

Sustainability at STADA

Reference Guide - Topics and Indicators 2025/2026

August 2026

The intention of this document is to provide a clear reference guide to frequently-requested sustainability topics. It is designed as a supplement to our current Sustainability Report 2025, which has been prepared in accordance with the Corporate Sustainability Reporting Directive (CSRD) and the underlying European Sustainability Reporting Standards (ESRS), and assured by an external auditor.

While the Sustainability Report focuses on impacts, risks and opportunities (IROs) identified as material through our materiality assessment, this reference guide also covers sustainability topics that fall below the materiality threshold but are frequently requested.

Guiding Third Party Frameworks	Our sustainability approach and distinct focus areas are also guided and reinforced by international frameworks: As a member of the United Nations Global Compact (UNGC) and a signatory to its ten principles, we commit to responsible corporate conduct by adhering to relevant international standards and guidelines. These include the Organization for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises on Responsible Business Conduct (OECD Guidelines), the UN Universal Declaration of Human Rights (UDHR), the UN Guiding Principles on Business and Human Rights, and the International Labor Organization's (ILO) Fundamental Principles and Rights at Work. Additionally, we integrate the requirements of the German Act on Corporate Due Diligence in Supply Chains (LkSG), which aims to safeguard both human rights and the environment, into our sustainability governance and management systems. Our sustainability goals are also linked to UN SDGs such as Good Health & Well-being (SDG 3), Decent Work & Economic Growth (SDG 8), Industry, Innovation and Infrastructure (SDG 9), Responsible Consumption & Production (SDG 12) and Partnerships for the Goals (SDG 17). In our revised STADA CoC, we also reference standards to which we commit and that employees are expected to uphold, such as: • UN (United Nations) Universal Declaration of Human Rights and UN Guiding Principles on Business and Human Rights, • ILO Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy and ILO Declaration on Fundamental Principles and Rights at work (especially the following issues: elimination of child labor, abolition of forced labor, prohibition of discrimination, freedom of association and right to collective bargaining), • International Covenant on Civil and Political Rights, • Covenant on Economic, Social and Cultural Rights, • OECD Guidelines for Multinational Enterprises, • UN Convention Against Corruption, • Rio Declaration on Environment and Development, • UN Framework Convention on Climate Change (UNFCCC), • Paris Agreement (Paris Climate Accords), • Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and their Disposal, • Stockholm Convention on persistent organic pollutants (POPs), • OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, • Minamata Convention on Mercury, • Declaration of Helsinki (WMA)
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Topical Chapter and Indicator	STADA Policies, Management Actions and Measures
ESRS 2 – General Disclosures	
<u>ESG Reporting Standards</u>	Following our first Sustainability for FY 2021 we continued external reporting in 2022, 2023 and 2024, and have now published our Sustainability Report 2025. Following four consecutive years of GRI-standard reporting, this report marks a transition to the ESRS (European Sustainability Reporting Standards) framework, prepared in partial compliance with the CSRD (see Sustainability Report 2025), and has again been subject to limited assurance by PwC and in accordance with the applicable ESRS disclosure requirements (see limited assurance report by PwC at the end of the report). After aligning with the GRI Index in previous reporting years, the Sustainability Report 2025 is aligned with CSRD / ESRS disclosures. The report sets out the ESRS disclosure index cross-referenced to the relevant chapters and pages, with selected material KPIs subject to PwC assurance. We also report to CDP and achieved a CDP B Rating in 2025, which can be publicly viewed. Scores and A Lists - CDP Reference to publicly available documents: - STADA Sustainability Report 2025 - STADA Code of Conduct - Global Sustainability Policy
<u>Verification of ESG Reporting</u>	Our Sustainability Reports are subject to limited assurance by PwC in accordance with ISAE 3000 (Revised: Assurance Engagements other than Audits or Reviews of Historical Financial Information, issued by IAASB). Reference to publicly available documents: - STADA Sustainability Report 2025 - STADA Code of Conduct - Global Sustainability Policy
<u>Global Compact Signatory</u>	STADA is official member of the UN GC.

<https://www.unglobalcompact.org/what-is-gc/participants/147513>

STADA's subsidiary Hemofarm A.D., Serbia, has been signatory to the UN Global Compact since 2017:

<https://www.unglobalcompact.org/what-is-gc/participants/124531-Hemofarm-A-D->

Reference to publicly available documents:

- STADA Sustainability Report 2025

**ESG Performance
Targets**

We disclose our progress and targets in our Sustainability Report 2025 in the following format:

	Our Commitments	2025 Achievements		Targets
DECARBONIZATION & CLIMATE CHANGE	Reduce Scope 1 & 2 carbon emissions [versus baseline year 2020; Scope 1 & 2]	Target 2025: -35.5% (Year End 2024: 34%)	✓ -35.5%	Target 2030: -42%
	Address Scope 3 carbon emissions through supplier engagement	Target 2025: SBTi validation	→ Postponed to 2026	Target 2026: Achieve SBTi validation
SUSTAINABLE PRODUCTION AND PACKAGING	Increase share of renewable electricity [out of total electricity]	Target 2025: 66% (Year End 2024: 60%)	✓ 70%	Target 2026: 70%
	Recycle waste (diverted from landfill)	Target 2025: >82% (Year End 2024: 82%)	✓ 85%	Target 2026: 81% [Waste to landfill]*
ACCESS TO MEDICINE & HEALTH PROMOTION	Build on partnership with 'Direct Relief' for further product donation	Target 2025: Systematized donation process and successful pilot	✓	Target 2026: Evaluation of the pilot project, further formalization and roll-out
EMPLOYEE ATTRACTION AND SAFETY	Enhance Work Safety [Lost Time Incident Rate]	Target 2025: < 0.3 (Year End 2024: 0.33)	✓ 0.25	Target 2026: <0.35
	Foster Employee Engagement [Pulse Survey Participation Rate and Score]	Target 2025: > 80% / > 8.0 Score (Year End 2024: 89.9% and 8.1)	✓ 87% ✓ 8.0	Target 2026: > 80% / > 8.0 Score
UNIQUENESS & EQUAL PAY	Enforce Gender Equality [women in management position]	Target 2025: 50% (Year End 2024: 51%)	✓ 52.5%	Target 2026: 50%
	Promote Equal Pay	Target 2025: Complete Gender Gap for prioritized countries	✓	Ensure compliance with local and EU legislation on Equal Pay
RESPONSIBLE PROCUREMENT	Expand supplier assessment [EcoVadis Coverage in% of direct spend category]	Target 2025: 90%	✓ 93%	Target 2026: 95%
	Improve Supplier ESG Performance [EcoVadis Supplier Score]	Target 2025: 63 (Year End 2024: 57)	✓ 63	Target 2026: 66
ETHICAL BUSINESS CONDUCT	Maintain high compliance training rate [% completion rate compliance basic e-learning]	Target 2025: 2: > 97% (Year End 2024: 94%)	✓ 98%	Target 2026: 97%
	Sustain high Code of Conduct declaration rate [% of employees]	Target 2025: 2: > 95% (Year End 2024: 90%)	✓ 97%	Target 2026: 95% Global rollout of the fully revised Code of Conduct

Internally we have also established our ESG Dashboard with 18 ESG KPIs. These KPIs are reported quarterly to our Sustainability Steering Committee which consists of seven STADA Executive Committee members, including two board members.

Reference to publicly available documents:

- STADA Sustainability Report 2025

ESRS E1 – Decarbonization and Climate Change

Environmental policy

Key sources addressing above criteria are our Sustainability Reports; the non-financial report; our STADA Group Sustainability Policy, STADA Code of Conduct and the Environmental Policy for Technical Operations which is binding for all STADA production sites.

Our STADA Group Sustainability Policy which is approved by our CEO defines more specific ESG commitments. Furthermore we have a specific Environmental Policy in place for our production sites which is ISO14001 aligned incl. the commitment for environmental mgt system.

Our Global Environmental Mgt System (as part of the HSE mgt system) is fully implemented globally – which is also confirmed and further defined in our Environmental Policy (as an addition to the Sustainability Policy).

In addition, 10 production sites have ISO 14001 certified environmental mgt system in place (see list of sites in Sustainability Report 2025, ESRS E1 Climate Change).

Our overall approach towards environmental management & protection is described in our Sustainability Report 2025 – Chapter 02 Environmental Information (ESRS E1 Climate Change / E2 Pollution / E5 Circular Economy) incl. the results of our Double Materiality Assessment (DMA) identifying environmental aspects as ‘material’ – as a result of our stakeholder dialogue.

In our Sustainability Policy we specify our carbon emission target (reduce scope 1/2 by -42% from 2020 – 2030) and renewable energy target of at least 50% by 2030 (page 6). More detailed environmental targets are disclosed in our Sustainability Report 2025 and are further defined on production site level (e.g. waste/energy efficiency).

The Global HSE function reports directly to the Chief Technical Officer (CTO) and steers the Group wide HSE management system. The Global HSE function develops environmental principles and standards and supports and monitors the business with adaptation and implementation. HSE performance and risk reporting is integrated into the monthly business performance review process to the CTO.

STADA’s sites have implemented local processes to ensure compliance with environmental legal requirements as well as to continuously improve their environmental performance beyond compliance requirements via annual HSE programs. In order to have these processes regularly monitored externally, HSE management systems with certification to relevant ISO standards are in place for 10 sites (ISO 14001) out of 16 production sites in total (list of ISO 14001 certified sites is disclosed in Sustainability Report 2025. Other sites have started to develop ISO-compliant HSE management systems (e.g. Germany) and will continue to do so. This approach supports STADA to improve the environmental performance at its sites.

Our Global HSE SOPs include requirements for environmental topics incl. awareness/training, management systems; performance and regulatory compliance as well as reporting is in place (see provided documents).

Additionally to our Sustainability Policy on group level, production sites with ISO 14001 have local environmental policies in place.

	Reference to publicly available documents: - STADA Sustainability Report 2025 - STADA Code of Conduct - Global Sustainability Policy
<u>Environmental Management System</u>	The Global HSE function reports directly to the Chief Technical Officer (CTO) and steers the Group wide HSE management system. The Global HSE function develops environmental principles and standards and supports and monitors the business with adaptation and implementation. HSE performance and risk reporting is integrated into the monthly business performance review process to the CTO. STADA's sites have implemented local processes to ensure compliance with environmental, legal requirements as well as to continuously improve their environmental performance beyond compliance requirements via annual HSE programs. In order to have these processes regularly monitored externally, HSE management systems with certification to relevant ISO standards are in place for 10 sites (ISO 14001) out of 16 production sites in total. Other sites have started to develop ISO-compliant HSE management systems and will continue to do so. This approach supports STADA to improve the environmental performance at its sites. This is elaborated in STADA's Sustainability Report 2025 (ESRS E1 – Climate Change, PwC audited). STADA has global SOPs in place for HSE Management System (incl HSE reporting); Occupational Health & Safety (incl. guidance documents for specific topics as WHRA, PTW, LOTO) and Environmental Management STADA has a clear process to define and follow up on HSE targets with HSE targets on site and global level which includes global environmental KPI reporting. We have defined HSE targets on global and site level. Our environmental management system covers operations aspects as well as product-related aspects. Even if operating in a highly regulated market, we established in late 2021 our Global Sustainable Packaging function which put in place our packaging sustainability strategy to serve as a guide to all packaging activities within the Group. The goal is to gradually make packaging more environmentally friendly wherever possible – also taking PPWR requirements into account. Information on packaging / products is also provided in our Sustainability Report 2025 (ESRS E5 – Circular Economy chapter) Reference to publicly available documents: - STADA Sustainability Report 2025 - STADA Code of Conduct - Global Sustainability Policy
<u>EMS Certification</u>	The list of ISO 14001 certified productions sites is provided in our Sustainability Report 2025 (ESRS E1 – Climate Change), audited by PwC. The ISO 14001 certified 10 productions sites cover > 80% of our internal production volume from our in total 16 production sites. We have the target to achieve ISO 14001 certification for all larger production sites.

	Reference to publicly available documents: - STADA Sustainability Report 2025 - STADA Code of Conduct - Global Sustainability Policy																		
<u>Carbon Intensity</u>	STADA has been monitoring and calculating our carbon intensity since 2019. Calculation is based on production volume (million packs) and Net Revenue and is published in our sustainability reports.																		
<u>Carbon Intensity Trend</u>	STADA is monitoring and calculating our carbon intensity since 2019. Calculation is based on production volume (mill packs) and Net Revenue and is published in our sustainability reports. In 2025, ghg intensity was reported per net revenue for the first time in our Sustainability Report in line with CSRD / ESRS reporting requirements, while before intensity was measured against produced packs (mill packs) and reported in our GRI-based Sustainability Reports <table><tr><th>GHG INTENSITY PER NET REVENUE</th><th>2025</th></tr><tr><td>Total GHG emissions (location-based) per net revenue (tCO2eq/Monetary unit)</td><td>183,56</td></tr><tr><td>Total GHG emissions (market-based) per net revenue (tCO2eq/Monetary unit)</td><td>172,20</td></tr></table> <table><tr><th>GHG emissions (Scope 1&2)</th><th>2022</th><th>2023</th><th>2024</th></tr><tr><td>Tons CO2e / packs</td><td>170.1</td><td>134.4</td><td>123.9</td></tr><tr><td>Tons CO2e / Revenue</td><td>28.5</td><td>21.9</td><td>17.4</td></tr></table> Reference to publicly available documents: - STADA Sustainability Report 2025 - Previous STADA Sustainability Reports	GHG INTENSITY PER NET REVENUE	2025	Total GHG emissions (location-based) per net revenue (tCO2eq/Monetary unit)	183,56	Total GHG emissions (market-based) per net revenue (tCO2eq/Monetary unit)	172,20	GHG emissions (Scope 1&2)	2022	2023	2024	Tons CO2e / packs	170.1	134.4	123.9	Tons CO2e / Revenue	28.5	21.9	17.4
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<u>Renewable Energy Use</u>	We have been disclosing our energy split in our Sustainability Reports since 2021. In 2025, we increased the share of renewable electricity out of our total energy used to 70%. The amount of self-produced renewable energy is constantly increasing through the installation of on-site photovoltaics (e.g. in Serbia and Vietnam in 2025) and by switching further sites to renewable electricity supply contracts.																		

	We have published externally our target to ensure renewable energy use across STADA – also as an important element of our Carbon Strategy – exceeds 66% of electricity derived from renewable sources for 2025. Reference to publicly available documents: - STADA Sustainability Report 2025
<u>Renewable Energy Programs</u>	Our Sustainability Policy defines our general target to achieve at least 50% renewable energy supply by 2030. In our Sustainability Report 2025, we disclose our new target of achieving > 65% of electricity from renewable sources, which we exceeded in 2025. We have a formal program in place – as part of our Energy Efficiency/Transformation network – to constantly increase renewable energy supply and to switch from fossil fuel to electricity from renewable sources. We have been disclosing our progress in our Sustainability Reports since 2021 and are constantly investing in on-site photovoltaic installations (e.g. Vietnam in 2022, Romania in 2023, Germany in 2024, Serbia in 2025 – see the annual Sustainability Reports). The additional element is to switch to renewable electricity supply contracts where possible, which we started in 2022 and the purchase of EACs. In 2022 we switched to renewable electricity supply for Huddersfield, and remaining UK-based sites joined in 2023. Since July 2023, all our sites in Serbia have been supplied with electricity from renewable sources by the supplier EPS. In 2024 we also changed our electricity supply contracts for our affiliates in Czechia, Romania and Germany to electricity from renewable sources either directly or via EACs – Germany. The option to use VPPA has been assessed in 2022 – but as the market has changed dynamically, an individual VPPA is currently not a valid option for STADA due to our relative minor demand. Through our energy efficiency network which covers 100% of our operations and which is lead jointly by Global HSE and Global Engineering and have monthly meetings through which we ensure tracking of EE initiatives on site level, exchange of information and stimulation for new projects. Renewable energy is a core part of our GHG program. We have increased our percentage of renewable energy consumption of the last 4 years as followed –Sustainability Report 25 (ESRS E1 – Climate Change, PwC audited) with energy data. This is also reflected in our CDP rating and report. Reference to publicly available documents: - STADA Sustainability Report 2025 - STADA Code of Conduct - Global Sustainability Policy
<u>Scope of GHG Reporting</u>	We report Scope 1 & 2 in our prior and the most recent Sustainability Report 2025 with limited assurance by PwC (Sustainability Report 2025, ESRS E1 – Climate Change). STADA reports Scope 1 & 2 emissions for entire organization market- and location-based.

	We report our Scope 3 emissions in our Sustainability Report 2025 with limited assurance by PwC. Scope 3 emissions disclosure is provided as total and per category split. Reference to publicly available documents: - STADA Sustainability Report 2025
<u>GHG Risk Management</u>	GHG Risk Mgt is a key element of our Sustainability Strategy and one of our (out of 7) strategic sustainability fields of actions and also a material topic for STADA based on our Double Materiality Assessment. Sustainability (also GHG Risk Mgt) is centrally managed by the Global Sustainability function which is reporting directly to our CEO. Our Sustainability Steering Committee (incl. 2 board members and further 3 members of the STADA Executive Committee) is steering. In 2025 we again reported to CDP and achieved a B-rating – the CDP report includes further details regarding Sustainability criteria as e.g. responsibility, climate change risks, strategy etc. which are covered in the CDP report. In 2024, we analyzed our transition and physical climate change risk via the external expert company ERM which resulted in a low risk both for transition and physical risks in the medium (2030) and long term (2050) under SSP1-2.6 and SSP5-8.5 scenarios (SR 25 – ESRS E1 Climate Change) We have defined our scope 1&2 reduction targets in line with Paris Agreement and are reporting progress against it. From 2020 – 2025 we have already achieved a absolute reduction of GHG emissions by ~ 35,5%, showing that we are on good track STADA is also assessing the ‘water scarcity risk’ as a potential climate change impact for our production sites using the WRI Aqueduct Risk Assessment Atlas. Assessment revealed no elevated risk for our production sites as only 5% of our total production water consumption is used at sites located in water-stressed areas. Data is disclosed in our Sustainability Report 2025. GHG risk reporting (e.g. incidents) is integral part of our Global HSE Mgt System and the associated global SOPs. Reference to publicly available documents: - STADA Sustainability Report 2025 - STADA Code of Conduct - Global Sustainability Policy
<u>GHG Reduction</u>	In 2021, STADA set its GHG reduction target based on 1.5 °C temperature increase target and publicly communicated our commitment (Sustainability Policy, SR 2021 – 2025, CDP 2022 - 2024) which means reduction by 42% (2020 – 2030) of total GHG emissions. Through our annual HSE and ESG Targets, we set ourselves interim targets to ensure we will meet our 2030 commitments. We have been reporting and disclosing our scope 1 &2 emissions since 2021 in our annual Sustainability Reports. From 2020 to 2025, we

	have achieved a ~ - 35,5 % reduction of total CO2 emissions (market-based) and are well on track. Our GHG data is subject to limited assurance by PwC (see Sustainability Report 2025, ESRS E1 – Climate Change). We continued in 2025 this reduction by different measures as site level energy efficiency projects (boiler and cooler upgrade, HVAC); installation of photovoltaic installation in e.g. Serbia and Vietnam, switching to renewable electricity supply contracts and the purchasing of renewable electricity certificates. In 2022, we established our Energy Efficiency/Transformation network for all production sites in order to leverage knowledge and good practices across our network (see also 2024 CDP report). In 2024, we conducted Energy Mgt Maturity Assessment at our production sites to understand the robustness of our energy mgt processes, we have completed certification of ISO 50001 at our production site in Bad Vilbel, Germany 2025 and have continued to install on-site photovoltaic installations (e.g. Bad Vilbel). In 2024, we established a strategic CAPEX budget of several million € to (co)-fund strategic energy and GHG related projects (e.g. for photovoltaic or introduction of innovative technologies as heat pumps). In 2024, we implemented the Carbon Accounting Software 'Persefoni' and completed a strategy project with expert company reviewing and improving our GHG reporting practices, conducting the first full Scope 3 reporting and analyzing the strategic GHG reduction option for STADA. As result, we have committed to SBTi targets including our Scope 3 target – supplier engagement: 'STADA aims for suppliers from the category 'purchased goods and services' (category 1) to set science-based targets by 2030' – see our SR 25 (ESRS E1 – Climate Change). We engage with our suppliers on ESG matters as part of its 'Responsible Procurement' function including our membership in industry supply chain initiatives as RHI (Responsible Health Initiative) and PSCI (Pharmaceutical Supply Chain Initiative). <i>Initiatives are linked to wider TCFD reporting:</i> STADA has conducted in 2024 a Climate Risk Assessment under different climate scenarios aligned with TCFD recommendations and disclosed the results in its Sustainability Report 2025 – for both physical risks and transition risks. - physical risks – time horizon 2030 and 2050 under SSP1 – 2.6 and SSP5 – 8.5 emission scenario. - climate change adaptation physical risks – time horizon 2030 / 2040 and 2050. Reference to publicly available documents: - STADA Sustainability Report 2025 - STADA Code of Conduct - Global Sustainability Policy
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ESRS E5 – Resource use and Circular Economy

Hazardous Waste Management

Our Sustainability Policy, the STADA Environmental Policy and the Global SOPs stipulate clear requirements for waste management, waste minimization and disposal.

Our Global HSE targets clearly include waste reduction targets and KPIs are defined and reported on global and local level and are also part of the regular Business Review Meeting from HSE site to HSE global and from Global HSE to Top Mgt level. These documents are showing that the KPI is tracked monthly for hazardous/non-hazardous waste and the recycling rate and reported to upper mgt.

In 2025, we established a global quantitative target to achieve a waste-recycling rate (including incineration with thermal recovery) of over 82%, covering both hazardous and non-hazardous waste streams from our own production sites. This target was exceeded, with an overall recycling rate of 85%. In addition, we achieved a 99% reduction in hazardous waste disposed to landfill and a 31% reduction in non-hazardous waste sent to landfill in 2025, reflecting significant progress in our waste-minimization program and underscoring our sustained commitment to advancing responsible waste management across all TechOps operations

Reference to publicly available documents:

- STADA Sustainability Report 2025
- STADA Code of Conduct
- Global Sustainability Policy

ESRS S1 – Own Workforce

Freedom of Association Policy

Our Sustainability Policy and the STADA Code of Conduct include clear commitment to 'Freedom of Association' and is therefore our 'Freedom of Association Policy.

Our Human Rights Statements (in accordance with German Supply Chain Act) - which is publicly available [nidda human rights statement 2 lksg jul 2025 en-1.pdf](#), [stada human rights statement lksg dec 2023.pdf](#) defines our full commitment to human rights internally (within STADA) and externally (with our business partners). The statement is based and in referring to the associated ILO conventions (e.g. ILO 87, 98, 138 and 182) and covers the aspect 'freedom of association' in a separate section.

	STADA also continues to express a clear commitment to the freedom of association as well as to the right of its workforce to unionize. As a matter of example, we have different works councils for all German sites. Further details are also disclosed in our Sustainability Reports incl. (SR 25, ESRS S1 – Own Workforce). Approximately 63% of the employees within the group are covered by a collective bargaining agreement (CBA) concluded between STADA and either a union representing the employees or internal employee representation bodies. The CBAs applicable within STADA cover either a whole specific entity, industry, or sector. STADA's German employees are covered by the Federal Employers' Association for the Chemical Industry (BAVC) collective agreement and its benefits.' Reference to publicly available documents: - Human Rights Statement stada_human_rights_statement_lksg_dec_2023.pdf - STADA Sustainability Report 2025 - STADA Code of Conduct - Global Sustainability Policy - Business Partner Code of Conduct -
<u>Discrimination Policy</u>	STADAs Sustainability Policy and the Code of Conduct include: • clear commitments to equal opportunity in all different aspects (incl. human rights, anti-discrimination, diversity/inclusion/gender equality, gender equality pay) • are listing the type of discrimination • are referencing ILO conventions as signatory of the ten Principles (and the associated ILO conventions) of the UN Global Compact (also STADA Signatory letter to UN Global Compact) Our Code of Conduct explicitly states that the interaction of employees and management is characterized by tolerance, respect, objectiveness and fairness towards one another. We respect the individual personality of each employee and reject any kind of discrimination or harassment. We promote equal opportunities within our company and reject any kind of discrimination. Our Human Rights Statements (in accordance with German Supply Chain Act) is publicly available nidda_human_rights_statement_2_lksg_jul_2025_en-1.pdf stada_human_rights_statement_lksg_dec_2023.pdf It defines our full commitment to human rights internally (within STADA) and externally (with our business partners). The statement is based on and referring to the associated ILO conventions (e.g. ILO 87, 98, 138 and 182) and covers the aspect 'discrimination' in a separate section. We defined and are following up with our business partners our expectations regarding anti-discrimination along our supply chain which is stipulated in our 'Responsible Procurement Policy' and our Business Partner Code of Conduct.

	In addition to the global policy, multiple processes and initiatives are implemented on country level to avoid any discrimination such as e.g.: - The STADA global e-learning covering compliance basics for all employees we have a specific section about the prohibition of any form of discrimination - STADA complies with existing regulations and therefore is committed to the principle of equal treatment and pursues violations of the German Non- Discrimination Act (AGG) with disciplinary consequences. In order to promote protection against discrimination in the workplace, employees at German locations are, for example, instructed in the applicable non-discrimination policy upon entering the company, and an internal complaints office serves as a contact point. - Equal Opportunity Policy of our company Thornton&Ross. Reference to publicly available documents: - Human Rights Statement stada_human_rights_statement_lksg_dec_2023.pdf - STADA Sustainability Report 2025 - STADA Code of Conduct - Global Sustainability Policy - Business Partner Code of Conduct
<u>Diversity Programs</u>	<i>Managerial responsibility / Initiatives to support a diverse workforce</i> Final responsibility lies with our Chief Culture & People Officer who is also board member and part of the STADA Sustainability Steering Committee. We disclose our approach towards diversity since 2021 in our sustainability reports. In our Sustainability Report 2025, we disclose our approach in the following sections (ESRS S1 – Own Workforce) As an internationally active Group, and inherently with our value ‘integrity’ diversity is an important part of STADA. It encourages every employee to leverage uniqueness and sees this as a recipe for success in its growth culture. To this end, STADA launched a communication campaign in 2021 under the motto “#UniquenessStartsWithU” (https://www.youtube.com/watch?v=mbSVRZWl4vM). As a part of this campaign, various aspects of uniqueness were presented, including language, sexual orientation, gender, etc. These efforts continued since then. We provide trainings to the whole STADA worldwide regarding “unconscious bias and diversity’ as trainings accessible for all employees via our SAP Success Factors (internally called HERO) Learning module. STADA has been awarded repeatedly as Top Employer over recent years incl Top Employer 2025 and 2026 in Europe, several STADA Countries received national TOP Employer certification, which is also an external recognition of our diversity program efforts (see internet sustainability). STADA has defined the following diversity/gender related target (see SR 25 (ESRS S1 – Own Workforce). Gender diversity is monitored and measured at different levels at STADA, divided into upper, middle, and lower management levels.

STADA is also compliant with German law regarding female representation to be ensured at Board level: Mehr Frauen in Vorstände (bundesregierung.de) having 1 female board member (representing 25% of Board).

Regular reporting on 'diversity' KPI is one of our key ESG KPIs and tracked as part of our group wide ESG reporting.

Employee affinity groups:

Also, affinity groups are existing, supported and promoted, as for example the LGBT+ network group called "Kaleidoscope" based in the UK, which has also been presented to the organization via our Intranet. This networking group organized the pride celebration within the organization to which the employees have been invited to participate.

Our campaign / approach "#UniquenessStartsWithU" (see above) continues since its launch in 2021. This topic remained positioned on the STADA Global Leadership Team agenda within the framework of ESG KPIs set, applicable for Board members and to be cascaded down throughout the company, ensuring full managerial responsibility of the topic.

Mentorship programs / Initiatives to recruit from diverse talents:

STADA also offers different types of mentoring and coachings and beside the "classical internal" mentoring programs, it is important to highlight that STADA is one of the board member of a women association called "Healthcare Frauen", this association, located in Germany, is also offering a very impactful Mentoring Program for women in the Healthcare industry and STADA is promoting this offer also on its intranet, giving this opportunity to any interested person to reach out to the association, become an active member and benefit from the mentorship program. Also, our Serbian affiliate Hemofarm is offering scholarship program via its Hemofarm Foundation to support younger generations and give them access to better education and better access to opportunities on the market (<https://www.fondacijahemofarm.org.rs/>).

In addition, STADA ensures diversity within the recruiting process with clear recruiting guidelines. Also at global level, STADA is training its HR and hiring managers in avoiding bias within the recruitment process to ensure diversity and avoid discrimination, e.g. below recruiting training called "Attitude Accelerates Performance" also offered within our SAP Success Factors Module Learning at global level but also translated in local languages. Recruitment at STADA is behavioral based, in order to avoid bias and remain objective.

Attitude Accelerates Performance - Recommended for managers (German)



Kursdaten
Typ: Mit Kursleiter
Dauer: 3.00 Stunden

Durchschnittliche Bewertung
★★★★★ (0.00 von 5 Sternen aus 0 Bewertungen)

Kursdetails

Beschreibung

Das Training wird empfohlen für Führungskräfte und in Interviews involvierte Kolleginnen, die

- mehr aus Gesprächen und mehr aus Kandidaten/ Kandidatinnen herausholen wollen,
- die nicht nur verstehen wollen, was jemand bisher gemacht hat, sondern auch, welche Potenziale in einer Person schlummern und für alle, die diese Potenziale wecken wollen,
- verstanden haben, dass Recruiting keine Einbahnstraße ist: dass es genauso an uns ist unsere Potenziale zu zeigen und uns gut zu verkaufen – sowohl auf inhaltlicher als auch auf emotionaler Ebene.

Was sind die wichtigsten Inhalte des Trainings?

- „Unconscious Bias“
- Interviewvorbereitung

On local / affiliate level, multiple initiatives/processes are in place – see also equal opportunity policy of our affiliate Thornton & Ross in

	the UK and including company stance on diversity and inclusion. <u>Training and guidance regarding diversity:</u> STADA's diversity expectations are defined in our Code of Conduct, Sustainability Policy and other documents. Every employee is trained and informed regarding 'diversity' formally as part of our Compliance Trainings and the different campaigns as described above. Also – see above – training is offered to managers incl. 'unconscious bias' aspects. Reference to publicly available documents: - Human Rights Statement stada human rights statement lksg dec 2023.pdf - STADA Sustainability Report 2025 - STADA Code of Conduct - Global Sustainability Policy
<u>Gender Pay Equality Program</u>	<u>Commitment to Gender pay equality</u> At STADA, personnel policy is managed centrally by the Global Culture & People department at Group headquarters. The four global Centers of Expertise (CoE), Talent Acquisition & Employer Branding, Talent Management, Performance & Rewards as well as People Analytics & Digital Experience define priorities, standards, guidelines and processes implemented by the Group-wide companies and supplemented with a view to market specific conditions. There are also functional reporting lines from local HR managers to global Culture & People management and a global Culture & People management team with local representatives from the largest market regions. Our approach, goals and metrics are described in our Sustainability Report 2025 – Section ESRS S1 Our commitment towards equal pay is for example also clearly documented in our Sustainability Policy – explicitly on page 4 'Gender equality pay'. Our UK business T&R has published its Gender Pay Report 2025-2026 on its web-page. <u>Global Gender Pay audits or compensation reviews/Monitoring and measurement</u> Global guidelines were introduced as a harmonized and compliant remuneration policy, based on WillisTowersWatson and Mercer as an external benchmark, as well as a grading approach for senior management. STADA endorses a pay-for-performance philosophy and utilizes variable incentives, when consistent with market practices, to drive individuals towards optimum performance. STADA's Performance & Rewards department is tracking and monitoring GenderPay equality and working on ensuring compliance with EqualPay requirements from the EU commission which will be one of the focus topics for the coming years. STADA aspires to offer similar compensation ranges for both women and men, for the same business positions, regardless of gender. This is elaborated in STADA's Sustainability Report 2025. STADA assesses the gender pay gap using the tool provided by Payanalytics. In the UK we disclose gender pay gaps (See the disclosed

	gender pay gap report 2024 of our affiliate in the UK, Thornton & Ross: THORNTON & ROSS LIMITED - Gender pay gap service), which is submitted each April of each year, as well as for our affiliate in France. (Professional Equality Index EG LABO). Also, our affiliate in Czech Republic has been successfully mandatory audited on this topic as part of the local labor law regulations. For internal purposes we assessed the potential for gender pay gap in our 9 West Europe affiliates covering ~ 50% of the STADA employees – resulting in a good status result. Reference to publicly available documents: - Human Rights Statement stada human rights statement lksg dec 2023.pdf - STADA Sustainability Report 2025 - STADA Code of Conduct - Global Sustainability Policy - Thornton & Ross Gender Pay Gap report 2025 to 2026 - Professional Equality Index; EG Labo
<u>Gender Pay disclosure</u>	STADA assesses the gender pay gap using the tool provided by Payanalytics. STADA is fully compliant with national standards and legal requests, e. g. in the UK we disclose gender pay gaps (See the disclosed gender pay gap report 2024 of our affiliate in the UK, Thornton & Ross: THORNTON & ROSS LIMITED - Gender pay gap service), which is submitted each April of each year. Further example is the gender pay gap disclosure from our affiliate in France. (Professional Equality Index EG LABO). Also, our affiliate in Czech Republic has been successfully mandatory audited on this topic as part of the local labor law regulations. For internal purposes we assessed the potential for gender pay gap in our 9 West Europe affiliates covering ~ 50% of the STADA employees– resulting in a good status result. Reference to publicly available documents: - Human Rights Statement stada human rights statement lksg dec 2023.pdf - STADA Sustainability Report 2025 - STADA Code of Conduct - Global Sustainability Policy - Thornton & Ross Gender Pay Gap report 2025 to 2026 - Professional Equality Index; EG Labo
<u>Collective Bargaining Agreements</u>	Our Sustainability Policy and the STADA Code of Conduct include clear commitment to ‘Freedom of Association’ and is therefore our ‘Freedom of Association Policy’.

	Our Human Rights Statements (in accordance with German Supply Chain Act) which is publicly available nidda human rights statement 2 lksg jul 2025 en-1.pdf stada human rights statement lksg dec 2023.pdf It defines our full commitment to human rights internally (within STADA) and externally (with our business partners). The statement is based and in reference to the associated ILO conventions (e.g. ILO 87, 98, 138 and 182) and covers the aspect of bargaining in the section 'freedom of association' in a separate section. Further details are also disclosed in our Sustainability Reports incl. (SR 25, ESRS S1 – Own Workforce) STADA continues to express a clear commitment to the freedom of association as well as to the right of its workforce to unionize. Approximately 63% of the employees within the group are covered by a collective bargaining agreement (CBA) concluded between STADA and either a union representing the employees or internal employee representation bodies. The CBAs applicable within STADA cover either a whole specific entity, industry, or sector. STADA's German employees are covered by the Federal Employers' Association for the Chemical Industry (BAVC) collective agreement and its benefits.' Reference to publicly available documents: - Human Rights Statement stada human rights statement lksg dec 2023.pdf - STADA Sustainability Report 2025 - STADA Code of Conduct - Global Sustainability Policy - Business Partner Code of Conduct
<u>Employee Turnover Rate</u>	We track and monitor our employee turnover rates at global level via our SAP Success Factors HR System (internally called HERO) and are disclosing the turnover rate (PwC audited) in our Sustainability Reports, 14.8% in 2025. Reference to publicly available documents: - STADA Sustainability Report 2025
<u>Human Capital Development</u>	Human Capital development remained a strong focus area for STADA also in 2024. In addition to information below, please also refer to our Sustainability Report 2023 and 2025 which provides an overview of our Human Capital development approach and processes. Growth mindset is a key concept for our company and its employees and we have made great progress in 2025. STADA employees worldwide can use the 'Learning' module within the SAP-based human resources IT system (Learning Management System, LMS). This platform provides access to over 800 both mandatory training programs and optional learning resources. We strive to continuously expand our training offerings. In the reporting year, the usage of LMS-based trainings increased in 2025 by 7%, measured in training hours.

	<i>Formal mechanisms to promote an open feedback culture</i> At STADA, constant and open feedbacks are part of our culture and anchored in our values and this way, the overall promotion of our values also always contributes to the promotion of our feedback culture. STADA is conducted twice per year in global survey (pulse survey)) with the result being one of STADA key internal ESG KPIs and part of our internal ESG dashboard. We have a mandatory Mid and Year-end Review process in place to ensure a promotion, tracking and monitoring of the feedback culture at STADA. Completion rate of these year end reviews is also part one of STADA key internal ESG KPIs and part of our internal ESG dashboard. In 2025 we developed and launched our new global employer brand and campaign 'Grow your own way' designed to reflect our culture and characterize our workplace for both internal and external audiences. A core element of this campaign approach is the unique individual growth we aim for to attract, empower and retain talent. The campaign was introduced in 2025 in several key STADA countries and will be expanded globally in multiple phases throughout 2026. <i>Initiatives for talent development</i> At STADA, we have a strong focus on Talent Development and have designed and kicked off new Talent Development programs for all Leaders and also for High Potentials and training KPIs are part of our internal ESG dashboard. We are also conducting Organizational Talent Reviews twice a year within the whole organization in order to identify and plan the development of our talents. We have an established global program for talent development aligned with our corporate culture and future growth objectives. Over the course of three development cycles, selected participants gain a comprehensive understanding of STADA's purpose, values, and strategy. Different development programs are offered based on the seniority of the candidates. Through the 'Timeless Talent' program introduced in 2025, we aim to leverage the experience of senior professionals within our growth culture, combining long-standing expertise with opportunities to contribute to relevant projects <i>Reporting on human capital development metrics and Quantitative Targets</i> Human Capital development metrics are integrated in our Global ESG Dashboard and have set annual Targets with the following KPIs: Social Dialogue / Employee Satisfaction / Pulse Survey Participant Rate / training hours / people with agreed targets and twice per year feedback Reference to publicly available documents: - STADA Sustainability Report 2025 - STADA Code of Conduct
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	- Global Sustainability Policy
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ESRS S4 – Consumers and end-users

Value-Based Health Care Program

Implementation of value-based initiatives

As defined by the World Health Organization (WHO), value-based pricing for pharmaceuticals “sets prices according to the benefits of a product to health systems and patients when compared to other available treatments for the same condition. Value assessments consider factors such as the product’s potential to extend life, improve quality of life, and reduce the need for hospitalization or extended treatment”.

Inherent in value-based pricing is an analysis of budget impact and affordability, including through health technology assessment (HTA) procedures.

For STADA, implementation of such value-based pricing approaches varies across the group’s three product segments: Consumer Healthcare, Generics and Specialty. As such, no one-size-fits-all value-based pricing policy or approach is appropriate within STADA.

In Consumer Healthcare, the value is typically determined directly by the patient or consumer, who makes the decision on which product to purchase directly in the pharmacy or other retail outlet. Here, STADA offers a broad array of options, including extensive ranges of over-the-counter generic medicines which are sold under an umbrella brand by their active ingredients at highly competitive prices. An example of this is the Care portfolio of more than 50 remedies for minor ailments sold through UK pharmacies: [Care for the whole family](#) | [Remedies for minor health concerns](#) | [Care \(allthecareyouneed.co.uk\)](#)

In Generics, the value basis of the individual products or active ingredients has typically already been determined through HTAs for the original reference product. Through a variety of competitive pricing systems, such as national or international reference pricing or tendering processes, health systems are able to ensure they achieve the best possible value for any off-patent pharmaceutical. This results in price reductions often in excess of 80%-90% for generics that are therapeutically equivalent to original products that have already been shown through HTAs to have a positive value-based pricing position. Thus, such generics *de facto* offer considerable added value in terms of pricing and benefit. As Europe’s fourth-largest provider of generic medicines, STADA makes a major contribution to delivering incremental value to health systems through competitive pricing.

In Specialty, STADA typically adds value through improvements in terms of reformulating, repositioning and/or creating new combinations of known and proven active ingredients. STADA examples include repositioning and reformulation of the well-known respiratory inhalation drug budesonide as the first approved oral treatment for the rare kidney disease IgAN through our Kinpeygo brand; as well as taking an established triple-combination oral tablet for advanced Parkinson’s and reformulating as the Lecigon intestinal

	gel that can be administered via an on-body pump, thus alleviating many of the patient compliance and other difficulties inherent in oral Parkinson's therapy. For Specialty therapies such as Kinpeygo and Lecigon, STADA's market-access teams engage with national and local HTA and equivalent authorities to demonstrate the clinical and therapeutic value of such products, including through clinical and real-world data. The resulting pricing models reflect the outcome of these value assessments. In other Specialty fields, such as biosimilar equivalents to original reference biologic medicines, pricing models vary by country, region and therapeutic category. On the whole, these pricing models and systems tend more towards the Generics model, with prices being determined by competitive tendering or reference-pricing systems. As with Generics, the value of the original product has already been established via HTA and similar processes – biosimilars bring competition that leads to significant price reductions. At the same time, biosimilars can bring additional value, even at lower price points, such as via improved administration devices. <u>Managerial responsibility for value-based programs</u> Managerial responsibility for value-based programs starts with our CEO and cascades throughout the organization, based on our stated purpose of 'Caring for People's Health as a Trusted Partner'. Delivering value across the product portfolio is inherent in all activities for all employees, given that STADA operates almost exclusively in competitive market sectors in which prices are not typically freely determined by the company, but rather are defined either by payers and national authorities, or by market competition among comparable therapies. As explained above, each of STADA's three strategic product segments is dedicated to delivering value through offering equivalent or value-added products at competitive price points that are appropriate to the given setting, channel and patient group. <u>Policy commitment to a value-based approach</u> STADA's Purpose of 'Caring for People's Health as a Trusted Partner' embodies a commitment to a value-based approach to pricing across our products and services. This is also documented in our Sustainability Policy and further described in our annual Sustainability Reports. <u>Regular monitoring of value-based indicators</u> Value-based pricing indicators are regularly reviewed within the context of commercial planning meetings as well as at board level within the STADA Executive Committee. <u>Reporting on value-based outcomes</u> NA.
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	<u><i>Value-based objectives and targets</i></u> Value-based pricing, as defined by the WHO, “sets prices according to the benefits of a product to health systems and patients when compared to other available treatments for the same condition”. STADA aims to develop, produce and make available competitive options for all significant therapies that are losing market exclusivity rights. In this way, the group ensures that health systems and patients benefit from competition among comparable treatments for the same condition, thereby reducing prices and increasing access to medicines for the same or lower costs.
<u>Access to Medicine Program</u>	<u><i>Monitoring of access to medicines initiatives</i></u> Access to Medicines is one of our seven strategic sustainability fields of actions for which program and quarterly reporting via the STADA Sustainability Steering Committee is established. It is operationalized based on six pillars: 1. Development and launch of essential/critical medicine products 2. Reliable supply with essential/critical affordable medicines 3. Treatment for rare diseases and niche indications 4. Public Healthcare Information, Patient Education and Political Engagement 5. Local Community Engagement and Partnerships 6. Global Donations strategy As a manufacturer of Consumer Healthcare products, Generics, and Specialty medicines, we positively impact the health and well-being of patients and customers in the countries where we operate. We aim to facilitate and optimize access to medicines in global markets, particularly in Asia, CIS/Eurasian states, the Middle East and North Africa (MENA) region, and selected countries in Southeast Asia, such as Vietnam and the Philippines. Through our broad portfolio of more than 25,000 individual product presentations, encompassing more than 800 Active Pharmaceutical Ingredients (APIs), we significantly contribute to supporting international, national, and regional health bodies, authorities, and systems in delivering high-quality, affordable healthcare and medicines. We distribute our pharmaceutical products in more than 100 countries, maintaining a direct presence in all major European markets, as well as in growth markets in the MENA region, Asia, and Australia. We delivered more than 1.1 billion packs in 2025, working with over 30 third-party logistics providers as part of our decentralized approach. Of these 1.1 billion packs, we produced 550 million packs in-house in 2025 (~570m in 2024). Besides our own manufacturing, we leverage our network with currently more than 400 CMOs along the ‘external as internal’ approach. With our portfolio and reach, particularly in low- and middle-income countries, we are dedicated to ensuring access to essential and critical medicines. The WHO defines essential medicines as those that effectively and safely treat the priority healthcare needs of a population. These medicines are intended to always be available in functioning health systems, in appropriate dosage forms, of assured quality, and at prices individuals and health systems can afford. The WHO Model List of Essential Medicines is updated and published every two years. As of December 2025, our portfolio covers around 20% of the medicines included in the WHO’s Model List of essential medicines (including least developed countries (LDCs), low-income countries (LICs), low-middle income countries (LMICs) and upper middle income

countries). The primary contributor to this achievement is our generics segment, which focuses on prescription drugs sold under their International Non-Proprietary Name (INN Generics). In Europe Generics account for around 70% of all medicines dispensed, ensuring affordable access to treatments for cancer, diabetes, heart disease and a wide range of other conditions.

Through our Sustainability Country network we are additionally steering the country ESG programs (incl. local AtM initiatives).

Specific targets are defined and published and progress is tracked and reported

Our commitments regarding the AtM program are published in our Sustainability Report 2025.

	Our Commitments	2025 Achievements	Targets
ACCESS TO MEDICINE & HEALTH PROMOTION	Build on partnership with 'Direct Relief' for further product donation	Target 2025: Systematized donation process and successful pilot ✓	Target 2026: Evaluation of the pilot project, further formalization and roll-out

Participation in credible industry initiatives to enhance access to medicine

STADA participates in several credible industry initiatives to enhance access to medicines, both independently and collectively through membership in leading industry associations and programs.

We are engaging with the organization 'Direct Relief' to cooperate systematically in the areas of medicine donation and defining the related processes. An example of this cooperation is the donation of the oncology molecule bortezomib that is enabling treatment for more than 1,000 cancer patients in Uganda (see STADA LinkedIn or webpage).

As an advisory member of the International Generic and Biosimilar medicines Association (IGBA), STADA regularly participates in discussions and interactions with global bodies on national and international industry initiatives. These include with meetings with the World Health Organization (WHO) on issues such as access to medicines and equitable access, and well as with the World Intellectual Property Organization (WIPO) on removing barriers to patient access through unjustified patents or protections.

Senior management or board responsibility for ATM

The strategic field of action 'Access to Medicines' is sponsored by our EVP Global Communications. Progress reporting is steered by the VP Global Sustainability who reports to the STADA Sustainability Steering Committee which includes 3 board members.

Strategic long-term drug donation program

We are engaging with the organization 'Direct Relief' to cooperate systematically in the areas of medicine donation and defining the related processes. An example of this cooperation is the evaluation of a donation for the oncology molecule bortezomib.

In addition, STADA is engaging in local drug-donation / support programs aimed at targeted relief for specific territories or situations. These initiatives are steered by the Global Sustainability as part of our Sustainability Country Network. One example is our local donation

	program in cooperation with the German Red Cross (Gesundheitsinitiative „Stada immer da“ STADA) which collected and donated ~ 690.000 € over the past 2.5 years (running till April 2025). Our countries have different donation programs in place and product donations are tracked and approved globally in accordance with our internal approval processes for donations. In 2024, we donated ~ 180 k€ in the Balkan region (mostly Serbia and Bosnia-Herzegovina) to hospitals or state healthcare institutions. Examples of these country programs are disclosed in our Sustainability Reports. In 2025, these local donation programs continue incl. donation of ~ 30 k€ to the Ministry of Health of Ukraine, ~ 40 k€ in Hungary for Lecigon therapy. <u>US drug price transparency</u> Neither STADA Arzneimittel AG or any of its affiliates sells "generic drug products" in the United States Reference to publicly available documents: - Sustainability Report 2025 - Sustainability Policy - STADA Code of Conduct
<u>Neglected Diseases R&D</u>	As a developer, manufacturer and supplier of off-patent Consumer Healthcare, Generic and Specialty medicines, STADA does not undertake research and development of novel chemical or biologic active ingredients. In recent years, we have built additional capabilities and invested in innovative specialty pharmaceuticals to expand our portfolio and provide care for more individuals with significant unmet needs. Our products within the Specialty segment include therapeutic areas for bone health, immunology, nephrology, neurology, oncology and ophthalmology, with a particular focus on kidney health – most recently strengthened through the launch of Kinpeygo. Kinpeygo was the first EU-approved medication for treating IgA nephropathy. <u>R&D partnerships for neglected or high burden diseases (rare diseases) with other companies</u> Partnering with other companies to develop Consumer Healthcare, Generic and Specialty medicines is an essential element of STADA's corporate strategy. With respect to neglected and high burden diseases, STADA's Generics segment covers around 400 active ingredients across a broad range of therapeutic categories. Within this broad range, STADA offers several antibiotic and antiparasitic products that treat high-burden infectious diseases. Within STADA's Specialty product segment, the group focuses on researching, developing and bringing to market novel solutions and

treatment options -including treatment option for orphan (rare) diseases. These programs are typically conducted in partnership with third-party companies.

A prime example of this approach (see press release on www.stada.com) is STADA's partnership with Sweden's Calliditas Therapeutics to bring to the European market Kinpeygo (budesonide), the first medicine authorized in the EU to treat IgA nephropathy (IgAN). IgAN is a rare, progressive autoimmune disease of the kidney with a high unmet need and burden, with more than 25%-30% of patients over time developing terminal kidney insufficiency that requires dialysis or kidney transplantation.

Also known as Berger's disease, IgAN is a chronic, debilitating and life-threatening kidney disease. It is the most prevalent primary chronic glomerulonephritis worldwide. An orphan disease, IgAN is estimated to affect approximately 200,000 people in the EU and United Kingdom, thus qualifying it is an orphan disease within the definition of the European Medicines Agency.

Kinpeygo is currently available in most European countries.

R&D pipeline focus on high burden diseases and/or specific needs of developing countries

Within STADA's Specialty product segment, the group licenses and markets tailored product offerings for specific diseases and needs in selected developing countries.

For example, in the Middle East and North Africa (MENA) region, STADA offers a comprehensive pain-management portfolio, such as Versatis (lidocaine) and Quetenza (capsaicin) therapeutic patches as well as Zaldiar (tramadol/paracetamol) capsules. Also in the MENA region, STADA addresses high-burden, non-communicable diseases such as cancer through brands such as Bortada (bortezomib) solution for multiple myeloma and Yondelis (trabectedin) for soft-tissue sarcoma and relapsed ovarian cancer ([Specialty pharmaceuticals | STADA \(stada-mena.com\)\)](http://Specialty.pharmaceuticals|STADA(stada-mena.com)))

Reliable Supply

We improve access to medicines by developing infra structure and continuously investing in our production sites, distribution, and value chain. At STADA, we place great value on the high reliability of supply through a strong, diverse, and decentralized manufacturing and supply network. Dual sourcing of materials plays a key role in building a resilient and robust supply chain and is a strategic business priority. Through a comprehensive Dual Sourcing program, we aim to ensure that 80% of our top 50 APIs are dual sourced in the future. In addition to APIs that are already dual sourced, for APIs currently supplied by a single source, a second source utilizing equivalent materials, comparable manufacturing processes, and appropriate technical capabilities is undergoing qualification and will be integrated upon successful completion to achieve this goal. Moreover, we assess and manage our suppliers on environmental and social topics using the EcoVadis platform. Over 80% of the top 50 API suppliers have an EcoVadis score above 50, which is considered 'good' according to the EcoVadis scale (for more information on EcoVadis assessments and supplier management (Sustainability Report ESRS S2, G1).

Reference to publicly available documents:

- Sustainability Report 2025 (ESRS S4 – Consumers and End-users)
- Sustainability Policy

<u>Equitable Pricing and Availability</u>	STADA operates in competitive off-patent pharmaceutical markets in which prices are typically determined either by free competition among multiple players on the same active ingredient/therapeutic option, or by payer-dictated mechanisms including tendering processes, reference prices, price ceilings, mandatory discounts, clawback mechanisms, reimbursement corridors etc. Based on our coverage of 25 LMIC within the STADA Generics business, STADA plays in some of these market as important player for the local healthcare system by supplying these generic medicines in high quality and supply reliability. Based on the list of countries with low-income or middle-income economies defined by <u>Organisation for Economic Co-operation and Development</u> (OECD), STADA we have generated in 2023 a net revenue of 91 million € with generics products in these countries which are subject to regulatory price setting (which is similar to equitable pricing) and for some of these smaller countries, STADA is an important player for the local health care system by supplying these generic medicines in high quality and supply reliability. In addition, we have provided high quality medicine in our Specialty segment to these countries. STADA portfolio covered 20% of WHO List of Essential Medicines in LDCs, LMICs and UMICs countries – see also STADA Sustainability Report 2025 (ESRS S4 – Consumers and End-users, page 104) LMIC covered by STADA Generics business segment in 2025: Albania Armenia Azerbaijan Bosnia-Herz. Belarus Georgia China India Iraq Kazakhstan Kyrgystan Libya Moldova Montenegro North Macedonia Mongolia Philippines Serbia Thailand
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	Tajikistan Turkmenistan Ukraine Uzbekistan Vietnam <i>Commitment to register product(s) in LICs</i> STADA offers an extensive portfolio of consumer healthcare and prescription medicines and healthcare products in selected lower middle income countries (LMICs) as defined by the World Bank (New World Bank country classifications by income level: 2022-2023). Foremost among these LMICs are STADA's considerable operations and registered product portfolios in Vietnam and the Philippines in south-east Asia, as well as Uzbekistan and the Kyrgyz Republic in the Eurasian region. STADA's 2 factories in Vietnam provide approx. 60 million packs of medicine to the local market, and are beginning to export to other countries in the AsiaPacific region, such as to Hong Kong. STADA is also working on registering its Specialty portfolio in developing and other non-European markets, as licensing and marketing rights permit. For example, the company and its partners have already submitted marketing authorization applications for biosimilars such as ranibizumab in MENA countries. Reference to publicly available documents: - Sustainability Report 2025
<u>Intellectual Property Access</u>	In general, STADA's approach as a generics manufacturer is to usually enter the market upon expiry of the originators' patents for a much lower price than the respective formally patent protected products of the originators. Thus, STADA provides accelerated, cost-efficient and reliable supply of generics following our purpose of Caring for People's Health as a Trusted Partner and which contributes to savings within the general healthcare systems and offers alternative medicinal products in addition to the one of the respective originators which is not only important from a cost perspective but also in case of supply shortages. Following this approach, the overall percentage of patent protected products within STADA is below 1%, which is why STADA's IP rights do not generally obstruct generic competition as such. As primarily a supplier of off-patent medicines and healthcare products, filing of as well as enforcing of patents is not STADA's main business in the field of intellectual property. If patents are filed they are generally not filed in LICs and LDCs. Patents are not enforced in LICs and LDCs. <i>Policy not to file for or enforce patents in some non-LICs</i> As primarily a supplier of off-patent medicines and healthcare products, filing of as well as enforcing of patents is not STADA's main business in the field of intellectual property. . If patents are filed they are only filed in selected countries or regions. If patents are granted they are exceptionally enforced and if they are exceptionally enforced they are enforced in highly developed countries.

	<i>Support for flexibilities provided under the World Trade Organisation's TRIPS agreement</i> As STADA focuses on off-patent medicines, it strongly supports flexibilities provided under the World Trade Organization's TRIPS agreement, such as the "Bolar exemption", which allows generics companies to conduct studies necessary to obtain regulatory approvals for generic and biosimilar medicines during the term of patent/Supplementary Protection Certificate (SPC) protection. In practice STADA is a member of the Medicines for Europe association, which is regularly lobbying to implement and follow these flexibilities provided under TRIPS to enhance medicine access. <i>Voluntary sharing of IP rights with generic manufacturers</i> As STADA focuses on off-patent medicines, the "voluntary sharing of IP rights with generic manufacturers" is not applicable to STADA. Rather, STADA as a rule enters the markets together with other generic companies upon expiry of the originators' patents and thus creates a competition that has been blocked so far by the 3rd party originators' patents. Furthermore, the overall percentage of patent protected products within STADA is below 1%, which is why STADA's IP rights do not generally obstruct generic competition as such. In addition, the patent rights hold by STADA in general do not restrict marketing of a generic product as such but are rather directed at giving STADA itself freedom-to-operate. Thus, sharing of these patent rights with generic manufacturers usually cannot enhance access to medicine for the public. <i>"Licensing conditions that enhance access to medicine"</i> As STADA focuses on off-patent medicines, this point is not applicable to STADA. Rather, at the opposite, STADA assumes certain costs such as upfront or milestone payments or royalties to be granted a license to enter the markets so far blocked by originators and their patents in order to offer a cost-efficient alternative to the originators' products. This is the best way to make medicine affordable and accessible to a broader audience of patients who need the respective treatment. Furthermore, the patent rights hold or in-licensed by STADA in general do not restrict marketing of a generic product as such but are rather directed at giving STADA itself freedom-to-operate. Thus, licensing of these patent rights usually cannot enhance access to medicine for the public. <i>"Technology transfer agreement(s) in LICs or LMICs"</i> As STADA itself is a generic company or manufacturer this point is not applicable to STADA. As we usually enter markets upon expiry of the originators' patents, we either ourselves or through third-party contract manufacturers create the conditions to build parallel hubs of technology in addition to the originators' technology. Thus, we multiply and thus ultimately spread certain technology, e.g. in case of a transfer our own knowledge to a 3rd party contract manufacturer which is in the ultimate interest of the markets, patients and end-consumers. A vivid example of this is the situation of supply shortages where generic companies may to a certain extent compensation supply shortages by securing their own independent supply.
<u>Product and Service Safety Program</u>	We are operating a very comprehensive and complete Quality Management System and we have robust and audited processes in place for all sub-criteria defined.

	It is essential for us as a pharma company to have a very good rating of our quality/safety program – and we are convinced that this is reflected in reality. The quality and safety of our processes is of highest importance for STADA as it is a basis of our purposes ‘Caring for People’s Health as a Trusted Partner’ and is core for our business being in the pharmaceutical industry. This is stipulated in our values (e.g. Integrity), our Sustainability Policy; our Code of Conduct and in our Sustainability Report. All STADA manufacturing sites hold manufacturing licenses issued by the competent authority of the respective country, where the manufacturing site is located. This license is based on a thorough inspection of the competent authority and will only be granted, if compliance with applicable pharmaceutical legislation is demonstrated successfully. This license needs to be renewed every three years, based on a successful follow up inspection. In addition, all STADA manufacturing sites located outside of the EU and providing product to EU markets, are subject to EU inspections. This process assures they also meet EU GMP requirements (which is the quality standard in the pharma industry and the basis the even get the manufacturing license) and is equivalent to QMS certifications. In 2025, a total of 34 GMP inspections were carried out at our own sites by regulatory authorities and successfully passed (37 in 2024) as well as 18 further external audits and ISO certifications (17 in 2024). No critical deviations were found. We also conduct regular GMP audits of our manufacturing partners and suppliers as part of our Quality Management System to ensure that products meet quality standards, safety requirements, and all applicable regulations at the time of manufacture. These audits are mandatory for batch releases, finished products, contract testing laboratories, intermediates (quality-critical steps prior to the final active ingredient), and APIs. In specific cases – such as for sterile products, unknown suppliers, or quality issues – audits are also carried out for excipients, packaging materials, and GMP service providers. In 2025, 403 audits have been performed under the responsibility of STADA. All EU GMP certificates are online available via: Eudra GMP - Public Layout (europa.eu) Our Global Quality Management System is documented along Global Quality Manual and global and local SOP of which an excerpt is presented below. Our global and local Quality Management System is regularly audited by our internal audit program as well as by regulators and customers. Global SOPs – associated local SOPs are in place on site level. <u>Incident Investigation / corrective action:</u> <table> <tr> <td>SOP00044</td><td>Global SOP for Investigation</td></tr> <tr> <td>SOP00044-A01</td><td>Risk Categorization</td></tr> <tr> <td>SOP00044-A02</td><td>Investigation and Root Cause Analysis Tools</td></tr> <tr> <td>SOP00034</td><td>Global Quality Issues and CAPA process</td></tr> <tr> <td>SOP00034-A01</td><td>Process Flowchart</td></tr> </table>	SOP00044	Global SOP for Investigation	SOP00044-A01	Risk Categorization	SOP00044-A02	Investigation and Root Cause Analysis Tools	SOP00034	Global Quality Issues and CAPA process	SOP00034-A01	Process Flowchart
SOP00044	Global SOP for Investigation										
SOP00044-A01	Risk Categorization										
SOP00044-A02	Investigation and Root Cause Analysis Tools										
SOP00034	Global Quality Issues and CAPA process										
SOP00034-A01	Process Flowchart										

SC2: managerial responsibility:

Final managerial responsibility lies with SVP Global Quality on global level and is formally further assigned to the quality heads on cluster and site level and the QP.

Managerial responsibility:

SOP00084 Duties of responsible persons (QP, Head of Production, Head of QC, Head of QA)

SC 3 Monitoring of product safety performance:

Internal SOPs are in place as described above and described below in 'Identification of Potential Risks to the Product after initial approval of the MA' and the following sub sections

Monitoring of product safety performance:

SOP00044 Global SOP for Investigation
SOP00044-A01 Risk Categorization
SOP00044-A02 Investigation and Root Cause Analysis Tools
SOP00034 Global Quality Issues and CAPA process
SOP00034-A01 Process Flowchart

SC 5: Product objectives or targets:

Quality objectives are in place on global, local and product level and defined in SOPs (see above) and below and subject to monthly business review.

Product objectives/targets

SOP00040 Global SOP for Periodic Quality Management Reviews (QMR)/ Quality Council
SOP00040-A01 Handbook Global Quality KPIs
Product safety risk assessments:
SOP00010 Procedure for Product Quality Review
SOP00010-A01 Template T01 PQR Report
SOP00010-A04 Template T04_Example Product Quality Statement
SOP00010-A05 List of suppliers which will be ordered by Headquarters
SOP00010-A06 Template T06_Risk Assessment regarding PQR gap

SC 6 Product Risk Assessment:

see below with detailed explanation about risk assessment and risk management

	<u>Product safety risk assessment:</u> SOP00056 Global SOP Quality Risk Management SOP00056-A01 Overview and description of commonly used tools SOP00056-A02 Template Ishikawa/Fishbone Diagram SOP00056-A04 Template FMEA <i>SC 8 Training:</i> All quality related SOPs and OPs are controlled documents which are managed via our document managementsystem EDMS. Training is mandatory for relevant staff and training plans and matrixes are in place. Training is tracked via EDMS and EQMS – electronic systems and are subject to internal and external audits <u>Training:</u> SOP00065 Global Training Process SOP00065-A01 Job Description SOP00065-A02 Training Matrix SOP00065-A03 Employee Training Plan SOP00065-A04 Record on Performed Training/Assessment SOP00065-A05 Employee Training Plan SC 9: product safety (quality) is subject to internal audits (as above for SOPs) and external certification audits (see below for GMP certificated and explanation <u>Monitoring of product safety performance:</u> SOP00044 Global SOP for Investigation SOP00044-A01 Risk Categorization SOP00044-A02 Investigation and Root Cause Analysis Tools SOP00034 Global Quality Issues and CAPA process SOP00034-A01 Process Flowchart SC 10: Regular external audits/inspections Sustainability Report 2025 <u>Regular external product safety audits:</u> SOP00015 Global Auditing Process
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	SOP00015-A01 Global Audit Agenda Template SOP00015-A02 Recommendation for audit duration SOP00015-A03 Risk Assessment Approach SOP00015-A06 Audit Evaluation Statement SOP00015-A07 Final Audit Report Template SOP00015-A08 Checklist Audit Preparation Template SOP00015-A09 General Audit Checklist STADA conducts regular Good Manufacturing Practice (GMP) audits of its suppliers as a part of its quality management systems ensuring that products meet quality standards, safety requirements, and all other regulations in place at the time of manufacture. These audits are mandatory for batch releases, finished products, contract testing labs, intermediates (quality-critical step before final active ingredient) and active ingredients at least every 3 years. These audits are also used in some cases (i.e., for sterile products, unknown suppliers, quality issues) for excipients, packaging materials, and GMP service providers. The further listed exemplary list of quality related Global SOPs provide more insight in the comprehensiveness of our quality system <u>Public reporting on product safety issues:</u> SOP00070 Global Process for Quality Customer Complaint Handling SOP00070-A01 Complaint Handling Investigation Workflow – Flow Chart SOP00070-A02 Scope of Preliminary Investigation - Form-Template SOP00070-A03 Complaint Assessment Matrix, Investigation Scope and CAPA - Form-Template SOP00070-A04 Risk assessment Criteria and CalculationRegular employee training: <u>Regular tests emergency response to ensure product safety</u> SOP00033 Escalation To Management (ETM) - Global Process SOP00033-A01 STADA worldwide contacts for Global ETM and Global Recall Process SOP00033-A02 Flow Chart - Global ETM Process SOP00033-A03 Form: Escalation to Management - Critical Quality Incident / Report SOP00033-A04 Template: Presentation for Quality Incident Committee SOP00042 Global Recall SOP00042-A01 EMA Recall classifications Reference to publicly available documents:
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- STADA Sustainability Report 2025
- STADA Code of Conduct
- Global Sustainability Policy

In addition to our Quality System, Pharmacovigilance (adverse drug reactions reporting and processing) and product user satisfaction are two closely related and important categories, as STADA products directly or indirectly influence people's health.

As part of a Group-wide global pharmaceutical safety system – i.e., the STADA Global Pharmacovigilance System—the safety of all STADA pharmaceuticals worldwide is monitored and ensured through the collection and evaluation of all reported pharmaceutical risks. Here, STADA's subsidiaries work in accordance with SOPs issued by the Corporate Pharmacovigilance department. In accordance with Good Pharmacovigilance Practices (GVP) and as a part of the Global Pharmacovigilance Quality System, adherence to legal requirements and STADA's standard operating procedures is monitored globally by means of a pharmacovigilance auditing system. Pharmacovigilance audits required in accordance with GVP are conducted by auditors from the Medical Affairs/Corporate Pharmacovigilance department. Additionally, STADA's GVP conformity is regularly inspected by authorities such as the German Federal Institute for Drugs and Medical Devices (BfArM).

In 2025, a total of 34 GMP inspections were carried out at our own sites by regulatory authorities and successfully passed (37 in 2024) as well as 18 further external audits and ISO certifications (17 in 2024). No critical deviations were found. We also conduct regular GMP audits of our manufacturing partners and suppliers as part of our Quality Management System to ensure that products meet quality standards, safety requirements, and all applicable regulations at the time of manufacture. These audits are mandatory for batch releases, finished products, contract testing laboratories, intermediates (quality-critical steps prior to the final active ingredient), and APIs. In specific cases – such as for sterile products, unknown suppliers, or quality issues – audits are also carried out for excipients, packaging materials, and GMP service providers. In 2025, 403 audits have been performed under the responsibility of STADA.

All stakeholders (including professionals – doctors and pharmacists, business partners in the supply chain as well as end users of STADA's products) are encouraged to submit any suspicion of a drug side effect. The individuals to contact to report potential adverse drug reactions are shown on the global corporate website[3], as well as on the websites of all subsidiaries within the Group. In addition, all employees are informed about the pharmacovigilance procedures.

This is elaborated in STADA's Sustainability Report 2025 (ESRS S4 – Consumers and End-users)

Reference to publicly available documents:

- STADA Sustainability Report 2025
- STADA Code of Conduct
- Global Sustainability Policy
- Business Partner Code of Conduct

QMS Certifications

All (100%) of STADA manufacturing sites hold valid quality management system certifications. For our sites producing pharmaceutical products, the pharmaceutical industry applicable quality standard is the EU GMP guidelines (which are much stricter as ISO 9001 and include all elements of an ISO 9001 QMS – further details regarding EU GMP is provided below). Other sites (e.g. food supplements) have ISO 9001 in place. Compared with ISO 9001 a lot of more quality related information need to be shared with authorities and complete value chain as the always safety of patients need to be considered and properly assessed by Qualified Persons according to EU legislation Article 48, the Directive 2001/83 who decided ultimately on the market release and that Medicinal Products can be used by patients.

On top of GMP, most of our sites have ISO 9001 (Quality) and/or ISO 13485 (Medical Devices) certifications in place.

EU GMP certifications are considered at least equal to an ISO 9001 QMS – reflecting the legal requirements and business practices in the pharmaceutical industry. Formal ISO 9001 certifications are not the main criteria for pharmaceutical production sites as this industry is subject to the much stricter EU GMP guidelines. For further details regarding EU GMPs and its quality management system elements please refer to and its definition:

[ICH Q10 Pharmaceutical quality system - Scientific guideline | European Medicines Agency \(europa.eu\)](#)

ICH Q10 describes one comprehensive model for an effective pharmaceutical quality system that is based on International Standards Organisation (ISO) quality concepts, includes applicable Good Manufacturing Practice (GMP) regulations and complements ICH Q8 “Pharmaceutical Development” and ICH Q9 “Quality Risk Management”. ICH Q10 is a model for a pharmaceutical quality system that can be implemented throughout the different stages of a product lifecycle. Much of the content of ICH Q10 applicable to manufacturing sites is currently specified by regional GMP requirements. ICH Q10 is not intended to create any new expectations beyond current regulatory requirements. Consequently, the content of ICH Q10 that is additional to current regional GMP requirements is optional.

STADA commercial affiliates holding a wholesaler license are subject to regular inspections by the local competent authorities. This assures, all legal aspects related to marketing and distribution of pharmaceutical products in their markets are covered.

Reference to publicly available documents

- STADA Sustainability Report 2025
- STADA Code of Conduct
- Global Sustainability Policy
- [Eudra GMP - Public Layout \(europa.eu\)](#)

<u>Ethical Marketing Promotion</u>	All information shared in our promotional materials is required to be precise, balanced, and compliant with current laws and regulations, supported by credible scientific evidence to enable informed decisions among healthcare professionals, customers, and patients. Beyond meeting legal requirements, relevant information is reviewed internally by Medical Affairs and, in some countries, by Legal Affairs to protect the interests of all parties involved. The workflow for the reviewing promotional materials for STADA products in Germany involves the Brand Manager, Medical Function, Legal, and Medical Affairs, with final approval by the Information Officer for pharmaceutical products. We also conduct medical reviews of product-related information, ensuring not only legal compliance but also validation from relevant scientific sources, and we regularly update our materials to incorporate the latest research and guidelines. In line with legal requirements, we communicate the intended uses, therapeutic benefits, and usage guidelines of pharmaceutical products (whether prescription-only or non-prescription) through ongoing interaction with relevant stakeholders, particularly medical professionals and pharmacists. Promotional standards are further reinforced through the Global Policy 'Interaction with HCPs' (see section ESRS S4 -1) and are part of training programs for the sales force and marketing teams. It provides the framework for marketing pharmaceuticals within the Group in accordance with applicable laws and regulations. It also adheres to the strict requirements of the MfE Code of Conduct for prescription medicines in the MfE jurisdiction. The Global STADA Sustainability Policy and ESG commitments provide the overall ESG framework and include explicit commitments regarding ethical marketing, access to medicines and equitable pricing (STADA Sustainability Policy and ESG Commitments, P6, SR 2023, pages 41). As stated already, ethical and legal promotion is important to STADA, as set out in its own Code of Conduct (section "Interaction with Third Parties") where we emphasize that we market and sell our products in accordance with all applicable rules and regulations. Furthermore, STADA is member of Medicines for Europe (https://www.medicinesforeurope.com/medicines-for-europe/#section-5) and complies with its strict Code of Conduct (https://www.medicinesforeurope.com/docs/Medicines-for-Europe_Code-of-Conduct.pdf). We are also defining and communicating our expectations towards our suppliers regarding 'governance aspects' through our Responsible Procurement Function incl. external ESG supplier assessment and our Business Partner Code of Conduct. <i>Incident Investigation and Corrective Actions</i> Any misconduct which is either reported via the 'whistleblower channel' (www.compliance-reporting-portal.stada.com) is investigated and corrective actions are as defined by our investigation process. Any misconduct identified through internal audits or other means is also fully investigated by the compliance and/or internal audit function following internal procedures. Ethical compliance trainings (e.g. anti-bribery) are covering potential misconduct situations regarding 'ethical marketing promotion' as well <i>Managerial responsibility for responsible drug marketing</i>

Managerial responsibilities is starting with our CEO via line management responsibility to the related employee. Our Global Policy are signed by the Head of Compliance and the STADA Code of Conduct by our CEO

Operating Guidelines

Despite more high level global policies, we have issued the Global Policy on the Interactions with HCPs HCOs POs which specifies on 16 pages requirements and details incl. topics as e.g. events; interactions with patient organizations, gifts, hospitality & entertainment; promotion materials....'

As part of our responsible procurement function and our Business Partner Code of Conduct, we are defining our requirements towards our supply chain partner in this respect.

Public reporting on outcomes and violations

STADA reports on its company webpage in accordance with the Medicines of Europe Code of Conduct.

Risk Assessments

Risk assessments are executed as part of our Internal Audit function.

Regular training and awareness programs

The training on related Global Policies is part of our compliance training program. All employees have to sign off the Code of Conduct (including STADA's commitment to ABAC summarizing our ABAC policy) and non-conflict of interest through global e-learning programs. Besides the global e-learning we have additional local focus trainings in place.

Completion rate of compliance e-learning is tracked globally and is one of our key ESG KPIs which is reported quarterly to our STADA Sustainability Steering Committee. The completion rate target was > 97% for 2025 with an achieved completion rate of 98% in 2025 (Sustainability Report 2025 – section 'Sustainability Commitments and KPIs')

Remuneration for sales representatives aligned with quality and objectivity

Our Sales Representatives have transparent Sales KPIs targets and the level achievement of their goals is the base for the calculation of their variable remuneration. Same as for all other employees, our Values are part of the assessment of their level of target achievement and the Value 'Integrity' includes compliance with internal and external standards, rules and policies (Code of Conduct, Compliance, etc.). Employees of STADA AG including sales representatives, are being rewarded based on certain integrity criteria.

Reference to publicly available documents:

- STADA Sustainability Report 2025
- STADA Code of Conduct

	- Global Sustainability Policy
<u>Drug Promotion Standards</u>	Our Sustainability Policy include also our Drug Promotion Standards Policy specifying our commitments and rules to conform marketing activities (drug promotion) in line with compliance and applicable industry standards incl. 'Code of Conduct from Medicine for Europe and the ABPI Code of Practice'. Ethical and legal promotion is important to STADA, as set out in its own Code of Conduct (section "Interaction with Third Parties") where we emphasize that we market and sell our products in accordance with all applicable rules and regulations. Our Global Policy 'Global Policy on the Interaction with Healthcare Professionals, Healthcare Organizations & Patient Organizations' specifies our internal requirements regarding 'drug promotion standards' and is defining that the Code of Conduct of the Association 'Medicines for Europe' Code of Conduct from 2020 is binding for STADA. This Code of Conduct is regularly reviewed and updated and based on the WHO Ethical criteria for medicinal drug promotion from 1988. Also, our Global Anti-Bribery and Anti-Corruption Policy emphasize that even the mere appearance of any improper behavior towards healthcare professionals (HCP) must be avoided. In addition, STADA prohibits any offer of benefits in exchange for any prescription. Our compliance training programs ensure that our staff is regularly trained in this respect. Reference to publicly available documents: - STADA Sustainability Report 2025 - STADA Code of Conduct - Global Sustainability Policy - Business Partner Code of Conduct
<u>Animal Testing Policy</u>	Our Sustainability Policy and STADA Code of Conduct commitments include our commitments regarding animal testing incl. to conduct testing only unless required by law and no reliable, authorized alternative is available; to apply the 3R principles to avoid testing and to work only with certified research organization. Our position towards Animal Testing is also disclosed in our Sustainability Report 2025 – ESRS S4 Consumers and End-users. Our Business Partner Code of Conduct defines our expectations towards our supplier regarding animal welfare including to reduce / replace animal testing and use alternatives when scientifically valid and required by law. In case of required testing, we define minimum requirements (AAALAC accreditation) for testing labs used. The vast majority of STADA's products are authorized on the basis of generic bioequivalence, biosimilarity, OTC monograph or similar provisions that do not require animal testing to be conducted. <i>Commitment not to use animal testing except where legally required</i>

	Animal testing is only conducted when legally required and animal testing is very strictly regulated. As we are not an originator pharma company, STADA is not involved in original research in new chemical entities and therefore STADA is typically not involved in studies. The vast majority of STADA's products are authorized on the basis of generic bioequivalence, biosimilarity, OTC monograph or similar provisions that do not require animal testing to be conducted. Only in very exceptional cases regulator may request animal testing studies by STADA to e.g. evaluate risks due to contamination. In such cases, these studies are executed by external specialized laboratory which would contract animal testing studies. <i>Commitment to replace animal testing</i> Wherever it is possible, alternative methods are favored over animal testing. This is also a legal requirement in the European Union which we also pass to our business partners worldwide via our Business Partner Code of Conduct. <i>Commitment to reduce animal testing</i> Wherever it is possible, animal testing is avoided. This is also a legal requirement in the European Union which we also pass to our business partners worldwide via our Business Partner Code of Conduct. <i>Reference to best practice standards or commitment to seek animal testing certification</i> Non-clinical research on animals is subject to numerous legal requirements (national, EU, international guidelines and laws). Animal testing is not conducted in-house. Only well-established / certified contract research organizations (CRO) or laboratories, which are compliant with either national or international standards and regulations (e.g. OECD, GLP, ISO, animal welfare law) are contracted for the conduct of animal tests. Compliance with applicable legal requirements/guidelines is mandatory. Reference to publicly available documents: - STADA Sustainability Report 2025 - STADA Code of Conduct - Global Sustainability Policy - Business Partner Code of Conduct
<u>Animal Testing Program</u>	Our Sustainability Policy with associated ESG commitments includes our commitments regarding animal testing incl. to conduct testing only unless required by law and no reliable authorized alternative is available; to apply the 3R principles to avoid testing and to work only with certified research organization. Our position towards Animal Testing is also disclosed in our Sustainability Report 2025 – ESRS S4 Consumers and End-users, page 102 (relocated from the 'Governance' chapter under the prior GRI-based report structure) Due to our business focus, STADA has no animal testing program in place. STADA would only conduct animal studies if explicitly required by authorities.

	<i>Initiatives to reduce/refine/replace animal testing</i> In line with our ESG commitments towards animal testing, STADA supports initiatives and programs to reduce/refine/replace animal testing. We only conduct (via 3rd party certified labs) animal testing if legally required and accordingly the regulatory body has defined that no alternative is existing. STADA is active in several industry association and experts groups and provides in knowledge/insights to continuously looking for alternatives to animal testing. <i>Managerial or board responsibility for overseeing animal testing</i> Managerial responsibility is finally with our Executive Vice President Global Dev, Portfolio, Reg & BD&L who is member of STADA Executive Committee. <i>Regular audits of animal testing practices</i> In case animal testing would be required, the scope of the study and the applied standards and animal welfare standards would be defined in close coordination between STADA and our contract partner following best practices. Animal testing is monitored/audited, as legally required Reference to publicly available documents: - STADA Sustainability Report 2025 - STADA Code of Conduct - Global Sustainability Policy - Business Partner Code of Conduct
<u>Policy on Emerging Technologies</u>	STADA has comprehensive processes in place to evaluate risks (including emerging technologies) when new technologies are evaluated or implemented. We do not use stem cells or genetic engineering in our product development or production processes. Regarding nano particles – we use these in some cosmetic products in line with related regulatory requirements. As a company that typically replicates known molecules upon expiry of applicable intellectual-property rights, STADA is usually a follower on emerging technologies. Such technologies are implemented in service of producing products that match the quality, safety and efficacy of the original reference product.
<u>Clinical Trial Standards</u>	<i>Commitment to adhere to international best practices or other international codes/principles</i> Our Sustainability Policy and STADA Code of Conduct includes our commitments regarding clinical trials incl. to meet all applicable ethical and national/international compliance standards and codes to conduct any trails in ethical manner - please refer to STADA Sustainability Policy and our Sustainability Report 2025 (ESRS S4 – Consumers and End-users). Our Sustainability Policy and included ESG commitments define that we adhere to international standards (Helsinki Declaration) and highest international best practices to ensure trail are conducted in an ethical manner.

	We are also defining our requirements towards our suppliers regarding 'Clinical Trials' in our Business Partner Code of Conduct incl. requirements to conduct clinical trials in accordance with international and local guidelines, standards and laws and to follow the strictest medical, scientific and ethical principles as define in the Declaration of Helsinki – WMA . <i>Commitment to conduct trial in ethical manner</i> To ensure product safety and quality, STADA complies with legal requirements and guidelines in its development activities and, in the case of local developments, with the respective national requirements. In all clinical trials with STADA acting as a sponsor according to ICH Good Clinical Practice (GCP) we have clinical, bioanalytical, and statistical Contract Research Organizations (CROs) for the execution of clinical trials in Germany and abroad which are qualified by STADA and regularly audited to ensure GCP compliance and adherence to other important guidances during a clinical trial. STADA clearly adheres to international best practice guidelines and internationally valid GCP principles for adequate conduct of clinical trials: • Each outsourced clinical trial must have a Cooperation Agreement in place (contract between STADA and CRO) clearly defining the Clinical Trial Standards and responsibilities according to international codes and principles, e.g. Declaration of Helsinki, applicable EU-Regulation (536/2014) and EU Directives, GCP standard as defined in WHO guideline ICH E6 (R2), etc. The basic standard of "international best practice guidelines" is defined in Clinical Affairs SOP, which applies to each outsourced clinical trial. • The Cooperation Agreement furthermore ensures compliance with all ethical requirements as defined in section 4.3 and 5.2 and each Clinical Study Protocol contains a section (as required by ICH E6 GCP guideline) stating to conduct the study in accordance with ICH 'Guidance on Good Clinical Practice', Declaration of Helsinki, Principles of Good Laboratory Practice and all applicable guidelines and regulations. This statement is signed by the study investigators in each clinical trial protocol. <i>Commitment to regular monitoring of outsourced trials:</i> All outsourced clinical trials are subject to regular monitoring activities: Compliance with all study requirements including ethical standards is ensured by intense monitoring activities by independent qualified Monitoring Service Providers. Additional remote co-monitoring is performed by STADA. The monitoring standards are defined in section 7.3 of the Cooperation Agreement in SOP CACT005-T02 and in Clinical Affairs Monitoring SOPs. Each clinical trial is at least monitored by conducting a Site Initiation Visit, a Monitoring Visit at dosing days in each trial period and a Close Out Visit. 100% source data verification is ensured. If monitoring activities are not performed according to STADA SOPs, the SOPs of the contracted and qualified monitoring service provider apply. We are also defining our requirements towards our suppliers regarding 'Clinical Trials' in our Business Partner Code of Conduct incl. requirements to conduct clinical trials in accordance with international and local guidelines, standards and laws and to follow the strictest medical, scientific and ethical principles as define in the Declaration of Helsinki – WMA. Reference to publicly available documents:
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	- STADA Sustainability Report 2025 - STADA Code of Conduct - Global Sustainability Policy - Business Partner Code of Conduct
<u>Clinical Trial Program</u>	Our Sustainability Policy with associated ESG commitments includes our commitments regarding clinical trials incl. to meet all applicable ethical and national/international compliance standards and codes to conduct any trails in ethical manner - please refer to STADA Sustainability Policy, page 7. STADA only conducts clinical trials with a specific product if there is the clear intention to apply for marketing authorization. STADA strictly adheres to all ethical standards as defined in ICH E6 (R2) (guidance on Good Clinical Practice) and the Declaration of Helsinki in order to ensure well-being of all study participants. For each clinical trial the study approval is given by an Independent Ethics Committee/Independent Review Board which has the force to reject study approval or request modification or termination of the clinical trial, if considered necessary. Prior to any clinical study activities each study participant must have freely signed the Informed Consent while clearly confirming that there was given enough time to ask questions and talk about the study, that all questions were answered satisfactorily, that enough information was given about the study, that the volunteer is in the study on his/her own free will and without being pressured by the study doctor or clinical staff, and that the volunteer knows that he/she can leave the study at any time without giving a reason and without affecting his/her health care. In case of patient studies in countries where the study treatment is not subject to reimbursement by the health care system STADA provides compassionate use medication in order to allow completion of a full treatment cycle for each patient, thus, providing post-trial access to medicines wherever required. Each trial participant is covered by a trial insurance and compensation and/or treatment available to the subject in the event of trial-related injury. The Informed Consent Form clearly highlights whom to contact in the event of trial-related injury and informs about the rights of the trial participants. Prior to start of any clinical trial the associated risks are assessed and measures are implemented in the Clinical Trial Protocol for adequate risk mitigation. As outlined in detail above, all clinical trials are monitored at the trial sites so that any deviations from the GCP standard can be recognized at an early stage and corrected as necessary. Each STADA Clinical Affairs employee involved in any clinical trial activities must be qualified by training and account for GCP compliance by completing a GCP training, followed by an exam at least every two years. Training requirements of clinical trial staff from contracted CROs is defined in Clinical Affairs SOP "Quality Management of Clinical Trials – Training of Trial Staff". Compliance with this standard ensures that the rights, safety, and well-being of trial subjects are respected in accordance with the Declaration of Helsinki. It also ensures the credibility and integrity of data collected during the clinical trials. We are also defining our requirements towards our suppliers regarding 'Clinical Trials' in our Business Partner Code of Conduct incl. requirements to conduct clinical trials in accordance with international and local guidelines, standards and laws and to follow the strictest medical, scientific and ethical principles as define in the Declaration of Helsinki – WMA.

	Reference to publicly available documents: - STADA Sustainability Report 2025 - STADA Code of Conduct - Global Sustainability Policy
<u>Trial Data</u> <u>Transparency</u>	<i>Commitment to specific timeframe for result disclosure</i> Our Sustainability Policy with and STADA Code of Conduct include our commitments regarding clinical trials incl. to meet all applicable ethical and national/international compliance standards and codes to conduct any trials in ethical manner - incl. our commitment to comply with all applicable national/international laws and regulations relevant for clinical trials (i.e. The Declaration of Helsinki by The World Medical Association, the International Ethical Guidelines for Health-related Research Involving Humans published by the Council for International Organizations of Medical Sciences (CIOMS), the Nuremberg Code, etc.). <i>Publication of trial data results</i> STADA Group complies with legally binding publication requirements of clinical trials. Clinical trials with patients are published in credible and publicly available databases such as TOLEDO study with Apomorphine in Parkinson patients (pls. refer to ClinicalTrials.Gov with sponsor Britannia Pharmaceuticals as part of STADA Group https://clinicaltrials.gov/ct2/show/NCT02006121) as well as ELEGANCE study with Lecigon in Parkinson patients published in ClinicalTrials.Gov database (https://clinicaltrials.gov/ct2/show/NCT05043103). Publication of clinical trial results by STADA Group is done wherever possible if there is data which is of scientific interest and accepted for publication such as the TOLEDO study which was published in a peer reviewed and highly ranked journal "The Lancet Neurology" https://pubmed.ncbi.nlm.nih.gov/30055903/. At least the results from clinical trials conducted in the European Union are uploaded to the EU Clinical Trial Register. Nonetheless, most of STADAs clinical trials are bioequivalence studies which do not investigate therapeutic effects of a drug (as exclusively was the case in 2021 and 2022). Such trials are usually conducted in healthy volunteers and investigate the biopharmaceutical in vivo-performance of drug product formulations. Such trials fall under the definition of Phase 1 studies. Therefore, as defined in European Guidance 2008/C 168/02 Art. 3 para 2 and in EudraCT & EU CTR Frequently asked questions, EMA/370102/2016 "Results for phase 1 trials will be visible only to National Competent Authorities, EMA and European Commission. Phase 1 trials conducted solely in adults will never be made public, even after the submission of their results". Raw data / source data (as defined by ICH-GCP Guidance) are located at the investigational sites and can be accessed by third parties during inspections or audits of the clinical trial. We are also defining our requirements towards our suppliers regarding 'Clinical Trials' in our Business Partner Code of Conduct incl. requirements to conduct clinical trials in accordance with international and local guidelines, standards and laws and to follow the strictest medical, scientific and ethical principles as define in the Declaration of Helsinki – WMA. Reference to publicly available documents:

	- STADA Sustainability Report 2025 - STADA Code of Conduct - Global Sustainability Policy - Business Partner Code of Conduct
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ESRS G1 – Ethical Business Conduct

ESG Governance

ESG and sustainability is of high importance for our company and is part of our Top strategic priorities. As stated by our Chief Executive Officer in various Annual Reports and Sustainability Reports, we will continue our growth and cultural journey with a focus on sustainability, both from an ESG perspective, but also in terms of investing in long-term growth opportunities.

Our STADA Sustainability Policy and Code of Conduct provides the overall framework.

Our ESG Governance structure and processes are disclosed in our Sustainability Report 2025 (Section ‘Managing Sustainability Topics and Reporting’)

Ultimate responsibility lies with the CEO (Peter Goldschmidt) who is supported by the STADA Sustainability Steering Committee. The Global Sustainability Function reports directly to the CEO. The STADA Sustainability Steering Committee (SSC) is the main body overseeing the management in respect to Sustainability / ESG and has the following members (board members: CFO, CTO, CPO and SEC members: EVP Global Legal; EVP Global Communication and EVP Eastern Europe.

The SSC is responsible for defining the sustainability policy and strategic directions, tracking progress and making strategic decision. It also analyzes all relevant sustainability aspects and their potential future implementation within business operations. The SSC meets at least on a quarterly basis. Decisions are confirmed by the SEC and officially approved by the CEO.

To ensure local implementation and to coordinate ESG topics in line with the strategic direction, the Sustainability Country Network was established. This network is centered around Sustainability Country Coordinators (SCCs), who serve as dedicated local representatives of STADA’s affiliates. They support the global ESG program, contribute to sustainability reporting, and implement and drive local ESG initiatives

For details please refer to Sustainability Report 25 – ESRS 2 General Disclosures

Further important ESG governance elements include the Supervisory Board which regularly considers and discusses ESG topics with the Management; the Compliance Committee of the Supervisory Board is responsible for monitoring compliance with legal standards and internal company guidelines by the Company and its bodies. As part of its activities, it is specifically responsible for introducing and accompanying proceedings concerning any compliance violations and for preparing the associated decisions of the Supervisory Board on such matters.

Reference to publicly available documents:

- STADA Sustainability Report 2025
- STADA Code of Conduct
- Global Sustainability Policy

<u>Bribery & Corruption Policy</u>	The Global STADA Sustainability Policy and ESG commitments provide the overall ESG framework and include explicit commitments regarding anti-corruption, anti-bribery and anti-money laundering. Further details are also defined in the STADA Code of Conduct - which was comprehensively revised and expanded in 2025 and 2026 - and the related specific Global Policies on - Global Anti-Bribery and Anti-Corruption Policy - Global Conflicts of Interest Policy We have clear processes and policies in place as part of our 'Responsible Procurement' function defining our expectations regarding ABAC towards our suppliers (STADA Business Partner Code of Conduct). We are conducting ESG risk assessments of our suppliers via EcoVadis – covering also 'governance' aspects. Reference to publicly available documents: - Sustainability Report 2025 - Global Sustainability Policy - STADA Code of Conduct
<u>Bribery & Corruption Programs</u>	The Global STADA Sustainability Policy and ESG commitments provide the overall ESG framework and include explicit commitments regarding anti-corruption, anti-bribery and anti-money laundering. Top Management Commitment is shown through signature in foreword of Code of Conduct and sign-off of core compliance documents such as the compliance handbook or policies by the CEO. In addition, the CEO of STADA grants Value awards in global townhalls for all employees worldwide for our core value integrity and being a role model for living said value; as this is a "real life experience" for employees, this strengthens the value in a very vivid way. All employees have to sign off the Code of Conduct (including STADA's commitment to ABAC summarizing our ABAC policy) and non-conflict of interest through global e-learning programs. Besides the global e-learning we have additional local focus trainings in place. Our Compliance Management System is dedicated to detecting potential misconduct, one example is also the ombudsman whose details are available online or STADA's Compliance Reporting Portal which can be used to report potential non-compliant behavior (like e.g. ABAC violations, environmental or human rights risks or violations). Completion rate of compliance e-learnings is tracked globally and is one of our key ESG KPIs which is reported quarterly to our STADA Sustainability Steering Committee. The completion rate target was > 97% for 2025 with an achieved completion rate of 97% in 2025 (Sustainability Report 2025 – section 'Sustainability Commitments and KPIs')

	We have clear processes and policies in place as part of our ‘Responsible Procurement’ function defining our expectations regarding ABAC towards our suppliers (STADA Business Partner Code of Conduct). We are conducting ESG risk assessments of our suppliers via EcoVadis– covering also ‘governance’ aspects (see also Sustainability Report 2025 (ESRS S2 – Workers in the Value Chain, G1 ‘Responsible Procurement’ section) Reference to publicly available documents: - STADA Sustainability Report 2025 - STADA Code of Conduct - Global Sustainability Policy
<u>Whistleblower Programs</u>	The Global STADA Sustainability Policy and ESG commitments and STADA Code of Conduct provide the overall ESG framework and include explicit commitments regarding whistleblowing and compliance reporting as well our commitments in STADAs Code of Conduct. Further details are provided in our Sustainability Report 2025 – Section ‘ESRS G1 Business Conduct – Whistleblower Protection’. STADA encourages employees to raise observations. Therefore, our reporting channels (Compliance Reporting Portal and the contact form of the ombudsman) are publicly available via webpage in various languages. Further details are also defined in the Global Whistleblower Policy. STADA has implemented in 2023 our Compliance Reporting Portal accessible via the internet page: www.compliance-reporting-portal.stada.com (published on STADA’s home page) and where STADA employees, business partners and third parties can report any potential misbehaviors, including violations of laws and regulations as well as potential human rights and/ or environmental risks or violations. The process is described in the related STADA Complaints procedure available on the internet via: Supply Chain Act STADA. Secondly, we have implemented an Ombudsman process – who can be contacted 24/7 via the contact information which is available on our company webpage. Our process and expectation towards our Whistleblower program is also an integral part of our compliance trainings. We are also defining and communicating our expectations towards our suppliers regarding ‘grievance mechanism’ through our Responsible Procurement Function incl. external ESG supplier assessment and our Business Partner Code of Conduct. STADA is actively communicating the Whistleblower Program to all employees globally and it is also part of our compliance trainings (of which we track completion rate globally incl. global target – see above). We also communicate the compliance reporting portal and our stance on whistleblower protection to external partners along our supply chain. Reference to publicly available documents: - STADA Sustainability Report 2025 - STADA Code of Conduct - Global Sustainability Policy

<u>Business Ethics Program</u>	The Global STADA Sustainability Policy and STADA Code of Conduct provide the overall ESG framework and include explicit commitments regarding all relevant aspects of business ethics. <i>Annual training of employee on the Code of Conduct</i> Annual training is ensured via our compliance training program and in addition the annual Code of Conduct declaration which every employee needs to sign annually. The training on related Global Policies is part of our compliance training program. All employees have to sign off the Code of Conduct (including STADA's commitment to ABAC summarizing our ABAC policy) and non-conflict of interest through global e-learning programs. Besides the global e-learning we have additional local focus trainings in place. Completion rate of compliance e-learning is tracked globally and is one of our key ESG KPIs which is reported quarterly to our STADA Sustainability Steering Committee. The completion rate for compliant training target was > 97% for 2025 with an achieved completion rate of 98% in 2025. Other related key ESG KPI include our Code of Conduct declaration rate (tgt 25: 97%; YE 25 KPI: 97%) (Sustainability Report 2025 – section ‘Sustainability Commitments and KPIs’) <i>Board responsibility</i> Board responsibility lies ultimately with our CEO (who also signed the STADA CoC and the Sustainability Policy). Our commitment and processes regarding ethics business are underpinned by our value ‘integrity’ and described in depth in our Sustainability Reports – see Sustainability Report 2025 – ESRS G1 Business Conduct chapter (page 110 ff). <i>Commitment to address major business ethics risks / incident investigation / managerial responsibility:</i> A dedicated risk management system and compliance management system, key value of STADA is “integrity”, clear commitment to integrity is part of our 4 values – including the value ‘Integrity’. This basic value and expectation are further specified across global policies and training programs (see above, incl. Code of Conduct, Sustainability Policy, ABAC policies etc.) We have a comprehensive global e-learning compliance training program in place with tracking of training completion rate – which is also one of our key ESG KPIs with a completion rate of 97% in 2025. Furthermore, there is a coordination of the supervisory board, the executive board and internal audit regarding the annual audit plan. Additionally, depending on the individual case, the executive board can also mandate ad-hoc audits. The executive board and the affected affiliated companies or departments receive all audit reports including an evaluation of the specific findings of internal audit. Furthermore, the report of the head of internal audit on the status and progress of findings is a standing item of the agenda of the STADA Executive Committee (SEC – the executive board is part of the SEC). Part of the annual audit plan are also so-called “baseline audits”, which also cover Compliance topics. In addition to the internal audits, Corporate Compliance is also regularly on the agenda of the STADA SEC meetings. In addition, STADA has a compliance committee both at the level of the supervisory board and an operational compliance committee within the STADA operations consisting of the CFO, the CTO, the CHRO, EVP Legal and the Chief Compliance Officer as well as the VP Internal Audit. In particular, the operational compliance committees discuss in depth compliance investigations. The internal Audit function is following the IIA standards (Institute of Internal Auditors) and DIIR standards (Deutsches Institut für Interne Revision) to run
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	the Internal Audit function. The approach and work of the Audit functions were subject to an external review and are certified under international Audit standards. We are also defining and communicating our expectations towards our suppliers regarding ‘governance aspects’ through our Responsible Procurement Function incl. external ESG supplier assessment and our Business Partner Code of Conduct. <i>Operating guidelines</i> Global guidelines and requirements are defined in several policies which are subject to mandatory compliance trainings (see above). Reference to publicly available documents: - STADA Sustainability Report 2025 - STADA Code of Conduct - Global Sustainability Policy
<u>Political Involvement Policy</u>	The Global STADA Sustainability Policy and STADA Code of Conduct provide the overall ESG framework and include explicit commitments regarding all relevant aspects of business ethics. In line with its corporate purpose “Caring for People’s Health as a Trusted Partner” STADA takes its role serious to contribute to the provision of public healthcare services. STADA representatives participate with the approval of senior management in a moderate way in the political discourse on healthcare topics such as ensuring stable supply chains and the availability of important active pharmaceutical ingredients. In Germany, the relevant companies are registered in the German lobby register e.g. as some colleagues occasionally take part in political events of the German Federal Ministry of Health. (see https://www.lobbyregister.bundestag.de) There are industry association memberships of STADA on Europe and country level e.g. MfE (Europe level) and in Germany BAH (Bundesverband der Arzneimittelhersteller e.V.), "Pro Generika e.V." and the working group "Arbeitsgemeinschaft Pro Biosimilars c/o Pro Generika e.V.". As part of our membership of MfE – we are also subject to the MfE association Code of Conduct and we are disclosing transparency data accordingly (see Compliance - Company STADA) Internal policies are regulating the process of political involvement and involvement. Our Business Partner Code of Conduct is specifying our requirements for our suppliers in terms of business integrity (referring to the UN Convention against Corruption') Reference to publicly available documents: - STADA Sustainability Report 2025 - STADA Code of Conduct

	- Global Sustainability Policy
<u>Lobbying and Political Expenses</u>	The Global STADA Sustainability Policy and STADA Code of Conduct provide the overall ESG framework and include explicit commitments regarding all relevant aspects of business ethics (see page 6 Governance, compliance and ethical commitments and the sub-elements. STADA has not done any political contributions. Any contributions have high approval requirements and always require the prior approval of the CEO as well as of our shareholder Nidda This topic is also elaborated in STADA's Sustainability Report 2025 (ESRS G1 – Business Conduct). STADA is reporting on its company webpage in accordance with the Medicines of Europe Code of Conduct (e.g 2023) (see Compliance - Company STADA).
Supplier Environmental Policy	'Responsible Procurement' is one of our seven strategic sustainability program area. It consolidates our efforts in supplier selection and relationship management and is managed by the Responsible Procurement function which is integral part of Global Procurement (Sustainability Report 2025, S2 and G1). Aligned with the corresponding procurement policies, we aim to exert a positive influence on environmental and social matters across our global value chains and thus minimize our own business risks within the supply chain in terms of efficient, reliable, and risk-diversified supply. Our dedicated Responsible Procurement function defines and steers STADA's sustainable procurement practices as part of the Global Procurement function, supported by other departments such as Sustainability, Legal and Compliance, and Culture & People. The governance of Responsible Procurement is overseen by a dedicated Steering Committee, headed by the Global Head of Procurement and the Head of Sustainability, with participation from Legal and Compliance, Country Procurement Heads and Category Leaders. The Steering Committee meets every two months to monitor progress against defined objectives, review updates on key initiatives, and address identified risks in the supply chain. In addition, training sessions on Responsible Procurement processes are organized for the procurement organization to support consistent implementation and continuous capability building. The Global Responsible Procurement Policy outlines STADA's internal principles and processes for the selection, evaluation, and management of supplier relationships, with a strong focus on ESG aspects. The Direct Procurement Policy and Indirect Procurement Policy establish the core guidelines for purchasing and contract management, covering product-related goods and services and business operations-related goods and services, respectively The Policy for Responsible Procurement defines our approach to engaging with suppliers and sets out our expectations for suppliers to contribute to environmental protection in line with STADA's ESG commitments. This includes the efficient use of natural resources and measures to prevent waste, such as the application of circular economy principles. As part of 'Responsible Procurement' function we have the STADA Business Partner Code of Conduct in place – which is addressing all requirements following the German Supply Chain Act and regarding environmental topics – for reference Sustainability Report 2025 – ESRS S2 Workers in the Value Chain; G1 Ethical Business Conduct <i>Engagement with suppliers to improve env. performance:</i>

	We engage via our suppliers in this respect through the EcoVadis supplier assessments and follow up / improvement plans as well as through our engagement in industry associations as PSCI and RHI <i>Policy addressing product related requirements</i> This is addressed via our 'Sustainable Packaging' function which is engaging with our suppliers (e.g. CMOs) – Sustainability Report 2025 (ESRS E5 – Circular Economy) Our Business Partner Code of Conduct specifies our requirements / expectation regarding product env. aspects in section 4.1 <i>Policy addressing process related requirements</i> Our Business Partner Code of Conduct specifies our requirements / expectation regarding product env. aspects for 'Environmental Protection' <i>Policy or initiatives addressing office products</i> Office products are handled by our 'Indirect Procurement' function which is integral part of our 'responsible procurement processes' meaning that our Business Partner Code of Conduct with its environment-related requirements applies also for our office material related products. Reference to publicly available documents: - STADA Sustainability Report 2025 - STADA Code of Conduct - Global Sustainability Policy
Scope of Social Supplier Standards	As part of 'Responsible Procurement' function we have the STADA Business Partner Code of Conduct in place – which is addressing all requirements following the German Supply Chain Act and regarding environmental topics – please also refer to our Sustainability Report 2025 – ESRS S2 and G1. Our Business Partner Code of Conduct addresses the different topics as followed: 1. Health & Safety 2. Freedom of association and the right to collective bargaining 3. Force Labour: 2.1 (2) Freely Chosen Employment 4. Acceptable Living Conditions 5. Minimum living wages 6. Corporal punishment/ disciplinary practices 7. Child labor 8. Non-discrimination Maximum working hours: We have developed and issued publically our Human Right Statement in line with Germany Supply Chain Act – also describing our approach towards social supplier audits (Supply Chain Act STADA).

	stada human rights statement lksg dec 2023.pdf Reference to publicly available documents: - STADA Sustainability Report 2025 - STADA Code of Conduct - Global Sustainability Policy - Statement oof principles on STADA Human Rights stada human rights statement lksg dec 2023.pdf
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