



**Eurofins Agroscience Services Sustainability Report No. 1**  
**- 2018 / 2019 -**

- An International Business Line of the Eurofins Group –

**One-stop service - world-class, worldwide**

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## 1. Letter from the Head of Eurofins Agroscience Services

Dear Readers,

*We aim to contribute to global health and safety by:*

- *providing our customers with high-quality field, laboratory and regulatory services, whilst:*
- *creating opportunities for our employees; and*
- *generating sustainable shareholder value.*

This has always been our mission at Eurofins Agroscience Services. It directly links to “People – Planet – Profit”, the three target areas of sustainable development. At Eurofins Agroscience Services, we acknowledge that our common future depends on a broad view of all three dimensions of sustainability. We are therefore proud to present our first sustainability report. We embarked on this journey as we firmly believe that long-lasting business success requires continuous improvement to our environmental and social performance as a corporate citizen.

As our work focuses on the behaviour of substances and formulations in environmental systems and their bioavailability and assimilation in organisms, as well as the biological responses of these organisms and their subsequent fate in the environment, we create reliable data that help registrants of agrochemicals and other chemicals to provide the most effective solutions with the lowest environmental impact possible. In doing so, Eurofins Agroscience Services supports the agricultural sector in providing affordable, healthy food for all, and thus contributes to a more sustainable agriculture.

We are strongly convinced that through our business model, core competencies and assets, we can support the agricultural industry’s development towards more sustainable agrochemical inputs, as well as the local communities in which we are operating around the world. But we are not alone on this journey. Thus, we have teamed up with partners in our value chain and communities, integrating their specific perspectives into the building and execution of our sustainability strategy.

Besides being a good corporate citizen, we strive to play an active role in the pursuit of the 17 United Nations Sustainable Development Goals (SDGs). Eurofins Agroscience Services is a dynamic enterprise, meaning we are always looking for innovative solutions and striving to continuously improve our operations. We provide a great workplace and home for our people and are a well-respected partner in the neighbourhoods and communities in which we operate. We use our resources efficiently and protect the environment in our operations. We also invest our capital in innovations that will provide the basis for our future success.

Sustainability is a journey, not a destination. We want to continuously improve our strategies, operations, and environmental and social footprint, in light of the 17 SDGs, and we invite you to become part of a dialogue on how best to pursue these goals. This report is intended to facilitate this dialogue with all of our stakeholders. We have embarked on a journey to ensure sustainability is at the forefront of our business model and would love you to join us in this effort.

Together,

Sincerely,



Klaus Kügler  
**Head of Agroscience**

## 2. Overview of Eurofins Agroscience Services

### 2.1 Values

By listening to our customers' expectations, we strive to add value through our services and are seeking sustainable innovations to help our customers to achieve their goals.

We have long-term collaborations across all of the large-scale agrochemical industry, plus with almost 100% of small and mid-sized agrochemical companies, to support them in the plant protection registration process in order to evaluate the efficacy and to minimise the possible environmental impact of their products.

It is of the utmost importance to us that our work enables the sustainable conservation of terrestrial, soil and aquatic ecosystems, and counteracts the loss of biodiversity.

Our goal is to provide substantial solutions for a sustainable agriculture and production of safe food.

To do so we need a committed, competent and highly motivated team. We rely on and value our employees. We see it as our obligation to provide good working conditions, create a positive working relationship between colleagues, and offer our employees opportunities to shape the company.

It is important for us to provide quality in all of our work, with accurate results on time. To achieve this, we use the most appropriate technology and methods and constantly seek to improve our processes.

Behaving ethically in all of our business and financial activities is the basis of our work. We demonstrate respect towards our customers and our staff and follow responsible environmental policies.

### 2.2 Mission and Vision

As an international business line within the Eurofins Group, Eurofins Agroscience Services supports our Eurofins Group Mission Statement of "Testing for Life". We aim to play our part in creating a safer and healthier world by contributing to food security, better nutrition, and sustainable agriculture. We provide our customers with innovative solutions, meeting the highest quality standards with cutting-edge technology and consultancy services, whilst creating opportunities for our employees and generating sustainable shareholder value.

A clean and safe environment is a prerequisite for health and quality in life. Eurofins Agroscience Services combines global, multi-disciplined research and technical support to meet regulatory needs.

We are the global leader in the Agroscience testing market and our long-term aspiration is to become the most respected partner for the development and assessment of solutions for sustainable and innovative agriculture.

### 2.3 Strategy

Agrochemicals have helped to multiply food production over the last century, in order to keep up with the needs of a growing population and to provide food security for as many people as possible. However, this must be achieved in a sustainable way. The short and long-term impacts of agrochemicals in terrestrial and aquatic ecosystems have to be reduced to an efficient minimum. How this can be achieved is subject to ongoing debate around general sustainable agriculture and agrochemical use.

Our business mission and competences place us at the centre of this discussion. In this context, our strategy is to:

1. provide involved parties with reliable and valid data on the benefits and impacts of agrochemical solutions as a "global one-stop service provider";
2. actively contribute to the development of regulatory science;
3. ensure that we use resources responsibly;
4. take care of our team.

### **Provide reliable and valid data on the benefits and impacts of agrochemical solutions:**

With over 30 years of experience, EAS Group offers outstanding technical knowledge and project management skills when sponsoring studies. Our service offering is continuously developed by knowledge transfer initiatives between the Group's various centres of expertise across the globe. We conduct studies and provide regulatory constancy on almost all of the aspects required for the regulatory assessment of agrochemicals, including:

- Biology;
- Product Chemistry;
- Consumer Safety (incl. Operator and Bystander Safety); and
- Environmental Safety.

This includes both synthetic agrochemicals and bio-rational solutions. Beyond this, we are involved in the performance of environmental safety assessments of pharmaceuticals (Pharma Environmental Risk Assessment) and chemicals (REACH).

### **Contribution to the development of regulatory science**

Since the very beginning of our company's history, we have been members of the Society of Environmental Toxicology and Chemistry (SETAC), a non-profit organisation dedicated to addressing environmental challenges and offering a platform to facilitate networking, training and exchanging the latest research results on environmental issues. We participate in several working groups and provide lectures, posters, and trainings to the working groups.

### **Ensure that we use resources responsibly**

This applies to laboratory and, in particular, field studies. We have long-lasting and trust-based partnerships with our local farmers. Fields are rented for performing field trials and reserve areas are used to promote biodiversity and food sources for the various insect populations.

### **Take care of our team**

We employ talented and competent staff, invest in training, and provide good career opportunities by recognising and encouraging outstanding performance. It is important for us to deliver quality in all of our work, with accurate results on time. To achieve this, we use the most appropriate technologies and methods and seek to improve or adopt processes for the better.

We are committed to adding value to the following sustainability goals:

- Maintaining and constantly improving our environmental responsibility;
- Respecting and complying with Human Rights;
- Ensuring that a safe working place is provided and respecting the needs and rights of our personnel.

We understand sustainability as a process of change and growth for our business. In this report, we will present data from selected pilot groups of Eurofins Agroscience Services and publish our goals and actions, whilst at the same time describing the areas in which we want to progress over the course of the coming years. These pilot groups highlight the progress we are working towards and are a representative illustration of the standards we apply to Eurofins Agroscience Services globally.

## **2.4 Structure**

### **2.4.1 Eurofins Agroscience Services operational organisation structure**

Eurofins Agroscience Services (hereafter called "EAS Group") is an international business line of the Eurofins Group. It consists out of over 50 separate legal entities with about 1,500 employees, ranging from small field stations up to laboratory sites with over 300 people. Entities are grouped in so-called 'clusters' based on the region they belong to – and, in Europe, by type of service provided.

We are experts in managing global field studies, worker exposure studies, ecotoxicology, analytical services, physicochemical property testing, metabolism studies, and environmental fate laboratory and field studies. With a comprehensive knowledge of laboratory and field studies, our scientists work

together to respond quickly, using the most current approach and complex, in-depth environmental studies.

Our laboratories and field entities are accredited by competent authorities for the quality standards Good Laboratory Practice (GLP) and Good Experimental Practice (GEP) as applicable for their field or work. One subsidiary is also accredited for Good Manufacturing (GMP).

We are following the regulatory guidelines that are applicable to our area of work. Guidelines from the Organisation for Economic Co-operation and Development (OECD) are a set of internationally accepted specifications for the testing of chemicals. National regulatory guidelines / laws are followed for the countries involved in the study.

This report refers to the pilot group, comprising eight legal entities from Germany with a total of 474 people (2019 numbers), representing 34% of the Eurofins Agroscience Services Group globally. In the future, we want to gradually add more entities to the scope of this report.

KPIs reported later in this report refer to these pilot companies unless explicitly stated otherwise. The reporting period is from 2018-2019. The closing date for all data and facts was December 31, 2019.

## 2.4.2 Structure of the EAS Group Pilots in 2019



EAS Field / Agrartest / Stade  
Various field sites/DE



EAS Chem  
Hamburg/DE



EAS EcoChem  
Niefern/DE



EAG Laboratories  
Ulm/DE



EAS Ecotox  
Niefern/DE



EAS Regulatory  
Niefern/DE



### **3. Sustainability Strategy**

#### **3.1 Roles & Responsibilities for Sustainability**

Eurofins Agroscience Services (EAS) is on the way to making sustainability an integral part of its corporate culture. The corporate business strategy and the sustainability strategy are fully aligned, also accounting for the long-term investments and growth opportunities identified. In EAS, sustainability is sponsored by the CEO Klaus Kügler, with execution championed and led by Friedrich Knecht (Chief Sustainability Officer). The different cluster leadership teams act as sustainability steering committees to ensure strategic alignment, co-ordination and knowledge sharing. Sustainability experts have direct access to the Chief Sustainability Officer and, thus, influence decision-making at executive management level.

In addition, EAS Group has initiated an external advisory committee that will audit the company's performance on sustainability and challenge its corporate direction on a regular basis.

In order to embed sustainability throughout the entire organisation, EAS Group has introduced a training programme dealing with the basic aspects of sustainability, which is being rolled out across the entire EAS organisation.

#### **3.2 Business Model & Value Chain Responsibility**

There is a strong need to maintain a productive agriculture and efficient land use for a rapidly growing world population. At the same time, the conservation of environmental resources and the preservation of biodiversity are key elements to protect the environment we all live in. This responsibility will continuously grow for the food producing and associated industries, as the integrity of terrestrial and aquatic ecosystems is more and more under threat. With our work, we are in a key position to help to solve the trade-off between the economic efficiency of farming and environmental protection. The short and long-term impacts in terrestrial, soil and aquatic ecosystems, along with the effects on humans, have to be investigated and reduced to a minimum before an agrochemical, chemical or biocide goes to the market. With our work, we therefore support our partners in bringing the best technology with the lowest environmental impact possible to the market. We constantly innovate and invest in our processes and technologies to provide state-of-the-art testing facilities and the highest level of scientific scrutiny possible, in order to best inform the product development efforts of our partners.

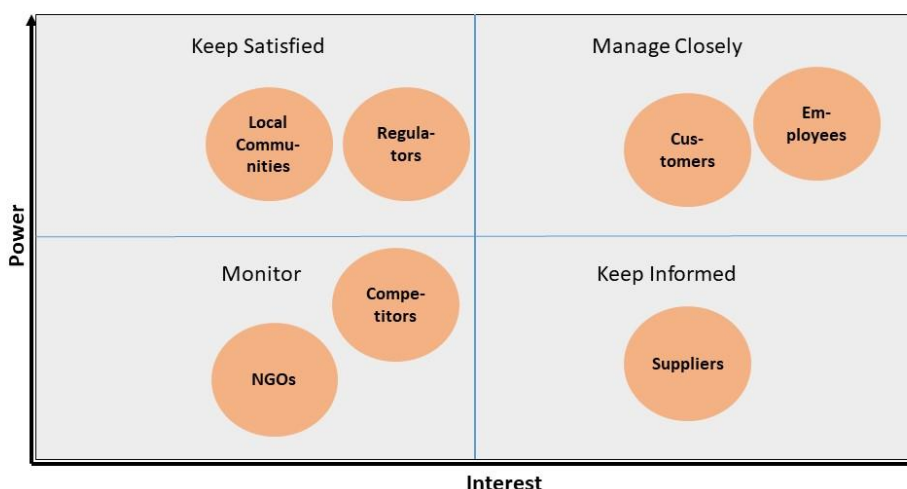


### 3.3 Engagement with our Key Stakeholders

In order to understand the perspectives of our key stakeholders, we have mapped them. Internal stakeholders are employees throughout the EAS organisation. They all have an influence because they represent the most critical part of an organisation. To capture their views, we invited employees from different units and levels of responsibility to share their views on our most material issues. Among them, technicians from the different testing facilities and the field team, middle managers, administrative staff and executive management have been involved.

Key external stakeholders are first and foremost the partners and customers who use our knowhow and technology to successfully develop their agrochemical, chemical or biocidal products. We further engaged with players in the same industry, to some extent competitors, in order to capture their particular views on our industry as Contract Research Organisations. In the future, we will further engage in dialogue with authorities and local communities in order to better inform our sustainability efforts in light of their views on our sustainability impacts and high priority issues.

Depending on the complexity of our industry, we have started this process with a rather limited number of stakeholders, who were previously identified to deeply understand our modus operandi as a CRO. In order to prioritise them, we use a matrix to analyse the influence that stakeholders have on our operations and their level of interest in it (Fig. 1). In the materiality analysis carried out in 2020, we attempted to capture the views of our customers and employees in particular.



**Fig. 1 Interest/Power-Matrix of EAS' Key Stakeholders**

### 3.4 Areas of impact and their relevance

From the mix of EAS' stakeholders, the group "customers" (n=6), "academia" (n = 2), "competitors" (n = 3) and "EAS Group internal" (n = 30) were selected. However, interviews with additional stakeholders are in progress. The data for the analysis were mainly collected through filling a questionnaire in combination with semi-structured interviews. In total, more than 40 interviews with internal and external stakeholders were conducted by and under the guidance of an independent sustainability expert. Anonymity was guaranteed to all interviewees.

All the interviews took place in 2020, and they were summarised in detailed notes, depending on the interviewee's preference. The interviews sought a clearer understanding of the relevance of different impacts of EAS' business on internal and external stakeholders. The relevant topic areas were pre-selected in light of the 17 SDGs and the potential impacts of the EAS' business model on them (see Tab. 1). In addition, the interviewees were asked to name additional sustainability topics of concern for them.

Questionnaire (English translation)						
Materiality Analysis						
Reference to SDG	How important is it for you that EAS...	not important	not very important	important	very important	extremely important
1	...contributes to food security?					
2	...contributes to better nutrition and sustainable agriculture?					
3	... offers participation of its employees and creates good working conditions as well as a sense of togetherness for its workforce?					
4	...offers professional training opportunities and performance appraisal programmes to foster the personal development of its employees?					
5	...strives for gender equality at the decision-making levels of its organisation?					
7	...increasingly uses renewable energy for its operations?					
8	...makes sustainable use of its financial resources and invests in a sustainable manner?					
9	...brings sustainable innovations forward?					
12	...uses environmental resources in a sustainable way?					
13	...contributes to the protection of aquatic ecosystems?					
14	...contributes to the mitigation of climate change?					
15	...contributes to the protection of terrestrial ecosystems and biodiversity?					
16	... is an inclusive and diverse organisation on every decision-making level?					
17	...contributes substantially to global sustainable development?					
	...					

**Table 1: Materiality Analysis Questionnaire**

Due to the pilot scope of this analysis, the interviews were conducted in German. The result of the analysis is depicted in Fig. 2. Amongst the most relevant issues selected by external and internal stakeholders as key topic areas for sustainable development of Eurofins Agroservice Services were:

- Participation of employees and working conditions (SDG 3); and
- Sustainable use of natural resources (SDG 12).



**Fig. 2: Material Issues for Eurofins Agroservice Services based on the initial Materiality Analysis**

In addition, a number of the issues selected and prioritised are linked to either issues, such as:

- “Gender Equality” (SDG 5) and “Training & Performance Appraisal” (SDG 4), linked to “Participation & Working Conditions”; and
- “Protection of aquatic & terrestrial ecosystems” (SDGs 13 & 15), “Protection against Climate Change” (SDG 14) and “Use of Renewable Energy” (SDG 7), linked to “Sustainable Use of Resources”

As far as additional issues repeatedly mentioned by the interviewees, the following need to be highlighted:

- “Global Standardization of Labour & Social Conditions” and
- “Sustainability Reporting & Transparency”

Whereas the first issue lies beyond the pilot scope of this report, the Eurofins Group as a globally operating organisation supports the four fundamental principles contained within the International Labour Organisation (ILO) Declaration:

- Effective abolition of child labour;
- Elimination of discrimination in respect to employment and occupation;
- Elimination of all forms of forced or compulsory labour;
- Freedom of association and the effective recognition of the right to collective bargaining.

These standards are further detailed in policies addressing conditions, e.g. the group's "Health and Safety Policy" and "Equal Opportunities and Fair Employment Policy" (cf. chapter 4.1).

The second issue has been addressed by providing this first sustainability report and EAS' commitment to update the document on a yearly basis.

### 3.5 Sustainability Goals

As previously explained, the core service of EAS is the generation of data for the characterisation, safety and efficacy assessment of agrochemicals and other chemicals, i.e. the provision of sound data to enable regulatory decision-making in the best interest of sustainable agriculture. Thus, it can be argued that the development of the group's size (in terms of net sales) and market share can be seen as a key indicator reflecting both the contribution made and economics success.

However, the materiality analysis suggests that financial and market share goals need to be complemented to fully capture the key sustainability topics for EAS. For this purpose, a set of eight mid to long-term goals has been defined for the identified two key areas of sustainable development:

SDG area	Goals
Sustainable use of natural resources (SDG 12)	<ol style="list-style-type: none"> <li>1. Develop new study designs to evaluate the environmental impact of farming practices in general and, in particular, agrochemicals use</li> <li>2. Support the environmental evaluation of chemicals under REACH</li> <li>3. Improve the CO<sub>2</sub> footprint of EAS business operations</li> </ol>
Participation of employees and working conditions	<ol style="list-style-type: none"> <li>4. Support employee health</li> <li>5. Provide a safe work place</li> <li>6. Improve employee engagement and talent retention</li> <li>7. Drive gender equality</li> <li>8. Keep regular dialogue with employees and their representatives</li> </ol>

EAS sustainability goals and the corresponding KPIs are described in detail in Chapter 7.2.

## 4. Social Dimension

### 4.1 Human Rights & Labour Relations

In a decentralised organisation like the Eurofins Group, overarching policies regulate topics from Human Health and Safety, IT Safety, or Employment and Ethical Rules. Each legal entity has to follow and implement these policies in their daily work. Furthermore, local guidelines, policies and standard operating procedures regulate the individual needs and requirements of an operating site in the different countries.

On October 24th 2019, the Board of Directors of the Eurofins Group issued a revised version of the Eurofins Group Code of Ethics that “serves as a standing guideline for all people working for, or with, the companies belonging to the Eurofins Group. It is designed to set out a series of ethical conduct principles which support Eurofins’ values of Customer Focus, Quality, Competence & Team Spirit and Integrity. Ethical and compliant behaviour is a core value of our business. Our clients, suppliers, employees and other stakeholders have to be able to rely on absolute integrity from our part. As such, it is non-negotiable. All our activities rely on and require ethical and compliant conduct of our leaders, employees and partners in all aspects of our companies’ business.” We behave ethically in all our business and financial activities, demonstrating respect towards our customers and our staff, and invest in training and creating good career opportunities. – **The Eurofins Group Code of Ethics Policy**

Other overarching policies:

**The Eurofins Group Health and Safety Policy**

**The Eurofins Group Equal Opportunities and Fair Employment Policy**

**The Eurofins Group Anti-Bribery Policy**

**The Eurofins Group Modern Slavery Human Trafficking and Child Labour Statement**

**The Eurofins Group Equal Opportunities and Fair Employment Policy**

**The Eurofins Group Privacy Policy**

**The Eurofins Group Ethical Behaviour at Laboratories Policy**

**The Eurofins Group Ethical Behaviour during Audits Inspections and other Offsite Operations Policy**

**The Eurofins Group Whistleblowing Guidelines**

The Group Code of Ethics are enforced along with these key policies and made applicable to all Eurofins Group companies via shareholder resolutions.

EAS Group is committed to respecting and fostering human rights. Human rights standards are set out in the Eurofins Group’s Equal Opportunities and Fair Employment Policy, and operating sites follow the local governmental human right laws. Leaders in the EAS Group have to create and influence an environment in which people perform, grow, and enjoy, and to which they also contribute. Our leaders serve as role models and play an important part in promoting this culture at the EAS Group. The leaders’ commitment to this culture is also part of their annual appraisals and will be evaluated.

Child and forced labour are strictly prohibited in the Eurofins Group. This prohibition is set out in our binding Eurofins Group Code of Ethics and Values. EAS Group only offers fixed term internships, training programs and seasonal employment.

#### 4.1.1 Commitment to EHS at Work

##### Health and Safety

EAS Group has health and safety rules fixed in policies and standard operational procedures. All accidents, hazardous situations or exposures to products must immediately be reported to Management. The EAS group-wide Policy “Protective Measures for Health and Safety” demands that every incident be recorded in an Accident & Incident Report book. This documentation must be known to all employees and remain easily accessible.

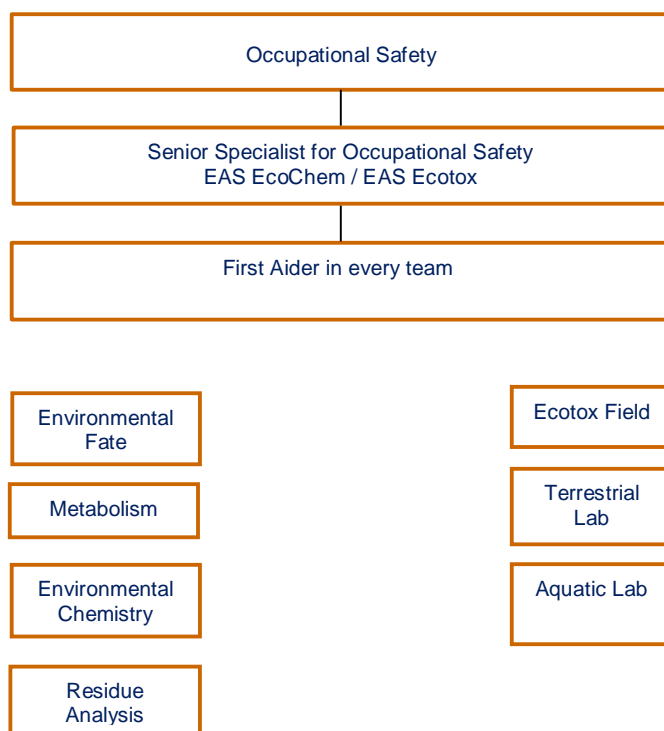
Laboratory testing with agrochemicals and other chemicals is covered by standard operational procedures, which must be read, understood and signed by each employee. This includes the handling of each type of testing. Detailed documentation within each study is covered by a defined study plan and in the accompanying raw data. Each person involved in a study is signing their participation. Every study and selected steps of performance, including the final report, are audited on correctness by an independent group called “Quality Assurance”.

Handling of test organisms, chemicals and their professional disposal is conducted in agreement with the local laws and is described in standard operating procedures. Chemical waste is collected and disposed of by professional companies.

#### Operating Rules Policy – Work Safety

In a policy, the responsibilities and communication cascade are described. A caretaker for occupational safety must be appointed. This function supports management in defining hazardous working conditions or situations, creates safety policies, conducts health and safety briefings and trainings, and conducts regular tours to check for potential hazardous conditions and situations. For each team, one or more first aider (depending on the size) is appointed. To reduce employee exposure to work-related health and safety hazards, personal protective equipment is provided to all employees, e.g. full body clothing, respiratory devices, eye and face protection (see Fig. 3).

Example: Occupational Safety organisation at EAS Group Niefern site:



**Fig. 3: Occupational Safety Responsibilities. Example of EAS Group Niefern site.**

Hazard evaluation assessments are described in the operational instructions and must contain, for example, a precise definition of the chemical/equipment, possible dangers in handling, danger symbols, first aid measurements, and reporting.

One of the indicators of performance concerning labour rights is the company's sickness absence rate.

*For further information, please see Appendix 1: Measurements – Health and Safety –*

### 4.1.2 Gender Equality

All people are equal before the law and no one may be discriminated against or favoured on the basis of their sex, ancestry, race, home and origin, faith, or religious or political beliefs. Furthermore, nobody may be discriminated against because of their disability.

Eurofins Group is highly committed to strengthening equality. Therefore, an Equality Driving Excellence (EDE) initiative was launched at Group level in 2020. The EDE initiative is led by a core global equality team, comprising equality ambassadors nominated in collaboration with the Business Leaders in all countries. Taking action on "Gender Equality" and "Stance Against Racism" has been the EDE's primary focus for 2020. Furthermore, Eurofins is committed to promoting equal opportunities in employment. Each job applicant will receive equal treatment, regardless of age, disability, gender, race, and nationality. This includes, amongst other things, the recruitment procedure, pay and conditions, training, appraisals, and promotion.

*For further information, please see Appendix 2: Measurements - Gender Equality -*

### 4.1.3 People Development

#### Recruitment and promotion

The EAS Group has standardised ethical standards and working conditions. New hiring and wages are made according to local laws and regulations. Vacancies are generally advertised to the relevant labour market. Job applicants must not be asked questions that may suggest an intention to discriminate based on sex, ancestry, race, home and origin, faith, or religious or political beliefs. EAS Group ensures that employees are fairly compensated throughout the Group. Our compensation system combines a basic salary with performance-related elements. Adjustments are based on continuous benchmarking and compensation is in excess of the statutory minimum wage.

This also applies to part-time employees whose compensation is proportionally aligned with that of a full-time position. The living wages are adapted annually, in line with changing conditions.

We offer our employees flexible and part-time models that provide them with significant scope for organising their working time, thus allowing them to take appropriate care of children and dependents. The positive resonance from our working time models and their flexibility is reflected by, for example, the return rate to the workplace after parental leave being at almost 100%.

For most personnel, working hours are recorded on a daily basis. Overtime hours are registered and these are compensated preferably through additional free time or, if this is not possible, then the overtime is paid. Annual appraisals with technicians, scientists and management, according to objectives/targets, are done continuously for the upcoming year.

Contracts defining salary and benefits are issued to each employee. The EAS Group pays all recruitment fees, visas, airfare, travel, lodgings and meals for our employees during the recruitment process. Male and female employees at EAS Group receive equal compensation based on qualifications and responsibilities.

Employees can join the company either as executives/managers or as technicians/scientists. This allows for the promotion of highly qualified technical staff who may not wish to pursue a management career. The EAS Group offers high-level scientific and/or technical talents extended career opportunities, while allowing them to stay in their chosen profession and continue to add value. Employees in both development streams receive equal treatment in terms of advancement, salary increases and the "respect" they receive from the company.



## Training Program

EAS Group is a knowledge-based business line, hence the development of employee competencies and knowledge is key. Trainings are a key measure to achieve this.

Training needs are identified through regular appraisals and employees are given access to training to enable them to progress within the organisation. The training comprises technical, scientific, financial or personal development topics. In recognising, engaging and developing our people, we invest in leadership trainings for management as well as emerging leaders of the EAS Group. Those groups are trained in a leader's programme in co-operation with the Loughborough University, U.K. The programme comprises a personality test and training on self-awareness, financials, leading a team, people skills, and how changes affect employees.

The Eurofins Group founded the Eurofins Academy. This Academy has an international team, who established an eLearning platform for efficient knowledge dissemination to all the employees. In 2020, training on the Eurofins Group Code of Ethics, Phishing Awareness Course, and COVID-19 protective measurements have been undertaken. The number of employees who successfully completed training will be reported in future progress reports of the EAS Group.

In addition, applicable scientific quality standards (e.g. GLP, GEP) pose training and qualification requirements for the personnel involved in the conduct of studies for which compliance is claimed. The personnel must be adequately qualified, trained and experienced to carry out the functions required to them. To achieve this requirement, a test facility/test site must operate a robust training program for members of staff, supported by comprehensive training records.

For field trials, the use of casual employees may be required. These staff members are under the direct supervision of trained staff for the duration of the task, in order to fully understand the work required. Internal training makes up the bulk of trainings with relevant demonstrations/discussions on a group or individual level. It is an ongoing process and staff competencies are reviewed periodically to identify any further training requirements. All training is documented with trainer, attendee, and a short description of what was covered by the training. This is either done on paper or through entries into a GLP training database.

We measured the different trainings in units. A training unit can range from an hour up to several days. However, not every training conducted is recorded in a database, but rather they are primarily recorded on paper. Therefore, some entities cannot provide a complete overview of trainings performed in 2018 and 2019. In the future, we will further develop and expand our training catalogue. By 2021, training of all entities should be collected in the training database, which will be extended to all trainings received.

*For further information, please see Appendix 3: Measurements – Training –*

## Trainees and Apprentices

University students are given the opportunity to participate in form of internship. They participate in most of the activities and gain a good insight into possible future work surroundings.

Some sites provide educational training and hire apprentices. Most of the apprentices are taken over after a successfully performance in their final exams. Training-on-job has the advantage that both sides (apprentice and company) get to know each other and their abilities. With this procedure, long-term employment is usually the result. Apprenticeship duration is more than one year, and usually 2-3 years.

2018	EAS EcoChem Niefern	EAS Chem Hamburg	EAG Lab Ulm	EAS Ecotox Niefern	EAS Regulatory	EAS Field / Agrartest / Stade
Trainees	0	3	1	8	0	3
Apprentices	6	0	0	2		2
2019						
Trainees	0	4	2	5	1	9
Apprentices	8	0	0	1		1

**Table 2: Overview of Trainees and Apprentices at the different EAS sites**

## Harassment

Harassment includes any unwanted conduct that creates an intimidating, humiliating, hostile, degrading or offensive work environment for any person, or which violates the dignity of any person. It can be physical, verbal or non-verbal conduct. Bullying can take the form of physical, verbal or non-verbal conduct and may include physical or psychological threats, overbearing and intimidating levels of supervision, or inappropriate derogatory remarks about someone's performance.

If a person feels they are being harassed, bullied or discriminated against, or are witness to this, they can report to the local human resources function. Where one may be afraid of retaliation, it may be appropriate to voice such concerns using the Eurofins Whistleblowing Point of Contact. Please see reference to the Eurofins Group Whistleblowing Guidelines: <https://cdnmedia.eurofins.com/corporate-eurofins/media/12152995/20200106-v1-eurofins-group-whistleblowing-guidelines-final-26052020.pdf>

## Anti-Corruption

The Eurofins Group Anti-Bribery Policy lays out in greater detail the stance towards corruption and bribery set out in the Code of Ethics. It establishes the limitations that every employee must adhere to when interacting with, for example, customers and government officials around the world. It provides information about anti-bribery laws in order to avoid inadvertent violations.

Every employee working for a Eurofins company deserves the same basic level of protection against non-compliant behaviour and should follow the same basic norms and standards, irrespective of where they are working.

The Whistleblowing Point of Contact is accessible for all within the Eurofins Intranet and the Eurofins Group's website, following a link called [Whistleblowing](#).

The annual performance appraisal includes both a Self-Assessment and an Assessment by the Assessor, which serves to evaluate the integrity of the assessed leader, as well as in their function in the Group.

By 2021, all EAS Group employees will have undergone a training on identifying and reporting harassment through the Eurofins Academy.

#### 4.1.4 Co-operation with Employees & their Representatives

A constructive dialogue and co-operation with employees are key for a productive working relationship, and representation is welcome. This can be via formal employee councils (e.g. in our Ulm and Hamburg laboratories) with mandates as per work constitution law, or via informal confidants ("Vertrauensleute").

The latter is the case for the Niefern site (Chemistry, Ecotox and Regulatory). Despite the less formalised setting, appropriate employee representation is taken seriously: Elections for group members take place every two years and are organised by the current group of confidants. Each confidant is trained in communication, mediation and bullying prevention. The staff can contact confidants personally, by phone, by email, or anonymously by post. In 2018 and 2019, the Group was contacted approximately 6-10 times per year. Regular meetings with the managing directors allow to issues to be brought to the table and shared, and a common understanding to be established. In future, we will record the contacts and classify them by topics e.g. feedback from exit interviews, mediation, dialogue with management, etc.

The committee is the contact for all employees and management in any matter related to individual needs or the working community. They accompany individuals, if requested, in personnel interviews, and assist in case of conflicts between employees or employee(s) and management. Possible protocols are kept strictly confidential, only accessible to confidants.

## 4.2 Community Relations

### 4.2.1 Testing Facilities as Honest Brokers between Registrants and Public/Authorities

EAS is a group of independent testing facilities whose data are only of value if recognised by scientists and the competent regulatory authorities. In this context, a test facility's GLP or GEP certificate represents its license to operate. At each testing facility, a Quality Assurance unit conducts systematic checks for correctness and compliance with applicable guidelines. Deviations from study plans (independent of the reason why) are addressed within the context of studies and are reported. Regular audits by government GLP inspectors reassure the reliability of the studies performed.

At the same time, EAS Group is a private Contract Research Organisation operating in a competitive marketplace. This creates a healthy incentive for quality and timeliness of study conduct and reporting. It also incentivises efficiency while keeping the requirements of GLP and GEP.

As a consequence, EAS Group's role between registrant and authorities/public creates an incentive to provide accurate and reliable testing results of high quality and on time, combined with a high level of responsiveness. This means acting as an independent "honest broker" between the different groups that have an interest in the assessment of an agrochemical.

## 4.2.2 Scientific Community

We see ourselves as a leading scientific practitioner and as such are an active participant in the relevant scientific community.

Our experts maintain individual memberships in, and EAS Group has corporate partnerships with, a number of scientific associations. For example, we are a member of the SETAC Global Partners Program and the ICP-PR's Bee Protection Group. One of our department leaders was on the Board of Directors of the SETAC GLB (German Language Branch) for six years and was the President of this branch in 2018. In 2017, our Valencia laboratory organised the venue for the third International Symposium of the ICP-PR Bee Protection Group. We regularly attend and support numerous scientific conferences. Please refer to section 5.1 for an overview of contribution highlights.

The sheer number of tests performed under GLP conditions lead to organisational learning and competence that is of value to the scientific community. Testimony to this are pollinator testing and risk assessment trainings conducted by the Niefern ecotox experts onsite (e.g. 2019 for members of EU and national authorities) and at conferences (e.g. SETAC 2019), with attendees from academia, authorities and agrochemicals industry. These events do not only allow EAS Group to share knowledge, but also allow EAS Group to learn through the feedback the participating experts.

## 4.2.3 Beekeepers & Farmers

For each field trial, EAS Group applies to the local authorities for the permission to perform a study with registered and non-registered plant protection test material, in agreement with the current and local laws.

In order to investigate the impact of plant protection products under field conditions, we have long-standing co-operations with local farmers. For our trials, we use large-scale cultivation of the crop *Phacelia tanacetifolia*. This plant is a very good source of pollen and nectar for honey bees, bumble bees and other pollinators. At least two hectares (ha) each year are used as backup areas without any treatment, and for each trial one third of the field area serves as control. This serves to maintain and improve the biodiversity of the research/study sites.

In 2018, 6.2 ha were untreated areas of *Phacelia*, and in 2019 this was 7.4 ha.

By 2025, we aim to set aside 20 ha of untreated areas each year as our contribution to reducing the environmental impact of intensive agriculture.

In addition, we have also stocked more than 400 beehives across over 20 locations to support the pollination of various crops.

EAS Group Field organisation has launched an initiative to lay out flowering strips within their test facilities as a contribution to stimulating insect biodiversity.

The roof coverage of the recently constructed Eurofins Campus in Hamburg is another example for our contribution to Environmental Impact. This was done in collaboration with a consultant for urban species protection, 'Stadtnaturentwicklung', Hamburg. One of the focal points of their work is the animal-friendly design of walls, façades and rooves of buildings.

*For further information, please see Attachment 1: Flowering Areas at EAS Group to support Biodiversity*

Our commitment towards sustainability is also demonstrated by training beekeepers and farmers on the requirements of pollinators and the need for plant protection product testing. One example comprises the course "Bee testing SETAC 3 Module" by Dr. Marco Candolfi and Dr. Silvio Knäbe - European Meeting Helsinki 26 May 2019, 13 May 2018.

## 5. Environmental Dimension

### 5.1 Contributing to the Advancement of Regulatory Science

In its role as a group of testing facilities for agricultural solutions, EAS Group supports the development and use of environmentally and climate-friendly products, processes and technologies. Based on the continuously increasing demand for “biosolutions” in agriculture, in particular for biopesticides / bioprotectants and biostimulants, the EAS Group is substantially expanding its capacities for regulatory testing and consulting to strive for sustainable agricultural solutions. Our regulatory team is a member of the International Biocontrol Manufacturers Association (IBMA) and participates actively in the “Group for Natural Substances”. In 2020, Eurofins Regulatory supported the Annual Biocontrol Industry Meeting (ABIM) key industry event as Bronze Sponsor.

For further information, please see Attachment 4: EAS Regulatory Report on Biologicals

#### 5.1.1 Test System Development & Journal Publications

The EAS Group actively contributes to the development and adaptations of validated methods for regulatory testing. Over the past 20 years, the EAS Group has issued 16 scientific publications dealing with the Environmental Impact of modern agricultural practices. The topics range from laboratory to field tests, covering investigations of plant protection products on honey bees and wild bees, calculation of meaningful endpoints to assess pollinator testing, recommendations for a semi-field experimental design, and more.

##### Test System Development:

Title of the Master Thesis	Co-operation with University	Year
Standard toxicity testing of in-soil organisms in the laboratory using natural soils and OECD artificial soil	University of Koblenz – Landau	2020
Test Method Development to Investigate Ecotoxicological Effects of Chemical Substances On Herbivorous Lepidopteran Larvae	University of Koblenz – Landau	2019

##### Journal Publications:

Title of the paper	Name of the publication / scientific journal	Year
Honey bee testing in Southern Europe: From the laboratory to the relevant crop in the field	Bulletin of Insectology	2003
Coming in from the cold	Far Eastern Economic Review	2008
Field studies for the assessment of pesticides with soil mesofauna, in particular enchytraeids, mites and nematodes	Soil Organisms	2009
Lethal and sublethal toxic effects of a test chemical (ivermectin) on the yellow dung fly ( <i>Scathophaga stercoraria</i> ) based on a standardized international ring test	Environmental Toxicology and Chemistry	2009
Toxicity testing with the collembolans <i>Folsomia fimetaria</i> and <i>Folsomia candida</i> and the results of a ringtest	Danish Environmental Protection Agency	2009
Proposal of the ICPBR Bee Brood Group for testing and assessing potential side effects from the use of plant protection products on honey bee brood	Julius-Kühn-Archiv	2010
Results of an international ring test with the dung fly <i>Musca autumnalis</i> in support of a new OECD test guideline	Science of The Total Environment	2010
A framework for a European network for a systematic environmental impact assessment of genetically modified organisms (GMO)	BioRisk	2012
Occurrence and distribution of earthworms in agricultural landscapes across Europe with regard to testing for responses to plant protection products	Journal of Soils and Sediments	2013
Application of predefined doses of neonicotinoid containing dusts in field trials and acute effects on honey bees	Bulletin of Insectology	2015
Available methods for the sampling of nectar, pollen, and flowers of different plant species	Julius Kühn Archive	2015
Country-specific effects of neonicotinoid pesticides on honey bees and wild bees	Science	2017
Which Endpoints Can Be Reliably Assessed in Semi-field Pollinator Species Testing without Estimating False Positive or False Negative? MDD's and Replicates Issue	Journal of Agricultural Science and Technology	2018
RESULTS OF 2-YEAR RING-TESTING OF A SEMI-FIELD STUDY DESIGN TO INVESTIGATE POTENTIAL IMPACTS OF PESTICIDES ON THE SOLITARY BEES <i>OSMIA BICORNIS</i> (LINNAEUS, 1758) AND <i>OSMIA CORNUTA</i> (LATREILLE, 1805) (HYMENOPTERA, MEGACHILIDAE) AND A PROPOSAL OF A SUITABLE TEST DESIGN	Environmental Toxicology and Chemistry	2018
Two new species records of <i>Proprioseiopsis Muma</i> (Acari: Mesostigmata: Phytoseiidae) from Germany	Soil Organisms	2019
Celebrating 20 years of SETAC German Language Branch (GLB)	Environmental Science Europe	2019

**Table 3: Overview of test System Development and Journal Publications of EAS**

## 5.1.2 Conference Contributions & Ring Testing

Alongside our daily work, we are strongly involved in the scientific approach to further improving the knowledge and quality of (agro)chemical testing. As a member for many years of The Society of Environmental Toxicology and Chemistry (SETAC), we constantly present the results of our research in poster and oral presentations and we are also providing training courses.

Besides SETAC, we have also participated in seven ring tests of laboratory studies with pollinators and aquatic organisms. Those ring tests form the basis of the harmonisation of new guidelines for the registration of new crop protection products (Tab. 4).

We have also participated in a European research project on the effects of nanotechnology, called NanoMile. We have investigated the interactions of engineered nanomaterial mechanisms with living systems and the environment. The main goal was to evaluate the applicability of OECD guidelines for testing the ecotoxicological effects on various terrestrial invertebrates (earthworms, springtails, and soil mites) of selected nanoparticles that are currently suspected to have biological effects.

### Poster/Presentations:

Title of the Poster/Presentation	Conference	Year
Feasibility and reliability of assessing generative traits of (non-) crop species for regulatory testing under greenhouse conditions	Platform presentation at the 29th SETAC Europe Annual Meeting, Helsinki	2019
A comparison between vegetative and reproductive endpoints for Non-Target Terrestrial Plant studies with (non-) crop species in greenhouse and field	Poster presentation at the 29th SETAC Europe Annual Meeting, Helsinki	2019
Development of a test method for herbivorous lepidopteran larvae	Platform presentation at the 29th SETAC Europe Annual Meeting, Helsinki	2019
Aporrectodea caliginosa: A long-term laboratory study with different untreated and Copper treated field soils	Poster presentation at the 29th SETAC Europe Annual Meeting, Helsinki	2019

### Ring Testing:

Topic/short description	Comments	Year
Osmia ringtest (acute oral toxicity; Labor)	An acute oral ring test will be conducted in June 2018	2018
Bumble bee ringtest (chronic toxicity; Labor)	One or two chronic ring test(s) in autumn 2018 (number of replicates can vary)	2018
Glyceria ring test	2018 meeting at SETAC (already GLP studies running inhouse)	2018
Bioaccumulation <i>Hyalella</i>	Meeting at SETAC; planned 2018/2019	2018
RFID Homing-Flight ring test	Last RFID ringtest	2018
DIN EN ISO 10253 Comparative Test mit <i>Phaeodactylum tricornutum</i>	Participation in ring test/ Data submitted	2018
Ring test with the Oribatid mite <i>Oppia nitens</i> (Environment Canada)	Ring test completed, draft GL proposals submitted to Environment Canada and ISO, both are commented without major issues and will be finalised within due time	2018
Topic/short description	Comments	Year
Glyceria ring test	Finished and reported. Probably another ring test will follow 2020	2019
Bioaccumulation <i>Hyalella</i>	Ongoing – Lab test planned for 2019	2019
DIN EN ISO 10253 Vergleichstest mit <i>Phaeodactylum tricornutum</i>	Ongoing	2019
ISO/DIN 10872 - Determination of the toxic effect of sediment and soil samples on growth, fertility and reproduction of <i>Caenorhabditis elegans</i> (Nematoda)	Lab test August/September; data to be delivered latest 01.10.2019	2019
ISO Soil quality –Test for estimating organic matter decomposition in contaminated soil in the lab	Lab test starting in September; data to be delivered latest January 2020	2019

**Table 4: Overview of Presentations and Ring Testing Activities of EAS**

## 5.2 Environmental Protection Measures during Study Conduct

The Eurofins Group is committed to ensuring its systems and processes meet the highest environmental standards.

A major aspect of our business is accompanied by testing products under real-life farming conditions. This means we have to grow crops as a farmer would do. Contrary to a farmer, we aim to test and identify the profile of the individual products rather than optimising yields per hectare. Therefore, our guiding principle is to reduce farming inputs as much as possible to avoid unwanted environmental impacts caused by rain, wind or soil leaching.



To further advance our testing capabilities and expertise, we are also investing in digital tools to complement field trials based on data generation and real-world evidence models. These approaches are still in their infancy but will – similar to clinical trials – find their application in daily practice in the near future.

### 5.3 Resource Usage

The EAS Group is continuously investing in efficient laboratory and field equipment. Our laboratories are equipped with state-of-the-art technology.

Requirements for new equipment differ naturally between laboratory and field studies. In 2018, the units in the pilot scope invested in the newest machinery, equipment, computer or company cars in the range of 4%-10% (vs 2.5% -8.6% in 2019) of their net capex/revenue.

Waste management is performed according to respective regulations. Chemical waste is separately collected, ready-made and treated by an external authorised partner.

Energy consumption is monitored at each laboratory individually. The annual balance is based on the evaluation of the energy meters installed.

We are allowed to process our wastewater without any further treatment. However, we have installed carbon filters for wastewater treatment at our chemistry labs in Niefern as an internal safety measure to avoid unwanted contamination.

We also invest in green energy and are in the process to gradually switching to green energy for our facility operations.

*For further information, please see Attachment 2: Green Electricity Supplier*

In 2015/2016, an external energy audit was performed on three EAG Group entities: EAS Field Stade, EAS EcoChem and EAS Ecotox. The aim of the energy audit was to systematically inspect and analyse the energy usage and consumption, as well as to identify energy flows and the potential for energy improvements.

*For further information, please see Attachment 3: Energy Audit*

We also aim to equip the lighting system with LED step-by-step in order to optimise our energy consumption. The greenhouse and equipment hall at the site in Niefern already switched the existing system to LEDs.

By 2030, we will have increased the share of 'green electricity' by 100% by switching to suppliers offering environmentally friendly energy.

With regards to pollution, the majority of our contribution is made by our fleet. We have therefore taken the decision to substitute all vehicles below EU 5 by the end of 2020.

In addition, a bike-leasing pilot concept was introduced to encourage people to use bicycles for their commute instead of cars. The concept entails a financial participation from the company for each person who leases a bike. The bike can also be used for private purposes.

We have also introduced LEAN principles as part of our resource optimisation program. The major focus is to improve workflow, laboratory utilisation and the quality of data assessments. As next steps, we are currently investigating the implementation of a holistic electronic laboratory network. This would not only enable us to reduce paper use significantly, but also to further improve our laboratory operations, which in turn positively impacts the utilisation of energy.

The LEAN principle has also been applied towards our sample logistics, where we have established standardised transportation routes covering Europe with centralised bundled shipment of specimens. All shipments are temperature logged, using GLP data loggers, from collection to delivery. Barcode tracking improves visibility to exact specimen and package location.



## 6. Supplier Relationship

The Eurofins Group maintains a central purchasing department for all Eurofins companies to purchase supplies, chemicals, equipment and furniture.

A procurement standard has been set up for all of our suppliers. Each purchase order contains a reference to the Supplier Code of Ethics, which is obliged for each supplier. From 2020 onwards, every new framework agreement will include additional Ethical Conduct and Compliance guidelines.

*See Attachment 5: Eurofins Group Code of Ethics*

*See Attachment 6: General Terms and Conditions of Purchase*

## 7. Outlook: Sustainability as a Journey

In line with the understanding of Sustainability as a journey, we see two main directions for advancing towards a more sustainable future at EAS:

- 1) Rolling out Sustainability beyond the Pilot Scope
- 2) Making progress with regard to our sustainability goals

### 7.1 Rolling out Sustainability beyond the Pilot Scope

In line with and in addition to applicable law, the Eurofins Group has defined its ethical standards in the Eurofins Group Code of Ethics Policy and related policies. These are rolled out to all legal entities via appropriate shareholder and board resolutions. These policies are a prerequisite for sustainable development, but they are also just the start.

Next steps include:

- A steady training process on the Code of Ethics via the Eurofins Academy to ensure all employees are familiar with our ethical standard;
- The successive roll-out of the sustainability indicators presented in this report beyond the pilot scope – initially targeting all European operations before building a worldwide database for sustainability; and
- The integration (and where missing, initiation) of actions to demonstrate that the progress described in this report is achieved regionally and ultimately globally.

## 7.2 Making Progress with Regard to our Sustainability Goals

We want to ensure sustainable development by achieving the sustainability goals outlined in section 3.4 of this report.

Based on the insight that only what can be measured can be systematically improved, EAS Group has defined indicators as guiding principle for continuous improvement, the performance level of which is easily quantifiable. They further reflect the most topical areas of sustainability that were previously identified in the Materiality analysis (see 3.3):

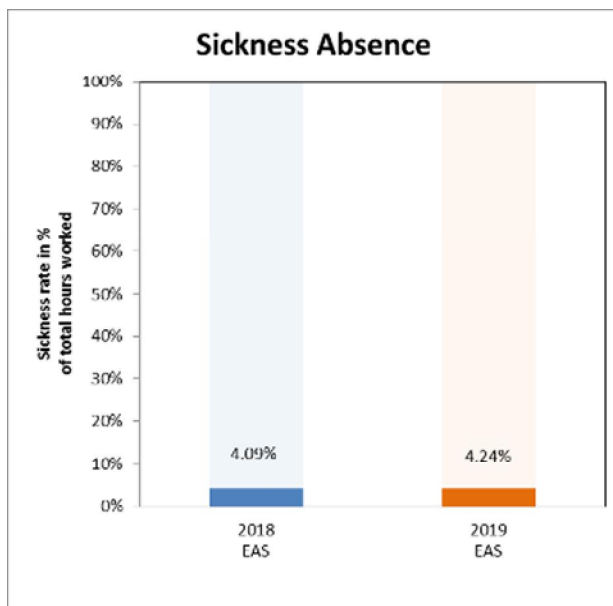
SDG area	Goals	Indicators	Targets 2023
Sustainable use of natural resources (SDG 12)	<ol style="list-style-type: none"> <li>1. Develop new study designs to evaluate the environmental impact of farming practices in general and, in particular, agrochemicals use</li> <li>2. Support the environmental evaluation of chemicals under REACH</li> <li>3. Reduce the CO<sub>2</sub> footprint of EAS business operations</li> </ol>	<ol style="list-style-type: none"> <li>1. Participation in ring tests for new test systems required for new EFSA agchem guidelines (non-target terrestrial plants, soil organisms, non-target arthropods, pollinators)</li> <li>2. Number of REACH substances tested</li> <li>3. a) Determine the Carbon Footprint of EAS' operations in Germany b) Share of green electricity c) Vehicle meeting at least EU 5 emission standard by the end of 2020</li> </ol>	<ol style="list-style-type: none"> <li>1. Participated in 100% of relevant ring tests; in addition: scientific papers &amp; publications (incl. posters, presentations at conferences)</li> <li>2. Yet to be defined based on market analysis and business planning</li> <li>3. a) Conduct a Carbon Footprint Analysis of EAS' operations in Germany b) Double compared to 2019 c) 100%</li> </ol>
Participation of employees and working conditions (SDG 3)	<ol style="list-style-type: none"> <li>4. Support employee health</li> <li>5. Provide a safe workplace</li> <li>6. Improve employee engagement and talent retention</li> <li>7. Drive gender equality</li> <li>8. Maintain regular dialogue with employees and their representatives</li> </ol>	<ol style="list-style-type: none"> <li>4. Sickness absence</li> <li>5. Absence due to Lost Time Injury in % of time</li> <li>6. Regular employees' average job tenure</li> <li>7. Female share of newly appointed leaders proportional to share in workforce</li> <li>8. % of entities which have regular dialogue with employees and/or employee representatives</li> </ol>	<ol style="list-style-type: none"> <li>4. Keep &lt;5%</li> <li>5. Keep &lt;0.1%</li> <li>6. +1.5 year vs. 2020</li> <li>7. New female leader share +/- 10% of share in workforce</li> <li>8. 100%</li> </ol>

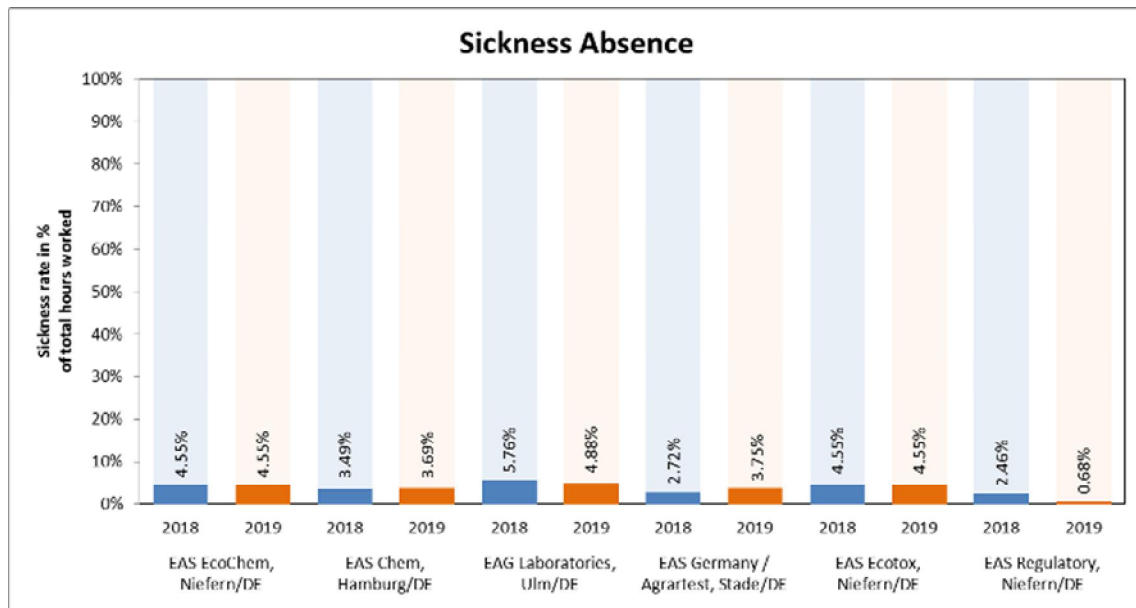
We look forward to further continue on the path to improved sustainability of our operations and an even greater contribution to sustainable agriculture and chemicals use.

## Appendix 1: Measurements – Health and Safety –

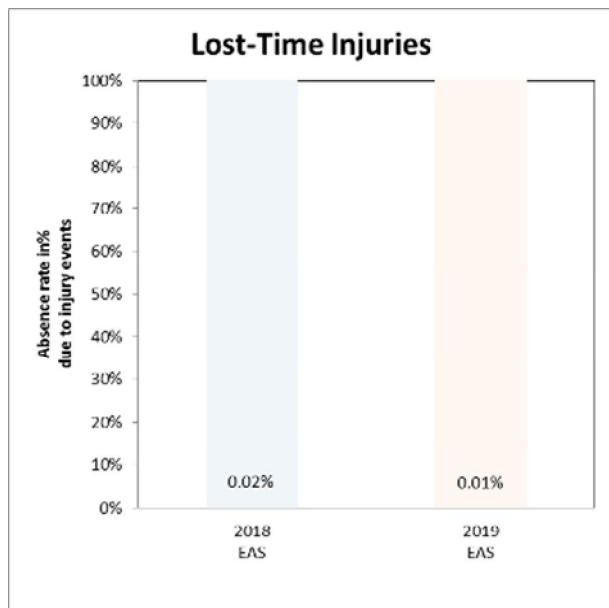
One of the indicators of working conditions is the company's sickness absence rate. The Group had a total sickness absence rate of 4.24% in 2019, comparable to a sickness rate of 4.1% in 2018. The sickness rate at the EAS Group lies considerably below the average level, which in Germany is roughly 5%, or 10.9 working days. It is generally assumed that there is a link between working conditions and absence due to sickness.

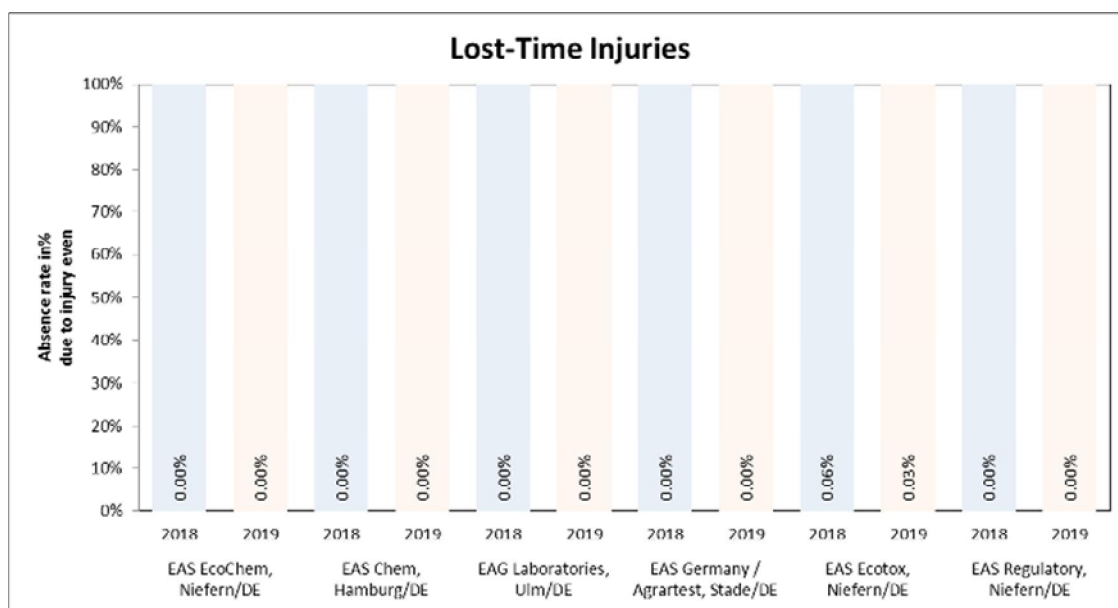
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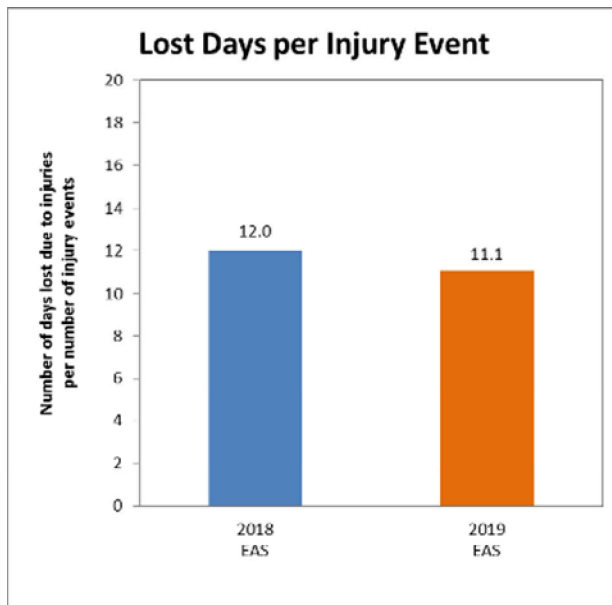


In 2018, EAS Ecotox Niefern/DE had a high number of 126 days lost due to injury. This number is based on the injury of one person following a non-work-related accident. However, the absence rate in % due to injury events is considerably below 0.1%.

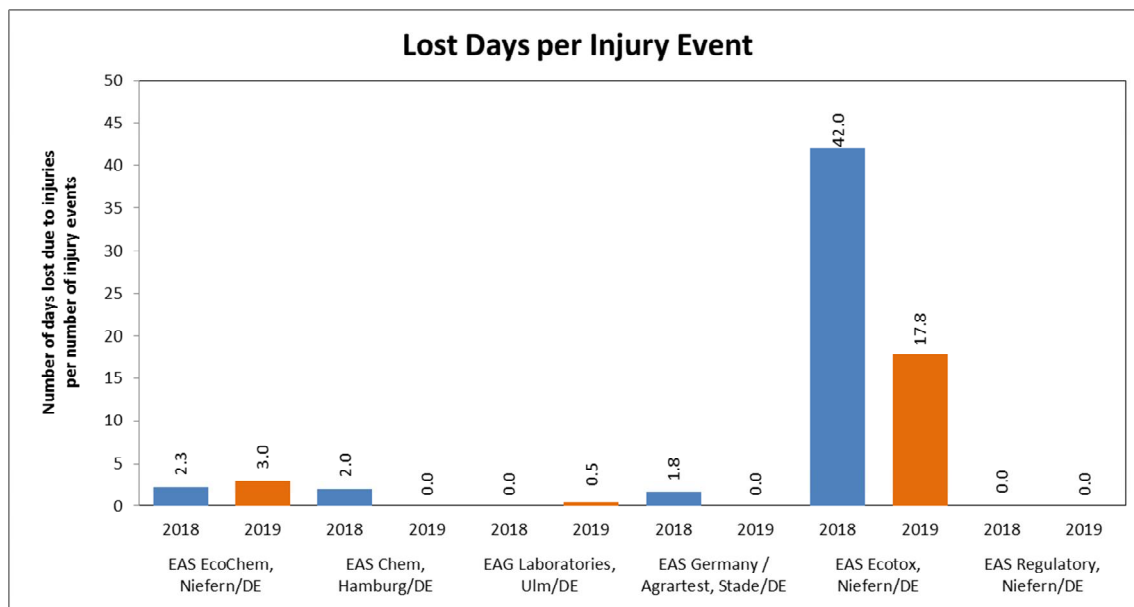




The number of days lost due to injuries per number of injury events over all entities decreased slightly from 12 days in 2018 to 11 days in 2019. To ensure this trend continuous in the future, we will continue to implement measures towards optimisation in the area of occupational safety and health.







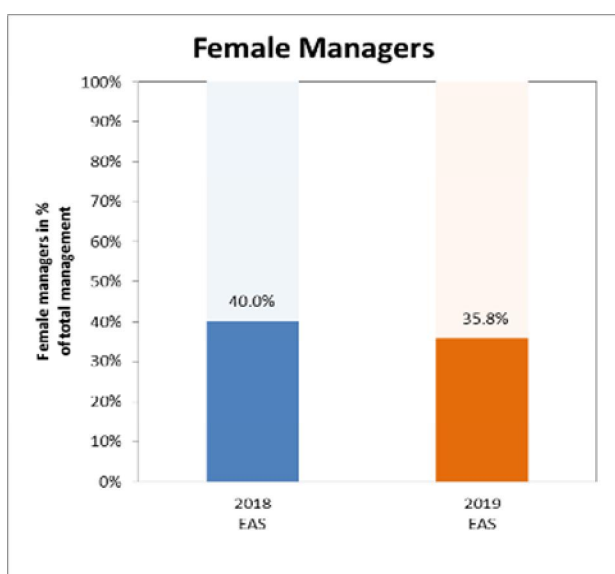
## Appendix 2: Measurements - Gender Equality -

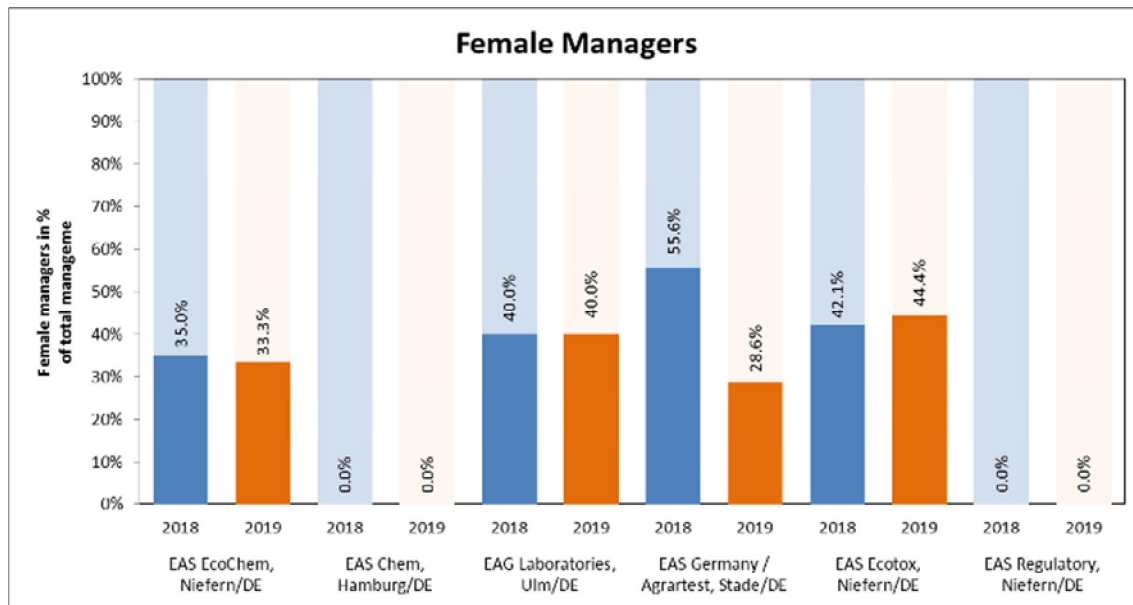
In 2018, women accounted for 259 out of 519 total employees in the pilot scope, i.e. 50%. 40% of positions with management responsibilities in the pilot groups were held by women. The total management board comprises 55 members, 22 of whom are women.

2019 shows a similar picture. The share of female managers decreased slightly to 36% against a stable share of women in the workforce, at 265 females out of 527 total employees. The total management board comprises 53 members, 19 of whom are women.

The share between business units still fluctuates, with no female board members at EAS Chem Hamburg and EAS Regulatory Niefern.

In the future, we want to encourage and promote more women into leadership positions, by maintaining the existing good balance and improving it where it is still below the desired level. We believe that equal opportunities should manifest themselves in the gender balance of new leadership placements, which we aim to lie within +/- 10% of the gender share of the entire workforce.





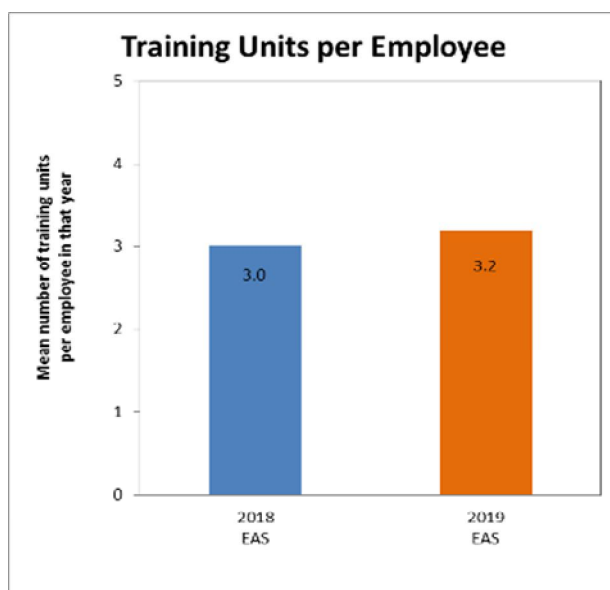
### Appendix 3: Measurements – Training –

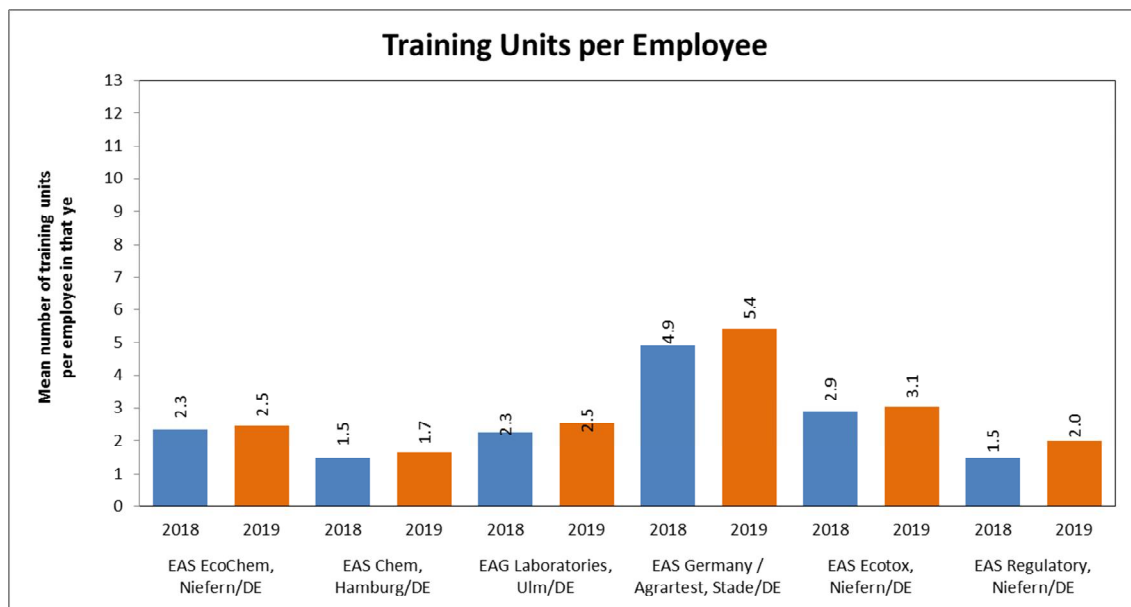
Our workforce is among the company's best assets. The individual professional and personal training and continuing education of our employees play a significant role at EAS Group. This allows us to identify abilities and promote from within the company.

Trainings are given in units. A training unit can range from an hour up to several days. As of now, some training records are documented on paper and are not enclosed in the data given below. The final numbers are therefore higher and we will now start to collect all training data electronically. From 2020 onwards, this will be extended to all trainings received.

In 2018, 1565 training units have been taken by administration, support, technical/scientific staff, Quality Assurance and management. This results in a mean number of 3.0 training units per employee.

In 2019, this increased to 1687 total training units, with 3.2 training units per employee.





Technical and scientific trainings are the bulk of our training programs.

In 2018 - Technical staff have been trained in 438 units, which accounts for 28% of the total 1565 training units.

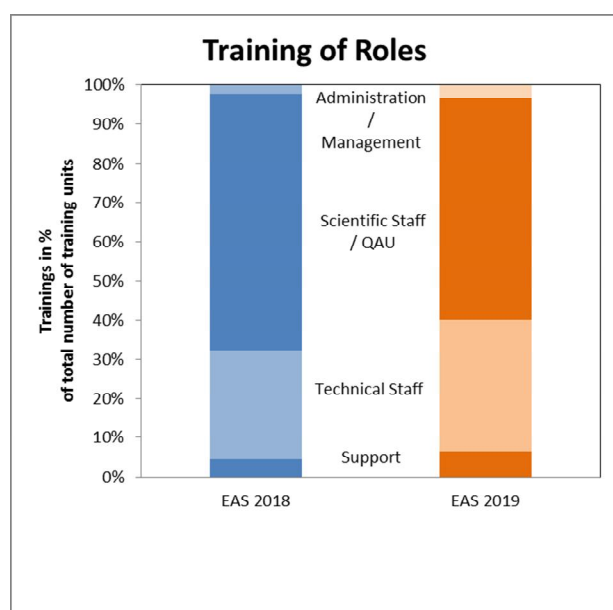
In 2019 – Technical staff have been trained in 574 units, which accounts for 34% of the total 1687 training units.

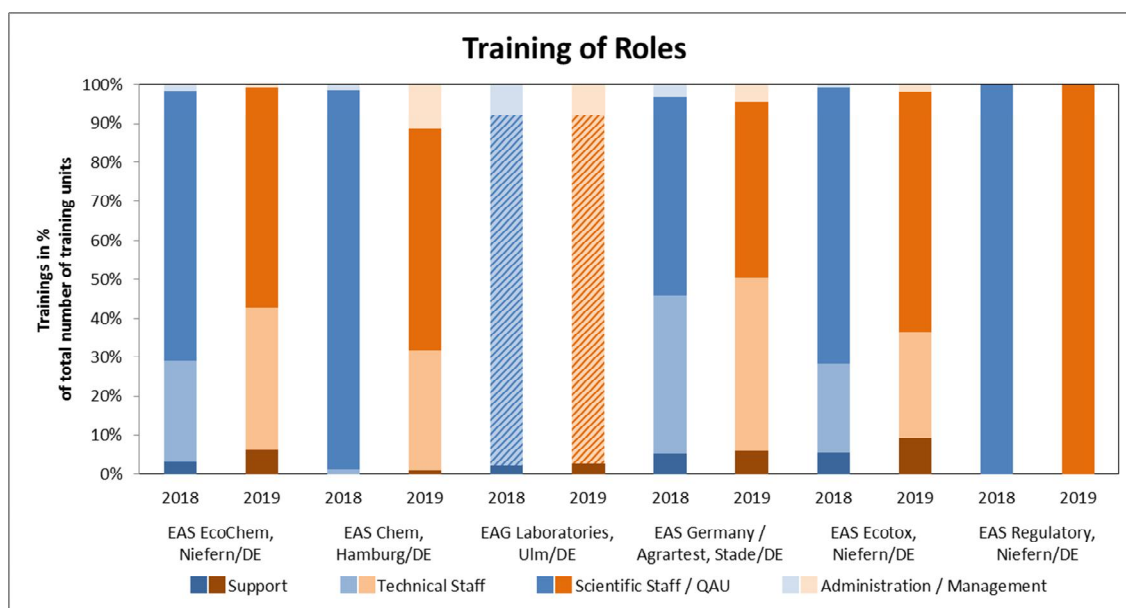
In 2018 - Scientific staff / Quality Assurance have been trained in 1024 training units, which accounts for 65.4% of the total 1565 training units.

In 2019 – Scientific staff / Quality Assurance have been trained in 950 training units, accounting for 56.3% of the total 1687 training units.

EAG Laboratories Ulm did not discriminate between technical/scientific personnel.

For EAS Regulatory, the main bulk of the trainings were scientific.







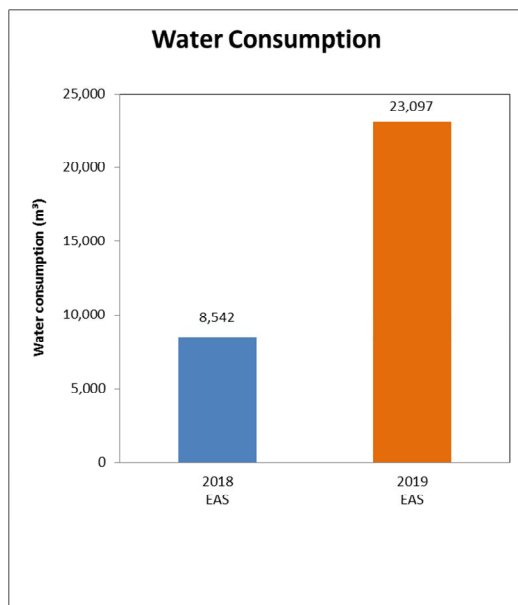
## Water– and Electricity consumption

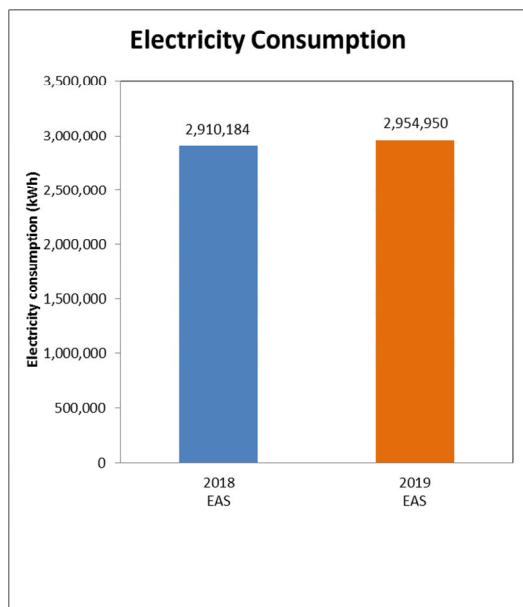
Below are the overall water and electricity consumption data for 2018 and 2019.

At the moment, we receive our water and energy from local suppliers. One site, EAS Field Stade, switched to 'green' energy.

*For further information, please see Attachment 2: Green Electricity Supplier*

We aim to increase the percentage of our renewably sourced electricity as soon as it's practicable to do so.

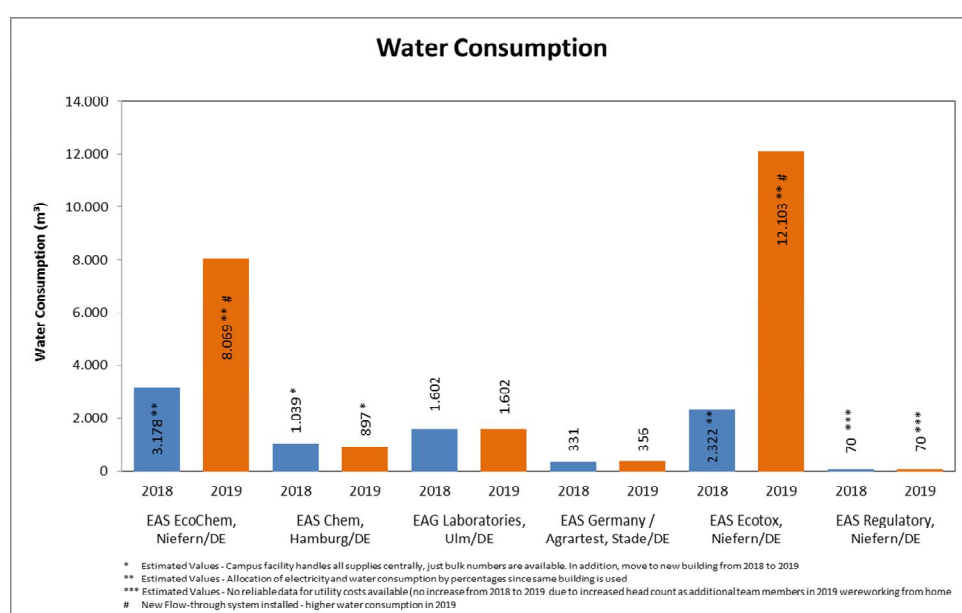


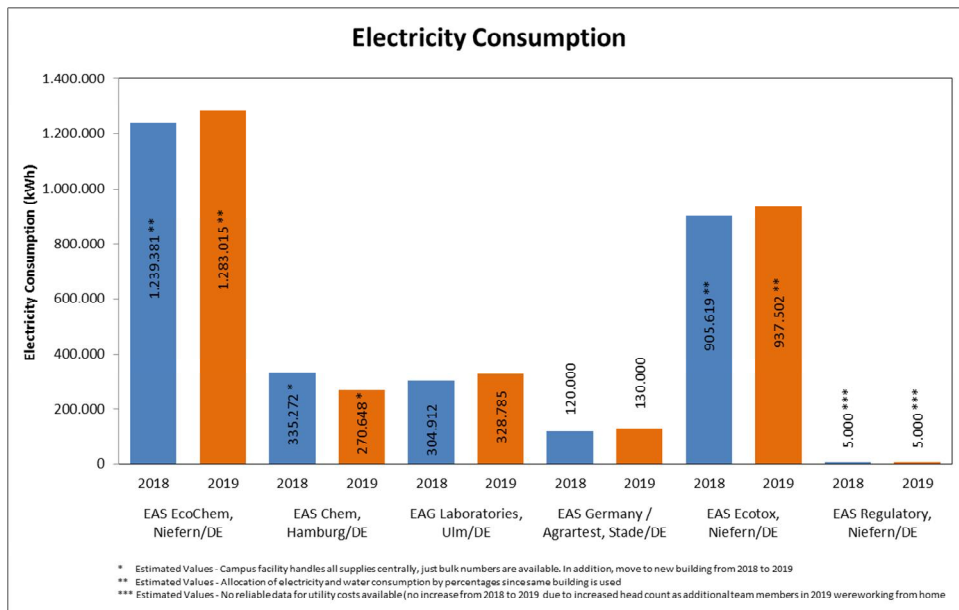


EAS Chem Hamburg is located on the Eurofins campus, a site with various Eurofins entities. The campus facility handles all supplies centrally. In addition, EAS Chem moved to a new building on the campus between 2018 and 2019. Therefore, the bulk numbers below are provided by the campus facility.

EAS EcoChem and EAS Ecotox are sharing the same building in Niefern. The allocation of water and electricity consumption is presented as a percentage. What can be seen is that water consumption considerably increased in 2019. This is due to the new flow-through construction in the aquatic lab for testing endocrine effects of (agro)chemicals on water organisms. Flow-through systems are used only when required to ensure a scientifically valid assessment of the impact of certain exposure levels of a substance on aquatic organisms (e.g. to ensure targeted exposure when a substance hydrolyses fast). The related studies are performed in the interest of assessing the sustainability of using the tested (agro)chemicals.

EAS Regulatory water and energy consumption data are estimated numbers based on percentage allocation to the Niefern premises and business units. The regulatory team have the option to work in the office or from home.





## Attachment 1: Flowering Areas at EAS Group to support Biodiversity

Eurofins Agroscience Services GmbH · Carl-Goerdeler-Weg 5 · D-21684 Stade

Eurofins Agroscience Services GmbH started a new initiative to make our research trials environmentally more friendly by drilling flowering strips for bees and insects around 3 of our major test sites:



Test site	Location	GPS Coordinates	Seed mix
1	Ohrensen	53.4886402602399, 9.48208937804218	AGRAVIS Honigbrache: 23 % Alexandrinerklee 20 % Sonnenblumen 13 % Buchweizen escul. 13 % Perserklee; 10 % Phacelia 8 % Serradella; 3 % Koriander 3 % Malve; 3 % Ölrettich 2 % Dill; 2 % Ringelblume
2	Dollern	53.546160799921, 9.50372058100071	
3	Burweg	53.618837432294, 9.27606570694678	

### Managing Directors:

Dr. Marcus Balluff  
Jörg Hempelmann

Registered office: Stade  
District court: Tostedt  
HRB 203056

### Bank Details:

UniCredit Bank AG  
Arabellastr. 14  
D-81925 München, Germany  
SWIFT/BIC: HYVEDEMM17  
IBAN: DE28207300177000002500

Tax No.: 43/201/14654  
VAT No.: DE 278592334

### Eurofins Agroscience Services GmbH

Carl-Goerdeler-Weg 5  
D-21684 Stade  
Fon: +49 (0) 4141 / 8003-0  
Fax: +49 (0) 4141 / 8003-20  
e-mail: EAS\_Germany@eurofins.com  
www.eurofins.com/agrosciencservices

Eurofins Agroscience Services Ecotox GmbH · Eutinger Straße 24 · D-75223 Niefern-Öschelbronn

Eurofins Agroscience Services Ecotox GmbH runs pollinator field studies since 1992. Fields are rented from local farmers to grow cultures attractive for pollinators.

We use these fields for performing field tests with plant protection products. Each year, several ha of the cultures are not treated with plant protection products as they are used as control plots and reserve crop.

The main crop we use in summer is *Phacelia*, a good nectar and pollen source. We always plant more area than needed for the study to further support biodiversity on our study sites.



Study sites with untreated crop and test tunnels

<i>Phacelia</i> Year 2018		
Farmer/Location	Area in ha for tunnel studies	Area in ha for field studies
B. / Pforzheim	3	
R. / Pforzheim	2	
H. / Pforzheim	2,5	
J. / Stutensee	1,9	2,4
L. / Stutensee	2,75	4,2
S. / Pforzheim	3	
<b>Total area planted [ha]:</b>	<b>15,15</b>	<b>6,6</b>
<b>Untreated areas [ha]:</b>	<b>3,8</b>	<b>2,4</b>

<i>Phacelia</i> Year 2019		
Farmer/Location	Area in ha for tunnel studies	Area in ha for field studies
B. / Pforzheim	2	
R. / Pforzheim	2	
H. / Kraichtal	2,6	
W. / Heilbronn	1	
H. / Maulbronn		2,1
J. / Stutensee	3	2
L. / Stutensee		2
Schm. / Pforzheim	2	
Sa. / Weingarten		2
Schw. / Dürrn		2
K. / Pforzheim	2	
<b>Total area planted [ha]:</b>	<b>14,6</b>	<b>10,1</b>
<b>Untreated areas [ha]:</b>	<b>3,4</b>	<b>4,0</b>

**Managing Director:**

Dr. Marco Candolfi  
Dr. Friedrich Knecht

Registered office: Niefern  
District court: Mannheim  
HRB 722860

**Bank Details:**

UniCredit Bank AG  
Arabellastr. 14  
D-81925 München, Germany  
SWIFT/BIC: HYVEDEMM17  
IBAN: DE26207300177000003700

Tax No.: 48/051/24277  
VAT No.: DE 301348781

**Eurofins Agrosience Services Ecotox GmbH**

Eutinger Straße 24  
D-75223 Niefern-Öschelbronn  
Fon: +49 (0) 7233 / 9627-0  
Fax: +49 (0) 7233 / 9627-680  
e-mail: [info\\_niefern@eurofins.com](mailto:info_niefern@eurofins.com)  
[www.eurofins.com/agrosienceservices](http://www.eurofins.com/agrosienceservices)



Eurofins Agrosience Services Chem GmbH Am Neuländer Gewerbepark 2 D-21079 Hamburg

With great commitment and love for nature, Eurofins employees and their families have transformed parts of the Hamburg company premises into an ecologically valuable bee pasture.

Due to the different flowering periods of the plants, insects will find food around the year. In addition, the children have busily drilled holes in some deadwood trunks. These are set up in spring and can then be colonized by wild bees and other beneficial insects. The initiative was rounded off with the construction of several new birdhouses and a garbage collection campaign.

All roofs of the laboratory buildings of EAS Chem on the Eurofins analytical campus in Hamburg are completely vegetated, mostly with bee-relevant flowering plants.

They have just been "winterized", i.e. gardeners have removed all the dried-out, higher-growing flowering plants which have been re-seeded for next season.

Another contribution to a better ecological balance is the manifold of water basins, canal and a natural pond next to the main reception.



**Managing Director:**

Dr. Frank Bodzian  
AG Hamburg, HRB 103943  
VAT No.: DE815042871

**Bank Details:**

UniCredit Bank AG  
Arabellastr. 14  
D-81925 München, Germany

Account No. (Konto-Nr.): 7000 001 750  
Bank sorting code (BLZ): 207 300 17  
IBAN: DE05 2073 0017 7000 0017 50  
SWIFT Code: HYVEDEMM17



## Attachment 2: Green Electricity Supplier

### Vertragsbestätigung

Vertragsstelle: Carl-Goerdeler-Weg 5, 21684 Stade

02. Jan. 2020



Stromio GmbH - Postfach 14 63 - 39004 Magdeburg

03 3047 6500 09 E000 C3FD

DV 12.19 0,80 Deutsche Post



\*319260\*\*K4007\*\*P27\*\*3174

Eurofins Agrosience Services GmbH

Carl-Goerdeler-Weg 5  
21684 Stade

Stromio GmbH

Postfach 14 63

39004 Magdeburg

E-Mail kundenservice@stromio.de

Telefon 0800 3331188

Fax 0800 3330102

Kostenlos aus dem dt. Festnetz  
Service-Zeiten: Mo - Fr, 7-19 Uhr, Sa, 9-16 Uhr

Bestellnummer 22250022

### Ihre Vertragsbestätigung - Willkommen bei Stromio

25.12.2019

Sehr geehrte Damen und Herren,

wir freuen uns, dass Sie sich für einen günstigen Tarif von Stromio entschieden haben und danken Ihnen für Ihr Vertrauen. Gerne bestätigen wir Ihnen hiermit das Zustandekommen Ihres Stromlieferungsvertrages. Wie versprochen übernehmen wir jetzt alle notwendigen Formalitäten. Dazu gehören die Anmeldung beim zuständigen Netzbetreiber und - sofern Sie Ihren alten Liefervertrag nicht bereits selbst gekündigt haben - auch die Kündigung bei Ihrem Vorversorger.

### Ihre Stromlieferung beginnt voraussichtlich am 21.01.2020.

Sobald uns der verbindliche Lieferbeginn von Ihrem Netzbetreiber bestätigt wurde, teilen wir Ihnen diesen in einer gesonderten Lieferbestätigung mit. Aufgrund der gesetzlichen Fristen beim Anbieterwechsel kann dies unter Umständen erst wenige Tage vor Beginn der Stromlieferung der Fall sein. Ihre Vertragslaufzeit beginnt selbstverständlich erst mit Beginn der Stromlieferung und während des Anbieterwechsels kann es zu keinem Zeitpunkt zu einer Stromunterbrechung kommen - das ist gesetzlich garantiert.

Auf der zweiten Seite dieses Schreibens haben wir die Details Ihres Auftrags noch einmal aufgeführt.

Haben Sie noch Fragen? Unsere Kundenbetreuung steht Ihnen gerne zur Verfügung. Benutzen Sie dazu einfach und bequem unser Kontaktformular unter [www.stromio.de/kontakt-strom](http://www.stromio.de/kontakt-strom). Telefonisch sind wir unter 0800 3331188 montags bis freitags von 7 bis 19 Uhr und samstags von 9 bis 16 Uhr erreichbar, Feiertage ausgenommen. Ein Anruf ist aus dem deutschen Festnetz kostenlos.

Freundliche Grüße nach Stade

Ihr Stromio Serviceteam

Dieses Schreiben wurde maschinell erstellt und ist ohne Unterschrift gültig.

Bankverbindung:  
Aareal Bank AG  
Konto 0 414 135 389  
BLZ 550 104 00  
IBAN DE75 5501 0400 0414 1353 89  
BIC AARBDE33WDOM  
Gläubiger-ID DE95ZZZ00000140461

Sitz der Gesellschaft:  
Girmes-Kreuz-Str. 55  
41564 Kaarst  
Geschäftsführer:  
Ormer Varol  
Amtsgericht Neuss  
HRB 17224  
USt-IdNr. DE815091293

## Attachment 3: Energy Audit

### Energieauditbericht Teil C – Energiebericht (Standortbericht)

#### 4.4 Analyse des Energieverbrauchs

##### 4.4.1 Energieverbrauch auf Basis der eingesetzten Energieträger

Die Verbräuche bezogen auf die eingesetzten Energieträger wurden wie in Anlage 1 beschrieben aus den Rohdaten (vgl. Kapitel 4.3.1) ermittelt und sind in Tabelle 5 dargestellt.

Tabelle 5: Eingesetzte Energieträger

Energieträger	Energie- verbrauch [kWh]	Standort interner Anteil [%]	Energie- kosten [€]	Standort interner Anteil [%]
Strom	46.657	14,1	10.139,36	26,2
Wärme	74.708	22,5	4.358,60	11,3
Kraftstoffe	210.501	63,4	24.201,07	62,5
<b>Summe</b>	<b>331.866</b>		<b>38.699,03</b>	

#### Lastganganalyse

Zur Bewertung des Lastgangs lagen keine Daten vor.

Gibt es untypische Energieverbrauchsverläufe oder Abweichungen?

<input type="checkbox"/> Ja	<input checked="" type="checkbox"/> Nein		
-----------------------------	--	--	--

#### Energiekennzahlen

Die Vergleichbarkeit der Energieverbräuche kann für Liegenschaften mit vergleichbaren Tätigkeiten vor Ort über Energiekennzahlen erfolgen.

Auf die Ermittlung von Energiekennzahlen wurde im Rahmen des Audits verzichtet, da eine Vergleichbarkeit der Liegenschaften aufgrund der unterschiedlichen betrieblichen Strukturen nicht gegeben ist.

## Energieauditbericht Teil C – Energiebericht (Standortbericht)

### 5 Möglichkeiten zur Verbesserung der Energieeffizienz

Ausgehend von der Datenerfassung wurden die wichtigsten Energieverbraucher einer Bewertung unterzogen (vgl. Kapitel 4), auf deren Basis systematisch nach möglichen Maßnahmen zur Verbesserung der Energieeffizienz gesucht wurde.

Im Zuge des Energieaudits wurden so in den nachfolgenden Bereichen energetische Effizienzpotenziale festgestellt und ggf. mit möglichen Maßnahmen zur Steigerung der Energieeffizienz hinterlegt. Diese wurden anschließend einer Wirtschaftlichkeitsuntersuchung gemäß den geltenden Unternehmensvorgaben unterzogen (vgl. Kap. 2.3). Die entsprechenden Unterlagen sind so abgelegt, dass die Bewertung der Maßnahmen bei Bedarf zurückverfolgt und überprüft werden kann. Die für diesen Standort gefundenen möglichen Effizienzmaßnahmen werden im Folgenden beschrieben. Identifizierte ggf. geeignete Energieeffizienzmaßnahmen werden in dem Maßnahmenplan in der Zusammenfassung des übergeordneten Berichtes (Kapitel 1) noch einmal dargestellt.

a. Effizienzpotenziale im Produktionsbereich

☒ Ja ☐ Nein

Überprüfung der Kühl- und Gefrierschränke auf Alter, angemessene Größe und eingestellte Temperatur.

b. Effizienzpotenziale bei Querschnittstechnologien (z.B. elektrische Antriebe/Motoren, Druckluft, etc.)

☐ Ja ☒ Nein

c. Effizienzpotenziale im Gebäudebereich (z.B. Hülle, Lüftung/Klimatisierung, Heiz-/Warmwassersystem, Beleuchtung, etc.)

☒ Ja ☐ Nein

Im Bereich Beleuchtung gibt es ein Potenzial (siehe Bewertung Anlage 3)

Die Maßnahmen in diesem Bereich:

- Optimierung der Lampenanzahl und Austausch durch LED-Technik

Die wirtschaftliche Berechnung basiert auf der reduzierten Anzahl der Lampen und des geringeren Verbrauches der neuen Beleuchtung.

a. Effizienzpotenziale im Bereich der Informations- und Kommunikationstechnik (z.B. Bürogeräte, Rechenzentrum)

☐ Ja ☒ Nein

b. Sonstige Effizienzpotenziale (z.B. Transport, Sonstiges)

☐ Ja ☒ Nein



## Attachment 4: EAS Regulatory Report on Biologicals

Eurofins Agroscience Services Ecotox GmbH · Eutinger Str. 24 · D-75223 Niefern-Öschelbronn

### Eurofins Agroscience Services – Registration Services for Biologicals

#### Introduction

Biologicals, i.e. biopesticides (*aka* bioprotectants<sup>1</sup>), biostimulants and biofertilizers, are beneficial products which are designated to improve plant health. Due to global challenges to secure the availability of food which is safe for consumers and produced in a sustainable way, political agendas on the European<sup>2</sup> and EU Member State level<sup>3</sup> have been adapted accordingly in recent years and are promoting the development and use of these innovative "eco-friendly" alternatives.

The Eurofins Agroscience Services group with its affiliates have been supporting the manufacturers of biologicals since the early 90s, when the legacy company at the Niefern campus (GAB Biotechnologie GmbH) was engaged in the research, development and regulatory testing of the first microbial active substances for approval as active substances under Directive 91/414/EEC. The extensive experience and track record of Eurofins support is well documented in the public domain, i.e. reference list of numerous EU assessment reports up until today.

While conventional plant health products will remain indispensable in the coming years to meet the global food demand, Eurofins Agroscience Services group is committed to continue to make its contribution for a more diverse and sustainable agriculture by providing expert services to industry for the development and registration of biologicals.

#### Registration support services

The Eurofins Agroscience Services group with its German affiliates

- Agrartest GmbH (Germany),
- EAG Laboratories GmbH (Germany),
- Eurofins Agroscience Services GmbH (Germany),
- Eurofins Agroscience Services EcoChem GmbH (Germany),
- Eurofins Agroscience Services Ecotox GmbH (Germany),
- Eurofins Agroscience Services Chem GmbH (Germany),
- Eurofins Agroscience Services Regulatory GmbH,

as well as other entities, is providing the core service elements for the development and registration of biologicals listed below, in particular for biopesticides / bioprotectants. Regulatory support is provided for active substance and product approval for natural substances (mainly inorganic natural compounds minerals, plant / microbial extracts), microbials (bacteria, fungi, viruses) and semiochemicals (pheromones).

Regulatory testing<sup>4</sup>:

- Efficacy screening in laboratory and greenhouse for early stage candidates
- Small and large plot efficacy studies
- Field demonstration platforms for marketing purposes
- Effects on quality and taints on harvested produce

<sup>1</sup> See definition acc. to IBMA Global (<https://www.ibma-global.org/upload/attach-image/ibma-definition-leaflet-web.pdf>)

<sup>2</sup> [https://ec.europa.eu/food/farm2fork\\_en](https://ec.europa.eu/food/farm2fork_en)

<sup>3</sup> <http://news.agropages.com/News/NewsDetail---36316.htm>

<sup>4</sup> Testing is carried out in compliance with applicable national and local laws and regulations, and recognized international quality and safety standards applicable to the proposed work.

#### Managing Director:

Dr. Marco Candolfi  
Dr. Friedrich Knecht

Registered office: Niefern  
District court Mannheim  
HRB 722860

#### Bank Details:

UniCredit  
Bank Code: 207 300 17  
Account No.: 700 000 370 0  
Swift-Code: HYVEDEMM17  
IBAN Code: DE26 2073 0017 7000 0037 00  
VAT No.: DE 301 348 781

#### Eurofins Agroscience Services Ecotox GmbH

Eutinger Straße 24  
D-75223 Niefern-Öschelbronn  
Fon: +49 (0) 7233 / 9627-0  
Fax: +49 (0) 7233 / 9627-680  
Email: [info\\_niefern@eurofins.com](mailto:info_niefern@eurofins.com)

<http://www.eurofins.com/agroscienceservices>

- Residue & metabolism studies
- Human safety studies
- Environmental safety studies
  - Terrestrial ecotoxicology
  - Aquatic ecotoxicology
  - Environmental fate
- Product chemistry studies
  - Identity
  - Phys.-chem. Properties
  - Analytical methods

Regulatory consulting:

- Regulatory advice, data gap analysis and waiving strategies
- Risk assessments (human & environmental safety)
- Dossier preparation and follow-up

The objective of the Eurofins proposition is to offer an integrated service package ("one-stop service" proposition) tailored to the needs of its clients. Based on the diversity of the biologicals industry ranging from academic spin-offs to multinational companies, individual requirements are different. In case of new active substances or products, companies regularly rely on Eurofins regulatory consulting as part of the regulatory / financial due diligence at the critical stage of research and development.

Following the initial regulatory assessment (data gap analysis) and preparation of a regulatory roadmap, Eurofins supports with the data generation in a coordinated manner. A dedicated project management / supervisory system with regular progress updates, exchange among experts, and issue management helps to keep track of costs and timing to reach agreed project milestones and to minimise deviations.

The Eurofins regulatory team together with the senior study directors provide their blend of experience from a large number of diverse registration projects. Companies developing biologicals benefit from the expertise of Eurofins staff, actively contributing in the development and adaptation of validated methods for regulatory testing by the participation in ring tests<sup>5</sup> and the development of new testing protocols<sup>6</sup> for almost three decades.

The integrated service approach with expert guidance from the research & development stage until regulatory approval of the substance / product is contributing to the sustainability of the business of both, clients and Eurofins as a service supplier, due to increased transparency and process control, which allows to save resources in terms of testing animals, supplies and corresponding costs.

<sup>5</sup> [EAS Ecotox: Ringtest solitary bee (*Osmia bicornis*) acute contact for ICPPR working group non-Apis published in [https://www.openagrar.de/receive/openagrar\\_mods\\_00040854](https://www.openagrar.de/receive/openagrar_mods_00040854)

Development of Semi-field testing for bumble bees and solitary bees 2017 and 2019 published in:

"RESULTS OF 2-YEAR RING-TESTING OF A SEMI-FIELD STUDY DESIGN TO INVESTIGATE POTENTIAL IMPACTS OF PESTICIDES ON THE SOLITARY BEES *OSMIA BICORNIS* (LINNAEUS, 1758) AND *OSMIA CORNUTA* (LATREILLE, 1805) (HYMENOPTERA, MEGACHILIDAE) AND A PROPOSAL OF A SUITABLE TEST DESIGN" by Franke, Lea et al. (ETCJ-Feb-20-00066.R2), Environmental Toxicology and Chemistry.

<sup>6</sup> [EAS Ecotox: OECD Test No. 246: Bumblebee, Acute Contact Toxicity Test (2017); OECD Test No. 245: Honey Bee (*Apis mellifera* L.), Chronic Oral Toxicity Test (10-Day Feeding) (2017); OECD Test No. 246: Bumblebee, Acute Contact Toxicity Test (2017);

ISO 23266:2020 (en) Soil quality — Test for measuring the inhibition of reproduction in oribatid mites (*Oppia nitens*) exposed to contaminants in soil (2019)

### Support for industry associations and events

Apart from the contribution to the improvement of suitable regulatory testing designs, the Eurofins Agroscience Services group is also supporting the International Biocontrol Manufacturers Association (IBMA) as the major industry organisation as a member and by active participation in the Professional Group for Natural Substances<sup>7</sup>. The group is providing technical support to the IBMA Executive Committee and to policy makers and regulatory authorities to properly apply scientific principles to adapt data requirements for substances falling into this category with the aim to facilitate their approval.

Eurofins is also participating in the key industry event for biologicals, the Annual Biocontrol Industry Meeting (ABIM)<sup>8</sup> as an exhibitor for the fifth consecutive time. For the 2020 release Eurofins decided to support the event as a Bronze Sponsor, in recognition of the importance of the event as a meeting place of the biocontrol industry and the challenges imposed on the organisers by the COVID-19 pandemic.

### Conclusion and Outlook

The Eurofins Agroscience Services group is engaged in the development and use of environmentally and climate-friendly products, processes and technologies. Based on the continuously increasing demand for "biosolutions" in agriculture, in particular for biopesticides / bioprotectants and biostimulants. Eurofins is substantially expanding its capacities for regulatory testing and consulting in this sector.

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<sup>7</sup> <https://www.ibma-global.org/en/natural-substances>

<sup>8</sup> <https://www.abim.ch/home.html>

## Attachment 5: Eurofins Group Code of Ethics



# The Eurofins Group Supplier Code of Ethics

Our customers expect us to be exemplary in our integrity in rendering our services and carrying out our business, and so untainted integrity is one of our most important assets.

*Message from Eurofins CEO, Dr. Gilles Martin*



April 2020





Integrity is at the heart of the business of all companies belonging to the Eurofins Group.<sup>1</sup> Our customers expect us to be exemplary in our integrity in rendering our services and carrying out our business, and so untainted integrity is one of our most important assets.

We at Eurofins take pride that integrity, impartiality and independence form an integral and unalienable part of our Group culture. Eurofins has always been taking a strong and clear stance against any unethical behaviour. With this Eurofins Supplier Code of Ethics, which is based upon the principles laid out in the Eurofins Group Code of Ethics, we are providing advice and recommendations on how our suppliers may identify and avoid improper behaviour in their day-to-day decisions when carrying out business for Eurofins.

*Message from Eurofins CEO, Dr. Gilles Martin*

## TO WHOM THIS CODE APPLIES

This Eurofins Group Supplier Code of Ethics (further referred to as "**Code**") is applicable to all suppliers and service providers, including their employees<sup>2</sup> and agents (jointly referred to in this Code as "**Suppliers**"), who provide goods or services to Eurofins Companies. Eurofins' direct Suppliers must ensure that any sub-contractors, agents or third parties engaged by them in support of Eurofins' business also comply with this Code.

## HOW THE CODE WORKS

This Code supports Eurofins Companies in upholding the highest ethical and professional standards in their business dealings and relationships with Suppliers wherever they operate. It is designed to set out a series of conduct requirements, principles and practices which promotes Eurofins' Values of Customer Focus, Quality, Competence & Team Spirit and Integrity.

Eurofins is committed to working with Suppliers who are aligned to these same values.

This Code formalises the requirements, principles and practices ("**Minimum Standards**") that any Supplier doing business with any Eurofins Company is expected to comply with, taking into account local legislation and customs, as well as appropriate business practices. Eurofins Suppliers should also ensure that these Minimum Standards are adhered to by all their employees and other persons acting for, or on behalf of, them.

We recognise that our Suppliers operate in different cultural and legal environments. Therefore, this Code outlines only the Minimum Standards that Eurofins Suppliers are expected to adhere to. At the same time, we strongly encourage Suppliers to exceed these Minimum Standards, and to promote best practice and improvement throughout their own supply chain and to comply with all legal obligations on them wherever they operate.

This Code forms part of the Eurofins General Terms and Conditions of Purchase.

## GOOD BUSINESS PRACTICES

### COMMITMENT TO ETHICAL CONDUCT

Eurofins expects its Suppliers not to engage in any improper or illegal conduct in the course of acting for, or on behalf of, Eurofins as well as maintain confidentiality about their business dealings with Eurofins.

Eurofins Suppliers must have in place systems and procedures that are designed to assist them in upholding high standards of integrity, honesty and ethics in all their activities.

<sup>1</sup> Eurofins or Eurofins Group or "we" means Eurofins Scientific SE and any entity directly or indirectly controlled by it, each individually referred to as a "Eurofins Company".

<sup>2</sup> The terms leader, director, employee, Eurofins Member, Associate, Intermediary and any other terms designating persons or groups of persons as well as the terms "he" or "she" in this Code are not meant to specify any gender and are to be read as being strictly non-discriminatory.







## CONFLICTS OF INTEREST

Eurofins Suppliers must avoid any interaction with any Eurofins leader, director or employee (referred to in this Code as “Eurofins Members”) or any other person acting for, or on behalf of, any Eurofins Company (referred to in this Code as “Associates”) that may conflict or appear to conflict with that Eurofins Member or Associate acting in the best interests of Eurofins. For example, Suppliers must not employ or otherwise make payments to any Eurofins Member or Associate during the course of any actual or contemplated transaction between the Supplier and Eurofins (other than pursuant to the contract).

If a Supplier employee has a family relation to any Eurofins Member or Associate, or if a Supplier has any other relationship with a Eurofins Member or Associate that might represent a conflict of interest, the Supplier must disclose this fact to Eurofins in writing.

## COMPETITION

Eurofins Companies aim to compete vigorously with their competitors, but in a fair and ethical way. We strive to ensure that our success is built upon providing excellence and never based on anti-competitive agreements or practices such as inappropriately accessing competitors’ confidential information. We expect our Suppliers to adopt the same approach. As such Eurofins Suppliers are expected to comply with all international and national competition laws and regulations across the jurisdictions in which they interact with Eurofins Companies.

Eurofins Suppliers must not participate in any anti-competitive agreements or practices (including, but not limited to, cartels, pricing, resale pricing, market sharing, bid rigging, terms of trading, purchase or supply and joint ventures) which may be considered to be a breach of competition laws or an abuse of a dominant or monopoly market position or may harm Eurofins or its customers.

Suppliers must not share with Eurofins Companies, Members or Associates any non-public information they have about Eurofins’ competitors.

## BRIBERY AND CORRUPTION

Eurofins takes a zero tolerance approach to any form of bribery and corruption, and we expect our Suppliers to adopt the same approach. Eurofins Suppliers must never give, offer, promise, request, agree to receive, authorise receipt or accept a bribe in connection with Eurofins business or any other business they conduct.

Eurofins Suppliers are required to familiarise themselves, and act in compliance with all international and national laws and regulations applicable to their activities, including, but not limited to, the Foreign Corrupt Practices Act 1977 (“FCPA”) in the U.S., the Bribery Act 2010 (the “UK Bribery Act”) and the Modern Slavery Act 2015 in the UK, the French Criminal Code as amended and supplemented by the Law No 2016-1691 of 9 December 2016 on transparency, the fight against corruption and modernisation of economic life (“Loi Sapin II”).

Suppliers should be aware of the local laws relating to gifts and hospitality that apply in the jurisdictions in which they interact with Eurofins, its Members or Associates.

Suppliers should also be aware that Eurofins Members and Associates are required to comply with the provisions on gifts and hospitality contained in the [Eurofins Group Anti-Bribery Policy](#). The policy provides that gifts may only be accepted if they are promotional or advertising articles of very modest value (and in any case not exceeding EUR 5 per item, per instance, and EUR 20 in aggregate for all such gifts received by a beneficiary per year or lower limits as may be set by Eurofins locally).

Suppliers must not interact with a Eurofins Member in such a way as to put him or her at risk of breaching the [Eurofins Group Anti-Bribery Policy](#).





## GOOD FINANCE PRACTICES

### ACCOUNTS, BOOKS AND RECORDS

It is a requirement that Eurofins Suppliers maintain accurate records, accounts and financial statements that fairly reflect the nature of the transactions recorded. All records must be completed in a timely manner and conform to all applicable laws, regulations, and accepted accounting principles.

Eurofins Suppliers must cooperate with all third party/supplier audits as carried out by Eurofins from time to time. Eurofins Suppliers must cooperate in a timely manner and produce any documentation or records requested by Eurofins.

### FRAUD, MONEY LAUNDERING AND TAX EVASION

Eurofins Suppliers must not engage or assist in any activity whatsoever relating to fraud, money laundering or tax evasion in connection with Eurofins business or any other business they conduct.

The fundamental elements of fraud are deception and dishonesty. Examples of prohibited activities include (non-exhaustive list):

- stealing from Eurofins, a customer or any third party;
- any kind of misappropriation of property;
- any kind of misreporting of time or costs;
- inflation of invoices;
- engaging or assisting money laundering.

Eurofins has a policy of only making payments to Suppliers if there is a valid legal basis to do so.

Eurofins Suppliers must have a zero tolerance approach to criminal facilitation of tax evasion, and commit to rejecting any facilitation of tax evasion.

### TRADE COMPLIANCE, SANCTIONS AND EXPORT CONTROLS

Eurofins Suppliers must conduct all transactions or import, export and re-export activities in full compliance with all applicable international and national import and export control laws, regulations, policies and governmental trade restrictions.

It is Eurofins policy to comply with sanctions laws ("Sanctions") implemented in the countries in which Eurofins Companies operate, including, but not limited to, those administered and enforced by the European Union and its Member States, the UK, the U.S., and China. Eurofins expects its Suppliers to adopt the same approach.

Consequences of violating trade controls and Sanctions can be severe for Eurofins and the Suppliers involved, and can result in disciplinary actions, substantial civil and criminal fines and penalties, including imprisonment of individuals, as well as termination of contracts, exclusion from tenders, debarment from government contracts and other consequences.

### KNOW YOUR CUSTOMER ("KYC") REQUIREMENTS

Suppliers must cooperate with Eurofins in respect of Eurofins' Know Your Customer ("KYC") checks and third-party due diligence. In addition, Eurofins Suppliers must be able to demonstrate, at Eurofins' request, that they have carried out reasonable and proportionate KYC checks on any sub-contractors whom they engage.

## FAIR TREATMENT AND EQUAL OPPORTUNITY

### FUNDAMENTAL PRINCIPLES AND RIGHTS AT WORK

Eurofins supports the four fundamental principles contained within the International Labour Organisation (ILO) Declaration on Fundamental Principles and Rights at Work:





- freedom of association and the effective recognition of the right to collective bargaining effective;
- elimination of all forms of forced or compulsory labour;
- abolition of child labour;
- elimination of discrimination in respect of employment and occupation.

We expect our Suppliers to adhere to the same principles.

## DIVERSITY AND INCLUSION

Eurofins promotes diversity and inclusion, and we expect our Suppliers to adopt the same approach. Employment - including recruitment, payment, benefits, promotion, training, termination and retirement - must be based on ability and merit, not on personal characteristics, and equal employment opportunity must be provided to all regardless of age, gender identity, race, ethnicity, sexual orientation, religion, nationality, disability or any other characteristic.

## HARASSMENT AND BULLYING

Eurofins is committed to promoting a work environment that is free from discrimination, harassment, bullying or any other forms of abuse. Harassment (both overt and subtle) is a form of misconduct that is demeaning to another person. Bullying is the repetitive, intentional hurting of one person or group by another person or group, where the relationship involves an imbalance of power. Eurofins Suppliers are expected to strictly oppose any form of harassment, bullying or any other forms of abuse.

## SLAVERY, HUMAN TRAFFICKING AND HUMAN RIGHTS

Eurofins supports human rights in line with the stipulations contained within the Universal Declaration of Human Rights, and we remain committed to upholding these principles through the conduct of our activities. We expect our Suppliers to adopt the same approach.

Eurofins Suppliers must have in place adequate procedures to ensure they are not directly or indirectly, through their supply chain, involved in any slavery or human trafficking or any other form of human rights abuse.

Eurofins Suppliers must comply with all local laws relating to forced and child labour, wages and benefits, and freedom of movement and association. Where such local laws are of a lower standard than the ILO principles and standards (where applicable), Eurofins Suppliers must comply with the ILO principles and standards as basic requirements.

## HEALTH AND SAFETY

Eurofins is committed to ensuring a safe, hazard-free environment for its people and all those on its premises and to complying with all applicable health and safety laws and regulations. We expect our Suppliers to adopt the same approach.

Eurofins Suppliers must ensure they have appropriate health and safety policies and procedures in place in relation to all aspects of their work and that adequate training, monitoring and auditing is in place in order to ensure compliance with those policies and procedures.

## ENVIRONMENT AND SUSTAINABILITY

Eurofins Companies strive to prevent or otherwise minimise, mitigate and remediate harmful effects of their operations on the environment, and we expect our Suppliers to do the same.

Eurofins Suppliers must comply with all applicable environmental laws and regulations and seek to operate in a manner which maximises sustainability of resources and limits, to the extent possible, their impact on the natural world.







## DATA PROTECTION AND PRIVACY

Eurofins recognises its duty to respect personal information, ensure it is protected and handled correctly and only used for the purposes for which it is provided. As part of this obligation, we require that our Suppliers manage personal information in accordance with all applicable laws and regulations, and in accordance with the following key principles:

- personal information will be processed in a fair, lawful and transparent manner;
- personal information will be obtained for specified purposes and will not be processed in any manner incompatible with those purposes, except where permitted by law;
- personal information will be adequate, relevant and not excessive in relation to the purpose(s) for which it is processed;
- personal information will be accurate and, where necessary, kept up to date;
- personal information will not be kept for longer than is necessary;
- appropriate measures will be taken to safeguard personal information against unauthorised or unlawful processing, and against accidental loss, destruction or damage.

## INTELLECTUAL PROPERTY

Eurofins respects the intellectual property rights of third parties. Inappropriate use of others' intellectual property may expose Eurofins to criminal and civil fines and penalties.

Eurofins Suppliers should protect and treat with respect Eurofins' intellectual property rights and those of third parties.

Suppliers should seek formal authorisation from Eurofins before they solicit, accept or use proprietary information belonging to Eurofins. The appropriate licences should be acquired if the Supplier is developing for Eurofins a product or service that uses intellectual property not belonging to the Supplier or to Eurofins.

## WHISTLEBLOWING

For serious or sensitive concerns about any form of malpractice or wrongdoing, including breaches of this Code or any other Eurofins' policy or other illegal activities within the Eurofins Group, Suppliers are encouraged to contact the relevant Eurofins compliance officer or legal department or the Whistleblowing Point of Contact ("**Whistleblowing Contact**") in the knowledge that their action will be viewed positively and that they will be protected against any detrimental treatment by Eurofins which may result from their reporting of these facts.

The following are examples of serious or sensitive concerns about malpractice and wrongdoings, whether actual or soundly suspected, which should be notified to Eurofins immediately upon becoming aware (non-exhaustive list):

- criminal activity;
- failure to comply with legal obligations;
- miscarriage of justice;
- danger health and safety;
- damage to the environment;
- financial malpractice or impropriety or fraud;
- modification or falsification of test results;
- serious breaches of authorised quality requirements or test procedures on the basis of which a Eurofins Company is accredited or authorised;
- attempts to conceal any of the above.

For more information on whistleblowing, please see the Eurofins website: [Whistleblowing Contact](#) as well as the [Eurofins Group Whistleblowing Guidelines](#).

On behalf of the Eurofins Group Operating Council

Dr. Gilles Martin  
Chief Executive Officer





## OUR VISION

Our long-term aspiration

**To be the Global Leader in Testing for Life.**

## OUR MISSION

Why we are here - the cause/purpose of our business

**To contribute to a safer and healthier world by providing our customers with innovative and high quality laboratory, research and advisory services whilst creating opportunities for our employees and generating sustainable shareholder value.**

## OUR VALUES

What we stand for/what is important for us

### Customer focus

- Delivering customer satisfaction by listening to and exceeding customer expectations
- Adding value for our customers through our services
- Seeking innovative solutions to help our customers achieve their goals

### Quality

- Delivering quality in all our work; providing accurate results on time
- Using the best appropriate technology and methods
- Seeking to improve or change our processes for the better

### Competence and Team Spirit

- Employing a team of talented and competent staff
- Investing in training and creating good career opportunities
- Recognising and encouraging outstanding performance

### Integrity

- Behaving ethically in all our business and financial activities
- Demonstrating respect towards our customers and our staff
- Operating responsible environmental policies



## Attachment 6: General Terms and Conditions of Purchase

See paragraph 21 Ethical Conduct and Compliance

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### 21. Ethical conduct and compliance. ¶

The Parties consider ethical conduct a prerequisite for successful business, and each Party has adopted policies to ensure both good internal governance and sound relationship with reliable third parties. In addition, each Party specifically undertakes to the other Party that: ¶

21.1. → all of its commercial activities and processes relating to its business with the other Party fully comply, at all times, with all applicable laws, regulations, other legal requirements, norms and standards applicable in the markets where that Party operates and /or has contractual relationship(s) and, where applicable, with the U.S. Foreign Corrupt Practices Act 1977 ("FCPA"), UK Bribery Act 2010 and French Criminal Code as amended and supplemented by the Law No. 2016-1691 of 9 December 2016 on transparency, the fight against corruption and modernisation of economic life ("Loi Sapin II"); ¶

21.2. → all of its transactions or import, export and re-export activities and processes relating to its business with the other Party will be conducted in full compliance with all applicable import and export control laws, regulations and policies as well as, governmental trade restrictions and international sanctions, including where applicable, but not limited to, UN Security Council sanctions, the OFAC Sanctions Programmes and Lists (<https://www.treasury.gov/about/organizational-structure/offices/Pages/Office-of-Foreign-Assets-Control.aspx>) and sanctions adopted by the European Union (<https://sanctionsmap.eu/#/main>). ¶

21.3. → Furthermore, Supplier shall at all times comply and cause its personnel to comply with the Eurofins Group Code of Ethics, the Eurofins Group Anti-Bribery Policy, the Eurofins Supplier Group Code of Ethics as well as other policies available for consultation at <https://www.eurofins.com/investor-relations/corporate-governance/eurofins-core-compliance-documents/>. ¶

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