

Human rights statement

Swedish Orphan Biovitrum Group

Approved by Sobi's Board of Directors
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1. Introduction

At Sobi, we are dedicated to transforming the lives of individuals living with rare diseases. Through our innovative therapies and unwavering commitment to patient care, we deliver life-saving medicines that address critical unmet medical needs. Our work not only improves the quality of life for patients but also supports their families and communities.

We recognise our responsibility to uphold high ethical and human rights standards in all aspects of our operations and sphere of influence. We always consider the impact of our activities and decisions on the people working for Sobi and on those around us and we aim to conduct our business in a way that does not lead to any harm to people, whether potentially influenced by our operations, partners, or related activities.

Our statement on human rights is based on the principles of the United Nations Guiding Principles on Business and Human Rights as well as the OECD Guidelines for Multinational Enterprises and considers evolving legislative requirements applicable to Sobi. We recognise our responsibility to respect and promote human rights throughout our value chain and are dedicated to implementing effective remediation and grievance mechanisms.

This position statement is a complement to the Sobi Code of Conduct, the Sobi Health and Safety Policy, the Environmental Policy and the Anti-bribery and Anti-corruption Policy, intended to summarise Sobi's principles, processes and governance mechanisms for issues specifically connected to human rights.

2. Principles

2.1 Respect for human rights

- We are committed to respecting all internationally recognised human rights as set out in the International Bill of Human Rights and the International Labour Organization's Declaration on Fundamental Principles and Rights at Work.
- We work with the aim to assure that our operations, or activities in which we are involved, do not impact negatively or infringe on the human rights of our employees, or people at contractors, suppliers, and communities.

2.2 Sobi's main human rights topics

- **Patient safety and patients' rights:** Safeguarding the health and safety as well as the rights of the patients that are or may be treated with our medicines is our most important obligation and our top priority. Patients as a group have special needs that must be respected, such as the right to transparent information, patient autonomy and personal integrity.
- **Labour rights:** We uphold the rights of workers, including freedom of association, the right to collective bargaining, elimination of forced or compulsory labor, abolition of child labour, and elimination of discrimination in respect of employment and occupation.
- **Health and safety:** We strive to always maintain a safe and healthy working environment for all employees and contractors, using a proactive and precautionary approach.
- **Non-discrimination and inclusion:** We promote fairness and inclusion, and prohibit discrimination based on race, color, sex, language, religion, political or other opinion, national or social origin, property, birth, or any other legally protected status.
- **Privacy:** We respect the privacy rights of our patients, employees, customers, and other stakeholders, and protect personal data in accordance with applicable laws and regulations.

- **Community impact:** We assess and manage the impact of our operations or activities on patient communities, ensuring that we contribute positively and that we act ethically in all situations. Our activities shall not impact negatively on local communities.
- **Anti-trafficking:** We are committed to working towards preventing and if needed addressing any form of human trafficking and modern slavery within our operations and supply chains. We aim to ensure that our business practices do not contribute to such activities.

2.3 Due diligence

We commit to regular risk-based assessments to identify, prevent and mitigate potential material negative impact on human rights.

- Our processes for these assessments are integrated into decision-making processes in relevant functions and include assessing actual and potential human rights impacts, as well as tracking the actions taken and their effectiveness.
- Our processes are based on the best understanding we have of inherent risks for human rights impacts and are limited by our ability to gain insight into events or conditions along our value chain, as well as our degree of control or influence.

2.4 Remediation and grievance mechanisms

Sobi has established grievance mechanisms accessible for stakeholders to raise concerns, and we aim to address adverse human rights impacts identified. These mechanisms should be equitable and a source of continuous learning. Employees as well as business partners are encouraged to speak up if they believe in good faith that misconduct has occurred. The Sobi Compliance Hotline is available for everyone internally and externally.

We are committed to providing appropriate remediation for any adverse human rights impacts for which we are accountable.

Grievances should be addressed promptly and fairly, and we are committed to engaging in dialogue with affected stakeholders to resolve issues.

2.5 Stakeholder engagement

We engage with stakeholders, including employees, suppliers, customers, and communities, to understand their perspectives and concerns, as part of our daily work or recurring materiality assessments. These dialogues include material human rights.

We collaborate with industry peers, civil society organisations, and other relevant stakeholders to promote and uphold human rights standards.

2.6 Training and awareness

We provide training for our employees and engage in awareness-building dialogue with our business partners to ensure they understand and can act in alignment with our commitments.

We promote a culture of respect for human rights within our organisation and towards our value chain.

3. Governance

- Sobi’s statement on human rights is overseen by our Board of Directors in dialogue with Sobi’s senior management. This facilitates the integration of human rights considerations in corporate strategy and decision-making processes.
- The implementation of these principles is the responsibility of our Sustainability steering committee, which includes representatives from key business functions such as Human Resources, Legal, Compliance, and Sustainability as well as executive level decision-makers.
- The Sustainability steering committee reports to the Board of Directors on the progress and effectiveness of our human rights initiatives.
- We regularly report on our human rights performance as part of our annual and sustainability report, including the outcomes and effectiveness of our due diligence activities and grievance mechanisms.
- We are committed to continuous improvement and will review and update this statement as necessary to reflect evolving human rights standards and best practices.

4. Conclusion

At Sobi we believe that respecting and promoting human rights is fundamental to our mission and values. We are dedicated to ensuring that our business practices contribute to the well-being and dignity of all individuals affected by our operations.

We support the Political Declaration on Universal Health Coverage (UHC) adopted by the UN member states and we recognise the special needs of the rare disease community as mentioned in the UHC declaration.

“It is the right of every human being, without distinction of any kind, to enjoy the highest attainable standard of physical and mental health.”

– Political Declaration on Universal Health Coverage (UHC)

5. Related policies

Sobi Code of Conduct

Policy on Healthcare Interactions

Health & Safety policy

Environmental policy

Partner Code of Conduct

6. Change history

This is Sobi’s first human rights statement.

7. Terminology and definitions

<p>Due diligence</p>	<p>The investigation or exercise of care that a business or person is normally expected to take before entering into an agreement or contract with another party.</p> <p>In the context of human rights, ‘due diligence’ is used as an umbrella to describe the steps and processes by which a company understands, monitors and mitigates its human rights impacts.</p> <p>The UN has formalised guidelines for human rights due diligence.</p>
<p>Grievance mechanisms</p>	<p>A formal process for addressing and resolving complaints, often in the context of a business’ or organisation’s activities, if there is suspicion of negative impact to individuals, communities, or employees.</p>
<p>Human rights</p>	<p>Fundamental freedoms and protections inherent to every human being, regardless of their race, sex, nationality, religion, or any other status. They are universal and apply to everyone from birth until death. These rights include civil, political, economic, social, and cultural rights, such as the right to life and liberty, freedom from torture and slavery, the right to education and work, and freedom of expression and peaceful assembly. Human rights are often protected by national and international laws.</p>
<p>International Bill of Human Rights</p>	<p>The International Bill of Human Rights is a foundational set of international laws that establishes universal human rights standards, comprising the Universal Declaration of Human Rights (UDHR) and the two legally binding treaties, the International Covenant on Civil and Political Rights (ICCPR) and the International Covenant on Economic, Social and Cultural Rights (ICESCR).</p>
<p>International Labour Organization’s Declaration on Fundamental Principles and Rights at Work</p>	<p>Statement by the International Labour Organisation of 1998, amended in 2022, outlining the obligations of members to respect, promote and realise the principles concerning fundamental rights outlined in their core conventions. These conventions cover collective bargaining, forced labour, child labour, discrimination and occupational health and safety.</p>
<p>Modern slavery</p>	<p>The exploitation of an individual by others for personal or commercial gain. Modern slavery refers to both human trafficking and slavery, servitude, and forced or compulsory labour. Many countries have during the last decade introduced legislation to fight modern slavery including requirements for companies to report on their supply chains, implement due diligence, and take steps to prevent forced labour.</p>
<p>OECD Guidelines for Multinational Enterprises</p>	<p>Recommendations jointly addressed by governments to multinational enterprises to enhance the business contribution to sustainable development and address adverse impacts associated with business activities on people, planet, and society. The guidelines were first introduced in 1976 and have been updated several times.</p>
<p>Privacy</p>	<p>The right to privacy is a fundamental human right ensuring freedom from arbitrary or unlawful interference with one’s personal life, family, home, and communications, and includes the right to control personal information. It is recognised in international law, like Article 12 of the Universal Declaration of Human Rights and is considered a prerequisite for other rights, such as freedom of expression and thought.</p>
<p>Remediation</p>	<p>The process of improving or correcting a situation. In the context of human rights, it aims to restore individuals or groups to the position they would have been in had the violation not occurred. A remedy can take various forms, such as apologies, rehabilitation, restitution, compensation (financial or non-financial), and guarantees of non-repetition.</p>

Trafficking (human)	The act of recruiting, transporting, transferring, harbouring, or receiving individuals through force, fraud, or coercion for the purpose of exploitation. This exploitation may include forced labour, sexual slavery or other forms of commercial sexual exploitation. See also modern slavery.
United Nations Guiding Principles on Business and Human Rights	An instrument consisting of 31 principles implementing the UN's "Protect, Respect and Remedy" framework on the topic of human rights and transnational corporations and other business enterprises. These guiding principles provide the most internationally accepted framework for enhancing standards and practice regarding business and human rights, also influencing national legislation.

8. Appendix

Sobi supports the following frameworks and has taken the content into account when developing its Human rights statement.

International Bill of Human rights

Consisting of:

- **Universal Declaration of Human rights (UDHR)**. Outlines fundamental human rights that are universally protected, such as the right to life, freedom of expression, equality, and freedom from discrimination.
- **International Covenant on Economic, Social and Cultural rights (ICESCR)**
- **International Covenant on Civil and Political Rights (ICCPR)**

International Labour Organization (ILO) Conventions

Conventions addressing labour rights, eg:

- **ILO Convention No. 87**: freedom of association and protection of the right to organise.
- **ILO Convention No. 98**: right to organise and collective bargaining.
- **ILO Convention No. 29 and No. 105**: elimination of forced labour.
- **ILO Convention No. 138 and No. 182**: minimum age and elimination of child labour.
- **ILO Convention No. 100 and No. 111**: equal remuneration and non-discrimination.