

Sobi Environmental policy

Global policy for Swedish Orphan Biovitrum Group



Version 2.0

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Introduction

Sobi's vision to transform everyday life for people living with rare diseases is supported by our ambition to always act responsibly. This ambition involves showing leadership in areas of some of today's most pressing environmental challenges, such as global climate change, usage of resources, and degradation of the physical environment. This policy supports us by serving as a guide to how we should prioritise our efforts.

This policy establishes a framework which is approved by the Chief Executive Officer. It translates Sobi's vision and environmental commitments into a set of principles that shall guide our everyday decisions and behaviours. Every employee needs to be familiar with it.

1. Purpose

The Sobi Environmental policy complements the Sobi Code of Conduct and establishes core principles for how Sobi views environmental matters and how we manage environmental matters over which Sobi has control or influence through our decisions. It serves as a guide to how we should prioritise our efforts.

This policy and commitments are also part of Sobi's contribution to achieving 2030 Agenda for Sustainable Development as expressed by the Sustainable Development Goals (SDGs) and the Paris Agreement.

As a signatory to the UN Global Compact (UNGC) since 2017, we actively support its environmental principles and conduct our business in a manner that is consistent with the principles of the Global Compact. The Environmental policy is built around the UNGC principles of a precautionary approach, promoting increased environmental responsibility and encouraging development and implementation of technologies with a smaller environmental impact.

2. Scope

The Environmental policy applies to everyone employed by Sobi and to individuals integrated into Sobi's workforce or otherwise operate under its direction. It applies to all parts of the company, including all Sobi operations, affiliates and subsidiaries, as well as the parts of our value chain that we can influence. Its principles aim to cover all stages of our products' lifecycle.

The environmental policy is implemented through our sustainability governance structure, our sustainability strategy, the objectives and targets set and materiality and risk processes. Compliance is measured by following up key performance indicators.

3. 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, a significant portion of Sobi's environmental impact arises from outsourced activities, making active engagement in the value chain, primarily with suppliers and partners essential to reducing our environmental footprint. Our expectations of suppliers and partners are further detailed in the Sobi Partner Code of Conduct.

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.

4. Roles and responsibilities

All employees and people acting on Sobi's behalf must be familiar with this policy and perform their duties in accordance with the principles it establishes.

4.1 All employees

All employees at all levels of the organization are responsible for environmental matters within their control. Everyone should:

- Identify and report environmental risks or dangerous situations to prevent negative impacts.
- Take action to reduce environmental impact where possible.
- Suggest improvements to environmental practices.
- Report any deviations from this policy.

4.2 Managers

The Chief Executive Officer has overall responsibility for the environmental matters covered by this policy.

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

4.3 Partners

Sobi expects that suppliers and partners consider and manage all relevant environmental 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. To determine this, Sobi will conduct screening of environmental management as defined by the requirements in the Procurement policy and collect performance data on key suppliers.

Sobi will conduct appropriate environmental due diligence when selecting partners, suppliers and contractors to minimize the risk of non-compliance with Sobi's environmental policies and objectives in key areas such as energy, emissions, water and resource use. Due diligence evaluations will also guide potential business acquisitions.

5. Principles

5.1 Environmental management

At Sobi we take responsibility for our impact and ensure that we manage it by setting ambitions and measuring progress against targets, our Code of Conduct, our Environmental Policy and our core values. The manner in which we conduct our daily work, and the outcomes we achieve, is fundamental to shaping the company's future.

We therefore:

- Work to ascertain that we have a good understanding of environmental risks and impacts in our operations or value chain, caused or contributed to by decisions that we make.
- Manage and follow up on our environmental impact and performance across our activities and products and through continuous improvements, aim to reduce the impact of our activities on the ecosystem.
- Set objectives 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.

5.2 Energy and climate

Sobi is committed to contributing to addressing climate change. As a global company with both colleagues, business and operations around the world, we strive to minimize our impact on the climate by:

- Replacing Sobi's use of fossil and non-renewable energy and technology with more sustainable and renewable alternatives wherever possible. This includes energy used in facilities and offices as well as the company's car fleet.
- Constantly striving to use energy efficiently and responsibly within Sobi with the aim of reducing consumption and the amount of greenhouse gases emitted.
- Engaging with suppliers and partners to encourage and support the transition to fossil-free and renewable energy and improved energy efficiency in Sobi's value chain.

This approach is integrated into business operations and management through our SBTi approved climate targets.

Sobi regularly assesses climate-related risks and opportunities, including financial or strategic impact connected to Sobi operations and relevant parts of the value chain to reduce or manage risks proactively and make use of opportunities.

5.3 Resources and circularity

As a provider of medicines to a global market, Sobi is associated with activities which require the use of resources and generate waste.

Sobi actively works to decrease impact from use of resources through reducing resource consumption, enhancing operational, and moving towards circular principles.

5.3.1 Materials

Sobi commits to the following principles:

- Constantly striving to use materials efficiently and responsibly, with a focus on reducing total amounts, shifting to renewable alternatives where possible and logical, and promoting reuse and recycling practices where possible.

5.3.2 Chemicals

Sobi commits to the following principles.

- Assessing the impact of substances used in operations and value chain and applying a proactive and precautionary approach, implementing more sustainable alternatives where possible,
- Working actively to exclude or limit the use of hazardous and restricted chemicals and materials and ensure proper handling to eliminate the environmental impact. Preventing pollution is always preferred to mitigating the impact.

5.3.3 Water

Water is a critical resource for the development and manufacturing of most pharmaceutical products. Sobi commits to the following principles:

- Recognising water as a shared critical resource, requiring protection and conservation.
- Paying special attention to geographies experiencing water scarcity or water stress and integrating these considerations into our planning and decision-making.
- Constantly striving to use water efficiently and responsibly in our own operations as well as any activity where we are responsible. This includes striving for more efficient processes.
- Working to prevent any potential release of harmful wastewater, including active pharmaceutical ingredients, and committing to securing proper treatment.

5.3.4 Waste

Sobi applies a circular waste strategy and a waste hierarchy.

Sobi commits to the following principles:

- Prioritising the prevention of waste generation and reduction of waste, with reuse as a second alternative where possible.
- Working to ascertain that all harmful waste, including wastewater, emissions, and active pharmaceutical ingredients are treated properly.
- Assuming proper producer responsibility for its products over their life cycle.

5.4 Biodiversity

Sobi commits to the following principles:

- Working to protect and conserve biodiversity by identifying, assessing and mitigating risks to species, habitats and ecosystems connected to Sobi's value chain, applying a precautionary approach where uncertainties exist.
- Working to ensure responsible use of biological and genetic resources, and to support compliance with international biodiversity frameworks.

6. Governance

The Board of Directors has overall responsibility for Sobi's environmental performance. It oversees strategy and monitors compliance, performance and risk management.

The CEO and the executive management team manage the implementation of the sustainability strategy. The Sobi Sustainability committee assesses and processes sustainability matters and monitors overall progress.

The Sustainability team is responsible for monitoring the development of Sobi's sustainability priorities, defining the environmental agenda, and recommending policy decisions. The sustainability team works to ensure the consistent development and implementation of this policy across the company and reports on progress to senior management.

The head of each business unit or group staff function is responsible for ensuring that activities are carried out in accordance with this policy.

7. Training

Sobi's employees are trained in the content of this policy on a regular basis. Environmental matters relevant to Sobi, as well as ambitions and objectives are communicated to all employees as part of regular sustainability training.

Employees with specific responsibilities are provided with further training according to their role.

8. Disclosure, reporting and communication

Reporting helps create awareness and knowledge on environmental matters and provides necessary information to monitor performance.

Sobi commits to transparent and objective reporting about our environmental performance to our employees, stakeholders, and authorities.

Sobi reports annually on its material environmental matters, governance, targets, actions and progress in the statutory Annual and Sustainability report. Other external reporting is done according to specific or local statutory requirements. Information is also regularly shared with stakeholders as well as on the company's website.

9. Change history

The policy is subject to regular review to ensure that it adds value to the business and our stakeholders.

V2 was published in 2026.

V1 was published in 2023 and replaced POL-216-312 “Environment, Health and Safety Policy”.

10. Linked policies and documents

Code of Conduct, VV-QUAL-POL-00029

Partner Code of Conduct, VV-QUAL-POL-00087

Procurement policy, VV-QUAL-POL-00007