QUALCO

Sustainability Policy & Procedure

Approved by:	Qualco Group S.A. Board of Directors
Date of Approval	24 March 2025

1. Table of Contents

2. Introduction

At Qualco Group, we recognize the substantial importance of shaping a better, more inclusive and more sustainable future for all.

Sustainability has been embedded into Qualco Group's purpose, core values, culture and mindset ever since its foundation and is the driving force through which the Group enhances its competitive advantage, achieves sustainable and profitable growth, meets contemporary challenges, and creates long-term value for its stakeholders through an all-encompassing approach that connects economic stability with social and environmental sustainability., fostering an inclusive, healthy and safe workplace, supporting high-impact social initiatives, and establishing a strong internal governance system of policies and procedures.

Also, this policy & procedure represents the fundamental framework in terms of Sustainable Development, for the Group to identify and measure the value of the Environmental, Social and Governance issues (hereinafter "ESG"), which are financially important (material) for it as well as the collective interests of its stakeholders, such as employees, customers, suppliers, local communities and other significant key groups.

3. Scope of Application

The scope of the Sustainability Policy & Procedure is to establish a framework of principles, priorities and commitments within which Qualco Group, through its operations and market presence, can provide constructive solution-oriented actions and approaches to advance sustainable development and to create long-lasting, shared value for the society and for its stakeholders.

Qualco Group is committed to upholding high ethical standards in its operations, expecting all employees, co-development partners, suppliers, and third parties to not only comply with applicable laws and regulations, but also embrace and adopt its principles related to ESG practices. The Policy & Procedure is applicable to Qualco Group S.A, as well as its affiliate companies and serves as a guiding document.

The Policy & Procedure establishes a framework for compliance with national, EU, and international laws, regulations, standards, and principles related to ESG issues, specifically addressing the following areas:

- Environmental Responsibility
- Social Responsibility
- Corporate Governance and Business Ethics
- Risk Management

4. Applicability and boundaries

5.1 The Sustainability Policy & Procedure of Qualco Group:

- Applies to all employees at all levels, as well as to all persons employed either by employment contract or through any contractual relationship.
- Applies to the boards and board members of Qualco Group.
- Is effectively communicated to all third parties providing services to the Group (supply chain) or on its behalf (including partners and suppliers, intermediaries, and any other persons with whom Qualco Group operates under outsourcing or other agreements).
- Is effectively communicated to regulators, shareholders, investors, clients, other market participants as well as communities and the society (stakeholders).
- Covers all the Qualco Group's activities in Greece and abroad, including all operations carried out by a third party acting on behalf of or in collaboration with the Group (value chain).

5.2 The Sustainability Policy & Procedure of Qualco Group is aligned with the applicable legislative and regulatory framework, as well as with international standards and best practices relevant to the areas it addresses.

5. Group's Mission and Philosophy

Our mission is to use a mix of technology, data analysis, operations and capital to promote financial well-being for economies, businesses and individuals. We believe in creating a work environment of fairness, compassion, and respect where our people feel valued and motivated to make a positive impact.

6. Sustainability Approach

Qualco Group recognizes sustainability as a key element for its long-term and successful growth. Additionally, it places great emphasis on the implementation of measures and actions that maximize its positive social impact and promote balanced economic, environmental, and social development. For Qualco Group, measuring and reporting performance on ESG pillars is critical to deeply understanding the impact of its operations and facilitating an effective dialogue with all stakeholders.

7. Sustainability Strategy Pillars

The Sustainability and ESG Strategy of Qualco Group is based on the following pillars:

- Our people
- Sustainable Performance and Responsible Operations
- Environmental Wellbeing

These pillars constitute the framework for any actions and initiatives related to the ESG pillars' implementation throughout the Group. To support this effort, we adopt responsible practices, introduce relevant actions, make commitments, set short- and long-term targets and monitor them through the implementation of Key Performance Indicators (KPIs). Our Sustainability and ESG Strategy is in line with the Group's mission and values and aims integrate sustainability into its long-term Business Strategy.

Qualco Group focuses on issues related to the creation of direct and indirect economic, social and environmental benefits throughout the value chain and operations of the Group and to all stakeholders, as well. Therefore, the Group acknowledges that its operation can contribute to the creation of a more sustainable future and is continuously:

- Managing in a responsible way the environmental, social and governance risks related to its business activities to minimize any negative impact.
- Intensifying its efforts to achieve long-term shared value for its stakeholders.

The core strategic sustainability commitments of Qualco Group are presented below:

(a) To minimize any direct or indirect adverse impact on the environment and climate resulting from our operations, in order to positively support the transition to a more resilient Planet and Future.
To fulfill this commitment, we have developed policies and procedures, and we implement actions, which entail to the reduction of energy consumption and greenhouse gas (GHG) emissions, to efficiently manage solid waste generation, to recycling of materials, to usage of eco- friendly products and to increasing employee's environmental awareness.

(b) To create conditions that promote continuity & future development, diversity & inclusivity, and safety for our People.
To fulfill this commitment, we have developed policies and procedures, and we implement actions dedicated to all employees, which aim at ensuring a healthy and safe working environment for them, promoting their wellbeing, improving their personal and professional skills, and creating an inclusive workplace that allows them to feel valued and respected free to express themselves regardless of their gender, age, race, ethnicity, religion, sexual orientation, or background.

(c) To build on integrity, transparency and accountability, complying with all equivalent national and EU laws, and ensuring the ethical and responsible Group's performance and operation as well as the business continuity.
To fulfill this commitment, we have developed policies and procedures, and we implement actions, ensuring that (i) corporate governance within the Group is built on integrity, transparency and accountability, ii) ethical conduct of business is vital for governing business activities and relationships, and serving and sustaining stakeholder relationships, iii) we ensure compliance with all relevant legislation and standards, and the expectations of our customers and other key stakeholders, and iv) we collect and use personal information with responsibility and transparency in full compliance with all

relevant national and EU laws regarding personal data, v) we ensure the commitment of the same values by all third parties we are cooperating with.

(d) To create social value in the short and long term, maximizing positive impacts and minimizing eventual negative impacts on society, promoting the search for sustainable business, establishing alliances and collaborations with all stakeholders.
To fulfill this commitment, (i) we have included Social Value requirements into our Third Party policy, (ii) we have developed Equality and Diversity policies, we are positive about disability status and we are committed to action on equal opportunities, and (iii) we have developed General Employment Practices Policy summarizing the Group's approach to recruitment, employment of minors, work authorization, drug- and tobacco-free workplace, violence and security in the workplace, and work hours. Each of Qualco Group's Offices adapts these practices to their local laws and context.

All these strategic Sustainability commitments touch, in a balanced way, the three pillars of Sustainability (Environmental, Social and Governance), contribute to sustainable development and are in line to commitments defined internally to our entire value chain (customers, partners, product and service suppliers and other stakeholders).

Qualco Group recognizes the importance of supporting international initiatives and engaging with key players that enable businesses to operate in a sustainable way. We are a signatory to United Nations Global Compact, committed to the ten Principles in the areas of human rights, labor regulations, environment, and anti-corruption. We also support the 2030 Agenda for Sustainable Development, adopted by all United Nations Member States in 2015, and the 17 Sustainable Development Goals (SDGs), designed as an ambitious plan for peace and prosperity for People and the Planet. We are member of the Diversity Charter of Greece and follow the respective commitments.

8. Environmental Responsibility

Environmental sustainability is a fundamental aspect of Qualco Group's ethos. We recognize our responsibility to protect the environment; thus, we implement an Environmental Management System (EMS) to better manage our environmental impacts and ensure our compliance with all applicable laws and regulations.
We primarily focus on the following key areas:

- Optimization of resources
- Minimization of waste
- Mitigation of carbon emissions

We commit to maintaining high waste disposal standards and waste management practices, especially for electronic waste (e-waste).

Energy efficiency is a strategic priority and so energy consumption is monitored across all facilities. We are committed to upgrading to energy-efficient technologies, optimizing operational processes, and always promoting energy conservation during operations and business as usual. To support the above commitments, employee education, training, and active engagement are essential elements and outcomes of the current Policy, while ensuring our contribution to the global goal for a sustainable future.

9. Social Responsibility

We place particular emphasis on the social pillar. We focus on developing and maintaining a diverse, equitable, and inclusive working environment, on strengthening relationships with key stakeholders, on building long-term partnerships with lasting value and on contributing to the community where we operate. The above commitments require balanced relationships on the following social factors:

- Labour Rights
- Workplace Practices
- Non-Discrimination and Equal Opportunities
- Diversity, Equity, and Inclusion (DE&I)
- Occupational Health and Safety (OH&S)
- Training and Development
- Well-being

We strive to bring social responsibility at the forefront. We invest in employees and workers and commit to fostering a challenging, dynamic, inclusive and diverse work environment that supports their professional development, as well as promoting a good work-life balance that prioritizes their overall health and wellness. Driven by the promotion of equality, we recognize the differences among people and consistently seek to support individuals from diverse backgrounds, regardless of gender, age, ethnicity, disability, or any other personal characteristics.

Consequently, we do not tolerate any form of discrimination in the workplace and the only decisive factors of people's advancement are based on performance, efficiency, skills and qualifications. In support of international labor standards, we comply with the International Labour Organization (ILO) conventions, including those on working conditions, freedom of association, and occupational health and safety.

We partner with our customers, communities, investors and suppliers to support initiatives that benefit the environment, human welfare, and education.

Guided by the UN Guiding Principles on Business and Human Rights (UNGPs) and the Ten Guiding Principles of the UN Global Compact, Qualco Group is committed to support and respect human rights. Based on these principles, we are committed to avoid causing or contributing to adverse human rights impacts through our own activities and address such impacts when they occur by others. By integrating these principles into our operations and corporate culture, we aim to protect and enhance our Group's reputation and values, maintain and expand our customer base, and foster positive relationships with surrounding communities. This stance also helps attract investors and mitigate potential risks related to internal and external disruptions. Ultimately, our dedication to human rights not only reinforces our ethical standards, but also promotes the values that define Qualco Group, ensuring a sustainable future for all stakeholders.

Through our structured procedures, we strive to ensure the materials we procure are sourced from responsible suppliers who uphold high standards of environmental responsibility, human and labor rights, and ethical conduct. Through responsible sourcing, we can guarantee our products' safety and high quality, while mitigating supply chain risks that could seriously impact patients' health and regulatory compliance.

10. Governance

The Sustainability Policy & Procedure of Qualco Group is prepared and proposed by the Corporate Affairs and Sustainability Director to the Group Board of Directors.

The Group Board of Directors defines, authorizes, and ensures that the Sustainability Policy & Procedure:

- Is appropriate to the nature, scale, and sustainable impact of the Group's products and services.
- Is reviewed periodically at least every 12 months.
- Remains relevant and appropriate to the Group.
- Is formally communicated to the CEOs of all Greek companies of Qualco Group.

The ESG Team of Qualco Group, on behalf of the Executive Management of Qualco Group and under the leadership of the Corporate Affairs and Sustainability Director, ensures that within the scope of its operations, the Sustainability Policy:

- Is documented, developed, monitored, implemented, maintained, and reported through an annual Sustainability Report.
- Is implemented through established procedures and practices in collaboration with all relevant business units and departments within the Group.
- Is communicated to all employees working under the control of the Group with the intent that they are made aware of their responsibilities.
- Is communicated and made available to stakeholders and other interested parties.

11. Corporate Governance and Business Ethics

Qualco Group is committed to upholding high standards of integrity, transparency, and accountability in all operations. Our governance framework ensures effective oversight, risk management, and compliance with laws and regulations. We prioritize responsible and ethical leadership, maintaining internal controls, and providing a set of well-rounded policies (i.e., Code of Conduct, Human Resources Policy, the Anti-Bribery and Anti-Corruption Policy, and the Whistleblowing Policy) that provide clear direction for employees and third parties and establish a framework of acceptable behaviour and actions across all levels.

12. Risk Management

We acknowledge that ESG-related risks, regulatory updates, supply chain disruptions, human rights violations, and reputational risks, among others, can seriously affect our business operations, financial performance, and stakeholders' trust. To this end, the Company proceeds with the following actions:

- Risk Identification
- Risk Assessment
- Risk Prioritization
- Mitigation Strategies
- Monitoring and Reporting

Additionally, Qualco Group maintains a Risk Management system, applied both proactively and retrospectively. To further support efforts for risk identification and categorization, we maintain a comprehensive Risk Registry, which serves as a key tool for risk review, control, communication, and prioritization.

13. Sustainability Report Procedure

This Policy & Procedure includes the sustainability report procedure, outlining the stages involved in the process of drafting the report. Specifically:

14.1 Data Collection

Qualco Group's Annual Sustainability Report is based on internationally recognized reporting and disclosure frameworks as references, as follows:

- The Global Reporting Initiative (GRI) Consolidated Set of Standards 2021
- The UN Global Compact's reporting framework, grounded on the "Ten Principles" related to human rights, labour, the environment, and the fight against corruption
- The United Nations (UN) Sustainable Development Goals (SDGs) framework
- The 2024 ESG Reporting Guide of the Athens Stock Exchange
- ESG - related standards mandated or proposed by domestic and EU regulations (e.g. European Sustainability Reporting Standards (ESRS) under the EU Corporate Sustainability Reporting Directive (CSRD)

The data collection process is a critical component of drafting Qualco Group's Annual Sustainability Report. This stage involves systematically gathering relevant information that reflects our sustainability performance and impact across various dimensions. The data collected serves as the foundation for our report, ensuring accuracy, transparency, and compliance with internationally recognized reporting frameworks.

The identification of key data sources includes internal sources such as the Qualco Group's Departments, as well as external sources, including stakeholder feedback and industry benchmarks, in order to enhance the comprehensiveness of the report. This way, quantitative and qualitative data related to our environmental, social, and governance (ESG) initiatives are provided.

Based on its sustainability goals and the reporting frameworks, Qualco Group defines specific metrics that align with the Global Reporting Initiative (GRI) Standards, the UN Global Compact Principles, the UN Sustainable Development Goals (SDGs), and ESG-related standards mandated or proposed by domestic and EU regulations (e.g. European Sustainability Reporting Standards (ESRS) under the EU Corporate Sustainability Reporting Directive (CSRD). These metrics cover various aspects, including energy consumption, greenhouse gas emissions, employee well-being, community engagement, governance and business ethics, and economic performance.

To ensure a data collection process, the Company employs a variety of methods, including:

- **Surveys and Questionnaires:** Conducting surveys among employees and stakeholders to gather insights on social impacts, workplace culture, and customer satisfaction.
- **Automated Data Tracking:** Utilizing technology to automate the collection of environmental data, such as energy usage and waste management statistics, facilitating real-time monitoring and reporting.
- **Document Review:** Reviewing internal reports, financial statements, and operational records to extract relevant data that supports our sustainability initiatives.

14.2 Data Validation and Quality Assurance

Once data is collected, a validation process is implemented to ensure its accuracy and reliability. This involves cross-checking information against established benchmarks and conducting internal audits. Any discrepancies are addressed promptly to maintain the integrity of our data.

Additionally, insights from internal and external sources are incorporated to refine our data collection processes and ensure they align with the expectations and priorities.

Upon completing the collection of all data, the synthesis and calculation of the data are carried out to extract the overall results. The Corporate Affairs and Sustainability Group Director composes the sections of the sustainability report. The texts for each section are sent to the involved Departments of the Company for any enhancement with additional qualitative information that will enrich the content of the report. Then, the Corporate Affairs and Sustainability Group Director receives the texts and integrates the new data into the sustainability report.

Additionally, relevant information from the announcement of the Company's annual financial results and key elements of the accounting for each social action is also taken into consideration for the preparation of the Sustainability Report. Afterwards, the Corporate Affairs and Sustainability Group Director reviews and finalizes the additions.

14.3 Continuous Improvement of the Sustainability Report

Data collection process is an ongoing effort, as well as the Company continuously reviews and improves its methods, leveraging technological advancements and stakeholders' input to enhance the data collection practices. This approach enables the Company to stay aligned with evolving sustainability standards and stakeholder expectations.

14. Interaction with Other Policies and Procedures

The present Policy & Procedure applies concurrently and serves as a supplement to the below corporate Policies and Regulations currently in force. This interaction ensures a cohesive approach to ESG and sustainability throughout Qualco Group.

- Code of Conduct
- Environmental and Energy Policy
- Health and Safety Policy
- Well-being Policy
- Group Anti-Bribery and Corruption Policy
- Conflict of Interest Policy and Procedures
- Whistleblowing policy
- Third Party Policy
- Third Party Code of Conduct
- Privacy policy
- Policy against Incidents of Violence and Harassment in the Workplace
- Human Rights Policy
- Diversity Policy
- GRP-RIM-PR04_Risk Register Guidelines
- GRP-RIM-PO01_Risk Management Policy
- GRP-RIM-PO02_Internal Control framework

15. Contact

Should you have any general queries, require a status update, or need further information or clarifications on the Policy & Procedure, you may raise a request Corporate Affairs & Sustainability Division.

16. Monitoring and Review

The Policy & Procedure is available in English and can be found on the official website of Qualco Group.

Group Compliance, Risk and Sustainability Committee is responsible for ensuring that the latest version of the Policy & Procedure is published and is made available to all employees.

Qualco Group ensures that any material changes on the content of the Policy & Procedure are to be notified to all interested parties.

The Policy & Procedure undergoes annual reviews and changes on an ad hoc basis, when needed. Any review and/or amendment on the content of the current ESG Policy is dependent to the following factors, among others:

- Changes in relevant Legislation: updates in national, EU, or international laws and regulations related to ESG and sustainability practices;
- Evolving industry standards: new guidelines and/or best practices established by pharmaceutical associations and regulatory bodies;
- Changes in business direction: changes in Qualco Group's business strategy, objectives, or ESG agenda
- Stakeholder feedback: insights, recommendations, and suggestions received from stakeholders
- Advancements in various areas: Environmental, social, or technological advancements
- Audits and Assessments: resulting in identification of gaps and/or areas for improvement

The Company states that it regularly reviews and updates the Policy & Procedure, in response to the above factors that could affect its effectiveness and relevance.

The Sustainability Policy & Procedure and any amendment thereto shall be approved by the Board of Directors of Qualco Group and under the leadership of the Corporate Affairs and Sustainability Director.

17. Reporting of Policy's infringement cases

Concerns refer to reasonable suspicions, about actual or potential breaches which occurred or are very likely to occur of the Sustainability Policy & Procedure can be addressed based on the Whistleblowing Policy, Procedures and Reporting Electronic Platform, already adopted by the Company, according to the Directive (EU) 2019/1937 of the European Parliament and of the Council "on the protection of persons who report breaches of Union Law", and the Greek Law 4990/2022 as long as all other legal and regulatory obligation.