

Title: Environmental Policy

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1 INTRODUCTION

At Sobi, we refuse to accept the status quo. Our vision is to be recognised as a global leader in providing access to innovative treatments that transform the lives of individuals with rare diseases. This ambition also involves showing leadership in areas of some of today's most pressing environmental challenges, such as global climate change. This policy supports us by serving as a guide to how we should prioritise our efforts.

This policy and these commitments are also part of Sobi's contribution to achieving the Sustainable Development Goals within Agenda 2030, adopted by the UN General Assembly.

As a signatory to the UN Global Compact since 2017, we actively support the environmental principles and conduct our business in a manner that is consistent with the principles of the Global Compact.

The policy establishes a framework for our environmental management, which is approved by the Chief Executive Officer and based, but not certified, on the ISO 14001 standard. Every employee therefore needs to be familiar with it.

2 PURPOSE AND SCOPE

The policy is a complement to the Sobi Code of Conduct and states the basic principles for managing environmental issues within all Sobi operations and Sobi's sphere of influence.

The environmental policy is implemented through our environmental management system, and applies to all parts of the company, including affiliates and subsidiaries. Compliance is measured by following up key performance indicators and the policy is subject to regular review to ensure that it adds value to the business and our stakeholders.

2.1 Environmental responsibility

Protection of the environment is a precondition for sustainable development, and environmental responsibility is part of Sobi's Sustainability strategy. In its activities worldwide, Sobi is committed to complying with applicable laws and regulations where Sobi operates and to implement relevant environmental requirements and best practices.

Sobi will strive to improve its environmental performance as well as the performance of others within the company's sphere of influence. By this we mean protection of land, water, air, natural resources and biodiversity. As an effect of Sobi's business model, part of Sobi's environmental impact is through sourced activities: active engagement with our suppliers and partners is therefore essential for decreasing our environmental footprint.

Sobi recognises the potential impact of pharmaceutical substances in the environment. Sobi will take actions to assess, disclose and minimise the environmental impact of activities and products over their lifecycle.

Sobi will perform appropriate due diligence when selecting partners, suppliers and contractors as well, in evaluating potential business acquisitions, to minimise the risk of contracting/acquiring operations that are not compliant with Sobi's objectives and/or policies.

2.2 All employees

Employees at all levels of the organisation must take responsibility for environmental issues over which they have control. Each employee is responsible for preventing and reporting dangerous situations that could harm the environment; to reduce environmental impact where possible and to suggest ways to do so; and to report deviations from this policy.

2.3 Managers

The Chief Executive Officer has overall responsibility for the environmental issues covered by this policy. Delegation shall be in writing.

Management at all levels must take overall responsibility for developing, leading and promoting a culture in the organisation that enhances environmental performance.

2.4 Partners

Sobi expects that suppliers and partners consider environmental and energy aspects of their operations; this is stipulated in Sobi's Partner Code of Conduct. Sobi will select partners with consideration to their capability to run environmentally responsible operations. Sobi will conduct screening of environmental management and collect performance data on key suppliers as defined by the requirements in the Procurement policy

3 PRINCIPLES

3.1 Environmental management

At Sobi we manage our impact by setting and measuring progress against targets, our Code of Conduct, our Environmental Policy and our core values. It is our everyday behaviour and achievements that matter the most in shaping the future. We therefore:

- Aim to have a good understanding of our own environmental risks and challenges, and the environmental impacts caused by our operations, including those of our partners on behalf of Sobi.

- Manage and follow up our environmental impact and performance across our activities and products, both from local and global perspectives. Through continuous improvements, we will reduce the impact of our operations on the ecosystem.
- Take appropriate risk reduction/mitigation measures, and be open and objective in reporting about our environmental performance to our employees, stakeholders and authorities.
- Set goals and targets for environmental performance in alignment with internal and external expectations and requirements.
- Work according to the precautionary principle so that damage to the environment is prevented.
- Meet all relevant environmental standards and applicable laws in the countries where Sobi operates.
- Educate, train and inspire Sobi's employees to act in an environmentally responsible way.

3.2 Climate impact and risks

As a global company with both colleagues, business and operations around the world, we manage our impact on the climate by:

- Replacing the use of non-renewable energy resources with more sustainable alternatives when possible. This includes the sources of energy used in facilities and offices.
- Constantly striving to use energy efficiently and responsibly with the aim of reducing the amount of greenhouse gases emitted. This approach should be integrated into business operations and management.

Sobi will strive to understand the climate-related risks including financial or strategic impact within the scope of the company's influence and value chain in order to manage, evaluate and reduce risks proactively.

3.3 Waste, water and resources

The production processes of Sobi's products require both water and chemicals to varying extents. Waste is generated in the end-to-end supply chain process. Therefore, to minimise the ecological footprint and preserve biodiversity, Sobi should:

- Strive first and foremost towards a circular waste model and secondly work with a waste hierarchy. This means that the amount of waste should first be reduced and secondly the waste should be reused if possible.
- Sobi will take proper producer responsibility for its products' life cycles.
- Work actively to exclude or limit the use of hazardous chemicals and materials, and ensure proper handling, including storage, transportation and disposal, to eliminate the environmental impact. When there are uncertainties regarding the negative environmental impact, Sobi will adopt a precautionary approach and avoid using the materials or processes if possible.

- Prevent pollution in preference to mitigating the impact, both from a local and a global perspective.
- Constantly strive to use water and materials efficiently and responsibly, with a focus on implementing conservation, reuse and recycling practices where possible.

3.4 Governance

The Board of Directors oversees management's role in ensuring that Sobi's environmental commitment is communicated and met across the Group in a responsible and sustainable manner.

The Environmental organisation is responsible for setting the environmental agenda, recommending policy decisions, and monitoring and following up the development of Sobi's environmental priorities. This includes consistent development and implementation of this Policy across the group, initiating an annual review and reporting on progress. This is done in line with the sustainability agenda.

The Head of each Business Unit or Group Staff Function is responsible for ensuring that activities are carried out in accordance with this Policy.

3.5 Reporting and Disclosure

Environmental reporting helps create awareness of the issues and provides management with the possibility to track performance in terms of agreed goals. Sobi will report publicly on the Company's environmental performance on at least an annual basis. The annual reporting will be finalised in conjunction with the Annual and Sustainability Report. Other external reports follow each Business Unit's reporting procedures

4 CHANGE HISTORY

New policy (replaces POL-216-312 "Environment, Health and Safety Policy").