within the scope of the complaints procedure, Elanco's Human Rights Officer will clarify the facts of the case, if necessary, with the involvement of the relevant departments within Elanco, and will make a statement to the reporting person within three months.
- The duration of the complaint procedure depends on the complexity of the respective complaint.
- If the investigation reveals that the information provided by the reporting person is not sufficient or not relevant to further clarify the complaint, the Human Rights Officer shall inform the reporting person accordingly (if possible) and request further information.

Possible violation of rights

If the examination of the complaint shows that the violation of an LkSG-related duty appears to be possible, imminent or has occurred in Elanco's own business area or at a direct or indirect supplier, Elanco will initiate appropriate preventive and/or mitigation measures. The aim of these measures is to prevent a violation of protected legal positions or to minimize or eliminate violations of protected legal positions that have already occurred.

Costs

This procedure is free of costs for the reporting person.

Effectiveness

The effectiveness of the complaints procedure is reviewed once a year and on an ad hoc basis.

Documentation and storage

Complaints are documented and stored in accordance with legal requirements.

Data privacy and confidentiality

Elanco takes appropriate personnel, organizational and technical measures to ensure that the confidentiality of the identity of reporting persons is maintained in the case of incoming complaints and tips and that effective protection against disadvantage or punishment based on a complaint by the reporting person is guaranteed.

Persons involved in the complaints procedure are bound by confidentiality and data protection obligations.

Confidentiality relates to the reporting person, the person(s) who is/are the subject of the report and other persons named in the complaint.