



Human Rights Policy

March 2026

1. Preamble

Axxam S.p.A. (hereinafter “Axxam” or “the Company”) is a Contract Research Organization headquartered in Bresso (Milan), dedicated to translating innovative biology into advanced drug discovery solutions. As a science driven organisation operating in pharmaceutical research and life sciences. Axxam recognises that scientific innovation carries responsibilities not only toward its clients, partners and employees, but also toward the individuals and communities who may ultimately benefit from the medicines and technologies it helps develop.

This Human Rights Policy (the “Policy”) sets out Axxam’s commitment to respect internationally recognised human rights across its operations and business relationships. The Company recognises that responsible scientific progress is closely connected to the protection of human dignity, including the right to safe and fair working conditions, the right to health, the protection of personal data and the preservation of a healthy environment.

Axxam’s mission to harness biology and support discovery is pursued within a framework of integrity, responsibility and respect for people. This Policy therefore establishes the principles and governance structures through which human rights considerations are integrated into the Company’s activities, including laboratory operations, employment practices, supply chain management, research collaboration, data governance and community engagement.

This Policy has been approved by the Board of Directors of Axxam S.p.A. and is effective as of March 2026. It complements the Company’s existing policies and governance instruments, including the HSE Policy, the Biodiversity Policy, the Sustainability Policy, the Data Protection and Cybersecurity Policy, the Environmental Social and Governance framework, the Gender Equality commitments, the Code of Ethics and the Whistleblowing Procedure.

In addition, the Company maintains an ISO Integrated Management System certified to internationally recognized standards. The following certifications are currently in place: (i) UNI EN ISO 9001:2015 (No. 83542) – Quality Management; (ii) UNI EN ISO 27001:2024 (No. 83543) – Information Security; (iii) ISO 45001 (No. 86352) – Occupational Health and Safety (certified July 2025). These certifications support the Company’s commitment to risk prevention, operational efficiency, and continuous improvement across its processes.

Finally, the Company has also adopted a Research Integrity Standard Operating Procedure (SOP) aligned with the European Code of Conduct for Research Integrity (2023) and the CNR Guidelines for Research Integrity. Such SOP establishes the principles and practices to ensure that all research activities are conducted with honesty, transparency, accountability, and respect, preventing scientific misconduct and promoting an ethical and trustworthy research environment.

2. Normative framework and guiding principles

Axxam's commitment to respecting human rights is grounded in internationally recognised standards and principles that define responsible business conduct. This Policy draws inspiration from, and is intended to be interpreted consistently with, the following international instruments and frameworks:

United Nations Instruments

- The Universal Declaration of Human Rights (UDHR), which establishes the foundational rights and freedoms to which all people are entitled.
- The United Nations Guiding Principles on Business and Human Rights (UNGPs), endorsed by the UN Human Rights Council, which articulate the 'Protect, Respect and Remedy' framework and constitute the primary international standard for corporate human rights responsibility.
- The International Covenant on Civil and Political Rights (ICCPR) and the International Covenant on Economic, Social and Cultural Rights (ICESCR), forming the International Bill of Human Rights.
- The UN Convention on the Rights of the Child (CRC) and the UN Children's Rights and Business Principles, which provide guidance on the responsibilities of companies in preventing adverse impacts on children.
- The UNESCO Universal Declaration on Bioethics and Human Rights, which provides ethical guidance relevant to research activities and the responsible conduct of scientific work.

International Labour Organisation Standards

- The ILO Declaration on Fundamental Principles and Rights at Work, which covers freedom of association, the right to collective bargaining, the elimination of forced and child labour, and the elimination of discrimination in employment and occupation.
- The ILO Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy, which provides guidance to companies on responsible employment practices and labour standards.

OECD & European Frameworks

- The OECD Guidelines for Multinational Enterprises on Responsible Business Conduct and the related guidance on due diligence for responsible business conduct.
- The European Convention on Human Rights (ECHR) and the Charter of Fundamental Rights of the European Union, which establish key rights protections within the European legal framework.
- Relevant European Union legislation and policy frameworks relating to corporate sustainability and due diligence, including the Corporate Sustainability Due Diligence Directive (CSDDD) as it becomes applicable.

Sector-Specific Standards

- Ethical principles governing biomedical and scientific research, including the Declaration of Helsinki of the World Medical Association.
- Relevant responsible business standards and industry guidance applicable to life sciences research and supply chains.

3. Scope of Application

This Policy applies across Axxam's operations and business relationships.

Internal scope

The Policy applies to:

- All employees of Axxam S.p.A., regardless of role, level, employment type or location, including permanent, fixed term, part time and apprenticeship contracts.
- Members of the Board of Directors, senior management and any internal governance or advisory bodies.
- Contractors, consultants, temporary workers and agency staff performing work on behalf of Axxam or operating on Axxam premises.

Business relationships

Axxam expects its suppliers, contractors and business partners to operate in a manner consistent with the principles reflected in this Policy. This expectation applies, where relevant, to:

- Suppliers and vendors providing goods or services to Axxam.
- Research collaborators, academic institutions and strategic partners.
- Other third parties whose activities may be linked to Axxam's operations, services or research activities.

Axxam seeks to promote responsible business conduct throughout its value chain through appropriate engagement, and regular assessment practices.

Geographic scope

This Policy applies to all facilities and operations of Axxam, including its primary operational site and any future offices, laboratories, subsidiaries, joint ventures or affiliated entities where Axxam exercises operational control or significant influence.

4. Axxam's Core Human Rights Commitments

4.1 Respect for Fundamental Labour Rights

Axxam recognises that its employees are central to the Company's scientific and operational excellence. The Company is committed to respecting internationally recognised labour rights and maintaining fair and responsible employment practices:

- Respecting freedom of association and the right of employees to organise, join trade unions and engage in collective bargaining in accordance with applicable labour laws.
- Providing fair and competitive remuneration and periodically reviewing compensation practices, including pay equity considerations, in order to identify and address potential disparities.
- Prohibiting all forms of forced labour and human trafficking within the Company's operations and seeking to prevent such practices within its supply chain.
- Maintaining a strict prohibition on child labour by verifying that all employees meet the minimum legal working age through recruitment and onboarding procedures.
- Respecting applicable legislation on working hours and ensuring that employees benefit from appropriate provisions related to rest periods, leave and work life balance.
- Maintaining fair, transparent and merit-based processes for recruitment, performance evaluation and career development.
- Supporting the professional development of employees through access to training, learning opportunities and scientific development programmes.

4.2 Diversity, Equity & Inclusion

As a holder of the UNI/PdR 125:2022 - Gender Equality Certification, Axxam maintains structured commitments to gender equality and extends this approach to broader dimensions of diversity and inclusion within the workplace:

- Promoting equal opportunity and preventing discrimination on the basis of gender, gender identity, sexual orientation, age, nationality, ethnic origin, religion, disability, pregnancy, parental status, political opinion or other legally protected characteristics.
- Aiming to maintain gender balance across all levels of the organisation through targeted recruitment, mentoring, and progression initiatives.
- Fostering a respectful and inclusive workplace environment in which employees feel able to contribute, raise concerns and express perspectives without fear of retaliation.
- Providing reasonable workplace accommodations for employees with disabilities in accordance with applicable legislation.

4.3 Occupational Health, Safety & Wellbeing

Axxam holds the ISO 45001 certification for Occupational Health and Safety Management and commits to going beyond regulatory compliance:

- Providing and maintaining safe, healthy and well-maintained working environments across laboratory, office and operational facilities.
- Conducting regular assessments of occupational risks, including chemical, biological, physical, ergonomic and psychosocial hazards associated with the Company's activities.
- Ensuring that employees receive appropriate health and safety training, including induction programmes for laboratory personnel and specialised instruction for work involving hazardous chemical or biological materials.
- Maintaining clear emergency procedures, incident reporting systems and near miss reporting processes designed to support transparency, learning and continuous improvement.
- Supporting employee wellbeing, including through initiatives that promote mental health awareness, respectful workplace behaviour and protection against harassment.
- Applying health and safety standards consistently across all categories of personnel, including employees, contractors and agency workers.

4.4 Right to Science and Access to Medicine

As a contract research organisation operating in early drug discovery, Axxam contributes to scientific activities that may support the development of future therapeutic solutions. The Company recognises the broader societal relevance of scientific progress, including its connection to the right to the highest attainable standard of health and the right to benefit from scientific advancement, as reflected in the International Covenant on Economic, Social and Cultural Rights:

- Supporting research initiatives that contribute to the advancement of therapeutic areas, including those addressing significant or unmet medical needs.
- Promoting responsible knowledge sharing and scientific collaboration, including the publication and dissemination of research findings where contractually permitted and consistent with client confidentiality obligations.
- Collaborating with academic institutions, foundations and relevant organisations in order to strengthen the connection between scientific research and the needs of patients and affected communities where appropriate.

4.5 Responsible Research & Bioethics

Axxam is proud to sit at the frontier of innovative biology. The Company's advanced research platforms represent not only scientific leadership, but a commitment to conducting discovery with the highest ethical standards. For Axxam, bioethics is a foundation of science, and a source of competitive strength.

- Maintaining the highest standards of scientific integrity across all research phases, with rigorous methodologies that reflect Axxam’s commitment to the patients and communities who may ultimately benefit from the scientific knowledge it helps generate.
- Advancing next generation research approaches through investment in innovative platforms that enhance scientific quality and efficiency, while integrating the principles of the 3Rs model, replacement, reduction and refinement, into research design and scientific practices.
- Embedding ethical reflection within scientific decision making so that, as Axxam’s research capabilities continue to evolve, they remain guided by the Company’s core values of care, responsibility, and respect for life.

4.6 Data Privacy & the Right to Information

Axxam holds ISO/IEC 27001 certification for Information Security Management. Consistent with its technical expertise and its obligations under EU General Data Protection Regulation (GDPR):

- Ensuring that personal data relating to employees, clients and business partners is collected, stored, processed and transferred in accordance with applicable data protection laws and internal data governance procedures.
- Maintaining appropriate technical and organisational safeguards to protect the integrity, confidentiality and availability of data, including proprietary scientific information entrusted to the Company by clients and partners.
- Respecting the rights of data subjects, including rights of access, rectification, erasure, portability and objection, and maintaining clear procedures through which these rights may be exercised.
- Ensuring that any workplace monitoring or data processing practices are conducted in a manner that respects privacy, proportionality and dignity at work.

4.7 Supply Chain & Third-Party Human Rights

Axxam recognises that adverse human rights impacts may arise not only within its own operations but also through its business relationships. In line with the UN Guiding Principles on Business and Human Rights and emerging EU due diligence frameworks, the Company seeks to manage these risks through proportionate oversight and responsible engagement:

- Monitoring human rights practices among significant suppliers, contractors and business partners, proportionate to the nature, scale and context of the relationship and the potential severity of human rights risks.
- Encouraging suppliers and business partners to uphold internationally recognised human rights standards and responsible business practices consistent with Axxam’s expectations.
- Integrating human rights considerations into the evaluation and ongoing management of key business relationships, particularly where activities or locations present heightened risk.

4.8 Environmental Rights

Axxam recognises the increasing international recognition of the right to a clean, healthy and sustainable environment, as reflected in UN Human Rights Council Resolution 48/13, and the close link between environmental protection and the health and wellbeing of communities:

- Managing, reducing and disposing of hazardous chemical and biological waste generated through its activities in accordance with applicable environmental regulations and recognised safety standards.
- Monitoring environmental performance and seeking to reduce energy consumption, water use and greenhouse gas emissions through appropriate operational practices and internal targets, with progress reported as part of Axxam's broader sustainability framework.
- Promoting environmental awareness among employees through training and the integration of responsible environmental practices into laboratory procedures and procurement activities.
- Considering potential environmental impacts associated with the Company's activities and implementing appropriate measures to manage and mitigate these risks where relevant.

5. Governance & Accountability

Effective implementation of this Policy requires clear assignment of responsibility at all levels of the organisation:

Board of Directors: The Board of Directors holds overall responsibility for the approval, oversight and periodic review of this Policy. The Board ensures that relevant human rights considerations are appropriately reflected in Axxam's strategic direction and governance framework.

Chief Executive Officer: The CEO is responsible for promoting the effective implementation of this Policy across the Company and for ensuring that appropriate resources and internal structures are in place to support its application.

Human Resources & Legal Functions: The Human Resources and Legal teams support the translation of the Policy's commitments into operational procedures and compliance mechanisms, if needed. They provide internal guidance on matters relating to employment practices, data protection, regulatory compliance and related human rights considerations.

Scientific Leadership: Scientific leadership are responsible for ensuring that research activities are conducted in line with applicable bioethical standards and safety requirements. They play an important role in promoting a culture of scientific integrity, responsibility and respect.

Procurement & Supply Chain Team: The procurement function is responsible for integrating human rights criteria into supplier selection, evaluation, and contract management processes.

All Employees: Each member of Axxam's team is expected to understand, uphold, and contribute to the implementation of this Policy in their day-to-day work. Employees are encouraged to raise concerns, ask questions, and report potential violations without fear of retaliation.

6. Human Rights Due Diligence

Consistent with Pillar II of the UNGPs, Axxam commits to an ongoing process of human rights due diligence to identify, prevent, mitigate, and account for how it addresses its impacts on human rights. This process will include:

6.1 Risk Identification & Assessment

Axxam seeks to conduct periodic human rights impact assessments covering its own operations, key elements of its supply chain and, where relevant, the potential downstream implications of its research activities. These assessments may draw on internal data, consultation with relevant stakeholders and, where appropriate, independent external expertise.

6.2 Integration into Business Processes

Findings from human rights risk assessments are intended to inform relevant business processes, including operational planning, procurement decisions, partnership evaluations and research design. Human rights considerations may also be reflected in management systems, internal policies and monitoring mechanisms.

6.3 Tracking Performance

Axxam aims to monitor progress through the development of key performance indicators that provide visibility on relevant human rights related topics. These may include workforce diversity and pay equity metrics, occupational health and safety indicators, training completion rates, outcomes of supplier assessments, data security incidents, among others.

6.4 Stakeholder Engagement

Axxam recognises that meaningful stakeholder engagement is central to effective human rights due diligence. The Company will maintain open channels of dialogue with employees, partners, associations, local communities, regulatory authorities, and civil society organisations, taking their perspectives into account when reviewing and strengthening its human rights approach.

7. Grievance Mechanisms & Remedy

Consistent with Pillar III of the UN Guiding Principles on Business and Human Rights, Access to Remedy, Axxam seeks to ensure that individuals or groups whose rights may be adversely affected by its activities have access to appropriate and accessible grievance mechanisms:

- Axxam maintains a Whistleblowing Procedure established pursuant to Italian Legislative Decree 24/2023, which transposes EU Directive 2019/1937. This procedure provides a confidential and secure reporting channel, independently managed, through which employees, contractors, suppliers and other stakeholders may report potential violations of this Policy or concerns related to human rights. The procedure includes safeguards to protect reporters from retaliation and allows for anonymous reporting where permitted by law.
- Axxam's Human Resources function is available to receive and address employment related concerns through a fair and documented internal process.
- Where the Company determines that it has caused or contributed to adverse human rights impacts, it seeks to provide or support appropriate remediation, which may include corrective actions, restitution, rehabilitation, financial compensation or improvements to processes and controls designed to prevent recurrence.
- The accessibility and effectiveness of the Company's grievance mechanisms may be periodically reviewed, including through feedback from users and internal or independent assessments.

8. Reporting & Transparency

Transparency is an important element of Axxam's approach to responsible business conduct, consistent with the Company's organisational values of transparent communication and trusted quality. In line with the expectations of the UN Guiding Principles on Business and Human Rights regarding communication on human rights performance, Axxam seeks to provide appropriate disclosure on its approach and progress:

- Axxam intends to report on relevant human rights topics as part of its broader sustainability and ESG reporting. These disclosures may include qualitative and quantitative information on the implementation of this Policy, key performance indicators, identified risks and areas of attention, and progress in addressing relevant issues.
- Axxam participates in the EcoVadis sustainability assessment, which provides an independent third-party evaluation of its performance across areas such as labour and human rights, ethics and environmental management. The Company aims to maintain and strengthen its performance over time.
- Axxam's EcoVadis sustainability assessment provides an independent third-party evaluation of its social, labour, ethics, and environmental performance. The

Company commits to maintaining and improving its EcoVadis rating as an objective measure of progress.

- This Policy will be made publicly available on Axxam's website and will be communicated internally to employees and new hires, as well as shared with relevant business partners through onboarding and procurement processes.

9. Policy Review

This Policy will be reviewed at least every two years, or earlier where developments warrant an update. Such reviews may be triggered by:

- Significant changes in Axxam's business activities, organisational structure or geographic footprint.
- Developments in the legal or regulatory environment, including in the implementation of EU human rights and due diligence legislation.
- The identification of new or heightened human rights risks through due diligence processes or stakeholder engagement.
- Findings or recommendations arising from internal audits, external assessments or grievance mechanism outcomes.

The review process will be conducted under the oversight of the Board of Directors, with contributions from relevant internal functions, and with external expertise where appropriate. Updated versions of this Policy will be communicated to employees and relevant stakeholders in a timely manner.