

HUMAN RIGHTS POLICY

2024

Message from the General Manager

As a leading international pharmaceutical company, we are dedicated to promoting and respecting human rights across all our operations and business relationships. This policy outlines our commitments and the principles we adhere to in supporting human rights within our organization and throughout our value chain.

Our commitment to human rights is rooted in our core values and principles, which guide our efforts to advance health, well-being, and equitable access to medical treatments. We understand that respecting and promoting human rights is not only a legal and ethical obligation but also an essential element for sustainable development and building trust with all stakeholders.

Human rights are fundamental rights and freedoms to which all individuals are entitled, regardless of nationality, sex, ethnicity, religion, language, or any other status. These include, but are not limited to, the right to life, liberty, and security; freedom from slavery and torture; the right to work and receive fair wages; the right to education; and the right to participate in cultural life.

This policy outlines our approach to identifying, preventing, and addressing human rights impacts associated with our business activities and relationships, as well as our commitment to transparency and continuous improvement.

We strongly believe that respect for people is imperative to ensure the sustainable development of our company and society as a whole.

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1. Scope

The Human Rights Policy of Antibiotice S.A. is based on the fundamental principles of the Universal Declaration of Human Rights, the OECD Guidelines for Multinational Enterprises, the ILO's Tripartite Declaration of Principles, and the ILO's Social Policy and Labor Standards Conventions.

These principles guide us in our current activities and in evaluating future development opportunities. Our commitment to respecting human rights is an essential part of the company's operations and applies to all geographic regions where we conduct business.

Antibiotice collaborates with partners, including companies with whom we have commercial relationships (e.g., suppliers of raw materials, services, and distributors) and other entities in partnerships or agreements (e.g., educational institutions, research institutes, financial institutions, public authorities, NGOs, intermediaries, and agents acting on our behalf). These collaborations are built on the expectation that all partners will adhere to the following principles:

- Respect for human rights;
- Prohibition of child labor and forced or compulsory labor;
- Conducting activities responsibly, adhering to ethical principles and best practices;
- Respecting the highest standards of quality, safety, and compliance throughout the value chain;
- Implementing measures to minimize negative impacts and maximize positive impacts of activities undertaken.

The principles guiding our activities are detailed in the Code of Conduct for Partners, a foundational document for our collaborative relationships. This code is made available to partners to establish a shared understanding of daily operational expectations.

This policy applies both internally—within all our operations—and externally—in our relationships with business partners.

2. Respect for Human Rights in Our Activities

2.1 Health and Safety in the Workplace

We are committed to ensuring that all employees and contractors work in an environment that prioritizes their health and safety. This commitment involves implementing comprehensive health and safety management systems that adhere to local, national, and international regulations and standards (e.g., ISO 45001/2018). We provide training, resources, and adequate support to enable employees and contractors to perform their tasks safely and efficiently.

Regular risk assessments and incident investigations are conducted to identify and mitigate potential hazards, ensuring continuous improvement of our safety practices.

Our health and safety expectations extend to the employees of our suppliers and business partners. We expect them to adhere to the highest standards of health and safety within their operations and throughout their supply chains. This includes implementing robust workplace health and safety practices and complying with relevant laws and regulations.

Objective: Achieve zero serious workplace accidents.

2.2 Freedom of Association and Collective Bargaining

We support the right of all employees and contractors to form, join, or refrain from joining unions or other organizations of their choice without fear of reprisal, intimidation, or harassment. We recognize the importance of collective bargaining and respect the role of unions and other representative organizations in defending workers' interests.

Employees have the right to unionize, as guaranteed by the Constitution and upheld by the company through the Collective Labor Agreement. The union represents employees in negotiations with the employer on the terms of the Collective Labor Agreement, which applies to all employees regardless of contract type, working hours, or union membership. Within the company, the Free Antibiotic Union operates as part of the Federation of Free Unions in the Chemical and Petrochemical Industry, affiliated with the National Union Confederation "Cartel ALFA."

We expect our suppliers and business partners to adhere to the same principles of freedom of association and collective bargaining, allowing their employees to exercise these rights freely and without interference.

Objective: Guarantee the right to freedom of association and collective bargaining for all employees and contractors, promoting a workplace culture that values open communication and social dialogue.

2.3 Working Conditions

We are committed to providing working conditions that meet all applicable legal and regulatory standards. This includes fair wages, reasonable working hours, parental leave, and adequate rest periods. Our policies aim to promote work-life balance and the overall well-being of our employees and contractors.

Employee benefits include, but are not limited to, meal vouchers, financial support for personal events, private health insurance, gift vouchers, performance bonuses, and free transportation to and from the workplace.

We extend our expectations for fair working conditions to our suppliers and business partners. They must adhere to the same standards and principles within their operations and supply chains.

Objective: Guarantee decent working conditions for all employees and contractors to foster a fair working environment.

2.4 Career Management and Fair Remuneration

Our commitment to ensuring effective career management encompasses recruitment, training, and career development, ensuring these practices are conducted fairly and transparently. We are dedicated to a recruitment process that is fair, inclusive, and free from discrimination. We ensure that all candidates are evaluated based on their qualifications, experience, and potential, without consideration of race, gender, age, disability, religion, sexual orientation, or any other characteristic protected by law. Our goal is to attract and retain a diverse workforce that reflects the communities we serve and enhances our ability to innovate.

We also provide continuous learning opportunities that enable our workforce to acquire new skills, advance in their careers, and stay updated with industry developments. This includes on-the-job training, professional development courses, and access to educational resources.

We believe that investing in our people is essential for their personal growth and the long-term success of our company. We support employees in setting career goals and provide the resources and guidance needed to achieve them. Performance evaluations, career counseling, and individual development plans are integral to our approach, ensuring career advancement is merit-based and aligned with the needs and objectives of both the individual and the company.

Compensation within the company is tailored to the specifics of our operations and national standards, complying with primary salary-related legislation in Romania, including applicable provisions of the Labor Code, Tax Code, Fiscal Procedure Code, and other mandatory regulations enforced by law.

The remuneration of the individuals we employ is grounded in principles of fair compensation, while also upholding pay equity between men and women performing the same work. Employee pay cannot be lower than the national minimum wage stipulated in collective labor agreements, and in the case of our value chain partners, it cannot be below the legal regulations in effect in each country.

Furthermore, we encourage our suppliers and business partners to adopt similar practices within their own organizations, promoting fair recruitment and remuneration policies as well as comprehensive career training and development opportunities.

Our objective is to ensure career management is fair, transparent, and inclusive, to uphold the highest standards of human rights, and to contribute to the development of a skilled, motivated, and empowered workforce.

2.5 Diversity, Equity, and Inclusion (DEI)

We are committed to creating a workplace where diversity is celebrated, and all individuals are treated with respect and dignity. We value the perspectives, experiences, and contributions that each person brings to our company. Our DEI (Diversity, Equity, and Inclusion) initiatives are designed to foster an inclusive culture where everyone feels valued and empowered to contribute to their fullest potential.

We have zero tolerance for any form of intimidation or harassment, including physical, psychological, or verbal abuse. Within the company, a Diversity, Inclusion, and Equity Policy has been developed and is applicable to both employees and our business partners. This policy outlines the principles and standards we adhere to, as well as the actions employees or other stakeholders can take if they observe a violation of these principles.

We also extend our commitment to DEI to our suppliers and business partners. We expect them to uphold similar values and practices within their own organizations, promoting diversity, equity, and inclusion within their operations and supply chains.

Our objective is to create a diverse, equitable, and inclusive working environment for everyone involved in our operations.

2.6 Child Labor and Forced Labor

We strictly prohibit the use of child labor and forced labor in any aspect of our operations. We adhere to international standards, including the conventions of the International Labour Organization (ILO), as well as local laws and regulations concerning the minimum age for employment and the prohibition of forced labor. We are committed to ensuring that our practices respect and

protect the rights of all individuals, particularly vulnerable populations such as children.

Our recruitment and employment practices are designed to prevent any form of child or forced labor. We verify the age and legal status of all employees and contractors during the hiring process and maintain robust documentation to ensure compliance.

We also ensure that students and interns participating in practical training programs only engage in activities outlined in their academic curricula, aimed at acquiring the practical skills specific to their field of study.

Furthermore, we extend our zero-tolerance policy on child labor and forced labor to our suppliers and business partners. We require and expect them to adhere to the same high standards within their operations and supply chains.

Our objective is to comply with local and international regulations regarding child labor and forced labor across all our operations. We aim to uphold a culture of integrity and fairness within our operations and value chain, ensuring that no form of child or forced labor occurs. To achieve this, we continually strengthen our verification measures and compliance processes.

2.7 Participation in Clinical Trials

Our commitment to ensuring the rights and well-being of clinical trial participants is fundamental to our operations. We recognize the importance of respecting the rights of individuals who voluntarily participate in clinical studies. These studies are conducted in accordance with a study protocol authorized by the National Agency for Medicines and Medical Devices of Romania and the National Bioethics Committee for Medicines and Medical Devices, adhering to the principles of the Declaration of Helsinki regarding participant safety.

We assure study participants that our clinical trials comply with harmonized European legislation (International Council for Harmonisation of Technical Requirements for Pharmaceuticals for Human Use - ICH) and are conducted in line with Good Laboratory Practice (GLP) guidelines, Good Clinical Practice (GCP) guidelines, and the provisions of the Integrated Management System documents.

Our policy ensures that the rights, safety, and well-being of participants remain a priority throughout the testing process. Good practices in conducting clinical studies are essential for the design, management, implementation, monitoring, auditing, recording, analysis, and reporting of trials. These practices not only ensure the credibility and accuracy of reported data and results but also safeguard the rights, integrity, and confidentiality of study participants.

Clinical trials are conducted with caution to prevent or minimize harm to both participants and the environment. Participation is open and non-discriminatory to any individual who meets the criteria established in the approved protocols. Trials are managed by ethical specialists with appropriate scientific training, qualifications, and the necessary experience for this activity. Furthermore, we discourage over-volunteering and implement inclusion/exclusion criteria in clinical studies to limit the participation of vulnerable individuals.

We uphold the principle of informed consent, ensuring that participants are fully informed about the nature of the study, its risks and benefits, and their rights as participants before providing their consent to take part. This includes delivering clear and easily understandable information to participants and allowing sufficient time for questions and discussions.

We implement robust data protection measures to safeguard participants' personal information, ensuring their identities remain confidential throughout the study and beyond. Our objective is to continue conducting clinical trials with integrity and transparency, in compliance with national, European, and global regulations. We are dedicated to prioritizing the rights and well-being of participants while contributing to the advancement of medical knowledge and the development of safe and effective treatments for the benefit of patients.

Objective: Safeguard participants' rights and safety during all clinical trials.

3. Reporting Channels

We are committed to ensuring that all stakeholders have access to a clear and accessible mechanism for raising concerns related to human rights. Our grievance resolution mechanism is designed to provide a confidential and responsive process for the prompt and effective resolution of complaints.

If any individual, including employees, contractors, suppliers, or business partners, believes that a human rights violation or a breach of these policies has occurred or is occurring within our operations, they are encouraged to submit a report to the following address: avertizari@integritate.eu.

External reporting can be done using one of the following methods:

- Online, via the Whistleblower Platform: <https://avertizori.integritate.eu>;
- Email, at avertizari@integritate.eu;
- Phone, by calling 0372.069.869 and selecting: 1 (Select Romanian language), 0 (Consent to conversation recording), 3 (Public Interest Whistleblowing Department). Calls will be automatically recorded;
- Postal Services, addressed to: Bulevardul Lascăr Catargiu nr. 15, Postal Code 010661, Sector 1, Bucharest – Romania – Attention: Public Interest Whistleblowing Department;
- In person, by visiting the ANI headquarters (prior appointment required via email at avertizari@integritate.eu).

Upon receiving a report, a thorough and impartial investigation of the case will be initiated. The confidentiality of the individual submitting the report will be maintained throughout the process. Depending on the nature of the report, appropriate measures will be taken to resolve the situation and prevent its recurrence. These measures may include remedial actions, disciplinary measures, or updates to policies and practices.

We are dedicated to fostering a culture of transparency, accountability, and continuous improvement. We encourage open communication and constructive feedback from all stakeholders to ensure that our operations uphold the highest standards of human rights and ethical conduct.

4. Responsibilities

We expect all our employees to respect and promote the provisions and principles outlined in this policy. This includes maintaining respectful and dignified interactions with colleagues, clients, and partners, reporting any human rights violations, and participating in related training and awareness programs.

The Executive Director of Legal and Corporate Governance and the Executive Director of Human Resources are responsible for taking all necessary measures to ensure that the Human Rights Policy is known and adhered to by all relevant parties.

5. Review of the Human Rights Policy

We are committed to periodically reviewing this policy to ensure it remains relevant and effective in light of legislative changes, the evolving context within our industry, and feedback received from employees or partners in the value chain. The review process will take place at least once every two years or more frequently if circumstances require.

The review process is the responsibility of a dedicated committee led by the Executive Director of Legal and Corporate Governance. This committee will include representatives from various company departments to ensure a broad and in-depth perspective on emerging needs and challenges.

Changes to the policy will be communicated transparently to all stakeholders and will be implemented effectively to ensure the continued fulfillment of our commitment to upholding human rights.

6. References

6.1 External References

- *Universal Declaration of Human Rights*: https://www.ohchr.org/sites/default/files/UDHR/Documents/UDHR_Translations/rum.pdf
- *OECD Guidelines for Multinational Enterprises*: <https://mneguidelines.oecd.org/mneguidelines/>
- *ILO Tripartite Declaration of Principles*: <https://www.mmuncii.ro/j33/index.php/ro/2014-domenii/munca/relatii-bilaterale-si-organizatii-internationale/928-declaratia-oim-cu-privire-la-principiile-si-drepturile-fundamentale-ale-salariatilor>
- *WMA Declaration of Helsinki – Ethical Principles for Medical Research Involving Human Subjects*: <https://www.wma.net/>
- *ISO 45001/2018*: <https://is09001.md/servicii/iso-450012018-sistemul-de-management-al-sanatatii-si-securitatii-in-munca/>

6.2 Internal References

- *Partner Code of Conduct*
- *Collective Labor Agreement*
- *Internal Regulations*: <https://www.antibiotice.ro/wp-content/uploads/2023/03/Regulament-intern-IUNIE-2023.pdf>
- *Annexes to Internal Regulations*: <https://www.antibiotice.ro/wp-content/uploads/2023/03/Anexele-Regulamentului-Intern.pdf>
- *Code of Ethics*: <https://www.antibiotice.ro/wp-content/uploads/2023/03/Cod-eticaanexa.pdf>
- *Integrated Annual Report*: <https://www.antibiotice.ro/rapoarte-non-financiare/>
- *Whistleblower Procedure*: <https://www.antibiotice.ro/investitori-php/corporate-governance/avertizori-in-interes-public/>
- *Compensation and Motivation Policy*
- *Diversity, Inclusion, and Equality Policy*

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