

1. PURPOSE

The Sustainability Policy defines CampusPharma's commitments to be a responsible company and sets out our ambition to contribute to sustainability in our own operations. It is based on our materiality analysis and risk analysis.

The overall governance of the sustainability work is stated in the Sustainability Strategy and the Sustainability Policy. These documents are part of CampusPharma's governing documents for our business operations.

2. INTRODUCTION

2.1 About CampusPharma

CampusPharma was founded in 2004 and the office is based in Gothenburg, Sweden. We are covering all Nordic countries with our pharmaceutical portfolio. Since 2011 we are part of the Italfarmaco group.

- *Our Business Proposition*
Our business concept is to market and sell pharmaceuticals and pharmaceutical-related products on the Nordic market in therapy areas that meet the needs of both small and large patient groups.
- *Our Focus*
Our focus is in women's health and specialty drugs in neurology and oncology. We work with both prescription and non-prescription products. We also cover tender business and unlicensed medicine.
- *Our Vision*
Our vision is to be a different pharmaceutical company that is characterized by concern for patients, customers, and employees. We want to be close to our customers and other stakeholders.
- *Our Values*
Our values Caring, Simplicity and Responsibility form the core of the CampusPharma spirit. This means that we strive to be flexible, responsive, open-minded, informal, and engaged to create trust and respect.

2.2 Sustainability Policy

The Sustainability Policy defines our commitments and efforts to be a responsible company:

CampusPharma shall operate in an ethically, socially, environmentally, and economically sustainable way. We want to contribute to a sustainable development, by ensuring that we do not negatively impact people or the planet in any part of our supply chain and by, where it is possible, providing positive contributions to a sustainable society.

The Sustainability Policy describes how we take responsibility for the respective sustainability topics included in the policy:

- Environment
- Occupational health and safety
- Human rights and workers' rights
- Business ethics and anti-corruption

The policy applies to all parts of CampusPharma's own operations – including our internal work to actively promote sustainability along the value chain.

For a closer description of our sustainability due diligence work with suppliers, please refer to CampusPharma's:



- Supplier Code of Conduct, which defines our sustainability requirements on suppliers
- Supplier Self-Assessment Questionnaire
- Supplier Sustainability Risk Analysis
- Sustainability Strategy, see chapter on sustainable supply chain, defining also our sustainability targets for the supply chain

This sustainability policy is informed by:

- our materiality analysis
- our analysis of environmental aspects
- relevant legal and contractual requirements
- our employees' input in regular strategy meetings

Our integrated management system for sustainability¹ is the main tool we use to manage, implement, and monitor our work to minimize our impacts on the sustainability topics covered in this policy.

The topics 'Occupational health and safety' and 'Human rights and worker's rights' are further described in our internal Working Environment Policy.

Continuous improvements are a natural part of how we work to improve our sustainability efforts. Our sustainability work is coordinated and led by the sustainability council and the management. It is however important to keep in mind that each colleague at CampusPharma contributes to achieving our sustainability goals through the decisions we take every day in our daily work.

This sustainability policy has been established by CampusPharma's management.

CampusPharma's management is responsible for compliance with applicable laws and requirements.

Let's contribute to creating a sustainable society that we want to live in today and that we can pass on to future generations.

¹ Set up inspired by the ISO standards ISO 14001 on environmental management and 45000 on occupational health and safety, as well as the ICC guide on anti-corruption.

3. ENVIRONMENT

At CampusPharma, we shall carry out our operations in a way that is in compliance with all relevant national environmental legislation and that minimizes our environmental impact.

We shall work to be continuously more resource efficient in our own operations, and in our supply chains through our work with suppliers.

We shall reduce our climate impact in line with the Paris agreement and work with objectives and action plans to continuously reduce our impacts in scope 1-2 for our own operations, as well as in scope 3 for our suppliers².

The full list of our environmental aspects and environmental goals is defined in CampusPharma's integrated sustainability management system.

General environmental guidelines

- Actively work to continuously reduce the environmental impact, for example by:
 - implementing updated travel and car policies to minimize emissions to air from our business travels and company car fleet
 - considering environmental aspects in goods transports, as well as in purchase of office supplies
 - using natural resources efficiently and recycling materials as much as possible
- Actively work with suppliers to:
 - reduce the risk of emissions of active substance (API) into the environment during manufacturing
 - reduce the environmental impact of packaging materials
 - ensure that relevant requirements regarding environmental responsibility are met

4. OCCUPATIONAL HEALTH AND SAFETY

CampusPharma shall provide a safe and healthy working environment for all our employees.

We want to offer our employees an inspiring workplace, where they are motivated to go to work and have a good work-life balance and provide flexibility for our employees.

We want our employees to thrive and develop in professional abilities and to be able to develop their competences as needed. We provide regular training on our policies, processes and routines. In addition to this it is everyone's responsibility to keep updated on applicable policies and goals for our company, as well as their respective role and responsibilities. Transparency is key for upholding quality and to identify improvements – if something is not clear, we want all employees to feel safe to ask questions to other colleagues and to the management.

² The Greenhouse Gas (GHG) Protocol categorizes greenhouse gas emissions as Scope 1, Scope 2, and Scope 3 emissions.

Scope 1: Direct emissions from the company's owned or controlled sources

Scope 2: Indirect emissions from purchased energy

Scope 3: Indirect value chain emissions

We want to offer good leadership and we shall set up regular follow-up meetings and individual targets for our employees.

We want to operate our company on a basis of trust in our employees. We all need to participate in creating the best possible working environment for ourselves and for each other. It is each employee's responsibility to follow safety instructions and report incidents or risks they identify.

In all our efforts, we seek to operate in an inclusive manner, and firmly stand against discrimination, bullying or harassment in any form.

Our integrated sustainability management system is the motor for our preventive work on Occupational Health and Safety (OHS) matters. Responsibility for the working environment lies with the management of CampusPharma. Detailed work-task descriptions and definitions are found in the integrated sustainability management system and in each employee's role description.

5. HUMAN RIGHTS AND WORKERS' RIGHTS

CampusPharma fully respects the internationally renowned set of human rights³ and all applicable national legislation concerning human rights and workers' rights. We shall uphold these rights wherever we operate.

Below, we further specify these basic expectations regarding human rights and workers' rights in more detail. These universal expectations are also found in our Supplier Code of Conduct.

Responsibility for ensuring these rights lies with the management of CampusPharma. Compliance to relevant national legislations regarding these rights is ensured by upholding our legal register and working actively with internal compliance checks, as defined in our integrated sustainability management system.

5.1 We respect the freedom of association and collective bargaining

All our employees shall enjoy their right to freely join or form a union and to bargain collectively, without any discrimination. CampusPharma shall provide meeting rooms in our office if needed for union or collective bargaining meetings.

5.2 We do not accept child labour

We do not accept any child labour, defined as employment of persons under the age of 18. Temporary work for people under the age of 18 may however be accepted during, for example, school breaks.

³ A range of topics regarding human rights are described in detail in a large number of international conventions, international law and similar documents. For the purpose of this human rights policy, we define "internationally renowned set of human rights" as the Universal Declaration on Human rights (UDHR), the International Covenant on Civil and Political Rights (ICCPR), the International Covenant on Economic, Social and Cultural Rights (ICESCR), as well as the Convention on the Rights of the Child and the core eight ILO conventions (convention number 29, 105, 87, 98, 100, 111, 138 and 182). This definition is based on EU's CSDDD, the ETI base code and the Swedish procurement agency's requirements on suppliers.

5.3 We do not accept discrimination and harassment

We do not accept discrimination in any form.⁴ We shall work actively against discrimination in connection to recruitment, employment terms, competence development and training, promotion, termination of contract or retirement.

We do not accept any form of sexual or other harassment, physical or psychological abuse or threats in our workplace.

We shall provide a routine on how to report any cases of discrimination and harassment in a safe way. We shall work actively with following up on these issues through our sustainability management system, deploying actions such as employee surveys including this topic.

5.4 We shall provide a safe and hygienic workplace

Our employees shall enjoy a safe and hygienic workplace. We shall regularly analyse OHS risks in our workplace and set up action plans to mitigate any identified risks as far as possible. We shall assign a safety officer and regularly carry out safety inspections of our workplace to ensure that it is safe and hygienic. All our employees shall regularly undergo OHS training. All our employees are covered by a work-place insurance during working hours.

5.5 We shall provide fair wages and employment contracts to all employees

We provide fair wages, based on individual roles and responsibilities, but at least in accordance with the levels defined in our industry's collective bargaining agreements and that are in all cases sufficient for a decent living standard. Deduction of wages shall not be used as a disciplinary measure. Employees shall be given a pay slip indicating detailed information about payments for the salary period at hand.

All employees shall be provided with an employment contract and a role description.

5.6 We shall provide reasonable working hours, paid holiday and uphold social security standards

We shall uphold all requirements as set out by national regulation regarding working hours.

All employees shall enjoy paid holiday and their rights to parental leave, sick leave and other social security standards as required by relevant national legislation.

General internal policies

- In addition to upholding social security standards and payments in accordance with national legislation, we provide other benefits described in our Employee manual.
- Internal Policies; Pension, Sick leave and Rehabilitation, Health care.

⁴ This includes but is not limited to discrimination based on sex, race, nationality, age, disability, sexual orientation, marital status, union association or political beliefs.

6. BUSINESS ETHICS AND ANTI-CORRUPTION

We do not accept corruption in any form, such as giving or taking of bribes, embezzlement, trading in influence, abuse of power, illicit enrichment, money laundry, facilitation payments, obstruction of justice or negligent financing of bribery.

We shall regularly provide training for all employees on our policy and requirements regarding business and anti-corruption.

It is each employee's responsibility to follow this policy on business and anti-corruption.

We welcome and encourage discussion on topics where there may be uncertainty; if there is any uncertainty about the rules set out in this policy, all employees are encouraged to seek advice from their closest manager.

Any suspicions of inconsistencies or violations regarding this policy on business and anti-corruption shall be reported to the nearest superior or anonymously to the safety representative. Reported cases will be followed up by management. Should reports concern members of management, they should be directed to members of the sustainability network.

If an employee is found to have breached the policy/rules on anti-corruption, appropriate measures will be taken. Severe or repeated violations can be ground for termination of employment.

General ethical guidelines

- Pharmaceutical industry code of ethics in the Nordic countries:
 - Sweden: Läkemedelsbranschens etiska regelverk för läkemedelsinformation
 - Norway: Legemiddelindustriens bransjeregler
 - Finland: Pharma industry code of ethics
 - Denmark: Laegemiddelindustriens reklamekodeks
- The Code to prevent Corruption in Business by the Swedish Anti-corruption Institute (Näringslivskoden: Kod mot korruption i näringslivet av Institutet Mot Mutor, IMM)