



Summit Pharmaceuticals Europe

Sustainability Report

2024

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Letter to stakeholders

Dear Stakeholders,

It is with great pleasure that I present the Summit Pharmaceuticals Europe S.r.l. Sustainability Report for the fiscal year 2024. This document reflects our continued commitment to transparency, responsibility, and progress in the areas of environmental, social, and governance (ESG), as well as economic performance.

In a rapidly evolving healthcare landscape, our mission remains steadfast: to contribute to equitable access to care, deliver high-quality and reliable services, and support technological innovation. The challenges facing medicine and healthcare — from post-pandemic recovery to the development of novel and affordable therapies — require a proactive and principled approach. At Summit Pharmaceuticals Europe S.r.l., we strive daily to create value through services that improve lives and medical advancement.

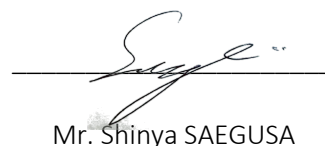
Our sustainability strategy is evolving, and this year marks a significant milestone in our sustainability journey. In 2024, we initiated the development of our Sustainability Plan for 2030, laying the groundwork for long-term impact. We also achieved a Gold Medal rating from EcoVadis, a testament to our improved ESG performance and our dedication to continuous enhancement.

Furthermore, our efforts in diversity, equity, and inclusion were strengthened through the implementation of a DE&I Policy and the update of our Human Rights Policy, reinforcing our commitment to ethical supply chain practices.

This report is not only a reflection of our achievements but also a roadmap for our future: it is a tool for dialogue, accountability, and shared progress.

We thank all our stakeholders for their continued trust and collaboration.

Milano, 30/09/2025



Mr. Shinya SAEGUSA

C. E. O.

Methodological Note

This document represents the Sustainability Report (hereafter also “the Report”) of Summit Pharmaceuticals Europe S.r.l. (hereafter also “SPE” or “the Company”) that aims to present the initiatives and key results obtained in the sustainability areas during financial year 2024 (from April 1st, 2024, to March 31st, 2025). 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. 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 SPE offices (Milan, Italy and Madrid, Spain) as of March 31, 2025, fully consolidated. 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 2023 is given wherever possible.

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

For information regarding the SPE Sustainability Report, please contact the following email address:

spe-esg@sumitomocorp.com

Highlights



Achievement of the EcoVadis Gold Medal



€ 47 million of total revenues



24 employees as of March 31, 2025



1,776 hours of training provided



Initiation of the process aimed at obtaining the Gender Equality Certification according to UNI/PdR 125:2022



72% of spending on local suppliers



Adoption of the DE&I Policy



389.5 GJ of total energy consumption

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. The latter was 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 off the pharmaceutical 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 opened a branch in Barcelona, which in 2009 was then relocated to Madrid. It was in 2005 that Summit Pharma Italia S.r.l. merged with **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**.

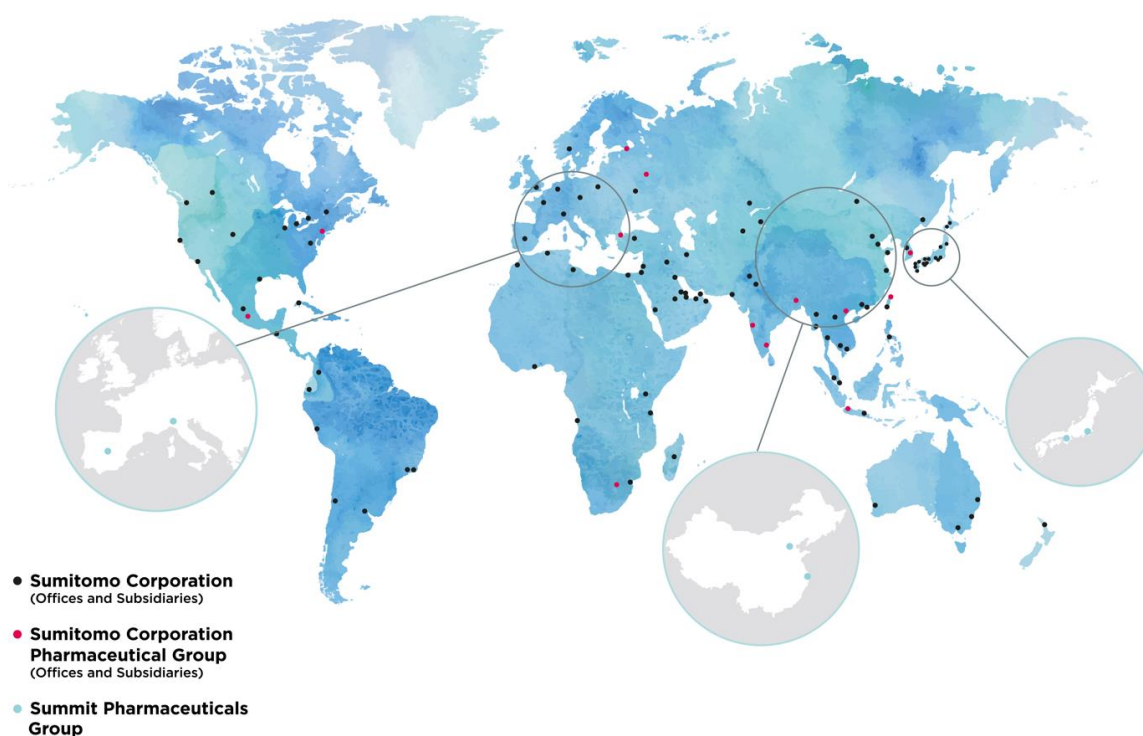
Over the years, the Company experienced significant changes in its shareholding, although always being under the ultimate control of Sumitomo Corporation Japan.

In December 2020, Summit Pharmaceuticals Europe Limited merged with **Summit Pharmaceuticals Europe S.r.l. in Italy** 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 S.r.l. has established itself as a **key player in the region**. Operating from strategically located offices in Milan and Madrid, SPE has fostered strong collaborations with Group Companies worldwide. This synergy enables the Company to leverage the **extensive expertise, experience, and global network of the corporation**, ultimately enhancing its ability to meet the healthcare needs of patients and healthcare providers across Europe. The dedicated SPE team is committed to **delivering exceptional solutions and services that make a positive impact on the healthcare landscape**.

Summit Pharmaceuticals Europe S.r.l. 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, and APIs**. SPE's expertise lays 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. Its expertise and partnerships enable the Company to respond effectively to the varied requirements of customers in the pharmaceutical sector. With an unwavering **commitment to quality and tailored solutions**, Summit Pharmaceuticals Europe S.r.l. contributes to the advancement of the industry, leveraging its extensive capabilities and knowledge.

As a subsidiary of Sumitomo Corporation, Summit Pharmaceuticals Europe S.r.l. benefits from the resources of its parent Company's facilities. With the strong support from Sumitomo Corporation, Summit Pharmaceuticals Europe S.r.l. 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, SPE follows the corporate mission statement of the Group, consisting of the fundamental and ultimate value standards of the Company.

PURPOSE AND VISION

Summit Pharmaceuticals Europe's S.r.l. 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 the future of society.

SPE's corporate **vision** looks at:

- Be an irreplaceable business developer who has a **responsible and valuable role** in Europe for diversifying benefit origins.
- Tackle new challenges to **establish new projects through innovative ideas** and utilize SPE's global network.
- Constantly strive for improvement 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 behaviour 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 well-being of the communities it works with. **The Group Corporate Social Responsibility (CSR) policy** sets out the principles SPE follows and the programs it has developed to focus on the areas where it has significant impact or influence.

Shared responsibility

Social and environmental responsibility involves everyone. In this regard, SPE shares its commitment to social and environmental policies with its stakeholders. It aims to develop and implement social and environmental policies that fit the daily activities and responsibilities of its Partners.

Honesty & accountability

SPE communicates its environmental policies, objectives and performance openly and honestly to its stakeholders and others with an interest in its activities. It encourages them to communicate with the company itself and to seek their opinions.

Sustainable progress

SPE is committed to improving its performance. It takes into account technical developments, evolving scientific evidence, costs and customer concerns and expectations in the development and implementation of all new social and environmental policies and procedures. It monitors its performance, sets targets for improvement and reports on its progress.

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

SPE's suppliers and business partners are required 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 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 the planet, but also setting the stage for long-term success.



United Nations
Global Compact

EcoVadis

SPE was assessed on its performance in ESG areas by **EcoVadis**, a world-renowned sustainability assessment company, in December 2024, achieving a **Gold Medal**, thus improving the previous results since the Company was awarded the silver medal in 2023. SPE is committed to further enhance its rating by improving its performance, network management and practices in ESG terms.

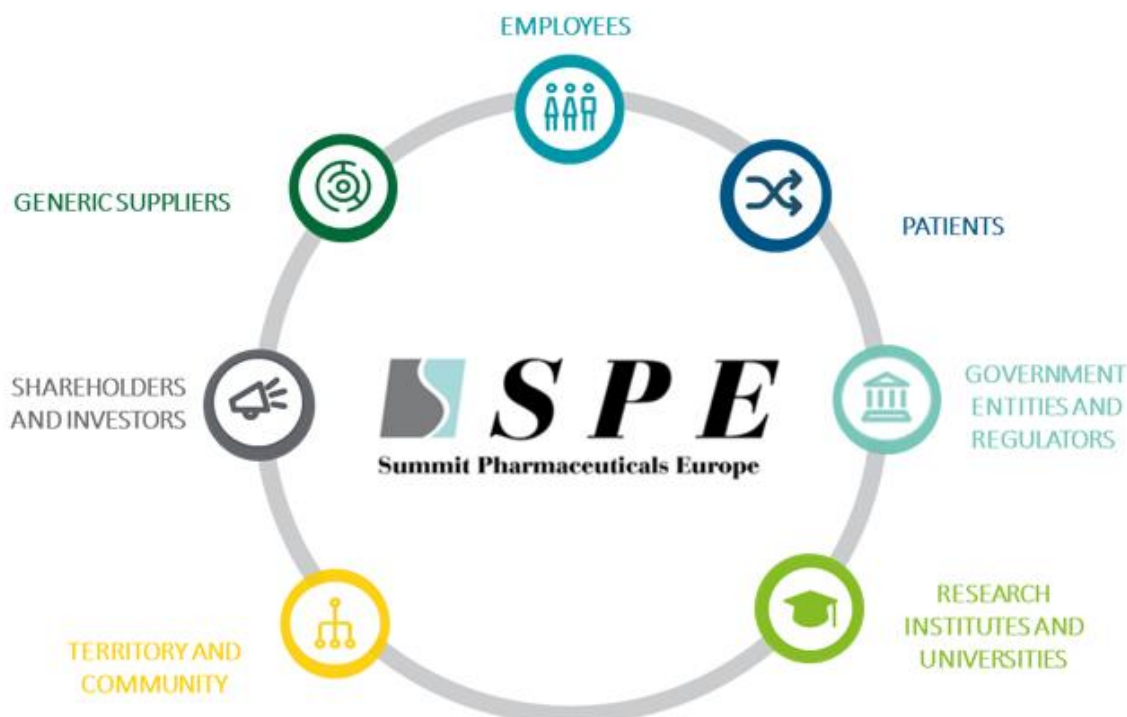


Finally, it is important to mention that during 2024, SPE has started the process of defining its own **Sustainability Plan for 2030**. This is an important step forward in the definition of its sustainability strategy.

2.1 Interest and view of Stakeholders

SPE's Sustainability Report aims to communicate the Company's ESG (Environment, Social and Governance) matters in a simple and direct way, addressing to all those who, in various capacities, are interested in, influence and/or are influenced by the Company's activities.

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.



2.2 Materiality analysis

SPE understands the importance and need for sustainable growth of its business. The **materiality analysis** represents a fundamental step undertaken 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.

In anticipation of its first double materiality assessment (that will be finalized during 2025), which encompasses a comprehensive evaluation of both the environmental and social impacts as well as the associated financial risks and opportunities, SPE has made a strategic decision to begin **updating its impact materiality framework**. This proactive update aims to align the Company's assessment criteria with the evolving regulatory landscape and the dynamic shifts occurring within the market. This approach not only ensures compliance with emerging standards but also strengthens the Company's capacity to respond effectively to stakeholder expectations and long-term value creation in an increasingly complex business environment.

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 – The **benchmark analysis** is an extremely important first step through which SPE analyzed competitors acting in the pharmaceuticals sector. This analysis revealed the most relevant sustainability topics considered by the competitors in the sector and the key stakeholders. In addition, the analysis also focused on the topics identified by the SASB (Sustainability Accounting Standards Board) for the pharmaceutical sector, the EcoVadis questionnaire requests, and the scientific literature. This allowed SPE to conduct its own analysis to identify the most relevant sustainability topics for the sector in which it operates.

Step 2 - Through the analysis that considers the organization's reference context, was created a **list of material topics** related to the Company's current and potential, positive and negative impacts (through an inside-out process) on the environment, the society, and the economy, including on the human rights. Below is a table showcasing an overview of the material topics associated with environmental, social, and governance responsibility identified for SPE. On the right-hand side, one will find the corresponding acknowledged material impacts related to each material sustainability topic.

Material topics	Impact Name	Impact Description	Impact Nature	
Energy and Emissions	Contribution to climate change	Contribution to climate change from direct/indirect greenhouse gas emissions generated through own operations and along the value chain	Negative	Potential
	Energy consumption from non-renewable sources	Consumption of energy from non-renewable sources generated by the Company's own operations and along the corporate value chain, with harmful effects on the environment and diminishing fossil energy resources	Negative	Actual
Material management	Unsustainable procurement practices	Negative impact resulting from unsustainable sourcing practices, even indirectly along the value chain, of products and raw materials (e.g. use of virgin raw materials, products from conflict zones), which also leads to poor availability of resources	Negative	Potential
Waste management	Improper disposal of waste	Contribution to pollution caused by improper disposal of waste delivered to the environment	Negative	Potential
Health and Safety	Potential work injuries and illnesses	Presence of occupational injuries and illnesses with negative effects on the health of workers and	Negative	Potential

		contractors, partly caused by the lack of supervision and the ineffective application of health and safety management systems		
Diversity, Equity and Inclusion	Equal opportunities and avoidance of discrimination	Creation of an inclusive work environment that avoids any form of discrimination against its employees and promotes fair compensation and benefits and equal opportunity to all	Positive	Actual
Human Rights	Cases of forced labor violations along the value chain	Violation of human rights and workers' rights throughout the value chain, with impacts on human dignity and community development	Negative	Potential
Professional Growth	Staff retention and work-life balance	Diffusion of a culture based on the psychophysical well-being of people through inclusion projects (e.g. welfare, work-life balance,...), leading to attractiveness and staff retention	Positive	Actual
	Development and enhancement of workers' skills through training activities	Employee skills development through the promotion of training programs and professional development activities, general and technical programs, also linked to growth objectives and personalized evaluation (e.g. career development plans)	Positive	Actual
Ethical Business	Compliance with laws and regulations	Compliance with laws and regulations through the adoption of a system of corporate rules and procedures, with a positive impact on the community in which the organization operates	Positive	Actual
	Creation and diffusion of a culture of business ethics	Promote a culture of corporate ethics by increasing awareness and culture regarding ethics and human rights among managers, employees, business partners and other stakeholders	Positive	Actual
	Episodes of corruption	Increase of awareness among employees through training on ethical and integrity issues, reducing the risk of corruption and bribery among the organization	Positive	Actual
	Management of reporting channels	Insufficient management of corporate reporting channels, which reduces the encouragement to use such channels and compromises the guarantee of	Negative	Potential

		confidentiality and anonymity for the people involved		
Product Quality and Safety	Offering safe, high quality and durable products	Sale of products that comply with quality and safety standards aligned with industry best practices, with positive impact on consumer health	Positive	Actual
Supply Chain Management	Payments to suppliers	Effects on the economy, the market and people resulting from delays in payments to suppliers, which compromise relationships, trust, stability and reliability of the value chain	Negative	Potential
Cyber Security and Data Protection	Customer data breach and low cybersecurity management	Customer data breach and inadequate security management due to failure to implement cyber protection systems, resulting in exposure to cyber-attacks and loss of sensitive information of the organization	Negative	Potential
	Non-compliant processing of employees' personal data	Violations of employee privacy, resulting in reputational and legal damage to the company, due to inadequate management of employee personal data	Negative	Potential

2.3 Ethical business

Summit Pharmaceuticals Europe S.r.l. is 100% owned by Summit Pharmaceuticals International (SPI), which is 100% owned by Sumitomo Corporation (Japan). During 2024, the **Board of Directors (BoD)** was renewed, consisting of **four members** appointed by Sumitomo Corporation, including one executive member, namely the Chief Executive Officer, and three non-executive members. There are no internal committees. All members of the BoD are independent but follow the guidelines of the shareholders.

The BoD deals 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 settled by the sole shareholder and decided by the shareholders' meeting.



The table below shows the composition of the Board of Directors by gender and age.

Table 1. GRI 405-1 Diversity of governance bodies and employees

Composition of the Board of Directors by age group								
Number of people	2023				2024			
	<30 years	30-50 years	>50 years	Total	<30 years	30-50 years	>50 years	Total
Male	-	1	4	5	-	2	2	4
Female	-	-	-	-	-	-	-	-
Total	-	1	4	5	-	2	2	4
Percentage of people	2023				2024			
	<30 years	30-50 years	>50 years	Total	<30 years	30-50 years	>50 years	Total
Male	-	20%	80%	100%	-	50%	50%	100%
Female	-	-	-	-	-	-	-	-
Total	-	20%	80%	100%	-	50%	50%	100%

The Company constantly strives to comply with laws and regulations in all its activities and firmly believes that transparency and fairness are fundamental principles that guide its business operations. In this regard, since 2021, SPE has adopted a specific **Anti-Bribery Rule** to prevent and manage possible bribery situations. In addition, the Company emphasizes the importance of legal compliance for its current and potential customers and suppliers, as it forms the basis for fostering ethical and trusting relationships. SPE also provides all its employees with an **anti-corruption training** and informs them about the anti-corruption policies and procedures of the organization.

SPE will not allow any employee or intermediary to engage in corrupt activities to obtain or retain a financial or other advantage for themselves or the Company. In this regard, an example is the **Gift and Entertainment Acceptance Rule**, which must be followed when receiving a gift, gift certificate, or being invited by a client to an entertainment event. This rule applies to all SPE employees, whether permanent or fixed-term, temporary or probationary, and includes employees assigned from any other SC office and interns.

In both 2023 and 2024, no incidents of active and/or passive bribery, prosecutions of anticompetitive behaviour, or violations of antitrust and monopolistic practice regulations were detected. Finally, there were no significant instances of non-compliance with laws and regulations during the reporting period. These outcomes reflect the Company's unwavering dedication to upholding the highest standards of legal and ethical conduct.

SPE adheres to its **Code of Ethic** as a guiding framework for daily decision-making processes. The Code outlines strong principles aimed at encouraging the Company's sustainable growth through the promotion of solid ethical values, including acting in good faith in conducting its business activities and thus proactively prevent any form of incorrect or collusive behaviour. In particular, key principles of SPE's Code of Ethic are: anti-bribery and anti-corruption, fair competition, conflict of interests management, compliance with international trade regulations (trade security controls), data protection and confidentiality, intellectual property rights, fair business practices and legal compliance, accuracy of Company books and records, respect for human rights, high health and safety standards, fair employment practices, respect for the environment, product safety and liability and whistleblowing protection. All employees are expected to uphold these standards and must always act with **honesty** and **integrity**.

During 2024, the **Internal Control policy** was approved. Internal control is a management process integrated throughout the organization, designed to ensure the effectiveness and efficiency of operations, the

reliability of financial reporting, compliance with applicable laws, and the protection of assets. It comprises six fundamental components:

- Control environment.
- Risk assessment and response.
- Control activities.
- Information and communication.
- Monitoring.
- IT management.

For its sustainable growth and development, the Company is committed to continuously improving the quality of its global business operations through the proper implementation, evaluation, and improvement of internal controls. To this end, the **Internal Control and Compliance Committee** was established with the task of overseeing and promoting these objectives.

In the same year, SPE implemented its **Whistleblowing Policy**, which governs the process of receiving, evaluating and managing reports of irregularities and/or unlawful conducts, ensuring regulatory compliance through binding rules and operational guidelines. Confidentiality is guaranteed for all the individuals involved – including those mentioned in the report, facilitators, and external collaborators – as well as for the content and related documentation. The exchange of information is limited exclusively to the person responsible for the reports, to the members of the structures involved in the reports management process and to the specific recipients of the report. SPE employees can send anonymous reports regarding any concerns or issues to the Whistleblowing Manager (or to Compliance Committee, if the Manager is somehow involved by the report), who will assess and process them, ensuring impartiality and protection for the whistleblower. The Board of Directors is kept informed, through written communications, of potential critical issues raised by employees. **In 2023-2024, no critical issues of any kind were recorded**, reflecting a stable and compliant work environment.

2.4 Product quality and safety

Sumitomo Corporation is active in all key areas of the chemical and pharmaceutical industries. Therefore, SPE can supply a wide range of excipients, resins, reagents, and raw materials to produce APIs. 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 2023 and 2024 for both offices.**

SPE keeps abreast of the national and European legislations applicable both to the chemical sector, particularly those concerning the registration and marketing of intermediates in Europe (among which REACH and CLP), and the pharmaceutical industry, by following regulations relevant for the distribution of APIs. Moreover, Summit Pharmaceuticals International provides regulatory support enabling SPE's suppliers to apply for Japanese Drug Master File (JDMF) registration and GMP conformity assessment, which are required for the sale of APIs in Japan.

2.5 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 that contain **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 yet, but SPE is evaluating the implementation of a **supplier selection process using ESG criteria** for the future.

As part of its future strategy, SPE started to work on the preparation of a **Supplier Code of Conduct**. The latter will apply to all direct and indirect suppliers who supply goods, services or carry out manufacturing,

subcontracting or distribution activities on behalf of SPE. The Supplier Code of Conduct will cover the following areas:

- Business Integrity and Ethics.
- Human and Labor Rights.
- Respect for the Environment.

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

In 2024, SPE mainly made use of local suppliers with a percentage of spending on **local suppliers**¹ equal to **72%**. For the Milan office, Italian suppliers were considered, while for the Madrid office, spending on Spanish suppliers was considered. These data have been consolidated calculating the percentage, leading to the results shown in the table below.

Table 2. GRI 204-1 Proportion of spending on local suppliers in %

	2023	2024
Local	69%	72%
Non-local	31%	28%
Total	100%	100%

2.6 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. The Company 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. **In 2023-2024 the Company has not**

¹ A local supplier is an organization or person that provides a product or service to the reporting organization, and that is based in the same geographic market where offices are located.

received any substantiated complaints about violations of customer privacy for both offices of Milan and Madrid.

Over the years, SPE has signed up to a set of rules that it is committed 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 outlined 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

SPE acts as an intermediary between companies in the pharmaceutical sector. It is not involved in the production of raw materials for the chemical and pharmaceutical industries 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** is of fundamental importance to society.

3.1 Health and Safety

The Company places strong emphasis on the health and safety of its team. The main risks identified are **office-related hazards**, such as accidental falls, which are formalized within the **Risk Assessment Document (RAD)** along with the related mitigation and prevention measures. A **qualified occupational physician** is also appointed by the Company.

To keep employees updated on potential risks, SPE organizes mandatory training programs through external consultants as per frequency required by law: these courses are designed to enhance awareness and knowledge regarding health and safety matters. Leveraging also 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.

Moreover, each year the Company distributes information material about safety in the workplace as refresher to all employees.

SPE also provides mandatory training to people appointed as First aid and Fire officers and DAE operators (defibrillator); in addition, the building management performs annual evacuation test simulating a fire scenario emergency, with compulsory attendance for all the tenants.

The Company also offers managers and employees a complete health **check-up** at a partner facility and a discounted health check-up for employees' family members. This service allows individuals to take care of

their own well-being and undergo a series of clinical and control examinations preventing any possibility of illness.

It is important to report that **during 2023 and 2024 there were no work-related injuries and cases of work-related ill** during the 30,995 hours worked in Milan and 3,063 hours worked in Madrid in 2024.

3.2 Diversity, equity, and inclusion

In 2024, SPE updated the **Employee Handbook**, which contains rules and regulations regarding the terms and conditions of employment. Some sections refer to specific policies, which are discussed further in the relevant section of this Sustainability Report.

To advance inclusive governance and promote equality and equal opportunities in human resource management throughout the employee life cycle, during 2024 SPE implemented its first **DE&I Policy**. This policy applies to all SPE employees and collaborators and promotes gender equality across the following areas:

- Recruitment and selection practices.
- Professional growth and career development.
- Salary equity.
- Work-life balance.
- Valorization of people before, during and after maternity/paternity leave.
- Prevention of abuse and harassment.

SPE firmly believes that these commitments also contribute to driving business growth and success. Reflecting this, **no cases of discrimination have been reported in the period 2023-2024 in SPE**. It is also important to highlight that, during the current reporting year, SPE has taken its **initial steps towards obtaining the Gender Equality Certification** according to **UNI/PdR 125:2022**.

Moreover, as part of its ongoing commitment to promoting diversity, equity, and inclusion (DE&I), SPE recognizes the importance of fostering an inclusive, safe environment that supports the mental and physical well-being of all its employees. Aligned with this strategy, a team-building initiative was organized once again this year with the theme 'Empathy and Trust.' This initiative highlights the key value of empathetic communication, which is fundamental for nurturing positive working relationships and creating a collaborative and supportive organizational climate.

The Company has renewed in 2024 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, to employees who have children under the age of 14 and to those who have vulnerable relatives. This initiative ensures equal opportunities and supports a diverse and inclusive work environment.

Summit Pharmaceutical Europe S.r.l. has a total of **24 employees in 2024**, 20 of whom work in the Italian office and 4 in the Spanish office. The percentage of the total number of employees covered by **collective bargaining agreements is 100% in both office in 2023 and 2024**.

In 2024, one employee was hired in the Milan office, while there were no changes in the composition of the Spanish working team. As a Company operating within the pharmaceutical sector, SPE focuses on facilitating the connection between demand and supply of raw materials for the chemical and pharmaceutical industries. As such, its core business does not involve a production area, which is why blue-collar positions are not present on the work board.

Males make up 100% of top management and 56% of middle management. Women make up 92% of the white collars.

The 88% of Summit Pharmaceuticals Europe S.r.l. employees have a **full-time contract** and 100% have a **permanent employment contract**. Furthermore, 62% of SPE employees are women, compared to 38% men. During 2024, SPE hired a female employee belonging to a **protected category**.

The number of external workforces recorded by SPE in 2024 is one male and one female belonging to the **"external staff"** category.

All SPE employees are entitled to **parental leave**. In particular, one employee took parental leave in 2023 and returned to work within the same fiscal year. While in 2024, there were no applications for parental leave.

Table 3. GRI 2-7 Employees

Total number of employees by type of contract, gender							
Sites	Type of contract	2023			2024		
		Male	Female	Total	Male	Female	Total
Italy	Permanent	7	12	19	7	13	20
	Temporary	-	-	-	-	-	-
Spain	Permanent	2	2	4	2	2	4
	Temporary	-	-	-	-	-	-
Total		9	14	23	9	15	24

Total number of employees broken down by full-time/part-time, gender							
Sites	Type of contract	2023			2024		
		Male	Female	Total	Male	Female	Total
Italy	Full-time	7	10	17	7	11	18
	Part-time	-	2	2	-	2	2
Spain	Full-time	2	1	3	2	1	3
	Part-time	-	1	1	-	1	1
Total		9	14	23	9	15	24

Table 4. GRI 405-1 Diversity in governance bodies and among employees

Total number of employees by employment category, gender						
Number of people	2023			2024		
	Male	Female	Total	Male	Female	Total
Top management	3	-	3	3	-	3
Middle management	5	4	9	5	4	9
White collars	1	10	11	1	11	12
Blue collars	-	-	-	-	-	-
Total	9	14	23	9	15	24

Percentage of people	2023			2024		
	Male	Female	Total	Male	Female	Total
Top management	13%	-	13%	12%	-	12%
Middle management	22%	17%	39%	21%	17%	38%
White collars	4%	44%	48%	4%	46%	50%
Blue collars	-	-	-	-	-	-
Total	39%	61%	100%	37%	63%	100%

Total number of employees by employment category, gender								
Number of people	2023				2024			
	<30 years	30-50 years	>50 years	Total	<30 years	30-50 years	>50 years	Total
Top management	-	-	3	3	-	-	3	3
Middle management	-	4	5	9	-	4	5	9
White collars	2	7	2	11	3	7	2	12
Blue collars	-	-	-	-	-	-	-	-
Total	2	11	10	23	3	11	10	24
Percentage of people	2023				2024			
	<30 years	30-50 years	>50 years	Total	<30 years	30-50 years	>50 years	Total
Top management	-	-	13%	13%	-	-	13%	13%
Middle management	-	17%	22%	39%	-	17%	21%	38%
White collars	9%	30%	9%	48%	13%	29%	8%	49%
Blue collars	-	-	-	-	-	-	-	-
Total	9%	47%	44%	100%	13%	46%	41%	100%

Table 5. GRI 401-1 New employee hires and employee turnover

New Hire										
Number of people	2023					2024				
	<30	30-50	>50	Total	%	<30	30-50	>50	Total	%
Male	-	-	-	-	0%	-	-	-	-	0%
Female	1	2	-	3	21%	1	-	-	1	7%
Total	1	2	-	3	13%	1	-	-	1	4%
%	50%	18%	0%	13%		33%	0%	0%	4%	

Turnover										
Number of people	2023					2024				
	<30	30-50	>50	Total	%	<30	30-50	>50	Total	%
Male	-	-	-	-	0%	-	-	-	-	0%
Female	-	-	1	1	7%	-	-	-	-	0%
Total	-	-	1	1	4%	-	-	-	-	0%
%	0%	0%	10%	4%		0%	0%	0%	0%	

Remuneration of SPE employees takes into account the position held, avoiding any form of discrimination. To confirm this, in 2024 the overall women-to-men ratio for basic salary and total remuneration across professional categories remains nearly balanced and consistent with the previous year. However, within the middle management category, the ratio registered a significant increase compared to the previous year, due to new hires and, as a result, women receive higher pay than their male colleagues.² The relevant tables have not been published for the Madrid Office as there are no representatives of both genders within the same professional category, making the data irrelevant.

² Following a process of improving the reporting system and in order to ensure its comparability, the data relating to the ratio of women's basic salary and total remuneration to men's have been restated compared to those published in the previous Sustainability Report.

Table 6. GRI 405-2 Ratio of basic salary and remuneration of women to men - Milan Office

Ratio of female to male basic salary		
Professional category	2023	2024
	Ratio of Women to Men	Ratio of Women to Men
Top managers	N/A	N/A
Middle managers	0.4	1.1
White collars	0.9	0.9
Blue collars	N/A	N/A
Ratio of female to male total remuneration		
Professional category	2023	2024
	Ratio of Women to Men	Ratio of Women to Men
Top managers	N/A	N/A
Middle managers	0.7	1.0
White collars	0.8	0.8
Blue collars	N/A	N/A

3.3 Human rights

SPE is dedicated to maintaining the highest standards of respect for people, ensuring the rights of its workers and human rights in general are guaranteed, by adhering to the International Bill of Human Rights and the **ILO** (International Labour Organization) Declaration on Fundamental Principles and Rights at Work. In 2024, SPE implemented the **Human Rights Policy** with the aim of establishing guidelines for the respect and promotion of human rights and labour rights in all its operations and supply chains, with particular attention to the following topics:

- Employee health and safety.
- Working conditions.
- Career management and training.
- Child labor forced labor and human trafficking.
- Diversity, equity, inclusion, discrimination and harassment.

This policy applies to all employees and collaborators of SPE.

In 2024, in order to improve its practices to fight modern slavery and human traffic, the Board of Directors of Summit Pharmaceuticals Europe S.r.l updated 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. In fact, 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.

The Company firmly believes in the importance of nurturing professional growth and supporting employees in attaining their personal aspirations by providing wide opportunities for development and creating a supportive framework. In confirmation of this, 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.

SPE's commitment is embodied in the appraisal process, a formal occasion where, once a year, an individual's performance against Company objectives is discussed. Conversely, performance management is a daily affair.

In 2024, the **Performance Management Policy** was updated, but the fundamental principles remain 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.

During 2023-2024, all SPE employees received performance and career development evaluations.

In 2024, SPE provided an **average of 74.0 hours of training**, registering a 70% increase over the previous year. This increase is attributable both to a higher number of courses attended by employees and to a longer average duration of training courses compared to previous years. In addition, numerous periodic courses were provided during the year in accordance with current legislation. The courses SPE provides include environmental issues, work and human rights, ethics and professional growth.

Table 7. GRI 404-1 Average hours of training per year per employee

Average hours of training by professional category		
Average hours	2023	2024
Top management	49.7	91.7
Middle management	31.7	75.1
White collars	55.7	68.8
Blue collars	-	-
Total	45.5	74.0

Average hours of training by gender		
Average hours	2023	2024
Male	47.4	77.8
Female	44.4	71.7
Total	45.5	74.0

Type of training provided						
Type of training	2023			2024		
	N. of people	Total hours	Average hours	N. of people	Total hours	Average hours
Environment	3	8	2.7	25	43	1.7
Labour and Human Rights	25	14	0.6	25	223	8.9
Ethics	24	31	1.3	25	121	4.8
Professional growth	25	994	39.8	26	1.389	53.4
Total	77.0	1.047.0	13.6	101.0	1.776.0	17.6

4. Environmental Responsibility

Summit Pharmaceutical Europe S.r.l. recognizes that environmental issues are global in scale and that they affect future generations. As part of Sumitomo Corporation Group and through solid business activities, SPE will strive to achieve sustainable development aimed at both social and economic progress and environmental preservation. For this reason, SPE has adopted its **Environmental Policy** and aims to formalize its commitment, in line with the regulatory environment in which it operates.

In pursuing its diversified business activities within Europe and other territories, Summit Pharmaceuticals Europe S.r.l. shall comply with the following guidelines, and work to achieve the aims of its environmental basic policy.

- Basic stance with regard to the environment.
- Compliance with environmental legislation.
- Caring for the natural environment.
- Response to climate change.
- Efficient use of resources and energy.
- Contributing to the building of a recycling-oriented society.
- Promotion of businesses that contribute to environmental preservation.
- Establishment of environmental management.
- Disclosure of the environmental policy.

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 an internal Policy “**Company car for business purposes**” regarding the allocation of company cars. This procedure governs the allocation of long-term rental vehicles to employees. Updated at the beginning of 2025, the policy now prioritizes sustainable vehicle options when ordering cars. The current company

fleet consists of 9 cars, and as soon as the previous leasing contracts expire, the cars will be gradually replaced with mild hybrid, full hybrid or plug-in hybrid models. In 2024, the total amount of **diesel (for leased vehicles)** consumed is **358.1 GJ**, in line with the previous year.

The **electricity purchased** from the national grid amounts to **34.5 GJ** in 2023 and **31.4 GJ** in 2024, representing a decrease of **9%** due to increased teleworking and business trips made by the Madrid Office. Since 2024, Madrid office has been powered exclusively by electricity obtained from renewable sources.

Overall, **total energy consumed** in 2024 was **389.5 GJ**, in line with the previous year. In 2024 **Scope 1** was equal to **0.9 tCO₂eq** released, in line with the previous year. As regards the **Scope 2 Market-Based (MB)**, SPE produced emissions equal to **4.2 tCO₂**, while according to the **Scope 2 Location-Based (LB)** approach emissions equal to **3.7 tCO₂** were produced.

Table 8. GRI 302-1 Energy consumption within the organization

Energy consumption (GJ) ³		
	2023	2024
Diesel (for company owned or leased/leased vehicles)	353.9	358.1
Electricity purchased from national grid	34.5	31.4
of which from renewable sources (certified)	-	1.4
Total energy consumption	388.4	389.5

Table 10. GRI 302-3 Energy intensity

Energy intensity ⁴			
Energy intensity	Unit of measurement	2023	2024
Revenues	K€	65,203	46,940
Energy consumption	GJ	388.4	389.5
Energy intensity	GJ/K€	0.006	0.008

³ Energy consumption (conversions in GJ):

(i) for diesel for company vehicles, the conversion factors used are those published by DEFRA 2023, 2024.

(ii) for electricity, the conversion factor used is 0.0036 GJ/kWh (Source: UK Government - GHG Conversion Factors for Company Reporting-DEFRA).

⁴ To calculate energy intensity, energy consumption (GJ) was compared to revenues expressed in thousands of euros.

Table 91. GRI 305-1 & GRI 305-2 Direct and Indirect GHG caused by the organization's activities

GHG Emission – tCO ₂ eq		
Direct GHG emissions – Scope 1 (tCO ₂ e) ⁵	2023	2024
Diesel (for company owned or leased/leased vehicles)	0.9	0.9
Scope 1 emissions	0.9	0.9
Indirect GHG emissions from energy consumption - Scope 2 (tCO ₂ e) ⁶	2023	2024
Purchased Electricity (Location-Based)	3.0	3.7
Purchased Electricity (Market-Based)	4.2	4.2
Total Scope 2 emissions (Location-Based)	3.0	3.7
Total Scope 2 emissions (Market-Based)	4.2	4.2
Scope 1 and Scope 2 (Location-Based)	3.9	4.6
Scope 1 and Scope 2 (Market-Based)	5.0	5.1

Table 102. GRI 305-4 GHG emissions intensity

GHG emissions intensity ⁷			
GHG emissions intensity	Unit of measurement	2023	2024
Revenues	K€	65,203	46,940
Emissions (Scope 1 + Scope 2 Location-Based)	tCO ₂ e	3.9	4.6
Emissions (Scope 1 + Scope 2 Market-Based)	tCO ₂ e	5.0	5.1
Emission Intensity (Scope 1 + Scope 2 Location-Based)	tCO₂e/K€	0.0001	0.0001

⁵ Scope 1 emissions are direct greenhouse (GHG) emissions that occur from sources that are controlled or owned by an organization (e.g., emissions associated with fuel combustion in boilers, furnaces, vehicles). To calculate Scope 1 emissions the factors used are those published by DEFRA 2023, 2024.

⁶ Scope 2 emissions are indirect GHG emissions associated with the purchase of electricity, steam, heat, or cooling. To calculate Scope 2 emissions, in line with the GRI Sustainability Reporting Standards, both calculation methods were used, i.e. Market Based (MB) and Location Based (LB).

The MB method is based on the CO₂ emissions emitted by energy suppliers from which the organization purchases electricity through a contract and can be calculated considering certificates of origin guarantees and direct contracts with suppliers, supplier-specific emission factors, factor of emission relating to the "residual mix". The source used is AIB- Residual Mixes 2023, 2024.

The LB method is instead based on average emission factors related to power generation for well-defined geographical boundaries, including local, subnational or national boundaries. In this case the source used is AIB- Supplier Mixes 2023, 2024.

⁷ To calculate the emission intensity, the emissions (tCO₂e) was compared to revenues expressed in thousands of euros.

Emission Intensity (Scope 1 + Scope 2 Market-Based)	tCO _{2e} /M€	0.0001	0.0001
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4.2 Waste and Material 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.

The Company 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. In 2023, SPE generated **10.0 tons of** non-hazardous waste while in 2024 it produced negligible amounts of waste⁸.

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

In terms of materials management, SPE does not have a manufacturing site but places significant emphasis on the responsible use of materials. 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.

8 Waste data does not include the Madrid office.

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 raw materials for the chemical and pharmaceutical industries that have been requested by the customer. The selected supplier will be responsible for packaging the product; SPE monitors the safety of transport of materials, especially if they are subject to the provisions of the hazardous materials regulation. In addition, for **APIs**, SPE is subject to the **Good Distribution Practice** (GDP) provisions.

As the previous 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 in the offices.

5. GRI Content Index

GRI CONTENT INDEX		
Statement of Use	Summit Pharmaceuticals Europe S.r.l. has reported the information cited in this report for the period April 1st, 2024 – March 31st 2025 “with reference” to the GRI Standards.	
GRI Sector Standard	N/A	

GRI Standard	Disclosure	Pages	Note
GRI 2: GENERAL DISCLOSURE (2021)			
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2-2	Entities included in the organization's sustainability reporting	2	
2-3	Reporting period, frequency and contact point	2	
2-4	Restatements of information	2	
2-5	External assurance		This Sustainability Report is not subject to Assurance
Activities and workers			
2-6	Activities, value chain and other business relationships	4-5	
2-7	Employees	22-23	
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2-9	Governance structure and composition	13-14	
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2-22	Statement on sustainable development strategy	1	
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2-26	Mechanisms for seeking advice and raising concerns	15-16	
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GRI 3: Material Topics (2021)			
GRI 3-1	Process to determine material topics	9-11	
GRI 3-2	List of material topics	11-13	
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3-3	Management of material topics	9-13; 13-16	
GRI 205: Anti-corruption (2016)			
205-2	Communication and training about anti-corruption	15	

	policies and procedures		
205-3	Confirmed incidents of corruption and actions taken	15	
206-1	Legal actions for anti-competitive behaviour, anti-trust, and monopoly practices	15	
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GRI 3: Material Topics (2021)			
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GRI 416: Customer health and safety (2016)			
416-2	Incidents of non compliance regarding health and safety impacts of products and services	16	
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GRI 3: Material Topics (2021)			
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Cyber security and data protection			
GRI 3: Material Topics (2021)			
3-3	Management of material topics	9-13; 18-19	
GRI 418: Customer privacy (2016)			
418-1	Substantiated complaints concerning breaches of customer privacy and losses of customer data	18-19	
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Health and safety			

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3-3	Management of material topics	9-13; 20-21	
GRI 403: Occupational health and safety (2018)			
403-2	Hazard identification, risk assessment, and incident investigation	20	
403-5	Worker training on occupational health and safety	20-21	
403-6	Promotion of worker health	20-21	
403-7	Prevention and mitigation of occupational health and safety impacts directly linked by business relationships	20	
403-9	Work-related injuries	21	
403-10	Work-related ill health	21	
Diversity, equity and inclusion			
GRI 3: Material Topics (2021)			
3-3	Management of material topics	9-13; 21-26	
GRI 401: Employment (2016)			
401-3	Parental leave	22	
GRI 405: Diversity and equal opportunity (2016)			
405-1	Diversity of governance bodies and employees	14; 23-24	
405-2	Ratio of basic salary and remuneration of women to men	26	
GRI 406: Non-discrimination (2016)			
406-1	Incidents of discrimination and corrective actions taken	21	
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GRI 3: Material Topics (2021)			
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GRI 3: Material Topics (2021)			
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