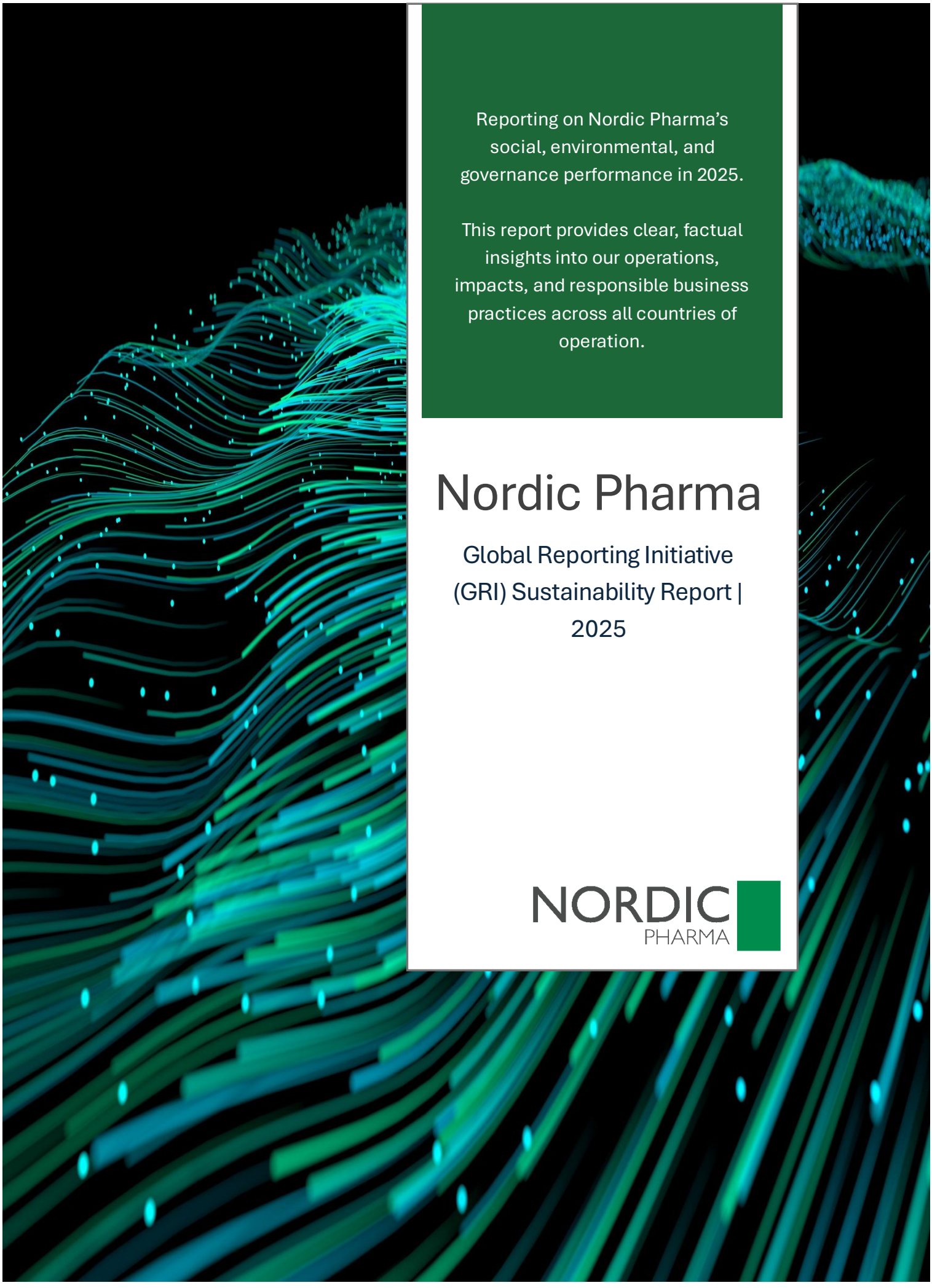

Reporting on Nordic Pharma's social, environmental, and governance performance in 2025.

This report provides clear, factual insights into our operations, impacts, and responsible business practices across all countries of operation.

Nordic Pharma

Global Reporting Initiative (GRI) Sustainability Report | 2025

NORDIC PHARMA

Contents

Nordic Pharma (Nordic Group B.V.) – 2025 Sustainability Report

Prepared in accordance with: GRI Standards 2021 (Core option)

1. General Disclosures

Nordic Pharma is a privately owned, medium-size Pharma company with a history of internal product development and acquisitions. We hold an established position in Women's Health, a fast-growing Rheumatology franchise with a global footprint, and an increasing international presence in Ophthalmology. We operate in 19 countries across Europe, North America, and Asia, employing 274 employees and 8 interns.

Nordic Pharma is committed to transparent, responsible, and sustainable operations. This report provides stakeholders with insights into our economic, environmental, and social impacts and is prepared in accordance with the **GRI Standards 2021**.

Contact: corporate.communication@nordicpharma.com

1.1 Reporting period, scope, roles and responsibilities

Reporting period: The period covered by this report is January 1, 2025 to December 31, 2025.

Scope: All operations across Austria, Belgium, Canada, Czech Republic, Denmark, Finland, France, Germany, Ireland, Italy, Japan, the Netherlands, Norway, Portugal, Spain, Sweden, Switzerland, United Kingdom, United States.

Roles and responsibilities: Sustainability oversight by Head of HR, Communication & Sustainability, Head of Supply Chain and Procurement, Corporate Communication & Sustainability Manager. Finance and HR for data collection.

Publication date: June 2026

Nordic Pharma ensures responsible corporate governance through Board-level oversight and Executive Committee management. Policies on ethics, anti-corruption, and compliance guide our operations globally. See Section 3 for full details.

1.2 Review mechanisms and targets

Sustainability performance is measured against internal KPIs and improvement targets and reviewed on an annual basis by our Executive Committee.

Role	ESG Responsibility
Chief Executive Officer (CEO)	Strategic oversight of sustainability initiatives, approval of ESG targets, and integration into corporate strategy

Head of HR, Communication & Sustainability	Collection and comms of ESG data, stakeholder engagement, communication of sustainability performance, CSR ambassadors
Head of Supply Chain & Procurement	Owns the ESG agenda across the external value chain, defining and steering sustainability initiatives from supplier selection through to last-mile delivery. Drives decarbonisation, responsible sourcing, and supply chain transparency programmes, ensuring alignment with corporate ESG targets. Represents the organisation in industry coalitions and peer networks to shape sector-wide standards and advance shared accountability across the pharmaceutical supply chain.

1.3 Entities included (GRI 2-2)

This sustainability report covers Nordic Group B.V. and all fully consolidated subsidiaries and affiliated entities under its control.

All operational entities within the Group across the 19 countries of operation are included in the reporting boundary.

The scope aligns with the financial consolidation perimeter. Entities over which Nordic Group B.V. does not have control are excluded unless explicitly referenced.

- Austria
- Belgium
- Canada
- Czech Republic
- Denmark
- Finland
- France
- Germany
- Ireland
- Italy
- Japan
- Netherlands
- Norway
- Portugal
- Spain
- Sweden
- Switzerland
- United Kingdom
- United States

1.4 Restatements of Information (GRI 2-4)

No restatements of previously reported information have been made in this reporting period.

1.5 External Assurance (GRI 2-5)

This sustainability report has not been externally assured. All data and disclosures have been internally collected, reviewed, and approved by the Head of HR, Communication & Sustainability and the Head of Supply Chain & Procurement.

2. Organizational Overview (GRI 2-1, 2-3, 2-6)

2.1 About Nordic Pharma

- **Industry:** Pharmaceuticals (specialty medicines & healthcare solutions)
- **Employees:** 274 employees and 8 interns. All our employees are on permanent contracts, except for two temporary employees: one based in the UK (male) and one in Ireland (female).
- **Workers who are not employees:** In addition to employees, Nordic Pharma engages temporary employees, fixed-term contract workers, interns, and a limited number of external consultants across its operations. These workers are primarily engaged to support temporary business needs, internships, or specific operational requirements.
- A breakdown of contract types by location is provided in the workforce data tables included in this report.
- **Operations:** Sales, marketing, sourcing, quality, regulatory affairs, and commercial distribution.
- **Products:** Specialty medicines for rare and autoimmune diseases, rheumatology, women's health, ophthalmology, oncology, and critical care.
- **Headquarters:** Siriusdreef 41, 2132WT, Hoofddorp, the Netherlands
- **Ownership:** Nordic Pharma operates as part of Nordic Group B.V., a privately held company

2.2 Mission & Strategy

We focus on the development and commercialization of specialty products, which include, but are not limited to, niche hospital and orphan products, to address unmet medical needs. Our expertise relies on the development and sales of our own products, but also on partner products acquired at various stages of development. Today, Nordic

Pharma has a range of highly specialized proprietary and in-licensed products in the following therapeutic areas: Rheumatology, Ophthalmology, Women's Health and Critical Care (Anaesthesia, Haematology, Oncology).

Our driving force is about innovative and efficient products to fight diseases. We strive to bring solutions to specific unmet medical needs, contributing to improved patient care. Nordic Pharma is committed to produce/sell/distribute products that are safe to use for its customers.

Beyond regulatory compliance, Nordic Pharma is committed to acting with care and integrity and to improving patient outcomes by combining scientific expertise with advanced technology. The company works to ensure a continuous supply of medicines and medical devices, prioritizing patient safety and addressing unmet medical needs.

Statement on sustainable development (GRI 2-22)

Nordic Pharma integrates ESG principles into its business, focusing on fairness, equity, and transparency. Key initiatives include compliance with the EU Pay Transparency Directive, ethical supply chain management, anti-bribery practices, and patient safety through pharmacovigilance. Environmental targets include reducing Scope 1 & 2 emissions by 40% and cutting energy use and operational waste by 10% by 2030. Social efforts focus on employee well-being, diversity, inclusion, and training. Governance and oversight are ensured through the Executive Committee, compliance functions, and KPI monitoring. Nordic Pharma is a signatory of the UN Global Compact, reinforcing its commitment to human rights, labor standards, environmental responsibility, and anti-corruption. This integrated approach supports responsible business practices, stakeholder engagement, and long-term sustainable development.

3. Governance & Business Ethics (GRI 2-9, 2-10, 2-16, 205)

3.1 Executive Committee & Board oversight

The Executive Committee at Nordic Pharma is responsible for day-to-day management, including oversight of sustainability, ethics, and compliance. Ultimate accountability rests with the Executive Committee, while the Board of Directors provides advisory guidance. Nordic Pharma promotes diversity and inclusion across its management structure.

Key Executive Committee metrics:

- **Gender:** 50% male, 50% female
- **Age distribution:** 30–50 years old: 12%, above 50 years old: 88%
- **Women in managerial positions (all management):** 48%

- For more information, see: Executive Committee

3.2 Policies & Ethics

Nordic Pharma maintains clear policies on anti-corruption, responsible business conduct, data privacy, environmental issues, health & safety, conflict of interest, and IT security.

All employees complete frequent compliance and ethics training across all regions and teams.

Whistleblowing channels are available for employees and suppliers to report concerns confidentially. In the past year, no whistleblowing reports were submitted, demonstrating strong adherence to our ethics policies. The system remains fully operational and accessible, ensuring transparency and accountability across the company.

3.3 Policy Commitments and Due Diligence (GRI 2-23, 2-24)

Nordic Pharma is committed to responsible business conduct in accordance with applicable laws, regulations, and internal policies. The Company has established due-diligence processes to identify, prevent, and mitigate risks related to ethics, data protection, labor standards, and environmental compliance across its operations and value chain.

Due diligence is conducted through internal controls, supplier and distributor screening, and periodic reviews. All new suppliers of Direct Materials undergo assessment using an external due-diligence platform (Graydon Creditsafe) to identify potential exposure to bribery, corruption, and sustainability-related risks. Findings are documented, and where issues are identified, corrective actions are implemented and monitored to ensure completion. This structured approach ensures that ethical, compliance, and sustainability standards are upheld across the supply chain.

These processes are proportionate to the size and nature of our operations and are continuously reviewed, including updating supplier contracts to include explicit ESG clauses.

3.4 Anti-Corruption (GRI 205)

Policy Reference: Nordic Pharma is committed to conducting business ethically with zero tolerance for bribery or corruption, in line with the Anti-Bribery Policy (NGR-LA-POL-000003, Version 4.4, February 2026). The policy applies to all employees, contractors, and third parties acting on behalf of the company, including suppliers, consultants, and business partners.

Scope & Boundaries

- Applies to all offices, operations, and third-party relationships globally.
- Covers all forms of bribery and corruption, including facilitation payments, cash gifts, and gifts to public officials unless legally permitted and pre-approved.

Performance & KPIs

KPI	Value	Unit	Policy Reference
Confirmed anti-bribery breaches	0	Number	Anti-Bribery Policy
% of new employees receiving policy	100	%	Anti-Bribery Policy

Targets & Future Plans:

- Maintain zero confirmed cases of bribery or corruption.

KPI	Value	Unit
Confirmed anti-bribery breaches	0	Number
% of business partners screened prior to engagement	100	%
% of contracts including anti-bribery clause	100	%
Gifts & hospitality controls	100% declared, pre-approved, and logged	Requirement
Facilitation payments	0 tolerance	Policy rule
Cash gifts	0 tolerance	Policy rule
Gifts to public officials	Prohibited unless legally permitted and pre-approved	Policy rule
% of new employees receiving Anti-Bribery Policy	100	%
Employee policy reconfirmation	Every 2 years	Requirement

KPI	Value	Unit
Supplier acknowledgment of anti-bribery commitments	100% by 2027 (target)	%
Complaint acknowledgment timeframe	Within 7 days	Target
Investigation closure timeframe	Within 90 days	Target

3.4.1 Data Privacy & Product Safety (GRI 416, 418):

Policy Reference: Nordic Pharma adheres to its Human Rights Policy (NGR-LA-POL-002155, Version 1.0, March 2024) and Data Privacy Guidelines, which outline commitments to product safety, responsible marketing, patient communication, and protection of personal data.

Scope & Boundaries

- Applies to all Nordic Pharma entities, employees, and operations globally.
- Covers product safety practices, responsible marketing, and communication of product risks.
- Covers processing and protection of personal data for employees, partners, and other stakeholders.

Performance Indicators

- Global Data Protection Officer (DPO) appointed to oversee GDPR compliance.
- Dedicated GDPR contact channel established for employees and stakeholders.
- Target: 100% of employees to complete GDPR training by 2028 and acknowledge the company policy.

Pharmacovigilance

- Nordic Pharma maintains a structured Pharmacovigilance (PV) system in line with regulatory requirements to monitor, investigate, and report adverse events associated with its products.
- All employees, as well as those involved in product handling and patient interactions are trained on PV responsibilities to ensure risks are promptly identified and addressed.

4. Stakeholder Engagement (GRI 2-29, 2-30)

Key stakeholders: Patients & healthcare providers, employees & interns, suppliers & distributors, owners/board/regulators, local communities.

Engagement channels: Surveys, audits, potential site visits, and consultations during ESG reporting.

Key concerns and responses:

Stakeholder Group	Key Concerns	Nordic Pharma Response
Patients & Healthcare Providers	Product safety	Maintain quality control and monitor adverse events
Employees & Interns	Workplace practices, safety	Ethics & compliance training; health & safety programs
Suppliers & Distributors	Responsible supply chain, product emissions	Supplier audits; corrective actions
Owners, Board & Regulators	Governance, compliance	Quarterly sustainability reporting; oversight of responsible conduct
Local Communities	Environmental impact	Carbon reduction programs; community engagement initiatives

5. Materiality Assessment (GRI 3-1, 3-2)

In 2024, our company conducted a double materiality assessment evaluating both the impact of our operations on society, the environment, and people (impact materiality) and the financial implications for our business (financial materiality). This approach ensures that we identify sustainability topics that are not only significant for our stakeholders but also critical to our long-term business success. No assessment was conducted in 2025, but a new assessment is planned for 2026 to maintain ongoing relevance.

Methodology

The assessment considered a wide range of sustainability topics relevant to our operations, including environmental, social, and governance factors. Each issue was evaluated across two dimensions:

- Impact Materiality: The significance of our company's impact on society, the environment, and local communities, measured on a scale of 0–5. Issues

scoring 3 or above were considered material due to their high potential effect at a national or local level.

- Financial Materiality: The potential risk or opportunity that sustainability topics may pose to our financial performance, assessed on a scale of 0–4. Issues scoring above 2.75 were considered financially material, representing risks or opportunities likely to significantly influence business outcomes.

Data Collection Process

To ensure a robust and representative assessment, we used multiple approaches in 2024:

1. **Business Impact Workshops**: Subject Matter Experts (SMEs) from each of our three business units provided insights on both financial and impact materiality across all 16 topics.
2. **Employee Panels:** Panels of employees selected the most relevant topics and provided their perspective on impact materiality for those topics.
3. **External Stakeholder Interviews and Desk Research:** Interviews with eight external stakeholders ranked the top 10 most relevant topics and provided a high-level assessment of both impact and financial materiality. Desk research, including sector benchmarking and regulatory trends, supported this evaluation.

5.1 Key Material Topics

Based on this assessment, the following topics were identified as material under the double materiality framework:

Material Topic	Why It's Material	Relevant GRI Standard
Access and Affordability of Health Care	Ensuring equitable access to treatments is a significant positive impact and business opportunity	416
Safe and Qualitative Treatments for Patients	Maintaining the highest standards for patient safety is both a societal impact and business priority	416
Responsible Supply Chain	Sustainable sourcing mitigates operational risks and strengthens positive impact on suppliers and communities	308, 414

Material Topic	Why It's Material	Relevant GRI Standard
Waste Management, Circularity, and Packaging	Promoting circular economy principles reduces environmental impacts and improves resource efficiency	301, 306
Talent Attraction, Development, and Retention	Supporting diversity, inclusion, and workforce development enhances societal outcomes and long-term business performance	404, 405

Other topics assessed include biodiversity and natural resources, human rights and labor practices, responsible innovation, climate change mitigation, and community engagement. While these are impactful, their financial significance varies and they are monitored continuously.

Integration Into Strategy

The outcomes of the 2024 double materiality assessment provide a foundation for Nordic Pharma's sustainability approach. As sustainability is a developing area within the organization, the integration of material topics into decision-making, risk management, and operational processes is ongoing.

The identified material topics are currently used to:

- Inform the structure and focus of sustainability reporting
- Support initial prioritization of sustainability efforts
- Guide future development of targets, KPIs, action plans

5.2 SDG mapping

Nordic Pharma has mapped its CSR strategy against the most relevant United Nations Sustainable Development Goals (UN SDGs) and recognizes our responsibility to advance action in these areas. Our material topics contribute to the following SDGs:

Material Topic	Relevant SDG	Nordic Pharma Contribution
Access to medicines & patient health	SDG 3: Good Health and Well-being	Our products aim to improve people's health globally, supporting equitable access to safe and effective treatments.

Material Topic	Relevant SDG	Nordic Pharma Contribution
Diversity & inclusion	SDG 5: Gender Equality	Policies and initiatives promote gender equality, while many of our products are designed for women, ensuring equal access to healthcare.
Resource use & waste management	SDG 12: Responsible Consumption and Production	We manage natural resources responsibly through recycling, circular packaging, and efficient operations.
Climate impact reduction	SDG 13: Climate Action	We plan and implement measures to reduce emissions, increase energy efficiency, and lower our environmental footprint.

6. Topic-Specific Disclosures

6.1 Access & Affordability of Healthcare

Management Approach

This topic was identified as material through Nordic Pharma's 2024 double materiality assessment.

The company aims to provide healthcare professionals with products that support efficient and appropriate patient care, while complying with applicable regulations and requirements of local governments and public health authorities.

Current Approach

Nordic Pharma operates within the healthcare systems and regulatory frameworks of the countries in which it is active. The company's activities focus on ensuring the availability and distribution of pharmaceutical products to healthcare providers.

Current Status and Limitations

Nordic Pharma does not currently have specific policies, KPIs, or targets dedicated to access and affordability of healthcare.

Future Development

As sustainability practices continue to develop, Nordic Pharma will further assess how this topic can be integrated into its sustainability framework.

6.2 Safe and Qualitative Treatments (GRI 416)

Management Approach

This topic was identified as material through Nordic Pharma's 2024 double materiality assessment.

Nordic Pharma is committed to ensuring that its products are safe to use for its customers and comply with applicable regulatory requirements.

Current Approach

Nordic Pharma maintains a pharmacovigilance system to monitor, investigate, and report adverse events associated with its products in line with regulatory requirements. Employees involved in product handling and patient interactions are trained in pharmacovigilance responsibilities.

Performance (2025)

- No major product safety incidents were reported during the reporting period.

Pharmacovigilance KPIs

Nordic Pharma monitors product safety performance through key pharmacovigilance indicators, including:

- ICSR submission timeliness (15-day / 90-day reporting requirements)
- ICSR quality (99.5%)
- xEVMPD compliance and data quality
- PSUR submission timeliness
- Safety variation submissions
- Error rates and late submissions

Targets

- Serious pharmacovigilance cases are submitted to Health Authorities within 15 calendar days.
- Non-serious pharmacovigilance cases are submitted within 90 calendar days.

Current Status
Nordic Pharma does not currently have additional quantitative targets specifically linked to this topic beyond regulatory timelines. However, pharmacovigilance performance is monitored through the KPIs listed above.

Future Development
Nordic Pharma may further develop its approach to this topic as part of the ongoing development of its sustainability framework.

6.3 Talent Attraction, Development & Retention (GRI 403, 404, 405, 406, 408, 409)

Management Approach
This topic was identified as material through Nordic Pharma's 2024 double materiality assessment.

Nordic Pharma is committed to fostering a safe, inclusive, and fair working environment for all employees, interns, and contractors across all countries of operation. The management approach is guided by internal policies on human resources, diversity, inclusion, and employee well-being, supported by local labor laws and corporate standards.

Key topics include occupational health & safety, career development, non-discrimination and anti-harassment, diversity & inclusion, and labor practices.

Scope & Boundaries
Applies to all employees, interns, and relevant contractors globally. Supplier-related labor risks are addressed through due diligence and monitoring of Tier 1 suppliers.

Roles & Responsibilities

- Executive Committee: Provides oversight of social compliance and policy alignment.
- Human Resources (HR): Implements policies, manages training programs, monitors compliance, and handles reported incidents.
- Managers: Foster a respectful and inclusive workplace and support employee well-being initiatives.
- Employees: Required to comply with social policies, participate in training, and report concerns through internal channels.

Review Mechanisms

- Regular internal audits of HR and training processes
- Monitoring through whistleblowing and grievance mechanisms
- Employee feedback surveys
- Supplier audits for child and forced labor compliance

6.3.1 Occupational Health & Safety (GRI 403)

Scope: Employees, interns, contractors, and visitors across all operations.

Performance Indicators (2025):

- Total work-related injuries: 1
- Fatalities: 0
- Work-related ill-health cases: 0
- Total days lost: 3
- Incident/near misses: 0

Programs & Actions:

- Safety and health measures are implemented across offices and operational sites.
- Employees can report hazards or incidents through internal channels.
- Corrective actions are applied where necessary to maintain workplace safety.

6.3.2 Career Development, Training & Talent Management (GRI 404)

Scope: All employees globally.

Performance Indicators (2025):

- Employees receiving career reviews: 233
- % employees receiving career reviews: 100% of eligible employees
- Total reported training hours: approximately 4,900 hours (excluding sites with missing data)
- Training data is partially tracked across sites, and data coverage is improving.

Summary of Training Hours (2025):

- Training data is available for the majority of operational sites.
- Several locations (e.g., Czech Republic, United Kingdom) did not report training data.
- Training hours are unevenly distributed across sites, reflecting differences in workforce size and local practices.

Targets:

- Maintain 100% coverage for career reviews
- Expand training programs and professional development initiatives
- Improve tracking of training hours and effectiveness in future reports

6.3.3 Non-Discrimination and Anti-Harassment (GRI 405, 406)

Scope: All employees, contractors, interns, and visitors globally.

Performance Indicators:

- Training completion: 100% of employees completed mandatory training
- Reported cases: 0
- Acknowledgment time: 100% within 5 working days

6.3.4 Diversity & Inclusion (GRI 405)

Policy & Commitment

Nordic Pharma fosters a diverse, equitable, and inclusive workplace in line with its Human Rights Policy (NGR-LA-POL-002155, Version 1.0, March 2024). The policy ensures equal treatment in all aspects of employment regardless of age, gender, ethnicity, disability, sexual orientation, religion, or other protected categories.

Scope & Boundaries

- Applies to all employees across Nordic Pharma offices and sites globally.
- Includes gender diversity reporting and monitoring representation across sites.

Roles & Responsibilities

- Human Resources: Oversees recruitment, diversity reporting, and initiatives to support workforce equity.

- Managers & Team Leads: Ensure inclusive practices in daily operations and talent development.
- Executive Committee: Provides oversight and ensures alignment with corporate values and policies.
- Employees: Expected to follow Human Rights Policy principles and support an inclusive workplace.

Review Mechanisms

- HR monitors workforce composition annually.

Workforce Composition (2025):

- Gender diversity: 49% male, 51% female
- Women in senior roles: 48%
- Nationalities represented: 28

Workforce composition by location and gender (GRI 2-7, 405-1)

Office / Site	Male Employees	Female Employees	Other Gender	Total Employees
Canada	5	5	0	10
Czech Republic	1	0	0	1
France	25	44	0	69
Germany	3	9	0	12
Austria	1	1	0	2
Switzerland	1	1	0	2
Ireland	1	5	0	6
Italy	6	5	0	11
The Netherlands	24	25	0	49
Spain	20	19	0	39
Sweden	5	17	0	22

Denmark	0	1	0	1
Finland	3	1	0	4
United Kingdom	12	12	0	24
United States	5	9	0	14
Portugal	5	2	0	7
Japan	6	2	0	8

Workforce composition by contract type (GRI 2-7, 2-8)

Contract Type	Male Employees	Female Employees	Other Gender	Total
Full-time	134	120	0	254
Part-time	3	16	0	19
Temporary employees	9	7	0	16
Total	146	143	0	289

Targets & Future Plans

- Continue to include diversity metrics in ESG reporting to track progress over time.

6.3.5 Child & Forced Labor (GRI 408–409)

Policy Reference: Nordic Pharma is committed to preventing child labor and all forms of forced or compulsory labor, in line with the Human Rights Policy (NGR-LA-POL-002155, Version 1.0, March 2024), the Universal Declaration of Human Rights, the ILO Declaration on Fundamental Rights at Work, and the UN Guiding Principles on Business and Human Rights.

Scope & Boundaries

- Applies to all Nordic Pharma employees, affiliates, contractors, and suppliers worldwide.
- Covers both office operations and the product supply chain.

Performance Indicators (2025):

- Child labor: 0 cases reported
- Forced labor: 0 cases reported

Supplier audits confirm compliance for Tier 1 suppliers.

Targets & Future Plans

- Maintain 0 cases of child or forced labor across all operations and supply chain tiers
- Continue supplier due diligence, awareness programs, and periodic reviews to prevent labor rights violations

Notes & Limitations

- Data is based on HR records, supplier audits, and the whistleblowing system.
- Reporting covers Tier 1 suppliers and direct operations, extended supply chain risks cannot be entirely excluded, though mitigation measures are in place.

6.3.6 Social Dialogue & Collective Bargaining

Policy Reference: Nordic Pharma respects employees' rights to freedom of association and collective bargaining, in line with the Human Rights Policy (NGR-LA-POL-002155, Version 1.0, March 2024).

Scope & Boundaries

- Applies to all Nordic Pharma employees globally, with collective bargaining implemented in countries where legally required.
- Covers office operations and operational sites subject to local labor law or collective agreements.
- Dialogue includes working conditions, employee well-being, transparency, and CSR initiatives.

Performance Indicators (2025):

- Employees covered by collective bargaining agreements: 100% of eligible employees
- Grievances related to collective bargaining: 0

Future Development

Data collection and monitoring processes for workforce-related indicators are still developing. Nordic Pharma aims to improve data consistency and further develop its approach to talent management, training, and workforce-related practices.

6.4 Responsible Supply Chain

6.4.1 Supplier Risk Assessment

Management Approach

Nordic Pharma is committed to ethical, sustainable, and responsible procurement, in line with its Sustainable Procurement Policy (NGR-LG-POL-002665, Version 1.0, June 2025). Supplier evaluation integrates three core pillars:

- People: Human rights, fair labor, ethical conduct, and supplier diversity.
- Planet: Environmental impact mitigation, circular economy practices, and energy efficiency.
- Prosperity: Long-term partnerships that create shared value and strengthen local economies.

Scope & Boundaries

- Applies to all suppliers, contractors, and third-party intermediaries providing goods or services globally.
- Covers procurement processes including ESG screening, monitoring, and performance assessment.
- Includes all strategic suppliers and those classified as high-risk for ESG factors.

Monitoring & Reporting

- 100% of new strategic suppliers undergo ESG screening prior to onboarding.
- ESG screening includes labor practices, human rights, ethical compliance, and environmental management.
- High-risk suppliers are subject to enhanced due diligence and action plans.
- ESG performance is reviewed annually, with follow-up on any identified non-compliance.

Key Highlights

- Total Suppliers: 18

- Employees in Procurement Department: 2
- 7 suppliers went through sustainability risk analysis (39%)
- 7 suppliers were assessed for sustainability compliance (39%)
- All suppliers were required to cooperate in capacity-building initiatives

Performance Against KPIs

KPI	2025 Target	2025 Performance	GRI Reference
% of strategic suppliers ESG-assessed	100% by 2026	85%	204-1, 308-1, 414-1
Suppliers with recognized sustainability certifications	+20% YoY	18% YoY	308-1, 414-1
Suppliers audited on-site	Target per policy	39%	308-3, 414-3
Suppliers completing sustainability risk analysis	Target per policy	39%	308-3, 414-3

6.4.2 Supplier Code of Conduct

Policy Reference: All suppliers are required to formally acknowledge and comply with Nordic Pharma's Supplier Code of Conduct (NGR-LG-POL-002665, Version 1.0, June 2025), which covers:

- Labor rights and fair employment practices
- Health & safety standards
- Ethical business conduct, anti-bribery, and compliance with laws
- Environmental management and sustainability commitments

Nordic Pharma is also an associate member of the Pharmaceutical Supply Chain Initiative (PSCI), reinforcing commitment to responsible supply chains.

Scope & Boundaries

- Applies to all suppliers, contractors, and third-party intermediaries providing goods or services globally.

- Covers procurement processes including onboarding, monitoring, auditing, and corrective action management.

Monitoring & Reporting

- Annual audits of high-risk and strategic suppliers are conducted.
- Third-party assessments, e.g., EcoVadis and PSCI, supplement internal audits.
- Suppliers and employees can report concerns anonymously via the EthicsPoint platform.
- Supplier ESG data collection is GDPR-compliant, anonymized where possible, and securely stored.

Performance & KPIs

KPI	2025 Target	2025 Performance	GRI Reference
% of suppliers signed Code of Conduct	100%	94%	414-1
% of suppliers with sustainability clauses in contracts	100%	39%	414-1
% of suppliers completing self-assessment questionnaire	56%	28%	414-2
% of suppliers participating in capacity-building initiatives	100%	94%	414-2
% of procurement employees receiving sustainable procurement training	100%	17%	414-2

Monitoring & Review

Nordic Pharma continuously monitors supplier compliance with the Supplier Code of Conduct to ensure alignment with ESG standards. Supplier risks are assessed during onboarding and periodically, with high-risk suppliers receiving targeted action plans. Procurement and Sustainability teams conduct regular reviews of supplier performance and engagement. Suppliers can report concerns anonymously via the EthicsPoint platform, and all supplier data collected is handled in accordance with GDPR principles.

6.5 Waste, Circularity & Packaging (GRI 301, 306)

Management Approach

This topic was identified as material through Nordic Pharma's 2024 double materiality assessment, reflecting the company's responsibility to minimize environmental impacts associated with its operations, including office activities, logistics, and product-related waste.

Nordic Pharma is committed to reducing waste generation and promoting circularity across its operations. As a commercial organization without manufacturing activities, the company's environmental impact primarily relates to office waste and the handling of pharmaceutical products, including expired or returned goods.

Waste management is governed by internal policies, including the Office Policy (Version 4.0, January 2026) and SOP NGR-QA-SOP-001824 (Version 2.0, May 2025), which define procedures for waste segregation, safe handling, and disposal.

Two primary waste streams are identified:

- **Office waste**: general administrative waste such as paper, plastics, and household residual waste
- **Product waste**: expired, obsolete, or returned pharmaceutical products, including packaging and materials requiring controlled destruction

Actions & Initiatives

Nordic Pharma has implemented several measures to improve waste management and promote circular practices:

- Waste segregation and recycling practices across office locations
- Controlled handling, return, and destruction of expired or obsolete pharmaceutical products in compliance with EU-GDP and national regulations
- We collect waste stream data from our affiliate offices

Entity	Waste Type	Quantity	Unit	Disposal Method
Nordic Group B.V.	Household residual waste	5,500	kg	Combustion
Nordic Group B.V.	Paper and board: mixed	4,000	kg	Composting

Entity	Waste Type	Quantity	Unit	Disposal Method
Nordic Group B.V.	Batteries	5	kg	Unknown
Nordic Pharma GmbH	Paper and board: mixed	908	kg	Recycled – Open-loop
Nordic Pharma GmbH	Glass	83	kg	Recycled – Open-loop
Nordic Pharma GmbH	Household residual waste	165	kg	Combustion
Nordic Pharma Portugal	Commercial & industrial waste	1,011	kg	Combustion
Nordic Pharma GmbH	Plastics: average plastics	495	kg	Recycled – Open-loop
Nordic Pharma BV	Household Residual Waste	70	kg	Combustion
Nordic Pharma SAS	Commercial & industrial waste	171	kg	Combustion / Destruction at CSP
Nordic Drugs AB	Batteries	2	kg	Recycled – closed-loop
Nordic Drugs AB	Paper and board: mixed	400	kg	Recycled – Open-loop
Nordic Drugs AB	Paper and board: board	668	kg	Combustion
Nordic Drugs AB	Plastics: average plastics	203	kg	Combustion
Nordic Drugs AB	Metal: aluminum cans and foil (excl. forming)	3	kg	Combustion
Nordic Drugs AB	Glass	282	kg	Combustion
Nordic Drugs AB	Household residual waste	890	kg	Combustion
Linepharma KK	Commercial and industrial waste	31	kg	Combustion

Entity	Waste Type	Quantity	Unit	Disposal Method
Nordic Pharma Canada	Commercial and industrial waste	660	kg	Unknown, data not available
Nordic Pharma Ltd	Paper and board: mixed	96	kg	Uknown, data not available
Nordic Pharma Ltd	Batteries	0.2	kg	Unknown, collected by external company for disposal
Nordic Pharma Ltd	Household residual waste	6000	kg	Unknown, data not available

Targets

- Reduce total operational waste generation by 10% by 2030 (baseline: 2024).
- Expand waste tracking across all offices and operational sites
- Strengthening circular practices, including packaging and resource use

Waste Diversion & Disposal (GRI 306-4, 306-5)

Waste streams diverted from disposal include paper, plastics, and glass, which are recycled or composted where local infrastructure allows. Residual and pharmaceutical waste is primarily directed to combustion or controlled destruction in accordance with regulatory requirements.

Due to current data limitations, waste volumes are reported by stream rather than aggregated totals for diversion and disposal categories. Nordic Pharma aims to improve data granularity and aggregation in future reporting cycles.

Materials 2016 (GRI 301)

Nordic Pharma monitors material used, material destroyed and recalled through third parties. For this reason, at this stage, the data is not available but we are working with our suppliers to be able to collect the data as soon as possible in the coming years.

6.6 Other Material Topics

In addition to the key material topics addressed in the sections above, Nordic Pharma identified several additional sustainability topics through its 2024 double materiality assessment, including climate change mitigation, biodiversity and natural resources, human rights and labor practices, responsible innovation, and community engagement.

Human rights and labor practices are addressed through Nordic Pharma's existing policies and procedures, including the Human Rights Policy and related HR and compliance frameworks. These topics are covered across several sections of this report, including diversity and inclusion, non-discrimination, occupational health and safety, and supplier due diligence (see Sections **3.3, 6.3, and 6.4**).

Other topics, including climate change mitigation, biodiversity, responsible innovation, and community engagement, are currently at an earlier stage of development. While recognized as relevant to Nordic Pharma's long-term sustainability impact, these areas are not yet supported by dedicated policies, KPIs, or targets.

As sustainability practices continue to evolve, Nordic Pharma aims to improve its understanding of these topics and progressively integrate them into its governance, risk management, and reporting processes.

6.7 Supporting Environmental Disclosures

While waste management and circularity have been identified as a material topic, Nordic Pharma also monitors additional environmental aspects, including energy use, greenhouse gas emissions, water consumption, and environmental compliance.

These topics were not identified as the most material in the 2024 double materiality assessment but remain relevant to the company's overall environmental impact. As sustainability practices continue to develop, Nordic Pharma aims to improve data availability, monitoring, and performance across these areas.

Management Approach

Nordic Pharma is committed to minimizing its environmental impact across offices, logistics, and distribution activities. The Executive Committee oversees environmental performance, with implementation managed by local operations and facilities teams. Key topics include energy use, greenhouse gas (GHG) emissions, water use, waste management, circularity, and regulatory compliance. Environmental performance is monitored through internal reporting, audits, and periodic review of key indicators, informing ongoing improvements and targets.

Scope

Applies to all Nordic Pharma offices, warehouses, distribution centers, and corporate logistics operations. Upstream supply chain activities are included in risk assessments

where relevant. Manufacturing is not part of Nordic Pharma's operations.

6.7.1 Scope 1/2/3 Emissions (tCO_2e) (GRI 305)

Policy & Commitment

- Commitment to monitor and reduce GHG emissions in line with GRI 305 standards.
- Targets: Reduce Scope 1 & 2 emissions by 40% by 2030 (baseline 2023).

Actions & Initiatives

- Increase renewable electricity use
- Optimize logistics and transportation
- Promote low-carbon business travel and remote work
- Centralized dashboard for Scope 3 tracking

Indicators & Performance (2025)

Metric	GRI Code	2025 Value	Unit	Notes
Scope 1	305-1	374	tCO_2e	Direct emissions, company vehicles & on-site equipment
Scope 2	305-2	546	tCO_2e	Indirect emissions, purchased electricity for offices
Scope 3	305-3	29.440,12	tCO_2e	Upstream/downstream value-chain emissions

Scope 3 Methodology

Calculated using activity data from suppliers, logistics partners, financial records, and internal operational data combined with recognized emission factors.

Where primary data is unavailable, estimates are applied using industry-standard methodologies to ensure completeness and comparability.

Categories included:

- Purchased goods and services
- Capital goods
- Fuel- and energy-related activities (not included in Scope 1 or 2)

- Upstream and downstream transportation and distribution
- Waste generated in operations
- Business travel
- Employee commuting
- Upstream & downstream leased assets

Targets & Progress

Scope 1 & 2: 40% reduction by 2030 vs 2023 baseline. This will be achieved through efficiency measures, process optimization, electrification of our logistics/ transportation, and increased use of renewable energy sources. Progress is being monitored.

Scope 3: Reduce total operational waste generation by 10% by 2030 (baseline: 2024).

6.7.2 Energy use (kWh) (GRI 302)

Policy & Commitment

- Reduce overall energy consumption and improve efficiency across all operations.
- Focus on reducing reliance on fossil fuels, particularly within the company vehicle fleet.
- Target: 10% reduction in total energy consumption by 2030 (baseline: 2024).

Actions & Initiatives

- Electrification and optimization of company car fleet.
- Promote energy-conscious behavior among employees and hybrid/remote work practices.

Indicators & Performance (2025)

Metric	GRI Code	2025 Value	Unit	Notes
Total energy consumption	302-1	2,164,762	kWh/year	Offices, warehouses, and distribution centers, company cars

Metric	GRI Code	2025 Value	Unit	Notes
Energy consumption intensity	302-3	Not measured	kWh/employee	KPI to track efficiency per employee
% renewable electricity	302-4	Not measured	%	Share of total electricity from renewable sources

Targets

- Achieve 10% reduction in total energy consumption by 2030 vs 2024 baseline.

6.7.3 Water usage (GRI 303)

Policy & Commitment

- Nordic Pharma is committed to responsible water use and aims to improve transparency on water consumption across its operations.
- As a commercial organization without manufacturing activities, water use is considered limited but will be monitored going forward.

Indicators & Performance

Metric	GRI Code	2025 Value	Unit	Notes
Water withdrawal	303-3	Not measured	m^3/ year	Monitoring planned for 2027
Wastewater generated	303-4	Not measured	m^3/ year	Monitoring planned for 2027

Targets

- No formal targets defined for 2025.
- Baseline data collection and potential target-setting to be planned in the future.

6.7.4 Compliance with environmental regulations (GRI 307)

Policy & Commitment

- Nordic Pharma is committed to full compliance with environmental laws, regulations, and permits across all countries of operation.
- Environmental compliance is integrated into the company's broader corporate responsibility and sustainability framework.

Actions & Initiatives

- Monitoring compliance through internal controls and periodic audits across operational sites.
- Ensuring environmental requirements are included in supplier and contractor agreements.
- Investigation and remediation of any identified incidents or deviations.

Indicators & Performance

- No significant environmental non-compliance incidents reported across operations.
- Environmental compliance of suppliers is monitored through contractual obligations and periodic assessments.
- Number of environmental policy updates in 2025: 1

Targets

- Maintain full compliance with applicable environmental laws and regulations.
- Continue strengthening monitoring and integration of environmental compliance into operational and procurement processes.

7. Future Goals & Targets

Environmental Goals

- Reduce Scope 1 and Scope 2 GHG emissions by 40% by 2030 (baseline: 2023).
- Reduce total energy consumption by 10% by 2030 (baseline: 2024).
- Reduce total operational waste generation by 10% by 2030 (baseline: 2024).
- Scope 3 reduction targets are to be defined.
- Baseline water data collection to be discussed in the future, with potential target-setting to follow.

Social & Workforce Goals

- Maintain 100% coverage for career reviews for eligible employees.
- Improve tracking of training hours and effectiveness in future reports.
- Include diversity metrics in ESG reporting to track progress over time.
- Maintain 0 cases of child labor and forced labor across operations and supply chain tiers.
- Ensure all employees are trained on GDPR compliance by 2028.
- Prepare for implementation of the EU Pay Transparency Directive by July 2026.

Governance & Ethics Goals

- Maintain zero confirmed cases of bribery or corruption across all operations and suppliers.
- Achieve 100% supplier acknowledgment of anti-bribery commitments by 2027.
- Acknowledge complaints within 7 days.
- Close investigations within 90 days.

Supply Chain Goals

- Achieve 100% ESG assessment of strategic suppliers by 2026.
- Achieve 100% acknowledgment of the Supplier Code of Conduct by new suppliers.
- Conduct ESG assessments and risk analyses for high-risk and strategic suppliers.
- Support supplier capacity-building initiatives to enhance sustainability practices.

8. Data & Methodology

Nordic Pharma collects sustainability and ESG data annually from internal teams and external partners to ensure accurate reporting. Key points:

Data Sources:

- Workforce data from HR systems.

- Energy and emissions data from office utilities, landlord reports, and business travel records.
- Supplier ESG data from internal screening, audits, and third-party platforms (e.g., EcoVadis, PSCI).

Emissions Calculation:

- **Scope 1:** Direct emissions from company vehicles. Wherever possible, we use actual fuel consumption (liters of gas/diesel) to calculate emissions.
- **Scope 2:** Purchased electricity in offices and facilities. Data is collected in kilowatt-hours (kWh) wherever available.
- **Scope 3:** Business travel, third-party logistics, and upstream procurement. We use actual activity data (kilometers traveled, service volumes) when provided by affiliates.
- **Data Gaps:** Not all affiliates or emission categories can provide detailed activity data. Where detailed data is unavailable, we estimate emissions based on spendings using recognized emission factors.

Data Limitations:

- As Nordic Pharma does not manufacture, some environmental impacts are indirect and may not be fully measurable.
- Water and waste data are limited due to shared offices and third-party logistics.
- Data collection processes will continue to improve for completeness and accuracy.

9. GRI Content Index

This report is prepared in accordance with GRI Standards 2021 (Core). The table below maps relevant disclosures to their corresponding sections.

GRI Standard	Disclosure	Section	Omission	Reason for Omission
GRI 2: General Disclosures 2021	2-1 Organizational details	2.1	No	
	2-2 Entities included in sustainability reporting	1.3	No	

	2-3 Reporting period, frequency and contact point	1.1	No
	2-4 Restatements of information	1.4	No
	2-5 External assurance	1.5	No
	2-6 Activities, value chain and markets	2.1	No
	2-7 Employees	2.1	No
	2-8 Workers who are not employees	2.1	No
	2-9 Governance structure and composition	3.1	No
	2-10 Nomination and selection of highest governance body	3.1	No
	2-16 Communication of critical concerns	3.2	No
	2-22 Statement on sustainable development strategy	2.2	No
	2-23 Policy commitments	3.3	No
	2-24 Embedding policy commitments	3.3	No
	2-29 Approach to stakeholder engagement	4	No
	2-30 Collective bargaining agreements	6.3.6	No
GRI 3: Material Topics 2021	3-1 Process to determine material topics	5	No
	3-2 List of material topics	5.1	No
GRI 205: Anti-Corruption 2016	205-3 Confirmed incidents of corruption and actions taken	3.4	No

GRI 302: Energy 2016	302-1 Energy consumption within the organization	6.7.2	No	
GRI 303: Water and Effluents 2018	303-3 Water withdrawal	6.7.3	Yes	Data not yet available
GRI 305: Emissions 2016	305-1 Scope 1 GHG emissions	6.7.1	No	
	305-2 Scope 2 GHG emissions	6.7.1	No	
	305-3 Scope 3 GHG emissions	6.7.1	No	
GRI 306: Waste 2020	306-3 Waste generated	6.5	No	
GRI 307: Environmental Compliance 2016	307-1 Non-compliance with environmental laws and regulations	6.7.4	No	
GRI 403: Occupational Health & Safety 2018	403-9 Work-related injuries	6.3.1	No	
	403-10 Work-related ill health	6.3.1	No	
GRI 404: Training & Education 2016	404-1 Average hours of training per employee	6.3.2	Yes	Data partially available; not normalized per employee/not complete
GRI 405: Diversity & Equal Opportunity 2016	405-1 Diversity of governance bodies and employees	3.1, 6.3.4	No	
GRI 406: Non-Discrimination 2016	406-1 Incidents of discrimination and corrective actions taken	6.3.3	No	
GRI 408: Child Labor 2016	408-1 Operations and suppliers at risk for child labor	6.3.5	No	
GRI 409: Forced or Compulsory Labor 2016	409-1 Operations and suppliers at risk for forced labor	6.3.5	No	

GRI 414: Supplier Social Assessment 2016	414-1 New suppliers screened using social criteria	6.4.1	No
	414-2 Negative social impacts in the supply chain and actions taken	6.4.1	No
GRI 416: Customer Health & Safety 2016	416-2 Incidents of non-compliance concerning product health and safety	3.4.1, 6.2	No
GRI 418: Customer Privacy 2016	418-1 Substantiated complaints concerning breaches of customer privacy	3.4.1	No