



Sustainability Policy

2025

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INTRODUCTION

At the Axxam Group, sustainability is a fundamental part of how we operate and make decisions. We are committed to advancing our mission in the life sciences while ensuring that our growth and innovation go hand in hand with environmental and social responsibility, coupled with strong governance practices. By embedding these principles into our operations, we aim to create long-term value for our stakeholders and contribute positively to the ecosystems in which we operate.

Our approach is structured around three core sustainability pillars:

- **Protecting the planet:** We aim to contribute to global climate goals by aligning our operations with a sustainable, low-impact future.
- **Supporting our workforce and communities:** We are committed to fostering a safe, inclusive, and empowering workplace for our workforce while actively supporting our local communities.
- **Acting with integrity:** We uphold the highest standards of ethics, transparency, and accountability, ensuring that our decisions are guided by fairness, compliance, and strong governance practices.

PURPOSE OF THE POLICY

This Policy sets the foundation for how we manage our operations, supply chain and stakeholder engagement to ensure lasting positive impact for society and the planet. This document provides a framework that defines the principles behind our commitments.

SCOPE

This Policy covers Axxam Group's direct operations across all functions and employees. Axxam Group also seeks to promote alignment with these principles among suppliers, partners, and other stakeholders in the value chain.

SUSTAINABILITY PILLARS

A. PROTECTING THE PLANET

Our focus areas:

Climate resilience and carbon reduction

Axxam Group recognizes the urgent global challenge of climate change and is committed to minimising its carbon footprint across all activities. We aim to contribute to global efforts to limit warming while ensuring resilience in our operations. We also focus on building long-term climate resilience by anticipating risks and strengthening our adaptive capacity across our organization.

Resource management and efficiency

Responsible use of resources and effective waste management are central to Axxam Group's commitment to sustainability. We aim to minimise waste generation through efficient processes and sustainable practices, while ensuring the safe management of all materials, including hazardous substances. By promoting reduction, reuse, and recycling, we seek to limit environmental impacts and contribute to a more circular approach across our operations and value chain.

Axxam Group is committed to managing energy responsibly by seeking efficiency improvements and considering sustainable technologies where feasible, with the objective of reducing overall consumption across its operations. We will continue to explore opportunities to encourage energy-conscious practices throughout the organization and all our sites.

Biodiversity and ecosystem preservation

Although Axxam Group's direct impact on ecosystems is limited, we recognize our responsibility to preserve biodiversity and natural capital as part of global environmental stewardship. By integrating biodiversity considerations into decision making, we aim to safeguard natural capital.

Our commitments:

- Measure our Scope 1 and 2 emissions on an annual basis and implement measures to maintain our minimal impact.
- Measure our Scope 3 emissions annually and aim to reduce our footprint associated with our value chain.
- Seek opportunities to improve efficiency in the facilities we operate in and maintain safe handling of hazardous materials.
- Collaborate with building managers of the lenders to explore options and encourage renewable energy adoption and involve the organization to implement low-carbon solutions across operations.
- Protect natural ecosystems by avoiding environmental degradation and integrating biodiversity considerations into business decisions.
- Aim to set targets for reducing environmental impacts in line with evolving best practices.

The Policy is aligned with existing policy documents at Axxam Group, ensuring consistency across our organization. This Policy's principles, complement those outlined in the following documents:

- Code of Conduct
- Code of Conduct for Sustainable Procurement
- Biodiversity Policy
- Health, Safety and Environment Policy
- Standard Operating Procedures (SOP)
- Standard Safety Procedures (SSP)
- Integrated Management Systems
- Organizational Model ex Italian Legislative Decree 231/2001

B. SUPPORTING OUR WORKFORCE AND COMMUNITIES

Our focus areas:

Talent attraction and retention

Commitment to attracting, developing, and retaining talent is central to fostering an environment where people can grow and thrive. We aim to emphasise continuous learning and professional development to strengthen skills that support both individual achievement and organizational success. Investing in our employees fosters personal growth and fulfilment while strengthening long-term resilience.

Workplace health, safety and wellbeing

Axxam Group places high importance on the health, safety, and well-being of its employees. We are committed to ensuring safe workplaces and protecting physical health. Equally, we recognise the importance of mental health and are dedicated to fostering a supportive culture with access to appropriate resources. By addressing both physical and mental aspects of well-being, we aim to provide an environment where our employees can thrive.

Diversity and inclusion

Axxam Group is committed to fostering a culture built on respect and equal opportunities, where all individuals feel valued and able to contribute. Through this approach, we aim to ensure a culture of fairness and collaboration across the organization.

Our commitments:

- Strive to strengthen opportunities for growth by expanding training programs that enhance employee skills, support career development, and build organizational capacity.
- Focus on maintaining high standards of health and safety while also fostering mental well-being.
- Promote diversity and fairness through recruitment and retention initiatives, with particular emphasis on achieving greater gender balance.
- Aim to cultivate a culture of belonging and shared responsibility that empowers employees to contribute meaningfully.

The Policy is aligned with existing policy documents at Axxam Group, ensuring consistency across our organization. This Policy's principles, complement those outlined in the following documents:

- Code of Conduct
- Gender Equality Policy
- Human Resources Policy

- Health, Safety and Environment Policy
 - Standard Operating Procedures (SOP)
 - Standard Safety Procedures (SSP)
 - Integrated Management Systems
 - UNI/PdR 125:2022
- Organizational Model ex Italian Legislative Decree 231/2001

C. ACTING WITH INTEGRITY

Our focus areas:

Anti-bribery and anti-corruption

Relationships, whether internal or external, must avoid any discrimination based on age, sex, race, nationality, personal and social conditions, sexual orientation, religious or political beliefs. Axxam Group does not tolerate violations of this principle and discourages corruption practices in every way.

Axxam Group ensures that business is conducted in accordance with the principles of integrity and transparency. In particular, all transactions, negotiations and, in general, all conduct carried out in business practice must be based on the utmost fairness, with the exclusion of any phenomenon of corruption or favoritism, as well as the completeness and transparency of information and legitimacy, not only on a formal basis, in accordance with current regulations and internal procedures.

Axxam Group considers acts of corruption both illicit payments made directly to any subjects and/or entities or their employees, and those made to subjects acting on their behalf in Italy or abroad.

Human rights

We strictly prohibit all forms of discrimination, harassment, bullying, violence, and human rights abuses, ensuring that every individual is treated with fairness, dignity, and respect. We protect fundamental labour rights by providing fair and competitive wages, maintaining reasonable working hours, and ensuring safe, healthy, and inclusive working conditions. Our commitment also extends to respecting the rights and well-being of employees, customers, suppliers, and other stakeholders, fostering ethical and transparent relationships across our business ecosystem. Our approach is guided by internationally recognised frameworks, including the United Nations Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises, and the core conventions of the International Labour Organization (ILO).

Cyber security and data protection

Axxam Group recognizes that safeguarding data and digital infrastructure is essential to protecting our work and our stakeholders. We are committed to maintaining the highest standards of cybersecurity and data protection and privacy, by placing particular importance on protecting sensitive scientific and personal information. By embedding strong data governance practices, we ensure confidentiality and integrity across all our operations.

Our commitments:

- Reinforce a culture of integrity by offering continuous employee training on governance, ethics, and compliance.
- Continuously strengthen internal compliance procedures, aligning them with recognised frameworks and industry best practices, including the United Nations Global Compact (UNGC).
- Ensure confidential reporting options are available through anonymous whistleblower channels, fostering trust, accountability, and ethical openness across the organization.

The Policy is aligned with existing policy documents at Axxam Group, ensuring consistency across our organization. This Policy's principles, complement those outlined in the following documents:

- Code of Conduct
- Cybersecurity Policy
- Data Protection Policy
- Standard Operating Procedures (SOP)
- Standard Safety Procedures (SSP)
- Integrated Management Systems
- Organizational Model ex Italian Legislative Decree 231/2001 Whistleblowing Procedures

SUSTAINABILITY AWARENESS

All employees are expected to play an active role in supporting Axxam Group's sustainability commitments. Appropriate training and guidance will be provided to ensure that employees can perform their day-to-day operations safely and responsibly.

GOVERNANCE OF THE POLICY

Our commitment to sustainability is embedded in the company's governance framework. Clear roles and responsibilities ensure that sustainability is overseen at the highest level, regularly monitored, and consistently implemented across all operations.

- **Oversight and approval**
 - The Board of Directors have ultimate responsibility for endorsing the sustainability policy and ensuring it aligns with the company's strategic objectives.

- **Monitoring and review**
 - The ESG Committee monitors the implementation of the policy, tracks progress against sustainability goals, and reports regularly to the Board of Directors.
- **Implementation and adherence**
 - Site managers and all employees are responsible for integrating the policy into daily operations, complying with sustainability standards, and fostering a culture of continuous improvement.

REVIEW & APPROVAL PROCESS

Updates and revision process: Axxam Group will periodically review its processes and practices to track progress. Updates to the Policy may be introduced in response to regulatory changes, industry best practices or feedback from stakeholders.

Approval process: Any substantive revisions will require the Board of Directors' approval prior to adoption.