



# HUMAN RIGHTS POLICY

<b>APPROVAL OF REVISIONS</b>		
<b>Revision No.</b>	<b>Effective date</b>	<b>Approved by:</b>
	31 July 2024	<b>Board of Directors of Laboratorios Farmacéuticos Rovi, S.A.</b>  Signed: Juan López-Belmonte Encina Chairman and Chief Executive Officer



## INTRODUCTION

As a member of the United Nations Global Compact, Laboratorios Farmacéuticos Rovi, S.A., together with the other entities belonging to its group (hereinafter "ROVI or the "Company" or the "Group" or the "Rovi Group"), adheres to the Compact's Ten Principles by protecting and respecting human rights. This Policy reflects the ROVI Group's commitment to ensuring that the activities conducted within its sphere of influence, i.e. in both its own operations and those of its value chain, do not violate human rights, as set out in the International Bill of Human Rights and the Fundamental Conventions of the International Labour Organisation.

Respect for human rights is the essence of the Company's values. Therefore, on 30 July 2024, ROVI's Board of Directors approved this Policy, which supplements the Code of Ethics, the Environmental and Social Sustainability Policy and the Corporate Social Responsibility Programme through compliance with the standard SA8000. All the foregoing is intended to have a positive impact on ROVI's stakeholders and ensure that all the Group's actions are guided by the strictest ethical standards.

This Policy will be communicated internally to all ROVI employees and will be made publicly available on the corporate website ([www.rovi.es](http://www.rovi.es)).

## OBJETIVE

The goal of the Human Rights Policy (hereinafter, the "Policy") is to set out ROVI's commitment to international legislation on respect for human rights in terms of principles and specific rules on how to act, in order to prevent its activities and commercial relations from provoking or contributing to generate negative human rights repercussions. Therefore, this Policy is also intended to establish the means necessary to identify and prevent any human rights violation and put appropriate mitigation or reparation measures in place

## SCOPE OF APPLICATION

Additionally, ROVI endeavours to ensure that companies over which it has no effective control – suppliers, distributors, consultants and other business partners – are familiar with the principles regulated in this Policy.

Therefore, the ROVI workforce and the professionals who provide services to ROVI must know and strive to comply with the contents of this Policy, ensuring that the persons for whom they are responsible likewise take it into account in everything they do that has human rights implications.



## ROVI'S PRINCIPLES FOR ACTION

ROVI's declaration of its commitment to the protection of human rights is set out in five principles for action that guide the Company's conduct in all its spheres of influence:

- Respect for human and labour rights recognised in national and international legislation.
- Creation of a system to periodically assess the risk of a human rights violation and update the Policy and the reporting system whenever necessary.
- Publication of the Policy and communication of ROVI's human rights commitment to all stakeholders as well as raising awareness among the ROVI workforce.
- Implementation of an internal information system to receive and manage information concerning any possible human rights violation, which allows tracking, appropriate handling and, if applicable, reparation of any negative consequences.

## COMMITMENTS TO STAKEHOLDERS

ROVI has identified four broad stakeholder groups on which its business activity has a direct influence and establishes the following commitments to ensure respect for human rights in the areas where it acts:

### **1. Commitment to ROVI's payroll and the subcontracted personnel who work at the ROVI facilities**

ROVI considers people to be its most valuable asset and, therefore, promotes a diverse and inclusive culture, based on an open, stimulating work atmosphere. To this end, it is committed to providing its workers with a fair and ethical work environment, as well as objective and non-discriminatory treatment. This commitment materialises through the Equality Plan, the Equality Plan's Joint Monitoring Commission, the Protocol for the Prevention and Handling of Moral and Sexual Harassment and ROVI's Code of Ethics.

#### *a. Working conditions, non-discrimination, equal opportunities and work-life balance*

ROVI promotes the absence of discrimination based on race, nationality, social origin, age, gender, civil status, sexual orientation, ideology, political opinions, religion or any other physical or social characteristic of its workers. Furthermore, ROVI promotes the



stability of its workforce, always prioritising permanent contracts, and has an Equality Plan in place that effectively protects the equality of its employees in relation to job access, promotion, training, working conditions and wage policy. To this end, ROVI:

- Respects the personal and family life of all the workers and promotes a balance between personal and professional life. To do this, it is developing a business model committed to a work-life balance, trying to prevent professional development from hindering the well-being of the workforce.
- Provides its professionals with competitive remuneration as well as a series of advantages and social benefits adapted to the country and work centre, endeavouring to create a work atmosphere that fosters the workforce's well-being and satisfaction.
- Incorporates criteria for flexibility and disconnection from work.
- Analyses and monitors its wage structure regularly in order to detect any gender gap and, where appropriate, implement suitable measures to eliminate it.
- Gives priority to ensuring that all the people employed by ROVI, irrespective of their location, enjoy equitable working conditions and levels of well-being.
- Promotes sensitising and training its workforce as tools to raise awareness of and combat the discrimination and the barriers that people with disabilities encounter.
- Holds agreements whereby it conducts support programmes aimed at the workplace inclusion of persons with intellectual disabilities and collaborates financially with a number of non-profit organisations that are active in this area.
- Works constantly for the work centres where it carries on its activity to be safely, comfortably and autonomously accessible to everyone.

*b. Harassment prevention*

ROVI does not tolerate harassment and rejects any form of violence, physical, sexual, psychological or moral harassment, abuse of authority at work or any other conduct that generates an atmosphere that is intimidatory or offensive for the workers' rights.

Furthermore, ROVI has a "Protocol for the Prevention and Handling of Cases of Moral and Sexual Harassment in the Workplace", whereby employees must report any case in which they know or have founded suspicions that any kind of harassment, discrimination or inappropriate conduct is taking place.

*c. Protection of the right to privacy*

ROVI's priorities include guaranteeing its workforce's right to privacy in all its manifestations, particularly with regard to personal data. Specifically:



- ROVI observes a correct management of the personal data of its employees and those to which it has access in relation to its subcontractors and, therefore, any data processing must be conducted in accordance with current legislation.
- Specifically, (i) personal data may only be collected and stored for legitimate purposes and it will be indispensable to obtain the data subject's consent when current legislation in each territory so requires; (ii) personal data may only be shared with those who are allowed to access them and after legal requirements have been met; (iii) personal data will only be stored for the necessary time period; and (iv) personal data must be protected as set out in ROVI's security policies.
- ROVI does not disclose personal data of its workers unless it has the data subject's consent or in cases where there is a legal obligation to do so. In no case are workers' data processed for a purpose other than that stipulated legally or contractually.
- ROVI respects its workers personal communications. All employees must make responsible use of the computer resources that the company makes available to them to carry out their duties.

*d. Health and safety at work*

ROVI undertakes to provide a safe and healthy work environment for its employees, business partners, suppliers, customers and any third party who visits the facilities. To this end, ROVI has a specific Occupational Safety and Health Department that provides its services to the whole Group.

*e. Selection, training and evaluation*

ROVI selects talent based solely on (i) academic and professional merits, (ii) suitability for the vacant job, and (iii) compatibility with the values and principles applicable at ROVI.

Likewise, ROVI has public, objective evaluation processes that allow the workers' performances to be evaluated. ROVI offers its professionals different training programmes, all of which must favour equal opportunities and foster the employee's career development and attainment of the Group's objectives. ROVI has a Training and Development Programme that describes and establishes the steps to be followed by the Human Resources Department, jointly with the management of other areas and departments, in the process of identifying needs and planning training actions.

*f. Freedom of association and collective bargaining*

ROVI is firmly committed to respecting the freedom of association and trade union membership of all the workers as well as the right to collective bargaining.



The Company continues to base its labour relations on transparency, legal compliance and respect and permanent dialogue with the social partners and workers' representatives. These relations materialise through smooth communication using all available means, particularly through meetings, including both those that follow a planned schedule and one-off meetings at the request of either the organisation or the workers' representatives.

The Group's Works Councils are the essential mechanism to ensure social dialogue. ROVI also has Health and Safety Committees and a Social Performance Team. Likewise, the workforce's participation in equality matters is fostered internally through the creation of the Equality Commission, which signed the ROVI Group's Equality Plan, and its Monitoring Commission.

ROVI also fosters fulfilment of these principles in relation to subcontracted personnel who provide services at its facilities by negotiating contracts with the subcontractors and the occupational health and safety coordination plans.

## **2. Commitments to patients and healthcare professionals in order to guarantee the right to health**

Improving patients' lives is ROVI's main commitment to society. This commitment is included in its Mission as a Group and in all the decisions adopted. Therefore, the Company's priority is to provide innovative medicines that help meet patients' needs, always respecting human rights, the law and the standards of conduct that regulate its activity.

### *a. Ensuring product safety and quality*

The cornerstone of ROVI's quality management is to protect the health and safety of its customers and patients throughout the life cycle of its products, starting with the raw material and ending with the sale and distribution, by adhering to the strictest standards and conducting regular audits.

Furthermore, ROVI has a pharmacovigilance system in place to monitor any potential adverse reactions derived from the administration of its products.

### *b. Marketing and sale of medicines and medical devices*

ROVI strictly respects the laws and standards of conduct established for the promotion, commercialisation and sale of its products, ensuring that the advertising of its products is truthful and complete.



ROVI strives to ensure that patients, healthcare professionals, healthcare organisations and customers receive useful and full information on its products.

Likewise, ROVI takes account of the advertising prohibitions applicable to prescription drugs. All the information provided to the market on its products, including the content of its promotional and advertising activities, is consistent with the approvals obtained for the products.

*c. Ensuring the continuity of medicine production and supply*

ROVI carries on an essential activity and, therefore, must ensure the continuity of its operations to guarantee that its medicines are available at all times for the patients who need them. ROVI has created incident management teams who immediately analyse the specific risks and needs of each one of its production centres, to ensure continuity in the production of the medicines, and the supply chain, to ensure they are correctly distributed.

*d. Promotion of equality in access to medicines*

ROVI is committed to the equality of all people and non-discrimination. To this end, it strives to guarantee the supply of its medicines wherever they are necessary when a request for supply is received, irrespective of the territory in question.

Furthermore, in health emergencies and/or exceptional situations, ROVI works with international and local entities to ensure a swift response to explicit requests for its medicines.

*e. Ensuring the safety and privacy of clinical trial participants*

As a company focused on research, ROVI devotes its efforts to medical progress and improving the quality of life. In its research work, ROVI strives to make ethical use of the existing scientific and technological potential, in order to develop innovative medicines and satisfy unmet medical needs.

In this process, ROVI respects current laws, regulations and standards in relation to research and development and takes all possible measures to guarantee the integrity and autonomy of the persons who take part in clinical trials in any part of the world, ensuring that they are not exposed to unnecessary risks and understand the purpose of the research.

In particular, ROVI respects and protects the privacy of the personal data of all participants in clinical trials and complies with the current laws in each territory in all the activities that entail personal data processing.



### **3. Commitments to suppliers and business partners**

ROVI aspires for its related companies and persons, including, therefore, its suppliers and other components of the supply chain, to adopt conduct that respects not only current legislation, but also the values of the entity's Corporate Governance Policy and the principles set out in this Policy.

In this respect, ROVI transmits its values of respect for and protection of internationally recognised human rights to its suppliers and business partners through its Code of Ethics for Suppliers, which sets out the mandatory requirements in relation to human rights for any service provider who works with the Group, in line with the content of this Policy.

### **4. Commitment to society**

ROVI is committed to the economic and social development of the areas where it carries on its activity and, therefore, assumes the impact that its activity generates on society, assessing and managing non-financial, ethical, reputational, social and environmental risks. Furthermore, it commits to social initiatives or activities that benefit society within the spheres of promoting health, commitment to research, social progress and environmental protection.

## **IMPLEMENTATION AND OVERSIGHT**

With specialised advice, ROVI will strive to ensure that this Policy is effectively implemented.

To safeguard human rights within ROVI's own operations, the Company has mechanisms in place to ensure compliance with the principles set out in this Policy, such as adherence to the current sectoral collective agreement, the legal representation of the workers at the different work centres, the health and safety delegates, the working hours register, the regulation of overtime and a philosophy of guaranteeing permanent dialogue with the social partners and workers' representatives.

In the case of the value chain, ROVI has designed a procedure to evaluate suppliers that includes parameters related to compliance with the principles set out in this Policy, which will be mandatory before any contract is signed.





## **ETHICS CHANNEL**

ROVI has a confidential Ethics Channel to report any conduct that is irregular or that violates human rights.

Through the Ethics Channel, any employee, director, manager, supplier, contractor, business partner and, in general, anybody who is subject to ROVI's Code of Ethics or the Code of Ethics for Suppliers of the ROVI Group is obliged to report any conduct that violates or may violate human rights. Likewise, ROVI's Ethics Channel is available on the corporate website and, therefore, is also open to anybody who has a legitimate interest in making confidential communications.

The operation of ROVI's Ethics Channel is governed by the content of the Policy on the Internal Information System and Whistleblower Protection, approved by ROVI's Board of Directors and published on the corporate website