

Human Rights and Child Labor Policy

1. Introduction

Human Rights encompass the essential political, civil, economic, labor, social, and cultural rights and freedoms that every individual is entitled to. Upholding these rights is a crucial aspect of Hovione's sustainable business practices and its commitment to respecting internationally recognized Human Rights. Hovione is dedicated to upholding and respecting Human Rights across all operations, business relationships, and communities in which we operate, specifically prohibiting Child Labor and Forced Labor within our Company operations and value chain. In doing so, we are guided by the following internationally recognized standards for corporate responsibility to respect Human Rights: United Nations ("UN") Guiding Principles on Business and Human Rights, UN Universal Declaration of Human Rights and International Labor Organization ("ILO") Declaration on Fundamental Principles and Rights at Work (collectively, the "Guiding Principles"). This policy (the "Policy") sets forth Hovione's principles, processes, and Due Diligence requirements to promote and ensure compliance with Human Rights across all aspects of our group operations and our value chain.

2. Purpose

This Policy aims to:

- Clearly articulate Hovione's commitment to Human Rights and rejection of all forms of Child Labor and/or Forced Labor.
- Establish a framework for identifying and mitigating risks associated with Human Rights abuses.
- Ensure compliance with relevant legal and ethical standards while promoting transparency and accountability.
- Guide our Team Members, suppliers, and partners in understanding and adhering to Hovione's Human Rights standards.

3. Scope

This Policy applies to:

- All Team Members and Third Parties working with or for Hovione, including without limitation, Hovione's suppliers, partners and collaborators.
- All operations and activities carried out by Hovione or any Third Parties across all geographic locations, including in countries or geographies where incidents of Forced Labor or Child Labor may be more common.

We also expect Third Parties in our value chain to commit to the Guiding Principles and implement appropriate processes to respect Human Rights. This expectation extends to a responsibility to procure the same commitments from suppliers, partners and collaborators within our Third Parties' respective value chains and, if requested, to provide information on how any such partners comply with the Guiding Principles. A description of these mandatory expectations can be found in Hovione's Third Party Code of Conduct.

4. Definitions

Human Rights: The basic rights and freedoms to which all human beings are entitled, as outlined by international human rights conventions and treaties.

Child Labor: Work that deprives children of their childhood, potential, and dignity, and is harmful to their physical and mental development.

Company: means Hovione.

Due Diligence: A process to assess compliance with each of this Policy, Hovione's Third Party Code of Conduct, the Guiding Principles and/or the actual and potential human rights impacts, as well as the implementation of any appropriate compliance activities.

Forced Labor: Any work or service that individuals are coerced into performing against their will or without freedom to cease work, including trafficking in human beings.

Hovione: means Hovione Holding AG or any of its affiliates.

Team Member: means any Hovione employee with an active employment agreement with the Company.

Third Parties: means any person (i.e., individual natural person, sole proprietorship, partnership, limited partnership, limited liability partnership, corporation, limited liability company, business trust, joint stock company, trust, incorporated associated, joint venture or similar entity or organization, including a government or political subdivision, department or agency of a government) other than a Team Member.

5. Procedures

5.1 Risk analysis: Hovione conducts regular assessments to identify operations and geographic areas at significant risk of Human Rights violations, Forced Labor or Child Labor. This includes:

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- **Operations:** Identifying specific operations that may be vulnerable to Human Rights violations, Forced Labor or Child Labor. Specialized Third Party service providers such as accountants, lawyers, consultants, R&D, tax advisors and other services that require high qualification are considered operations of low risk and excluded for due diligence purposes.
- **Geographic Areas:** Analyzing suppliers and regions where operations are located, considering socio-economic factors that heighten risks, pursuant to classifications published by UNICEF's Children's Rights in the Workplace Index. For suppliers located in geographies regarded as "Enhanced" or "Heightened", Hovione conducts annually a specific risk assessment based on adverse media to understand whether acquisition of products or services from such suppliers presents any reasonable suspicion of Child Labor or Forced Labor.
- **Occupational health and safety:** Auditing some in-scope suppliers for compliance with quality, occupational health and safety requirements.
- **Worker Characteristics:** Analyzing how understanding of our Team Members and value chain workers — especially those with particular characteristics or in vulnerable contexts — has developed, including identifying specific groups of workers who may be at greater risk of harm, and addressing how material risks and opportunities related to these impacts are recognized and managed. Such risk varies considerably depending on the type of services and whether or not such Team Members or Third-Party workers provide services on Hovione's site. Hovione provides specific training and safety requirements for Team Members or Third-Party workers who need to have access to Hovione's manufacturing facilities, and where construction services are involved, certain additional measures for safeguarding safety are applicable.

The risk analysis to identify Human Rights violations, Forced Labor or Child Labor within our value chain will be continued on an ongoing basis, with results reported annually to Hovione's management or promptly where deemed necessary as a result of specific concerns.

5.2 Preventive Measures and Policies: Hovione is committed to taking appropriate preventative measures aimed at preventing Human Rights violations. These include the issuance of this Policy as well as elements of other corporate policies, such as our Code of Conduct, Third Party Code of Conduct and HSE Policy.

In addition, this is also reflected in our Procurement Policy and standards regarding risk assessment and audits of Third Parties. Hovione includes relevant compliance obligations in its contracts with Third Parties and, in accordance with our Procurement Policy, considers Human Rights as a key factor in its supplier selection process.

5.3 Grievance mechanism and remediation: Hovione promotes a 'speak up' culture, which is endorsed by the Company's management. Potential violations of Human Rights or instances of Forced Labor or Child Labor can be reported by Team Members as well as by Third Parties via the Company's 'speak up' portal at: <https://www.hovione.com/speak> or by emailing information to report@seehearspeakup.co.uk. The name of the reporting person, unless reported anonymously, and the information provided will be treated confidentially. In cases where it is found that we cause or contribute to actual Human Rights violations or instances of Forced Labor or Child Labor through our business activities, we will implement effective measures to withdraw Hovione's contribution to all such violations. The follow up and the process for treating any such case is made pursuant to Hovione's Global Grievance and Speak Up Policy.

5.4 Review of effectiveness: We continuously work on improving and further developing our Due Diligence processes both in our own business operations and in our value chain, in order to prevent, eliminate or reduce Human Rights violations. We will use these findings to annually review this Human Rights and Child Labor Policy, to develop and improve our Due Diligence approach to respecting Human Rights and preventing Forced Labor or Child Labor.