

medartis

Corporate Social Responsibility

Valid from November 15th, 2023

Content

1. Introduction	3
1.1 Scope and objective	3
1.2 Laws and International Regulations	3
2. Medartis Labor Standards	3
2.1 Commitment	3
2.2. Forced or compulsory labor	4
2.3 Freedom of association	5
2.4 Working conditions	5
2.5 Child labor	5
2.6 Remuneration	6
2.7 Working hours	6
2.8 Discrimination	6
2.9 Regular employment	7
2.10 Harassment and harsh treatment	7
3. Responsibilities	7
3.1 Contracts and Suppliers	7
3.2 Ethical Behavior	8
3.3 Privacy and Data Protection	8
3.4 Training and Awareness	8
3.5 LSAS Representative & Ethics Committee	9
3.6 Communication Channels	9
3.7 Approval and Review	9

1. Introduction

1.1 Scope and objective

Corporate Social Responsibility ("CSR") are the measures applied to establish reliable, ethical and mutually beneficial relationships between Medartis and its stakeholders. These stakeholders include shareholders, investors, employees, distributors, suppliers, service providers and other market players with whom Medartis interacts in its business.

This policy defines the corporate social responsibility and labor standards that should be upheld in the business operations and supply chain of Medartis AG and its subsidiaries (hereinafter "Medartis"), which are of the utmost importance. All stakeholders shall commit to and advocate for ethical business practices along the entire supply chain.

The objectives of the Corporate Social Responsibility Policy are to:

- Conduct business with integrity and transparency respecting laws and regulations of the territories in which Medartis operates.
- Maintain work standards in line with the Ethical Trading Initiative Base Code ("ETI Base Code").
- Promote the understanding and awareness of ethical and good labor practice standards.
- Respect human rights in all decisions and practices.
- Encourage all parties in the supply chain to participate in and develop their labor standards.
- Maintain a sustainable development and continuously improve our labor standards.

1.2 Laws and International Regulations

Medartis complies with local labor laws and regulations relevant to the areas in which the company operates. In addition Medartis complies with international labor practices such as the United Nations Universal Declaration of Human Rights and International Labour Organization Declaration on Fundamental Principles and Rights at Work.

Where local or national laws conflict or are divergent from our Labor Standards, Medartis will comply with the local legal provision and national laws, and will seek where possible, without disregard to local laws to also apply our Labor Standards, as long as they are more beneficial to the employee.

2. Medartis Labor Standards

2.1 Commitment

Medartis is working on the continuous improvement of its environmental, occupational health and safety protection and is committed to upholding our Corporate Social Responsibility Policy in line with the moral obligations of the ETI Basic Code, a global reference standard and internationally recognized code of good labor practices.

These ethical standards cover:



*ETI Base Code: www.ethicaltrade.org

Medartis is also committed to:

- Comply with all local labor/employment laws in countries in which it operates;
- Require that key contractors, distributors and suppliers are aware of the ETI Base Code and promote/communicate it among their own supply chains;
- Promote diversity and equal opportunities;
- Promote the safety and health of all employees;
- Support the training of employees;

2.2 Forced or compulsory labor

Forced, compulsory, slave-like labor or modern slavery is all type of work or services required from an individual under threat of penalty and for which the individual has not offered their services voluntarily. This type of work uses coercive labor practices, under exploitative conditions, usually induced by debts, withholding of identity documents and/or requiring compulsory deposits.

Medartis prohibits and condemns all forms of modern slavery, forced labor, slave-like, or compulsory work. All are free to leave their employer. Medartis is committed in its activities to be diligent and take the necessary actions in order to combat any and all forms of forced labor.

Medartis will also take measures to refrain from contributing in any way, directly or indirectly, to forced or slave labor through its relationships with other players in the supply chain, such as suppliers, distributors, and service providers, among others.

Medartis will consider modern slavery issues at different stages of its supply process and will work to reduce risks by pre-assessing its suppliers, carrying out contractual requirements and taking special care in its supply chains where modern slavery risks are highest.

2.3 Freedom of association

Freedom of association is a human right defined by international declarations and conventions and refers to the right of employers and workers to establish their own organizations without prior authorization or interference from the state or any other entity.

Medartis adopts an open attitude towards trade unions and their organizational activities. Freedom of association and the right to collective bargaining are respected. Medartis workers have the right to join or form trade unions of their own choosing and to bargain collectively.

Collective bargaining refers to all negotiations that take place between an employer, a group of employers or one or more employers' organizations, on one hand, and one or more organizations of workers as trade unions on the other, to define working conditions and terms of employment, or to regulate relations between employers and workers.¹

2.4 Working conditions

Medartis is committed to promoting healthy and safe working conditions, that include both the prevention of physical and mental harm as well as the promotion of employees' health.

Adequate steps are taken to prevent accidents and injury associated with, or occurring in the course of work. Medartis will minimize, so far as possible, the causes of hazards inherent in the working environment. For example, granting personal protective equipment (PPE) where necessary. Medartis employees will also receive on a regular basis health and safety training, whether general or job-specific, regarding occupational hazards, activities, dangerous situations and the correct use of PPE.

Medartis provides a safe and hygienic working environment. The work accommodations are clean, safe, and meet the basic needs of our employees. They are provided access to clean toilet facilities, potable water, sanitary facilities for food storage, among other things, to promote a positive and healthy working environment.

The responsibility for health and safety at Medartis and its subsidiaries is overseen by the local senior management and the local/regional HR and Compliance representatives.

Medartis will apply its best efforts to ensure the health and safety of its employees as well as those who are not employees but whose work and/or workplace Medartis controls. This includes outsourced employees who provide services on the company's premises. Medartis will take the same precautions regarding the prevention of these risks and requiring appropriate PPE from their Employers, or when applicable, by providing PPE directly, as well as ensuring the use of clean toilets, potable water, and food storage at Medartis.

2.5 Child labor

According to the International Labor Organization, Child Labor refers to "work that deprives children of their childhood, their potential and their dignity, and that is harmful to physical and mental development. It refers to work that: is mentally, physically, socially or morally dangerous and harmful to children; and interferes with their schooling by: depriving them of the opportunity to attend school; obliging them to leave school prematurely; or requiring them to attempt to combine school attendance with excessively long and heavy work."

Medartis does not use or recruit child labor. Medartis participates in legal programs for young people as minor

¹ Definition brought by the GRI standard 402 - Labor Relations 2016, based on Convention n° 154 of the International Labor Organization (ILO), "Convention on the Encouragement of Collective Bargaining", 1981.

apprenticeship programs, young apprenticeship programs, vacation internship programs, among other official government programs approved by the competent authority and permitted by local laws. These programs promote the learning of work skills, with light services that do not harm the youth's health or development and do not affect their school attendance or their participation in vocational guidance programs. These work programs shall never be at night, in hazardous conditions or considered dangerous.

Medartis pre-assess its suppliers and service providers to avoid the use of child labor indirectly in its activities. Medartis makes contractual requirements and penalties for violating these standards, in particular with third parties from regions with operations and suppliers considered of risk for child labor.

2.6 Remuneration

Wages and benefits paid by Medartis meet the national legal and sectoral standards, and are adequate to meet the basic needs of workers and their families, as well to provide some discretionary income compatible with industry benchmark standards.

All employees are provided with written and understandable information about their employment conditions in respect to wages before they enter employment, including the particulars of their wages and payment dates.

Deductions from wages as a disciplinary measure are not permitted, however, wage deductions permitted by local law are allowed.

2.7 Working hours

The regular weekly hours, excluding overtime, are defined by contract, and follow the local standard established by local law or by collective bargaining.

At Medartis overtime shall be used responsibly, taking into account the extent, frequency and hours worked by individual workers and the workforce as a whole. It shall not be excessive or used to replace regular employment.

Overtime must be within the legal limits established by each country, with compensation of overtime pay/bonus or rest compensation, where local legislation or collective bargaining allows it. The total working hours, in any seven-day period or monthly period, including overtime, shall not exceed the legal limit allowed by local law.

2.8 Discrimination

Discrimination is comments or actions that treat people unequally, impose unequal burdens or deny them of benefits. Discrimination can occur on grounds of race, age, gender, sexual orientation, marital status, religion, health conditions, disability, national origin, national ancestry, social origin, political affiliation, political opinion, among others.

It is a violation of this policy to discriminate regarding conditions of opportunities, benefits or privileges, create discriminatory work conditions, use discriminatory standards, or practice any acts of discrimination.

Medartis does not tolerate discrimination of any kind and encourages diversity and equal opportunities, in an environment of respect and a neutral and professional atmosphere.

Employees have the right to be treated fairly and to work in an environment that is free of discrimination. This also applies to the recruitment of people, career progression opportunities and remuneration. There shall be no

discrimination in hiring, compensation, access to training or promotion.

2.9 Regular employment

Medartis does not use irregular or legally unrecognized forms of work, nor does it use third-party service providers, contracting, sub-contracting, or homeworking arrangements, apprenticeship schemes or hire legal entities as a way to avoid labor obligations or formal employment contracts.

Medartis' work force has a recognized employment relationship that is established through national legal requirements and is in accordance with applicable labor or social security regulations arising from regular employment relationship.

Outsourced or service provider resources shall never be hired with the intention of avoiding regular working relationships. Medartis will only use third parties as service providers, agents, outsourced workers, etc. under the limits permitted by local laws, for a legitimate purpose, ensuring that the employers of these third party employees follow the applicable laws and regular labor payments for their work.

2.10 Harassment and harsh treatment

Medartis prohibits and does not tolerate any form of physical abuse, threat of physical abuse, sexual harassment, moral harassment, "mobbing", "bullying", psychological terror, and other forms of abusive treatment that violates ethical integrity.

Moral and sexual harassment comes in different forms of behavior which could be verbal, nonverbal and physical conduct. Sexual harassment can include unwelcome sexual advances, requests for sexual favors, bullying about sexual orientation, and other verbal or physical conduct of a sexual nature. All employees are required to work in a manner that prevents harassment in the workplace.

All disciplinary and corrective measures at Medartis must respect the dignity and psychological integrity of the employee being proportionate, reasonable and in accordance with the applicable local laws and/or collective bargaining rules, and should never be done in the form of abuse, threats or intimidation. All disciplinary measures must be duly recorded by local Human Resources and the Manager.

3. Responsibilities

3.1 Contracts and Suppliers

Medartis can terminate with cause contracts with any supplier, contractor or subcontractor in its supply chain, found to be using unethical or illegal labor programs or going against the principles of this Policy, when mitigation is not being fulfilled in due time.

Medartis commits to monitor and maintain its labor standards in the supply chain through the distribution and communication of the company's policies and practices. New suppliers must pass the initial selection and evaluation procedures and receive a copy of this Policy and the ETI Base Code. Suppliers should acknowledge receipt of the Corporate Social Responsibility Policy, the ETI Base Code, which will outline the ethical and labor standards the supplier will be expected to maintain as part of their contract with Medartis.

3.2 Ethical Behavior

It is the responsibility of managers to ensure that their employees are aware of this policy and to implement this in their daily business.

All employees must comply with laws and regulations applicable to their working environment including adherence with internal instructions and guidelines as Medartis labor standards and the corporate compliance.

Medartis employees are expected to uphold high commitment, friendliness, fairness and respect towards each other, superiors, clients, suppliers and other stakeholders. Responsible action is not only based on laws and regulations, but also on one's own conscience and the standards defined in these guidelines.

Medartis business are based on integrity, ethical, honest, and well-intentioned behavior, and shall be reflected by each Medartis employees.

Medartis does not tolerate any form of bribery, corruption, fraud, kickbacks or other illegal or unethical granting of advantages. The company competes fairly in the market, rejecting misleading, fraudulent and malicious conduct that leads to undue advantages.

Medartis works in a transparent way, presenting transparent information, truthful and timely communication to its stakeholders, providing regular financial information and relevant company actions.

3.3 Privacy and Data Protection

Medartis follows applicable local Data Protection Laws. All managers and employees of Medartis and HR Business Partners will treat information and data handled in the performance of their work as strictly confidential.

Medartis respects the privacy and maintains the confidentiality of personal information of its employees, especially those related to health. The employee's participation in health programs, or the employee's health data shall never be used as criteria for decisions regarding employment or worker engagement, including decisions about termination, demotion, promotion, remuneration or any other favorable or unfavorable treatment.

HR Business Partners, Managers and other key employees whose functions are related to Medartis Labor Standards must be especially committed in this regard.

3.4 Training and Awareness

Medartis commits to train all its employees in general knowledge of the provisions of its Labor Standards.

Key employees with roles within the organization with impact/direct relation to Medartis Labor Standards will be identified and trained to competently handle the Labor Standards. Persons involved with the Labor Standards should:

- have a good understanding of how Medartis operates, with knowledge of the supply chain;
- be in a position to contact suppliers and build a relationship with them;
- be trained on Medartis Labor Standards requirements;
- be able to monitor the work environment, identify breaches and remediate them when necessary.

All Medartis employees must participate in regular training of Social Corporate Responsibility and meet the assessment cut grade established by the HR Department.

3.5 LSAS Representative & Ethics Committee

In order to ensure the effectiveness of this policy, Medartis has elected its Chief Human Resources Officer as the global Labor Standards Assurance System (“LSAS”) Management Representative. The LSAS Management Representative is part of the EMB and ensures the availability of sufficient resources to establish the Medartis Labor Standards, delivery of documented procedures, as well as action plans.

The LSAS Management Representative has the authority/responsibility for:

- developing procedures that meet this policy requirements
- establishing, implementing and maintaining effective Labor Standards
- regularly reviewing and improving our Labor Standards
- communicating and reporting labor issues to top management
- implementing training for employees involved with the LSAS
- setting objectives and targets for the LSAS and Medartis Labor Standards
- liaising with all relevant companies in the supply chain, to undertake labor standards status reviews, performing supplier assessments and implementing an action plan when applicable

A cross-functional Committee, including Human Resources with its Chief Human Resources Officer, Legal with its General Counsel and Compliance with its Global Compliance Manager, collectively known as the Ethics Committee, has been established by top management to support Labor Standards Management, responsible for deliberating on the measures applicable in case of violations and non-compliance with this Policy, ethical and labor standards, as well as for the establishment, review and approval of LSAS documents and policies.

3.6 Communication Channels

In case of questions regarding the content of this Policy, or information concerning a possible breach of its provisions, please contact your local Human Resources representative, or report the situation to the Ethics Committee:

- Email: ethics@medartis.com
- Medartis Homepage “Whistleblower Channel”: <https://www.medartis.com/en-us/compliance/>

These means of communication can also be used by external stakeholders.

Medartis prohibits retaliation and protects employees who report a possible violation and cooperate in internal investigations. This applies even if the complaint, made in good faith, turns out to be unfounded.

3.7 Approval and Review

This Corporate Social Responsibility Policy was approved by the Global Ethics Committee, being effective from November 15th 2023, and will be available publicly for both internal and external stakeholders of Medartis.

MANUFACTURER & HEADQUARTERS

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information regarding our subsidiaries and distributors, please visit www.medartis.com