



SUMMIT PHARMACEUTICALS EUROPE S.R.L.
(S.P.E.)

SUSTAINABILITY REPORT
2022

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Letter to Stakeholders

Dear Stakeholders,

I am pleased to present the first Summit Pharmaceuticals Europe Sustainability Report for the fiscal year 2022. With this document, we strive to respond to the growing attention that all our stakeholders pay to environmental, social, ethical governance and economic issues. We recognize and take into consideration the growing awareness of 'green' issues in the communities in which we operate.

In particular, in view of the field in which we operate, we feel a duty to commit ourselves to Contributing to equitable access to care, providing quality and reliable services our clients, and supporting technological progress.

There are so many challenges that medicine, and health care are facing in recent years, from the recovery of the COVID -19 pandemic to developing new medicines to address new diseases. Summit Pharmaceuticals Europe strives every day to create value by marketing products and services that can significantly improve people's lives. Our goal is to continue to collaborate with our providers and customers to create a sustainable environment conducive to the development of new medical technologies.

In this first year of reporting we have analyzed our current situation that will lead us to implement activities and initiatives to improve our sustainability journey in the coming months. Therefore, we plan to draft our own corporate code of ethics, which will be supplementary to Sumitomo Corporation's code of ethics, and the supplier code of ethics that will help us assess our supply chain with an eye increasingly focused on sustainable development.

This report represents our first step to present to all our Stakeholders our values, commitments, and performance in economic, social and environmental areas, marking an important milestone for us in our sustainability path.

Milano, 29/09/2023



Mr. Yoshiaki Miyamoto

C. E. O.

Methodological Note

This document represents the first Sustainability Report (hereafter also “the Report”) of Summit Pharmaceuticals Europe S.r.l. (hereafter also “SPE” or “the Company”). The document aims to present the initiatives and key results obtained in the sustainability areas during financial year 2022 (from April 1st, 2022, to March 31st, 2023). The report covers - to the extent necessary to ensure an understanding of the company’s activities, performance, results, and impact - the environmental, social, supply chain, human rights and product-related topics.

In particular, the contents are based on the material sustainability topics for the Company and its Stakeholders, identified from the materiality analysis, described in the chapter ‘Materiality Analysis’ and the information of the document are presented with reference to the ‘Global Reporting Initiative Sustainability Reporting Standards’ defined by the Global Reporting Initiative (GRI) and updated in 2021 and. The list of GRIs reported is presented within the ‘GRI Content Index,’ which provides evidence of the coverage of the GRI indicators associated with each sustainability topic reported in this document.

The data and information in the report refer to all companies’ offices belonging to SPE as of 31st March 2023, consolidated on a line-by-line basis. With reference to environmental data, only Italy office data has been considered in the monitoring. Any exceptions are expressly stated in the text. To allow the comparability of data and information over time and the evaluation of the company’s business performance over a period, a comparison with the financial year 2021 is given wherever possible.

The periodicity of the publication of the Sustainability Report is set to be annual.

1. About the company

1.1 Overview

Summit Pharmaceuticals Europe S.r.l. (SPE) is part of Sumitomo Corporation, one of the leading Japanese trading companies founded in 1919 with a rich history that dates back over 400 years when the original mission and principles of business were established.

The history of SPE begins in 1997 when Summit Pharma Italia S.r.l. was founded in Milan, spinning out the Pharma business from Sumitomo Corporation Italy. Four years later, in 2001, Summit Pharmaceuticals Europe Ltd. was founded in London as a separate entity. In 2002 the Company received a branch spun out from SC Spain with the opening of a branch in Barcelona, which in 2009 was then relocated to Madrid. It is in 2005 that Summit Pharma Italia S.r.l. merged into Summit Pharmaceuticals Europe Limited (UK), creating a unified entity that could leverage the strengths and resources of both companies to better serve customers in the pharmaceutical industry across Europe.

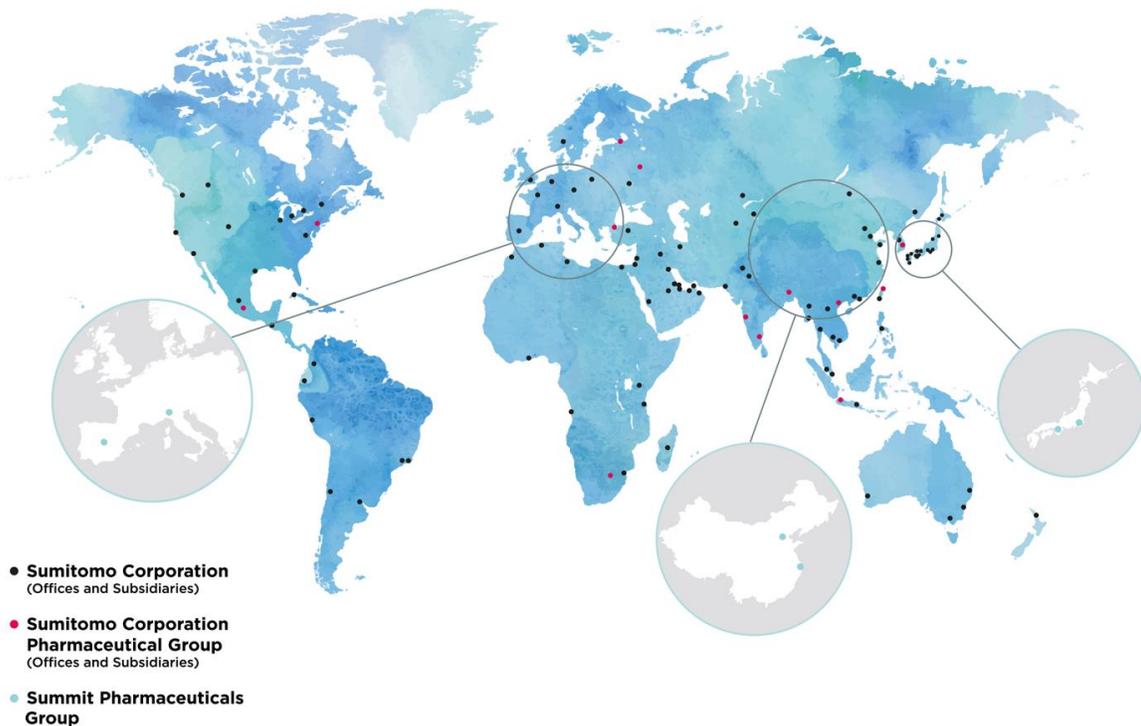
Over the years, the company experienced significant changes in its shareholding, although always being under the ultimate control of Sumitomo Corporation Japan. In 2010 the Company officially moved from the influence of Sumitomo Corporation Europe (under which it was born) to direct control from mother house in Japan, while in 2020 becoming part of the Summit Pharmaceuticals International Group, as of today the Sole Shareholder of the Company, so to complete the Sumitomo Corporation's broader strategic objectives that fostered collaboration and global perspectives within the Group.

In December 2020, Summit Pharmaceuticals Europe Limited merged into new Summit Pharmaceuticals Europe S.r.l. in Italy by moving the head quarter to Milano, therefore shaping the current business identity of the company. With over 20 years of experience in Europe, Summit Pharmaceuticals Europe has established itself as a key player in the region. Operating from strategically located offices in Milan and Madrid, we have fostered strong collaborations with Group Companies worldwide. This synergy enables us to leverage the extensive expertise, experience, and global network of the corporation, ultimately enhancing our ability to meet the healthcare needs of patients and healthcare providers across Europe. Our dedicated team is committed to delivering exceptional solutions and services that make a positive impact on the healthcare landscape.

Summit Pharmaceuticals Europe operates as a versatile and progressive company, involved in a broad spectrum of business activities that undergo constant evolution and diversification. The company places

particular emphasis on sourcing and supplying pharmaceutical raw materials, key intermediates, APIs, and formulations. Its expertise in custom manufacturing, compound licensing opportunities, and research alliances positions it to effectively cater to the varied requirements of customers in the pharmaceutical sector. With an unwavering commitment to quality and tailored solutions, Summit Pharmaceuticals Europe contributes to the advancement of the industry, leveraging its extensive capabilities and knowledge.

As a subsidiary of Sumitomo Corporation, Summit Pharmaceuticals Europe benefits from the resources of its parent company's various business departments, the Medical Science department is responsible for overseeing the pharmaceutical business operations. With the strong support from Sumitomo Corporation, Summit Pharmaceuticals Europe is well-positioned to provide high-quality products and services to the healthcare industry and contributes to the advancement of medicine. Thanks to its global reach in key areas of the pharmaceutical market and the interconnectivity of its various offices, it can support companies in the development and research of innovative solutions, creating new opportunities for success in the pharmaceutical business sector. With a local presence built over many years and a highly professional team operating in a worldwide network, the company is well-equipped to identify cost-effective and reliable suppliers, monitor its performance, and ensure timely delivery of products to customers. By leveraging these strengths, SPE can meet the needs of its customers and uphold its commitment to excellence in pharmaceutical services.



1.2 Corporate values

As part of the Sumitomo Corporation Group, the company follows the corporate mission statement of the group leader, consisting of the fundamental and ultimate value standards of the company.

PURPOSE AND VISION

Summit Pharmaceuticals Europe's purpose is:

- To contribute to healthier lives around the world by providing high-quality services for its partners' innovation and development in the pharmaceutical field and a stable supply to society;
- To achieve sustainable growth for our future selves and loved one's enriching lives.

SPE's corporate *vision* looks at:

- be an irreplaceable business developer who has a responsible and valuable role in Europe for diversifying benefit origins
- always challenge ourselves to establish new projects through innovative ideas and utilize our global network
- continuously strive to improve ourselves to maintain a high level of internal control and become a role model within the Sumitomo Corporation group

CORPORATE MISSION STATEMENT

Besides its purpose and vision, the *Management Principles* are the redefinition of Sumitomo's corporate philosophy, cultivated over 400 years of corporate history and shape the corporate mission, management style and culture.

- To achieve prosperity and realize dreams through social business activities
- To place prime importance on integrity and sound management with utmost respect for the individual.
- To foster a corporate culture full of vitality and conducive to innovation.

ACTIVITY GUIDELINES

The *Activity Guidelines* set out the behavior required of the company and its officers and employees and provide the means to carry out the Management Principles:

- To act with honesty and sincerity on the basis of Sumitomo's business

- To comply with laws and regulations while maintaining the highest ethical standards.
- To set high value on transparency and openness.
- To attach great importance to protecting the global environment.
- To contribute to society as a good corporate citizen.
- To achieve teamwork and integrated corporate strength through active communication.
- To set clear objectives and achieve them with enthusiasm.

2. Sustainability path

SPE constantly looks for opportunities to improve the environment and to contribute to the wellbeing of the communities in which we trade. Our CSR policy sets out the principles we follow and the programs we have developed to focus on the areas where we have significant impact or influence.

Shared responsibility

Social and environmental responsibility involves everyone. In our case, we share our commitment to social and environmental policies with our stakeholders. We aim to develop and implement social and environmental policies which fit in with our Partners everyday activities and responsibilities.

Honesty & accountability

We will communicate our environmental policies, objectives, and performance openly and honestly to our stakeholders and to others with an interest in our activities. We will encourage them to communicate with us and will seek their views.

Sustainable progress

We are committed to improving our performance. We will consider technical developments, changing scientific evidence, costs and customer concerns and expectations in the development and implementation of all new social and environmental policies and procedures. We will monitor our performance, set objectives for improvements, and report our progress.

Summit Pharmaceuticals Europe supports the Ten Principles of the UN Global Compact.

Our suppliers and business partners are expected to comply with UK Modern Slavery Act and The Ten Principles of the UN Global Compact.

Corporate sustainability starts with a company's value system and a principles-based approach to doing business. This means operating in ways that, at a minimum, meet fundamental responsibilities in the areas of human rights, labor, environment, and anti-corruption.

Responsible businesses enact the same values and principles wherever they have a presence and know that good practices in one area do not offset harm in another.

By incorporating the Ten Principles of the UN Global Compact into strategies, policies, and procedures, and establishing a culture of integrity, companies are not only upholding their basic responsibilities to people and planet, but also setting the stage for long-term success.

SPE was assessed on its performance in ESG areas by EcoVadis, a world-renowned sustainability assessment company, in September 2022, achieving a bronze medal evaluation. SPE is committed to enhance its rating by improving its performance, network management and practices in ESG terms.

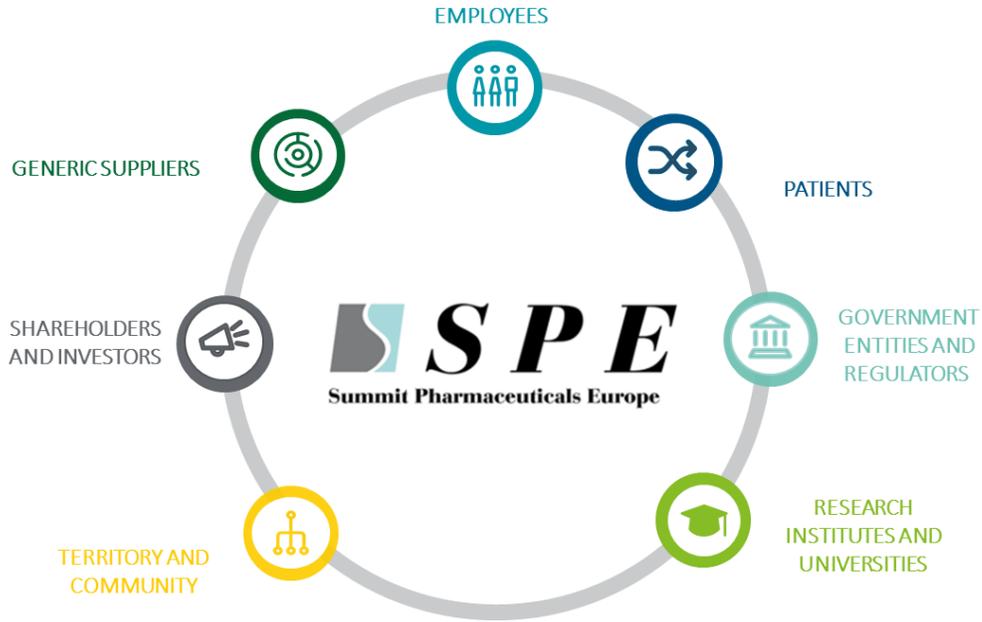
2.1 Materiality analysis

SPE understands the importance and need for sustainable growth of its business. The materiality analysis represents a fundamental step undertaken for the first time by the company, with the aim of identifying relevant topics for the organization itself and its stakeholders and define the impacts of every topic on the economy, environment, and people, including impacts on human rights.

As required by the GRI Standard, a materiality analysis was conducted to define the sustainability content and data to be included in this Report and the process was divided into 2 steps:

Step 1 - An extremely important first step carried out was the benchmark analysis, through which competitors acting in the pharmaceuticals sector were analyzed. The analysis revealed the most relevant sustainability topics taken in consideration by the competitors in the sector and the key stakeholders. Furthermore, the analysis focused on understanding the reporting standards used in their reports: Global Reporting Initiative (GRI) and/or Sustainability Accounting Standards Board (SASB). This allowed SPE to conduct its own analysis to identify the most relevant sustainability topics for the sector in which it operates.

An accurate materiality analysis also requires the identification of the organization's most relevant stakeholders to understand categories of interested party the company interacts with. Thus, the term stakeholder refers to all individuals, groups of individuals, organizations that directly and indirectly influence the organization's activities or on which the organization can reasonably be expected to influence through its activities. The benchmark analysis and the Working Group identified key Stakeholders for the Company, represented in the following diagram.



Step 2 - Through the analysis that considers the organization’s reference context, a list of material topics was created related to their positive and negative impacts that the Company has towards (through an inside-out process) on the environment, the society, and the economy, including on the human rights.

Below is a table showcasing the material topics associated with environmental, social, and governance responsibility identified for SPE. On the right-hand side, you will find the corresponding acknowledged impacts.

TOPIC	IMPACT
Energy and Emissions	Contribution to climate change as a result of energy consumption and direct/indirect GHG emissions from production activities and company’s value chain.
Material management	Reduction of the environmental impact associated with products bought and sold, given by the improvement of sustainable and eco-friendly procurement practices.
	Negative impact caused by unsustainable sourcing of products and raw materials, (e.g., use of virgin raw materials, products from conflict zones) that also leads to low resource availability).
Waste management	Recovery and/or reuse of waste, by improving waste management through a circular economy approach focused on reuse, recycling or other waste and packaging recovery practices
	Contribution to pollution caused by improper disposal of waste delivered to the environment

People access to health	Contribution to people's health and well-being by sourcing and supplying raw materials and services for the pharmaceutical industry.
	Lack of access to medicines and thus healthier lives by a segment of the population, due to the cost of the products offered, with a consequent limitation to equitable access to healthcare and the increase of health disparities among disadvantaged populations.
Health and Safety	Promotion of employee welfare and safety, with no work-related injuries and illnesses within the organization (and/or along the value chain).
	Occurrence of occupational injuries and illnesses with negative consequences on the health of workers and contractors, partly due to the failure to monitor and enforce health and safety management systems.
Diversity, Equity, and Inclusion	Attractiveness and staff retention through an inclusive work environment that avoids any form of discrimination against its employees and promotes fair compensation and benefits and equal opportunity to all.
Human Rights	Violation of human and labor rights along the value chain affecting human dignity and community development.
Professional Growth	Employee skills development through the promotion of training programs focused on increasing skills within and outside the organization.
	High staff turnover, with loss of personnel and key knowledge.
Ethical Business	Compliance with laws and regulations by establishing a system of corporate rules and procedures, with positive impact on the society in which the organization operates.
	Creating a culture of business ethics through the increase of awareness and culture about ethics and human rights among managers, employees, business partners and others.
Product Quality and Safety	Negative impact on consumer health given by the sale of unsafe and not up to standard products.
Supply Chain Management	Negative impact on environment and people due to the lack of management of ESG issues generated along the supply chain, with indirect disadvantages for workers and related communities.
Cyber Security and Data Protection	Breach of customer data and low security management due to failed implementation of cyber security systems and resulting in vulnerability to cyber-attacks with loss of sensitive information of the organization.

Responsible governance and economic performance

2.2 Ethical business

At SPE, a steadfast commitment to compliance with laws and regulations is upheld throughout all its activities. The company firmly believes that transparency and fairness are foundational principles that drive its business operations. Additionally, SPE emphasizes the importance of legal compliance for its current and prospective customers and suppliers, as it forms the bedrock for fostering trustworthy and ethical relationships. Notably, in both 2021 and 2022, there were no significant instances of non-compliance with laws and regulations, nor were there any confirmed episodes of corruption. These outcomes reflect the company's unwavering dedication to upholding the highest standards of legal and ethical conduct.

Summit Pharmaceuticals Europe is 100% owned by Summit Pharmaceuticals International (SPI), which is 100% owned by Sumitomo Corporation (Japan). The Board of Directors (BoD) consists of five members who are appointed by the Sole Shareholder SPI and handles various management matters, including approving annual accounts, evaluating company performance, appointing executives, modifying internal rules, addressing significant issues, and discussing other relevant topics. Moreover, the BoD holds the authority to ensure profitable and compliant corporate management, preserving capital integrity, and act as the company's representative. Members must execute all actions necessary for the Company's purpose, adhering to Italian laws and the Articles of Association.

Only the CEO's remuneration is decided by the sole shareholder and decided by the shareholders' meeting.



SPE has established several initiatives to ensure its business operations are conducted with the utmost ethics and transparency. The key initiatives are outlined below:

- SPE employees can send anonymous reports of any problems or concerns; a third-party company oversees this process. No incidents of any kind have been reported as of today.
- SPE provides all its employees with anti-corruption training and informs them about the organization's anti-corruption policies and procedures. In addition, since 2021 SPE has adopted the anti-corruption standard, through which it intends to establish key principles for the prevention of corruption.
- All employees must always act with honesty and integrity. The Company will not allow an employee or intermediary to engage in corrupt activities to obtain or retain a financial or other advantage for themselves or the Company.

- SPE is committed to establishing a guideline for the procedure to be followed when receiving a gift, a gift voucher or being invited by a customer for entertainment. A standard has been implemented for this purpose.
- The company is working on implementing a Code of Ethics in 2023; however, until now it has always complied with the general rules imposed by the parent company Sumitomo Corporation.
- A Covid-19 pandemic committee has been established and remains in place until the beginning of May 2023.

2.3 Product quality and safety

The Group has offices in all key areas of the chemical and pharmaceutical industries. Therefore, the Company can supply a wide range of different raw materials to produce APIs, excipients, resins, reagents, and catalysts.

The total number of incidents of non-compliance with regulations and/or voluntary codes related to health and safety impacts of products and services was zero in both 2021 and 2022.

SPE keeps abreast of all European regulations involved in the production, registration, and marketing of FDF, APIs and intermediates in Europe, such as REACH, CLP, national and international directives. Sumitomo Co's Japanese offices provide regulatory support enabling us to apply on behalf of our partners for foreign manufacturer accreditation (FMA), Japanese Drug Master File (JDMF) registration and GMP conformity assessment, which is required for the sale of APIs and FDFs in Japan. Comprehensive support is also provided to our partners who intend to sell APIs and FDFs in China. In fact, our office in Beijing (SPC) provides comprehensive regulatory support for obtaining the necessary import license.

2.4 Supply chain management

SPE is committed to select responsible suppliers who comply with the laws of the pharmaceutical industry, believing that it is of primary importance to create relationships based on trust and compliance with applicable rights and regulations. In support of the above, the company is committed to complying with the Sumitomo Corporation Group's guidelines for supply chain management. This document contains 11 principles, set out below:

- Respect human rights and not to be complicit in human rights abuses.
- Prevent forced labor, child labor and the payment of unfairly low wages.
- Not engage in discriminatory employment practices.

- Respect the rights of employees to associate freely in order to ensure open and fair negotiations between labor and management.
- Provide employees with safe and healthy work environments.
- Protect the global environment and give due consideration to biodiversity.
- Ensure the quality and safety of products and services.
- Ensure fair business transactions, to abide by all applicable laws, rules and regulations, and to prevent extortion, bribery and all other forms of corrupt business practices.
- Ensure appropriate information security.
- Cooperate with members of local host communities and contribute to sustainable regional development.
- Disclose information regarding the above in a manner both timely and appropriate.

However, the process of monitoring negative environmental and social impacts along the value chain was not put in place by SPE during 2022.

As part of its future strategy, SPE started to work on the preparation of a supplier code of conduct.

Suppliers are not only required to be familiar with these principles but also to uphold and adhere to them in their own business activities.

2.5 Cyber security and data protection

Ensuring the proper handling of personal data belonging to SPE's customers and suppliers is of utmost importance in safeguarding their privacy. SPE maintains a steadfast commitment to protecting the sensitive data of its customers from potential cyber-attacks.

All SPE employees participate in regular cybersecurity training. The goal is to gain the knowledge needed to recognize cyber-attacks that could cause data security problems. Security and data protection systems are managed in London, at one of the Sumitomo Group's locations. The Company has never received any substantiated complaints about violations of customer privacy.

Over the years, SPE has signed up to a set of rules that it is committed to following to ensure data protection.

SPE is fully committed to upholding the privacy and confidentiality of personal data belonging to its employees, business contacts, and other individuals processed during its business operations. This

unwavering dedication to data protection is encapsulated in the Data Protection Rule, which serves as a framework for ensuring the secure handling of personal data.

The primary objective of this Rule is to establish a unified and compliant approach for the processing of Personal Data in accordance with the General Data Protection Regulation (GDPR). It applies whenever a company, including its affiliates, processes Personal Data governed by the GDPR or acts as a data processor on behalf of another entity subject to the GDPR. By adhering to this Rule, the company ensures consistent and lawful handling of Personal Data while maintaining compliance with GDPR requirements.

This Rule establishes the general principles that underlie SPE's specific practices for the collection, use, storage, sharing, cross-border transfer, or otherwise processing of Personal Data.

The purpose of the **information management** standard is to establish the principles of information management for the protection of SPE's information assets. The rules laid down in the document can always be used and referred to.

All members of the company must be aware that the information owned or held by SPE is an asset of SPE; therefore, all measures and precautions must be taken to protect the information assets. Each member of SPE must follow all applicable laws and regulations when dealing with information assets.

According to the **Compliance Manual**, which sets out internal procedures to be followed during its activities, if SPE obtains confidential information it is required not to disclose it to third parties.

3. Social responsibility

3.1 Health and Safety

The Company cares about the health of its employees and for this reason offers managers, employees, and family members a comprehensive check-up at a contracted facility. This service allows individuals to take care of their own wellbeing and undergo a series of clinical and control examinations to discourage any possibility of illness.

SPE prioritizes the health and safety of its employees by conducting annual mandatory training programs. These courses are designed to enhance awareness and knowledge regarding health and safety matters. Leveraging online platforms, the training sessions are easily accessible to all employees, offering the flexibility to participate at their convenience without being restricted by geographical or time constraints. This approach ensures that employees can effectively balance their work commitments while actively engaging in essential health and safety training. For example, a refresher course on safety in the workplace was held in 2022. Additionally, a team building initiative is organized once a year to explore the topic of mental health.

It is important to report that for 26,650.75 hours worked in 2021 and 27,113.5 hours in 2022, there were no occupational accidents or recordable cases of occupational diseases.

3.2 Diversity, equity, and inclusion

SPE has implemented a Smart Working policy that provides its employees with the opportunity to work remotely. This policy aims to promote flexibility and work-life balance. In line with its commitment to inclusivity, SPE grants an additional day of Smart Working to employees belonging to protected categories. This initiative ensures equal opportunities and supports a diverse and inclusive work environment

Summit Pharmaceutical Europe has a total of 25 employees, 21 of whom work in the Italian office and 4 in the Spanish office.

In both 2021 and 2022, there were no changes in the composition of the working team.

As a company operating within the pharmaceutical sector, SPE focuses on facilitating the connection between demand and supply of finished products and/or components. As such, its core business does not involve a production area, which is why blue-collar positions are not present on the work board. Instead, SPE's expertise lies in effectively bridging the gap between suppliers and customers, ensuring seamless and

efficient transactions within the pharmaceutical industry. By specializing in this strategic role, SPE contributes to the smooth functioning of the supply chain and ultimately supports the timely delivery of pharmaceutical products to meet market demands.

SPE's workforce remained unchanged over the years under review, numbering 21 employees. Males make up 75% of top management and 71% of middle management. Women make up 90% of the white collars.

84% of Summit Pharmaceuticals Europe employees have a full-time contract and 96% have a permanent employment contract.

There is no change in the number of female and male employees between 2021 and 2022. 57.14% of SPE employees are women, compared to 42.86% men. To date, SPE does not have any employees in disabled categories but reserves the possibility of hiring one in the next future.

Total number of employees by employment category, gender							
Number of people	2021			2022			
	Male	Female	Total	Male	Female	Total	
Top management	3	1	4	3	1	4	
Middle management	5	2	7	5	2	7	
White collars	1	9	10	1	9	10	
Blue collars	0	0	0	0	0	0	
Total	9	12	21	9	12	21	
Total number of employees broken down by full-time/part-time, gender							
Sites	Type of contract	2021			2022		
		Male	Female	Total	Male	Female	Total
Italy	Full-time	9	9	18	9	9	18
	Part-time	0	3	3	0	3	3
Spain	Full-time	2	1	3	2	1	3
	Part-time	0	1	1	0	1	1
Total		11	14	25	11	14	25

Total number of employees by type of contract, gender							
Sites	Type of contract	2021			2022		
		Male	Female	Total	Male	Female	Total
Italy	Permanent	9	11	20	9	11	20

	Temporary	0	1	1	0	1	1			
Spain	Permanent	2	2	4	2	2	4			
	Temporary	0	0	0	0	0	0			
Total		11	14	25	11	14	25			
New Hire										
Number of people	2021					2022				
	<30	30-50	>50	Total e	%	<30	30-50	>50	Total e	%
Male		1	1		0,29					0
Female										0
Total	0	1	1	2	0,10					0
Turnover %		0,10	0,10	0,095		0	0	0	0	0

The number of external workforces recorded by SPE in both 2021 and 2022 is one male belonging to category "external staff" and one male belonging to category "self-employed workers".

3.3 Human rights

Respect for human rights is an inalienable prerogative for SPE; for this reason, no act that would undermine this principle is tolerated.

The percentage of the total number of employees covered by collective bargaining agreements is 100% in both 2021 and 2022.

On 10th July 2023, in order to improve its practices to fight modern slavery and human traffic, the Board of Directors of Summit Pharmaceuticals Europe S.r.l approved the statement on modern slavery and human trafficking in accordance with the UK Modern Slavery Act 2015.

3.4 Professional Growth

SPE is deeply committed to fostering an environment where every employee can thrive and unleash their full potential.

The company recognizes that by empowering individuals to achieve their personal targets, it not only strengthens their respective teams but also contributes to the overall success of the organization. SPE firmly believes in the significance of nurturing professional growth and supporting employees in attaining their

personal aspirations. By providing ample opportunities for development and creating a supportive framework, the company aims to inspire its workforce to continually excel and make significant contributions towards fulfilling both their individual goals and the collective objectives of SPE.

The success of the individual member contributes to the success of the entire work group and the company.

All SPE employees receive regular performance and career development evaluations. The appraisal process is a formal occasion where, once a year, an individual's performance against company objectives is discussed. Conversely, performance management is a daily affair.

The core principles present in the performance management policy are as follows:

- The appraisal process aims to improve the effectiveness of the Company by developing and delivering a well-motivated and competent workforce.
- Performance management is an ongoing process with an annual formal appraisal meeting to review progress.
- The appraisal meeting is a two-way communication exercise to ensure that both the needs of the employee and the organization are being met and will continue to be met in the next year.
- The appraisal process will be used to identify the employee's and the employer's strengths, weaknesses, opportunities, and threats to support continuous improvement (Kaizen).
- The appraisal process will be a fair, consistent, and equitable process.

All SPE members have the right and duty to attend training courses in first aid and firefighting.

In both 2021 and 2022, the company offered its employees other training courses in addition to the legally required ones.

Some examples of the courses provided were:

- Public speaking.
- In-depth training on relations between national and international contractors.
- Trade Risk Management
- Diversity and Inclusion
- Safety on workplace

SPE is currently implementing an automatic system to keep track of the training hours provided to each employee.

As the table below shows, SPE has only one employee under the age of 30, 10 between 30 and 50 and 10 over 50.

People access to health

SPE acts as an intermediary between companies in the pharmaceutical sector. It is not involved in the production of finished products and/or components but hopes that its work will enable access to care for an ever-larger number of the population. The issue of people's health and safety, coupled with the issue of people's access to care are of utmost importance to society.

Total number of employees (headcount) divided by employment category and by age								
Number of people	2021				2022			
	<30	30-50	>50	Total	<30	30-50	>50	Total
Top managers			4				4	
Middle managers		3	4			3	4	
White collars	1	7	2		1	7	2	
Blue collars								
Total	1	10	10	21	1	10	10	21

4. Environmental Responsibility

4.1 Energy and Emissions

The company is aware of the importance of environmental issues and is adopting systems to monitor its emissions.

SPE has a company car subscription for business purposes. This is an internal procedure to determine how employees are allocated a company-owned or leased car. The company provides its employees with 7 company cars, all with diesel engines and with long-term rental.

Currently, the internal policy is to allocate hybrid cars, but reserves the possibility in the future to limit the choice to electric cars.

The total amount of diesel (for company owned or leased vehicles) consumed in 2022 is 392 GJ.

The electricity purchased from the national grid amounts to 33 GJ in 2021 and 26 GJ in 2022¹.

The emission factors published by DEFRA were used to calculate the energy for the years 2021 and 2022.

4.2 Waste management

At SPE, a strong commitment to environmental sustainability is reflected in the daily practice of separate waste collection within its offices and the entire apartment building where it resides. Each day, paper, plastic, wet waste, aluminum, and glass are meticulously sorted to ensure proper disposal. To support this initiative, the company pays a monthly fee for a comprehensive service that includes waste collection and office cleaning.

SPE has entrusted the responsibility of waste management to an external company, which complies with national regulations for waste disposal. Notably, printer toners are disposed of separately, recognizing the need for specialized handling.

¹ The data for diesel consumed and for electricity purchased from national grid refers to the Italian office

While waste monitoring has not been implemented thus far, SPE is actively pursuing the adoption of a waste monitoring system. By doing so, the company aims to enhance its ability to track and manage waste generation, further strengthening its commitment to environmental stewardship.

4.3 Material management

Although SPE does not have a production site, it places significant emphasis on responsible material usage. The company is dedicated to minimizing the use of materials that result in waste within its offices. This commitment is widely acknowledged throughout the organization, and there is a strong awareness of the importance of proper waste management.

Within SPE, the adoption of waste reuse and recycling practices is prevalent. The company actively promotes and encourages these sustainable practices to minimize its environmental footprint and contribute to a circular economy. By prioritizing waste reduction, reuse, and recycling, SPE demonstrates its commitment to responsible resource management.

SPE is committed to using organic beverage cups, reusable ceramic cups, and returnable water glass bottles in its offices.

Some monitors instead of being sent for disposal are donated to employees for smart working when they are no longer used by the company.

SPE does not have its own vehicles to carry out shipments but selects suitable shipment agents according to need. Furthermore, the company has no warehouse, as it only purchases components and/or finished products that have been requested by the customer. The selected supplier will be responsible for packaging the product; SPE checks that the products are packaged as required by law for the purpose of the CONAI declaration for import.

For this year, the company has not been able to monitor data on renewable and non-renewable materials in terms of volume and weight that it uses during the year; however, SPE is working on implementing a system to keep track of the materials used.

5. GRI Content Index

GRI CONTENT INDEX	
Statement of Use	Summit Pharmaceuticals Europe has reported the information cited in this report for the period April 1st, 2021 – March 31st 2022 with reference to the GRI Standards.
GRI Sector Standard	N/A

GRI Standard	Disclosure	Pages
GRI 2: GENERAL DISCLOSURE (2021)		
Activities and workers		
2-7	Employees	
2-8	Workers who are not employees	
Strategy, policies and practices		
2-27	Compliance with laws and Regulations	
2-30	Collective bargaining agreement	
TOPIC STANDARDS		
ECONOMIC AND GOVERNANCE RESPONSIBILITY		
Ethical Business		
GRI 3: Material Topics (2021)		
3-3	Management of material topics	
GRI 205: Anti-corruption (2016)		
205-2	Communication and training about anti-corruption policies and procedures	
205-3	Confirmed incidents of corruption and actions taken	
Product quality and safety		

GRI 3: Material Topics (2021)		
3-3	Management of material topics	
GRI 416: Customer health and safety (2016)		
416-2	Incidents of noncompliance regarding health and safety impacts of products and services	
Supply chain management		
GRI 3: Material Topics (2021)		
3-3	Management of material topics	
GRI 204: Procurement practices (2016)		
204-1	Proportion of spending to local suppliers	
GRI 308: Supplier Environmental Assessment (2016)		
308-2	Negative environmental impacts in the supply chain and actions taken	
GRI 414: Supplier Social Assessment (2016)		
414-2	Negative social impacts in the supply chain and actions taken	
Cyber security and data protection		
GRI 3: Material Topics (2021)		
3-3	Management of material topics	
GRI 418: Customer privacy (2016)		
418-1	Substantiated complaints concerning breaches of customer privacy and losses of customer data	
SOCIAL RESPONSIBILITY		
Health and safety		
GRI 3: Material Topics (2021)		
3-3	Management of material topics	
GRI 403: Occupational health and safety (2018)		
403-6	Promotion of worker health	

403-9	Work-related injuries	
403-10	Work-related ill health	
Diversity, equity and inclusion		
GRI 3: Material Topics (2021)		
3-3	Management of material topics	
GRI 405: Diversity and equal opportunity (2016)		
405-1	Diversity of governance bodies and employees	
405-2	Ratio of basic salary and remuneration of women to men	
GRI 406: Non-discrimination (2016)		
406-1	Incidents of discrimination and corrective actions taken	
Human rights		
GRI 3: Material Topics (2021)		
3-3	Management of material topics	
GRI 402: Labor/Management Relations (2016)		
402-1	Minimum notice periods regarding operational changes	
GRI 407: Freedom of Association and Collective Bargaining (2016)		
407-1	Operations and suppliers in which the right to freedom of association and collective bargaining may be at risk	
Professional growth		
GRI 3: Material Topics (2021)		
3-3	Management of material topics	
GRI 401: Employment (2016)		
401-1	New employee hires and employee turnover	
GRI 404: Training and Education (2016)		
404-1	Average hours of training per year per employee	
404-3	Percentage of employees receiving regular performance and career development reviews	
ENVIRONMENTAL RESPONSIBILITY		

Energy and emissions		
GRI 3: Material Topics (2021)		
3-3	Management of material topics	
GRI 302: Energy (2016)		
302-1	Energy consumption within the organization	
302-4	Reduction of energy consumption	
GRI 305: Emissions (2016)		
305-1	Direct (Scope 1) GHG emissions	
305-2	Energy indirect (Scope 2) GHG emissions	
Waste management		
GRI 3: Material Topics (2021)		
3-3	Management of material topics	
GRI 306: Waste (2020)		
306-3	Waste generated	
Material management		
GRI 3: Material Topics (2021)		
3-3	Management of material topics	
GRI 301: Materials (2016)		
301-1	Materials used by weight or volume	
301-2	Recycled input materials used	