

### PURPOSE

As a global company ProChema believes it has the responsibility, as good corporate citizens, to respect Human Rights and comply with international laws.

Respect for human rights is deeply ingrained in our values, in how we run our business, interact with stakeholders, and engage with our global community. At ProChema, we value diversity and equal opportunity and do not tolerate discrimination or harassment of any kind.

ProChema is committed to our employees, customers, future generations, and the communities where we live and work. This policy communicates our expectations with respect to human rights and labor practices and the high standard of conduct expected of our employees worldwide. This includes, but is not limited to, ethical and lawful practices concerning discrimination, workplace health and safety, freedom of association, collective bargaining, child labor, human trafficking, forced or compulsory labor, and indigenous rights.

This policy communicates our expectations with respect to human rights and labor practices, in line with our Code of Business Conduct & Ethics, the UN Global Compact principles, and the Sustainable Development Goals (SDGs). We set both qualitative and quantitative targets to continuously improve labor rights, diversity, and workplace safety, aligned with best practices and standards.

The implementation of this policy and related KPIs is regularly reviewed and forms part of ProChema's internal sustainability reporting and performance monitoring.

### SCOPE

This policy applies globally at every level of ProChema, and extends to all partners, employees (including full-time, part-time, temporary, probationary, casual and contract staff) and interns.

### FRAMEWORK AND PRINCIPLES

ProChema adheres to the highest ethical conduct as outlined in the ProChema Code of Business Conduct & Ethics in all aspects of business including inclusion and diversity, anti-discrimination and harassment, workplace safety, privacy, anti-corruption, human rights, and corporate sustainability.

ProChema operates on a foundation of our core values of accountability, customer focus, inclusiveness, trust, integrity, and partnership which are expected to be followed by all employees, superiors, Management and the Managing Director.

ProChema respects fundamental human rights and views them as a key component of responsible corporate citizenship. In addition to supporting the fundamental principles contained in *the Charter of Fundamental Rights of the European Union*, we are committed to applying those principles in our daily operations, interactions with customers and vendors, and in our communities.

ProChema follows the *Ten Principles of the UN Global Compact* and adheres to the *International Labour Organization (ILO) conventions*. These include core labor standards on collective bargaining, forced labor, child labor, and workplace discrimination. Our commitment is reflected in the ProChema Code of Business Conduct & Ethics, ensuring ethical behavior at all levels.

ProChema also recognizes the *European Convention on Human Rights* as the global standard for identifying, preventing, and addressing the risk of adverse impacts on human and labor rights linked to our business activity.

ProChema is committed to establishing both qualitative and quantitative goals for improving labor and human rights conditions. These include setting specific objectives for reducing instances of harassment and discrimination, improving workplace health and safety metrics, and ensuring diversity and inclusion in line with best practices.

## CODE OF BUSINESS CONDUCT AND ETHICS

ProChema has a published Code of Business Conduct and Ethics which is communicated to all employees and publicly available on our corporate website. The purpose of the Code is to ensure that all ProChema employees and those acting on our behalf are aware of the standards of ethical behavior and integrity in all business dealings that are required of all superiors, employees, Management and our Managing Director. These standards both protect us from business risk and support the development of trust and positive relationships with all business associates, colleagues and partners. The Code of Business Conduct and Ethics outlines the Company's expectations with regards to personal behavior and respect for individuals.

## RISK ASSESSMENT, PREVENTION, AND REMEDIATION

It is the responsibility of all employees, superiors, Management and the Managing Director to comply with this policy and the ProChema Code of Business Conduct & Ethics, to remain alert to any potential violations, and to report concerns without delay. If a potential violation occurs, our Managing Directors and HR Manager must be notified immediately.

Should ProChema identify any risk of contributing to an adverse impact in the area of human or labor rights, it will take the necessary steps to cease or prevent its contribution and use its leverage with internal and external business networks to mitigate any remaining impacts to the greatest extent possible.

ProChema conducts regular internal audits and assessments, to ensure adherence to human rights and labor standards across all operations and our supply chain.

By doing so, and in accordance with its core business, ProChema pays special attention to international labor standards such as:

- Non-discriminatory treatment and anti-harassment
- Workplace Practices
- Workplace health and safety
- Minimum wages
- Working conditions
- No child labor
- Voluntary employment
- Freedom of association
- Anti-slavery and human trafficking
- Open dialogue
- Reporting and whistleblowing
- Diversity, Equality and Inclusion

## NON-DISCRIMINATORY TREATMENT AND ANTI-HARASSMENT

We are committed to an inclusive workplace environment free from acts of discrimination and harassment and strive to make all employment decisions based on job-related qualifications without regard to race, color, sex, age, disability, medical condition, physical appearance, marital status, national origin, ancestry, alienage or citizenship status, pregnancy, ethnicity, religion/creed, disability, genetic information, gender (including gender identity or gender expression, or status as a transgender person), sexual orientation, military or veteran status, marital or familial status, status as a victim of domestic violence, stalking or sex offenses, or any other category protected by applicable law (“protected characteristics”).

Our aspiration is for every employee to feel respected and valued and to have the opportunity to develop and grow in line with business needs and personal aspirations. We offer all employees an equal opportunity to join the company and advance within the company based on performance and potential. We welcome employees from all backgrounds representing different dimensions of diversity. We seek to ensure that our workplace is free from all forms of discrimination, harassment, violence and other behaviors that could negatively impact the workplace, such as alcohol or drug abuse.

Company employees receive regular training on relevant topics related to combating harassment and discrimination.

**Target:**

ProChema maintains a zero-tolerance approach to discrimination and harassment and aims to continuously reduce reported cases.

Performance is monitored through annual employee feedback, training participation, and internal audits.

## WORKPLACE PRACTICES

At ProChema, we strive to attract, engage and retain employees who will help us execute our business strategy in a manner consistent with our commitment to our core values, ethical behavior and integrity in all that we do. We hire highly competent employees based on appropriate education, training, skills and experience.

We are committed to respecting and upholding the rights of our employees in all aspects of their employment and involvement with ProChema. Our approach to creating an ethical work environment is based on a fundamental appreciation and respect for internationally recognized labor standards. These include the International Labour Organization (ILO) conventions and the principles outlined in the United Nations Global Compact.

We enhance employee rights through progressive human resource practices, including ongoing development opportunities and maintaining a safe, inclusive workplace that values diversity, equality, and fairness.

## WORKPLACE HEALTH AND SAFETY

We are committed to the health and safety of our employees. We maintain a global program beginning with safety training as part of our onboarding process to ensure that employees are able to identify and manage potential risks in our office workplaces.

**Target:**

As an office-based organization, health and safety risks are assessed regularly, covering 100% of employees.

Health and safety performance is monitored annually, with the objective to maintain zero lost-time incidents and continuously improve preventive measures, based on regular risk assessments and internal monitoring processes.

## MINIMUM WAGES

We comply with local minimum wages. We use market and industry standards to apply fair wages where no wage law is in existence. In Austria the collective agreement is applied. As an expression of appreciation for our employees and their expertise, ProChema pays Austrian employees' wages in excess of those required by the collective agreement.

Wage deductions as a disciplinary measure are not permitted.

For ProChema it is a matter of course to compensate each employee fairly based on his or her performance and professional experience. Women and men are treated equally. In order to avoid the gender pay gap and to protect women in particular, constant equal pay monitoring is carried out as part of monthly payroll accounting.

### **Target:**

Achieve and maintain gender pay equity across all levels of the organization by conducting annual pay equity analyses to ensure that there are no unjustifiable differences in pay between men and women.

ProChema ensures that 100% of employees are compensated in accordance with applicable collective agreements and legal requirements, monitored through annual payroll reviews.

## WORKING CONDITIONS

Working hours, breaks, holidays and vacation periods are determined in accordance with local laws and agreements. We abide by all local working hour laws including local statutory limits on weekly hours worked. All overtime and/or statutory holiday hours are administered fairly; recorded accurately; paid correctly; and compliant with applicable employment standards legislation for the purposes of overtime pay.

In any case, a working week should not exceed 60 hours, including overtime, except in emergencies or unusual situations.

Austrian labor law also provides for additional paid absences, such as parental leave, caregiver leave, and special leave days for funerals, relocation, weddings and births.

ProChema ensures that all employees are given a written employment contract and can leave their jobs with reasonable notice.

For each pay period, employees shall be provided with a timely and understandable pay slip that contains sufficient information to verify accurate compensation for work performed. Temporary, contract and outsourced employees may only be used within the limits of local laws. Imported employees and migrant employees must receive the same wages, benefits and working conditions.

As previously stated, discrimination for any reason has no place at ProChema. We are proud of our diversity and like the way each additional employee enriches us as an overall organization. That is why we already start addressing all genders equally in our published job descriptions. The final selection is based purely on a professional level. To increase the degree of objectivity, several independent observers and decision-makers are used within our recruiting process. When drawing up the employment contract and submitting the offer to the applicant, the Managing Director and the HR Manager are guided by the internal salary structure.

As part of the hiring process, employees must be provided with a written employment contract at least in English if not in their native language that includes a description of the terms and conditions of employment before the employee leaves his or her country of origin.

# Policy

## Labor and Human Rights



Employees must not be required to pay recruitment fees or other fees to employers or intermediaries for their employment.

### **Target:**

ProChema aims to ensure fair and transparent working conditions for all employees.

Working hours, overtime, and leave entitlements are managed through a structured time management system that ensures full compliance with applicable labor laws and provides employees with transparent access to their working time and entitlements.

The company monitors working conditions through regular employee feedback and internal reviews. An annual employee satisfaction survey is conducted, with the objective to achieve and maintain a satisfaction rate of at least 90%.

ProChema ensures that 100% of all employees, including temporary and contract employees, have written employment contracts in compliance with local labor laws.

The system ensures that 100% of employees are covered by compliant working time arrangements.

Work-life balance is supported through flexible working arrangements and is regularly reviewed as part of employee feedback processes.

Working conditions KPIs are reviewed annually and form part of internal reporting processes.

## NO CHILD LABOR

We comply with local minimum age laws and child labor laws and regulations in the countries where the company operates and do not condone child labor under any circumstances.

The minimum age of a ProChema employee shall not be less than the age at which he or she completes compulsory education in the country where the relevant ProChema business unit is located, and shall in no case be less than 16 years of age.

### **Target:**

ProChema maintains zero tolerance for child labor and ensures continuous compliance through annual internal audits and supplier evaluations covering 100% of relevant operations and business partners.

## VOLUNTARY EMPLOYMENT

We do not use forced or compulsory labor. All employment is voluntary. Employees come to ProChema of their own free will and agree to the proposed terms and conditions. We do not require any employee to remain employed for any period of time against his or her will, and do not engage in practices that limit employees' ability to terminate employment.

## FREEDOM OF ASSOCIATION

We respect the right of our employees to freely participate in labor unions, or choose not to participate, and the right to collectively bargain, in accordance with local law. No ProChema employee shall be discharged or otherwise discriminated against because of membership in or participation in any such employee organization outside of working hours or, with the consent of the superior, within working hours.

## ANTI-SLAVERY AND HUMAN TRAFFICKING

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labor, and human trafficking, all of which have in common the deprivation of a person's liberty by another for personal or commercial gain.

ProChema has a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

We expect the same high standards from all of our contractors, suppliers and other business partners, and as part of our contracting processes, we require commitments against the use of forced, compulsory or trafficked labor, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.

**Target:**

ProChema maintains zero tolerance for forced labor, slavery, and human trafficking.

Compliance is monitored through annual internal audits and supplier evaluations, ensuring full coverage of relevant operations and business partners.

## OPEN DIALOGUE

We respect employees' right to open communication and to be treated humanely and fairly. We maintain open and direct communication with our employees through our Human Resources Department and encourage their full participation in our business. We keep our employees informed about business activities and results, as well as any other matters that may affect them or help them perform their duties more effectively. During the employment relationship, our Managing Director and the HR Manager are committed to addressing any questions or complaints from employees regarding working conditions, rights and other concerns.

**Target:**

ProChema aims to maintain an open and transparent dialogue with employees at all levels.

Structured communication channels are ensured through direct access to HR, management engagement, and regular feedback discussions.

The company conducts an annual employee engagement survey to assess the effectiveness of communication channels, with the objective to achieve and maintain a satisfaction rate of at least 90%.

All employee concerns and feedback are addressed in a timely and confidential manner, ensuring continuous improvement of working conditions and internal communication.

Results are reviewed annually and used as input for continuous improvement measures.

## REPORTING AND WHISTLEBLOWING

Reporting and mitigation of issues and concerns related to human rights and labor rights issues, such as other reporting concerns, in accordance with our ProChema Code of Business Conduct & Ethics and in accordance with our HR manager.

**Target:**

ProChema aims to respond to 100% of whistleblowing reports within a maximum of 30 days, monitored through annual internal audits.

## DIVERSITY, EQUALITY AND INCLUSION

We respect the diversity of all our employees and ProChema is proud to provide an open work and corporate culture within an international team. Employment and promotion within ProChema is solely based on qualifications, individual performance as well as professional and social competencies. At ProChema we reward performance and achievement in a fair way. All employees are treated equally and individuals are not preferred.

ProChema is committed to providing and maintaining gender pay equity across all levels of the organization.

**Targets:**

Achieve and maintain gender pay equity through annual pay equity analyses, ensuring no unjustifiable differences in pay between men and women.

Increase the representation of underrepresented groups (e.g., women) in leadership roles by 25% by 2027, with annual diversity reports tracking progress.

Progress is monitored annually and reported internally.

## VIOLATION OF THIS POLICY

Any violation of this Labor and Human Rights Policy will be treated with the utmost seriousness. Employees or business partners found to be in breach of the policy, including engaging in discriminatory practices, harassment, forced labor, or failing to uphold the rights outlined, will be subject to disciplinary action, which may include termination of employment or contract, legal action, or other measures deemed appropriate by ProChema.

Employees are encouraged to report any suspected violations through the company's whistleblowing system. ProChema ensures that all reports will be investigated confidentially and thoroughly, with no retaliation against those who raise concerns in good faith.