



ENVIRONMENTAL AND SOCIAL SUSTAINABILITY POLICY

June 2024



INTRODUCTION

The present Environmental and Social Sustainability Policy falls within the framework of the good corporate governance policies of Laboratorios Farmacéuticos ROVI, SA and its subsidiaries (hereinafter, "**ROVI**" or the "**Company**") and is based on ROVI's firm commitment to strict compliance with applicable laws and regulations.

This Environmental and Social Sustainability Policy, which was approved by ROVI's Board of Directors on 24 June 2024, is aligned with the rest of ROVI's policies, forming part of the Company's culture and its commitment to the basic principles of sustainable conduct, and aims to reflect:

- a) The principles, commitments, objectives and strategy in relation to shareholders, employees, customers, suppliers, social issues, the environment, diversity, tax responsibility, respect for human rights, and the prevention of corruption and other illegal forms of conduct.
- b) The methods or systems for monitoring compliance with policies and their associated risks and management of the latter.
- c) Non-financial risk oversight mechanisms, including ethical and business conduct-related risk.
- d) Channels for communication and dialogue with stakeholders and stakeholder engagement.
- e) Responsible communication practices that prevent information manipulation and protect honour and integrity.



OBJECTIVES OF THE ENVIRONMENTAL AND SOCIAL SUSTAINABILITY POLICY

The **ROVI** pharmaceutical **GROUP** (hereinafter, the Group or ROVI) is a group composed of companies engaged in the research and development of medicines and medical devices, the manufacture of active ingredients, the manufacture and marketing of medicines and medical devices in all their pharmaceutical forms and the manufacture of pressotherapy garments.

Objectives of the Environmental and Social Sustainability Policy

All the companies that form **ROVI GROUP**, aware of the improvement in health that their products provide, wish to respond to certain social demands in relation to the impacts of their activities on society and the environment.

For this reason, ROVI's economic development must be compatible with its ethical, social, labour and environmental conduct and respect for human rights.

The knowledge, dissemination and implementation of these values, which express the **GROUP's** commitment to business ethics and sustainability, serve as a guide for the actions of the Board of Directors and other bodies of **ROVI GROUP** in their relations with stakeholders.

The support instruments developed by ROVI GROUP are, in addition to this Environmental and Social Sustainability Policy, the Integrated Management Policy (Environment and Health and Safety at Work) and the Code of Ethics. These instruments, when put into practice, must:

- a. Foster attainment of the Group's strategic objectives.
- b. Improve the Group's competitiveness by adopting management practices based on innovation, equal opportunities, productivity, profitability and sustainability.
- c. Responsibly manage the risks and opportunities arising from the evolution of the environment and maximise the positive impacts of the Group's activity in the different territories in which it operates while minimising, as far as possible, any negative impacts.
- d. Encourage a culture of ethical conduct and increase corporate transparency to generate credibility and trust among its stakeholders, which include society as a whole.
- e. Promote relationships of trust and the value creation for all its stakeholders, providing all of them with a balanced and integrated response.

Corporate strategies and practices or principles for action

As a result of the foregoing, in order to pursue these objectives appropriately, the following general and specific principles for action are established:



GENERAL PRINCIPLES FOR ACTION

To attain the sustainability goals established, **ROVI GROUP** adopts the following general principles:

- a. To comply with **CURRENT LAWS** in the places where our companies are located.
- b. To support, by adopting and disseminating them, the integration of the **UNITED NATIONS GLOBAL COMPACT** and other international instruments, particularly in the areas of human rights, labour practices, the environment and the fight against corruption.
- c. To follow the guidelines of the **CODE OF ETHICS**, which sets out ROVI's commitment to the principle of business ethics and transparency in all areas of activity and regulates the responsible conduct of all the Group professionals in the course of their work.
- d. To favour free market practices, rejecting any kind of illegal or fraudulent practice and implementing effective measures for the **PREVENTION, MONITORING AND SANCTIONING OF IRREGULARITIES**.
- e. **COMMITMENT TO TRANSPARENCY** as a way to convey confidence and credibility to stakeholders. This will entail:
 - a. Sharing relevant and true information with shareholders, meeting any public information requirements that may exist.
 - b. Preparing and publishing financial and non-financial information, using, in the latter case, an internationally-accepted methodology and submitting it to the internal and external assurance processes that are deemed appropriate, guarantee that it is reliable and foster its continuous improvement.
- f. **PROMOTING COMMUNICATION CHANNELS AND DIALOGUE**, and fostering the Group's relations with its shareholders, investors, employees, customers, suppliers and, in general all its stakeholders. This helps achieve harmony between business values and social expectations, adapting, as far as possible, the Group's policies and strategies to the stakeholders' interests, concerns and needs and using all the communication instruments available, including direct contact and the GROUP's corporate website.
- g. **CONSERVATION AND PROMOTION OF THE ENVIRONMENT**. ROVI carries on its activity under a firm commitment to contribute to sustainability from an environmental perspective, materialising this through the integration of the environment into the different business areas, the preservation of biodiversity, the prevention of pollution, efficient resource management and the adaptation to and mitigation of climate change, as set out in the Group's Environmental Policy.
- h. **TAX RESPONSIBILITY**: the taxes that ROVI settles in the places where it carries on its activity are the principal contribution that Group companies make to sustaining public expenditure and are, therefore, one of their contributions to society.
- i. **STANDARD SA8000**: compliance with the requirements of **Standard SA8000** as a commitment to its employees, customers and other stakeholders on the part of the company.

PRINCIPLES FOR ACTION IN RELATION TO THE MAIN STAKEHOLDERS



WITH CUSTOMERS AND PATIENTS: provide a service based on quality and experience.

The customers and patients are the essence of the business, including potential customers, and, therefore, **ROVI GROUP** assumes the following commitments:

- a. Commitment to innovative drugs as one of **ROVI's** growth drivers.
- b. To pay special attention to the protection of our customers' and patients' health and safety throughout the life cycle of our products by strict compliance with the applicable legislation.
- c. To maintain due confidentiality in processing their data.
- d. To manage and resolve their queries and complaints in the shortest possible time.
- e. To monitor the customer's experience through surveys that measure their satisfaction and other systems that allow permanent active listening to the customer in all those processes and operations in which they relate to the company.
- f. To maintain suitable and efficient communication channels using the most appropriate means.
- g. Respecting and complying with the rules that regulate communication and marketing activities and adhering to the voluntary codes that furnish such activities with transparency and veracity.

WITH EMPLOYEES: generate enthusiasm and facilitate training and motivation

ROVI GROUP has a Code of Ethics that sets out the rules that must govern the conduct and actions of its employees in their relations with third parties. Furthermore, it promotes a work environment based on an atmosphere of mutual trust and confidence, which implies:

- a. Respecting human and labour rights recognised in national and international legislation.
- b. Ensuring the right to effective equal opportunities and treatment for all employees, allowing them, without exception, to develop personally and professionally.
- c. Promoting the establishment of remuneration conditions that ensure a decent salary, recognising the employees' performance and their contribution to the business's results.
- d. Encouraging the professional growth and personal development of each employee in an environment in which diversity, equal opportunities and non-discrimination prevail, as well as supporting the training of the employees and basing promotion on merit, ability and performance.
- e. Attaining an optimal level of occupational safety and achieving a work environment that allows ROVI professionals to carry out their work in the best physical and mental conditions with the highest degree of well-being.
- f. Prohibition of:
 - o Child and adolescent labour.
 - o Forced or obligatory labour.



- The need for our employees to deposit their identity documents on commencing the employment relationship or pay as a condition for obtaining employment.
- Discrimination based on gender, religion, disability or sexual orientation.
- Corporal punishment, physical or mental violence and verbal abuse of workers.
- Withholding wages from workers.
- Retaining workers beyond their working hours and allowing employment relationships to end with reasonable notice.
- Involvement of ROVI workers in human trafficking.

WITH SHAREHOLDERS AND INVESTORS: Create more value in a way that can be sustained over time.

ROVI considers that relations with shareholders and investors, in addition to being based on trust, must have the creation of sustainable value as one of their goals. In this respect, following corporate governance recommendations, ROVI's Board of Directors will be guided by business interests, defined as attaining a business that is profitable and sustainable in the long term and seeks continuity and the maximisation of the company's economic value. Furthermore, ROVI undertakes to encourage the informed participation of shareholders in the general meetings, affording the same treatment to all of them.

WITH SOCIETY: making an active contribution of social progress.

ROVI is committed to the economic and social development of the areas where it carries on its activity and, therefore:

- a. Assumes the impact of its activity on society, assessing and managing the non-financial, ethical, reputational, social and environmental risks.
- b. Commits itself to those social initiatives or activities that benefit society.

In this respect, **ROVI** considers that its priority spheres of social action are: improvements for people with disabilities; promoting health; the environment; and corporate volunteering. To develop its spheres of action, ROVI establishes collaborations with public and private entities.

WITH THE ENVIRONMENT: protect the environment.

As a pharmaceutical group, **ROVI** assumes care of the environment as one of the essential bases of its activity. Thus, care of the environment and the principles of quality and occupational safety to protect our employees form the pillars on which we base the management principles of our activity.



ROVI carries on its activity under a firm commitment to contribute to sustainability from an environmental perspective, which materialises in the prevention of pollution, efficient resource management and the promotion of environmental responsibility, as set out in the Group's Environmental Policy.

WITH SUPPLIERS: enable them to find a partner for mutual benefit in ROVI

It is essential to ensure a supply chain that respects the principles of sustainability adopted by the **GROUP**. Therefore, we undertake to **promote values** related to sustainability among **our suppliers and subcontractors of goods and services**, placing special emphasis on compliance with legislation and respect for human rights and the environment.

THE ADMINISTRATION: create channels for collaboration with the Administration

Observing the requirement imposed by healthcare agencies means that ROVI is a reliable supplier of high-quality active ingredients, medicines and healthcare and cosmetic products. The industrial development, manufacture and supply of these products, as well as the supply of units for clinical trials, is always conducted in an environment that strictly complies with all the legal and regulatory requirements applicable to our activities, as well as the authorisations granted by the healthcare agencies.

METHODS OR SYSTEMS TO MONITOR POLICY COMPLIANCE, THEIR ASSOCIATED RISKS AND THE MANAGEMENT OF THE LATTER

The Board of Directors of ROVI, in accordance with the provisions of the Capital Companies Act, the Bylaws and the Regulations of the Board of Directors, is responsible for approving ROVI's general policies and strategies, in particular, the Environmental and Social Sustainability Policy.

The Audit Commission has, among others, the following functions:

- Oversight of the policy to control and manage risks that affect attainment of the corporate goals.
- Periodically evaluating and reviewing the corporate governance system and ROVI's Environmental and Social Sustainability Policy in order to ensure that they fulfil their mission of promoting corporate interests and take account of the legitimate interests of other stakeholders as appropriate.
- Ensuring that ROVI's environmental and social practices observe the strategy and policy established.
- Overseeing and evaluating the process of preparing and presenting the financial and non-financial information and the integrity of said information, as well as the control and management systems of the financial and non-financial risks relating to ROVI and, when applicable, the Group, —among others: operating, technological, legal, social, environmental, political and reputational risks or



risks related to corruption—, reviewing compliance with regulatory requirements, the appropriate delimitation of the scope of consolidation and the correct application of accounting principles, and submitting recommendations or proposals to the Board of Directors, aimed to safeguard the integrity of the information.

- Periodically reviewing and overseeing the internal control and risk management systems, as well as the efficacy thereof, so that the main risks are appropriately identified, managed and made known.
- Striving to ensure that, in general, the internal control policies and systems established are applied effectively in practice.
- Identifying the different types of financial and non-financial risks — (including operational, technological, legal, social, environmental, political and reputational risks and those concerning corruption)— which ROVI faces, including contingent liabilities and other off-balance-sheet risks among the financial or economic risks.
- Establishing a risk control and management model based on different levels.
- Identifying and fixing the risk level that ROVI considers acceptable.
- Identifying the measures planned to mitigate the impact of the risks identified in the event that they materialise.
- Identifying the information and internal control systems that will be used to control and manage the aforementioned risks, including contingent liabilities and off-balance-sheet risks.

The functions of the Nomination and Remuneration Commission include the following:

- Oversight of application of the Policy for the communication of financial, non financial and corporate information, and communication and contact with shareholders, institutional investors and proxy advisers , Institutional Investors and Proxy Advisors and monitoring the way in which ROVI communicates with and relates to small and medium-sized shareholders.
- Reviewing the Environmental and Social Sustainability Policy and ensuring that it is oriented towards the creation of value.

NON-FINANCIAL, ETHICAL AND BUSINESS CONDUCT RISK OVERSIGHT MECHANISMS

ROVI's Board of Directors is responsible for designing, evaluating and reviewing in general this Environmental and Social Sustainability Policy. This Policy will be developed and supplemented by the different policies approved in the Group that are directly related to the general and specific principles established for action.

The Sustainability Committee, a permanent internal body with powers to inform, advise and propose within its sphere of action, will, acting in accordance with the competencies it holds, report annually to



ROVI's Board of Directors, the Nomination and Remuneration Commission and Audit Commission on the degree of compliance with the Policy and the sustainability strategy.

In addition, ROVI has a confidential mechanism for reporting unethical conduct: the "Ethics Channel of ROVI". ROVI's Ethics Channel is regulated in the Policy on the Internal Information System and Whistleblower Protection, approved by ROVI's Board of Directors on 14 June 2024.

Through the Ethics Channel, anybody with a legitimate interest may report any irregularity of which they are aware to ROVI. Additionally, employees, directors, managers, suppliers, contractors, trading partners and, in general, any person or entity subject to the Code of Ethics of ROVI or the Code of Ethics for ROVI Group suppliers is obliged to report the following conducts:

- Breaches of external regulations, including Good Manufacturing Practice (GMP), Good Clinical Practice (GCP), Good Laboratory Practice (GLP) and Good Pharmacovigilance Practices (GVP), including both mandatory regulations and those with which ROVI has decided to comply voluntarily, such as, for example, the EFPIA¹ Code, the Code of Good Practice for the Pharmaceutical Industry in Spain or the Codes of Good Practice issued by the industry associations to which ROVI belongs in any territory.
- Conduct that constitutes a criminal offence or could constitute a serious or very serious administrative offence, as well as any breach of the Group's Crime Prevention Model or the Competition Compliance Programme.
- Conduct that could be classified as unethical or a breach of ROVI's Code of Ethics, the Code of Ethics for Suppliers or any of ROVI's internal protocols and procedures or other internal rules.
- Conduct that may involve a financial or accounting irregularity or any other irregularity that could potentially be significant for ROVI's functioning and operations.

Management of the Ethics Channel has been outsourced to an independent third party in order to reinforce the confidentiality of all the communications. Likewise, the Board of Directors has appointed a Committee responsible for the Ethics Channel, which has the functions of investigating and resolving on all the reports submitted. The Ethics Channel Committee is formed by the Human Resources Manager, the Internal Audit Manager and the Head of the Compliance Department.

The Head of the Compliance Department periodically reports in writing to the Compliance Committee, the Audit Commission and the Board of Directors on the communications received through the Ethics Channel and the corrective actions taken by the organisation, respecting the confidentiality of said communication channel at all times.

STAKEHOLDER COMMUNICATION, DIALOGUE AND ENGAGEMENT CHANNELS

¹ European Federation of Pharmaceutical Industries and Associations.
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The Board of Directors recognises as a strategic goal the adoption of measures that foster ROVI's information transparency when communicating economic/financial, non-financial and corporate information and thus contributing to promoting ROVI's good name, as set out in the Policy for the communication of financial, non-financial and corporate information, and communication and contact with shareholders, institutional investors and proxy advisers approved by the company. Likewise, this promotion of transparency when disclosing information is always carried out applying responsible communication practices, in order to avoid any manipulation of the information and protect honour and integrity.

ROVI undertakes to communicate with transparency, honesty, integrity and responsibility. To this end, all the areas of ROVI will provide the stakeholders with true, clear and verifiable information, maintaining consistency in the messages issued on any media or through any channels. The foregoing will respect the obligations imposed on listed companies with regard to the publication and treatment of confidential information, as well as those that apply in relation to the promotion of medicines, as set out in the Code of Good Practice for the Pharmaceutical Industry, to which ROVI has adhered voluntarily.

The corporate website (www.rovi.es) is the place where information on ROVI is published in general, together with the query, information and complaint channels that ROVI stakeholders may require, as described previously.

Additionally, any breach of the standard SA-8000 may be reported to:

Social Accountability International (SAI):

Email: info@sa-intl.org

Local Office TÜV Rheinland:

Email: almudena.bouza@es.tuv.com

Fax: (34) 93 478 1131

Certification Office of TÜV Rheinland:

Email: CSR-feedback@bj.chn.tuv.com

SAAS:

Email: saas@saasaccreditation.org

Fax: (212) 684-1515