

**Grünenthal Pharma GmbH &  
Co. Kommanditgesellschaft  
Aachen/Germany**

Assurance Report of the Independent Practitioner on a  
Limited Assurance Engagement in Relation to the  
Sustainability Statement of consolidated Grünenthal  
Group for the financial year from 1 January to  
31 December 2025

## Appendix

### Sustainability Statement of consolidated Grünenthal Group 2025

### General Engagement Terms for Wirtschaftsprüferinnen, Wirtschaftsprüfer and Wirtschaftsprüfungsgesellschaften (German Public Auditors and Public Audit Firms)

**ASSURANCE REPORT OF THE INDEPENDENT GERMAN PUBLIC AUDITOR ON A LIMITED ASSURANCE ENGAGEMENT IN RELATION TO THE SUSTAINABILITY STATEMENT OF CONSOLIDATED GRÜNENTHAL GROUP**

To Grünenthal Pharma GmbH & Co. Kommanditgesellschaft, Aachen/Germany

**Assurance Conclusion**

We have conducted a limited assurance engagement on the Sustainability Statement of Consolidated Grünenthal Group of Grünenthal Pharma GmbH & Co. Kommanditgesellschaft, Aachen/Germany, for the financial year from 1 January to 31 December 2025 (hereafter referred to as “the Sustainability Report”). The Sustainability Report was prepared to fulfil the requirements described in section “BP-1 General basis for preparation of sustainability statements” in Chapter “ESRS 2 – General Disclosures” as basis for preparation of the Sustainability Report (hereafter referred to as “specifying criteria”).

Based on the procedures performed and the evidence obtained, nothing has come to our attention that causes us to believe that the Sustainability Report is not prepared, in all material respects, in accordance with the requirements of the specifying criteria presented by the executive directors of the Company.

**Basis for the Assurance Conclusion**

We conducted our assurance engagement in accordance with the International Standard on Assurance Engagements (ISAE) 3000 (Revised): “Assurance Engagements Other Than Audits or Reviews of Historical Financial Information”, issued by the International Auditing and Assurance Standards Board (IAASB).

The procedures performed in a limited assurance engagement vary in nature and timing from, and are less in extent than for, a reasonable assurance engagement. Consequently, the level of assurance obtained is substantially lower than the assurance that would have been obtained had a reasonable assurance engagement been performed.

Our responsibilities under ISAE 3000 (Revised) are further described in section “German Public Auditor’s Responsibilities for the Assurance Engagement on the Sustainability Report”.

We are independent of the entity in accordance with the requirements of European law and German commercial and professional law, and we have fulfilled our other German professional responsibilities in accordance with these requirements. Our audit firm has applied the requirements of the IDW Quality Management Standards. We believe that the evidence we have obtained is sufficient and appropriate to provide a basis for our assurance conclusion.

**Emphasis of Matter – Basis for Preparation of the Sustainability Report**

Without modifying our conclusion, we draw attention to the details provided in the Sustainability Report, which describe the basis for preparation of the Sustainability Report. According to these principles, the Company has applied the European Sustainability Reporting Standards (ESRS) to the extent described in section “BP-1 General basis for preparation of sustainability statements“ in chapter “ESRS 2 – General Disclosures” of the Sustainability Report.

**Responsibilities of the Executive Directors for the Sustainability Report**

The executive directors are responsible for the preparation of the Sustainability Report in accordance with the specifying criteria presented by the executive directors of the Company and for designing, implementing and maintaining such internal control as they have considered necessary to enable the preparation of a Sustainability Report in accordance with these requirements that is free from material misstatement, whether due to fraud (i.e. fraudulent reporting in the Sustainability Report) or error.

This responsibility of the executive directors includes establishing and maintaining the materiality assessment process, selecting and applying appropriate reporting policies for preparing the Sustainability Report as well as making assumptions and estimates and ascertaining forward-looking information for individual sustainability-related disclosures.

The executive directors are responsible for overseeing the process for the preparation of the Sustainability Report.

**Inherent Limitations in Preparing the Sustainability Report**

The specifying criteria contain wording and terms that are subject to considerable interpretation uncertainties and for which no authoritative comprehensive interpretations have yet been published. The executive directors have disclosed interpretations of such wording and terms in the Sustainability Report. The executive directors are responsible for the reasonableness of these interpretations. As such wording and terms may be interpreted differently by regulators or courts, the legality of measurements or evaluations of the sustainability matters based on these interpretations is uncertain. The quantification of non-financial performance indicators disclosed in the Sustainability Report is also subject to inherent uncertainties.

These inherent limitations also affect the assurance engagement on the Sustainability Report.

**German Public Auditor's Responsibilities for the Assurance Engagement on the Sustainability Report**

Our objective is to express a limited assurance conclusion, based on the assurance engagement we have conducted, on whether any matters have come to our attention that cause us to believe that the Sustainability Report has not been prepared, in all material respects, in accordance with the specifying criteria presented by the executive directors of the Company and to issue an assurance report that includes our assurance conclusion on the Sustainability Report.

As part of a limited assurance engagement in accordance with ISAE 3000 (Revised), we exercise professional judgement and maintain professional scepticism. We also

- obtain an understanding of the process used to prepare the Sustainability Report, including the materiality assessment process carried out by the entity to identify the disclosures to be reported in the Sustainability Report.
- identify disclosures where a material misstatement due to fraud or error is likely to arise, design and perform procedures to address these disclosures and obtain limited assurance to support the assurance conclusion. The risk of not detecting a material misstatement resulting from fraud is higher than the risk of not detecting a material misstatement resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations or the override of internal control. In addition, the risk of not detecting a material misstatement in information obtained from sources not within the entity's control (value chain information) is ordinarily higher than the risk of not detecting a material misstatement in information obtained from sources within the entity's control, as both the entity's executive directors and we as practitioners are ordinarily subject to restrictions on direct access to the sources of the value chain information.
- consider the forward-looking information, including the appropriateness of the underlying assumptions. There is a substantial unavoidable risk that future events will differ materially from the forward-looking information.

**Summary of the Procedures Performed by the German Public Auditor**

A limited assurance engagement involves the performance of procedures to obtain evidence about the sustainability information. The nature, timing and extent of the selected procedures are subject to our professional judgement.

In performing our limited assurance engagement, we

- evaluated the suitability of the criteria as a whole presented by the executive directors in the Sustainability Report.
- inquired of the executive directors and relevant employees involved in the preparation of the Sustainability Report about the preparation process, including the materiality assessment process carried out by the entity to identify the disclosures to be reported in the Sustainability Report, and about the internal controls related to this process.
- evaluated the reporting policies used by the executive directors to prepare the Sustainability Report.
- evaluated the reasonableness of the estimates and related information provided by the executive directors. If, in accordance with the ESRS, the executive directors estimate the value chain information to be reported for a case in which the executive directors are unable to obtain the information from the value chain despite making reasonable efforts, our assurance engagement is limited to evaluating whether the executive directors have undertaken these estimates in accordance with the ESRS and assessing the reasonableness of these estimates, but does not include identifying information in the value chain that the executive directors were unable to obtain.
- performed analytical procedures or tests of details and made inquiries in relation to selected information in the Sustainability Report.
- considered the presentation of the information in the Sustainability Report.

**Restriction of Use**

We issue this report as stipulated in the engagement letter agreed with the Company (including the “General Engagement Terms for Wirtschaftsprüferinnen, Wirtschaftsprüfer and Wirtschaftsprüfungsgesellschaften (German Public Auditors and Public Audit Firms)” dated 1 January 2024 of the Institut der Wirtschaftsprüfer (IDW)). We draw attention to the fact that the assurance engagement was conducted for the Company’s purposes and that the report is intended solely to inform the Company about the result of the assurance engagement. Consequently, it may not be suitable for any other than the aforementioned purpose. Accordingly, the report is not intended to be used by third parties as a basis for making (financial) decisions.

Our responsibility is to the Company alone. We do not accept any responsibility to third parties. Our assurance conclusion is not modified in this respect.

Köln/Germany, 11 March 2026

**Deloitte GmbH**  
Wirtschaftsprüfungsgesellschaft

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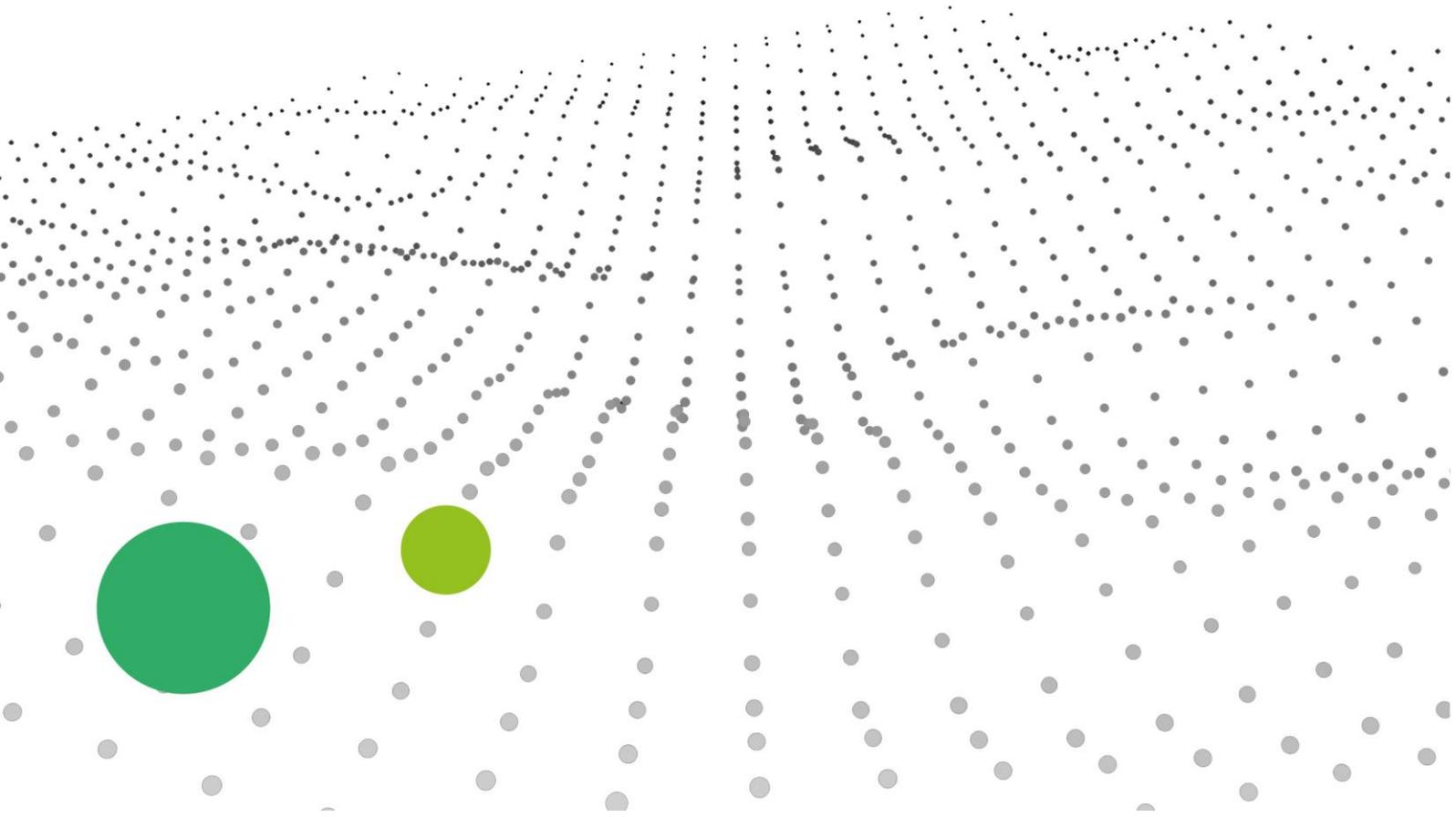
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Director



# **Sustainability Statement of consolidated Grünenthal Group**

01.01.2025 – 31.12.2025



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## General Disclosures

### ESRS 2 – General disclosures

#### About this report

### BP-1 General basis for preparation of sustainability statements

#### Consolidated basis of reporting

This sustainability statement has been prepared on a consolidated basis, in alignment with the consolidated financial statements of Grünenthal Pharma GmbH & Co. Kommanditgesellschaft. Unless explicitly noted otherwise, the scope of consolidation reflects the framework applied in the company's financial reporting with one exception: the Sustainability Statement also includes the non-consolidated companies. This approach aligns with prior reporting periods, ensuring comparability across reporting cycles.

#### Subsidiary undertakings and exemptions from individual or consolidated sustainability reporting

During the reporting period, Grünenthal held a 51% majority stake in Grünenthal Meds, a joint venture established with Kyowa Kirin International in 2023. This report covers Grünenthal Meds, except where explicitly stated otherwise. At the end of February 2026, subsequent to the reporting period, Grünenthal acquired the remaining 49% stake from Kyowa Kirin International, thereby obtaining full ownership of Grünenthal Meds.

As of July 2024, Grünenthal has 100% of the US-based pharmaceutical company Valinor Pharma, Inc. Effective October 2025, Valinor was fully integrated into Grünenthal following its merger with Grünenthal's US subsidiary, Averitas Pharma, Inc. (where Averitas remains as the surviving entity). Consequently, as of that date, Valinor's business operations are fully incorporated into Averitas, which is already part of Grünenthal's organisational and reporting frameworks.

#### Coverage of value chain

The sustainability statement encompasses the entire Grünenthal value chain, covering its own operations, upstream and downstream. Material topics have been systematically mapped to reflect their relevance within this value chain, supporting a comprehensive understanding of Grünenthal's sustainability impacts.

#### Application of the European Sustainability Reporting Standards (ESRS)

Grünenthal provides comprehensive information on the ESRS requirements relevant to general disclosures and material topics. The report reflects a partial application of the ESRS framework, with S1-16 as the only Disclosure Requirement not disclosed. No specific information is omitted in this report.

### BP-2 Disclosures in relation to specific circumstances

#### Disclosure of data using indirect sources, estimations or approximations

Since primary data for Q4 2025 was not available across several categories, emissions across all scopes were estimated using a simple proportional extrapolation of +33% based on actual data for Q1–Q3. Where full year data was missing for newly added entities (Grünenthal Meds and Averitas/Valinor), upscaling approaches were applied using office-space-based (m<sup>2</sup>) models, sales forecasts, or purchase order extrapolation, depending on the category.

### Application of estimation methods across Scope 1, 2 and 3

When activity data was not available, estimations included:

- **Spend-based modelling** (Scope 3.1, 3.2, for some entities)
- **M<sup>2</sup>-based upscaling** for energy and heating, waste, and electricity consumption for entities lacking primary data (Scope 1, Scope 2, Scope 3.5, for Grünenthal Meds, Averitas/Valinor)
- **Weight estimation methodologies** for upstream transportation and packaging where only partial mass data existed, using average weights derived from known product categories (Scope 3.4)
- **Assumption-based packaging end-of-life methodology (2021 baseline)** due to insufficient material-specific data (50 g plastic, 14 g aluminium, 25 g cardboard, 10 g paper per pack) (Scope 3.12)
- **Emission factor proxying** where energy source or refrigerant type was unknown (e.g., diesel vehicle assumption for unknown mobile combustion records and default natural gas for heating) (Scope 1)
- **Full-Time Equivalent (FTE)-based estimation** for Grünenthal Meds' business travel due to lack of primary data (Scope 3.6)
- **Flat global commuting assumption** applied to all employees (Scope 3.7)

### Use of indirect sources

Indirect sources were applied where own primary data was not available, including:

- Emissions reports provided by Third-Party Logistics (3PL) (Kühne & Nagel, VTS Transport & Logistics) for upstream and intercompany logistics (Scope 3.4)
- Emission certificates calculated by travel agencies (Averitas) for business travel (Scope 3.6)
- Market-based electricity emission factors and grid averages for sites lacking renewable energy certificates or utility certificates (Scope 2)

### Approach to data gaps

All known data gaps are disclosed and will be resolved in future reporting cycles. These include missing or incomplete data on: weight data for the majority of purchased goods (Scope 3.1) and inbound products (Scope 3.4), warehousing information for Grünenthal Meds upstream transport (Scope 3.4), waste data for a number of office locations (Scope 3.5), business travel data for Valinor (Scope 3.6), and reliable packaging material weight data for all entities (Scope 3.12), (see section '[E1-6 Gross Scopes 1, 2, 3 and Total GHG emissions](#)').

### Commitment to improvement

Grünenthal will replace all estimated or upscaled 2025 values with primary data in the 2026 inventory, where possible, and will strengthen data completeness, granularity, and supplier activity-level data. In 2026, Grünenthal will develop a structured framework to obtain primary greenhouse gas (GHG) emissions data from strategically selected suppliers to improve the quality of the company's GHG inventory.

### Application of differing time horizons

While short-, medium-, and long-term horizons were all taken into account – defined in accordance with ESRS as up to one year, one to five years, and more than five years, respectively – the evaluation of Impacts, Risks and Opportunities (IROs) was conducted on all three time horizons. If not specified, the respective IRO and corresponding assessment is valid across all time horizons.

### **Changes in the preparation and presentation of sustainability information**

In the current reporting period (2025), we refined the calculation approach for Scope 3 greenhouse gas emissions, applying actual data for Q1–Q3 2025 and estimates for Q4 2025, as detailed in section ‘E1-6 Gross Scopes 1, 2, 3 and Total GHG emissions’. At the same time, Scope 3 data for 2024 that had previously been based on assumptions were updated using actual data. For changes in Scope 2 and Scope 3 GHG emissions reporting, including changes to previously reported data, see section ‘E1-6 Gross Scopes 1, 2, 3 and Total GHG emissions’.

### **Corrections for prior periods**

In the reporting period, corrections were made to sustainability information for the financial year 2024. Specifically, Scope 2 data for two affiliates and pollution-related data for 2024 were corrected (as described in detail in sections ‘E1-6 Gross Scopes 1, 2, 3 and Total GHG emissions’ and ‘E2-4 Pollution of water’).

### **Sustainability standards and reporting frameworks**

Grünenthal does not disclose data points that result from other EU legislation listed under ESRS 2 Annex B. We take the following generally accepted sustainability standards and frameworks into account: As a United Nations Global Compact (UNGC) participant, Grünenthal is committed to the ten universal principles of the UNGC on human rights, labour standards, environmental and climate, and corruption prevention. Our Statement of Compliance with Human Rights and Environmental Standards reflects this formal commitment. In addition, we support the achievement of the United Nations Sustainable Development Goals (SDGs) in line with our business strategy. We particularly contribute to SDG 3, which aims at ensuring healthy lives and promoting wellbeing for all.

The Science Based Targets initiative (SBTi) is guiding our decarbonisation and emissions reduction efforts. In 2025, the SBTi officially approved our near-term science-based emissions reduction target. We report according to the Global Logistics Emissions Council (GLEC) Framework, which enables both distance-based and fuel-based GHG emissions calculations.

For specific data points, we reference internationally recognised standards, including:

- ISO 14001 – Environmental Management Systems (Environment, Health & Safety).
- ISO 45001 – Occupational Health & Safety Management Systems.

We have a comprehensive environmental management system based on ISO 14001:2015, aligned with regulatory requirements, corporate sustainability standards, and the Greenhouse Gas Protocol. Our approach integrates best practices from across industries and geographies to optimise efficiency, reduce emissions, and minimise environmental impact. To uphold occupational health and safety and achieve our Vision Zero (zero recordable workplace accidents), all manufacturing sites maintain ISO 45001-certified safety management systems.

### **External assurance and verification**

To ensure the accuracy and reliability of our sustainability disclosures, our data and processes undergo external verification, including:

- SWOT (Strengths – Weaknesses – Opportunities – Threats) analyses conducted in compliance with ISO 45001 and ISO 14001.
- Third-party ISO audits to validate conformity to industry-leading standards.
- Certification processes aligned with ISO 45001 and ISO 14001 to uphold global best practices in health, safety, and sustainability for manufacturing sites.



## Sustainability Statement

Grünenthal Group

The individual performance metrics disclosed in this report are not subject to external validation.

## Sustainability organisation

### GOV-1 The role of the administrative, management and supervisory bodies

Grünenthal's administrative, management and supervisory bodies play a pivotal role in guiding the organisation's operations, ensuring alignment with regulatory frameworks, ethical standards, and sustainability objectives.

#### Corporate structure and dual governance system

The ultimate parent company, Grünenthal Pharma GmbH & Co. KG, is a limited partnership (Kommanditgesellschaft) incorporated in Germany with corporate seat in Aachen, and with a limited liability company (Gesellschaft mit beschränkter Haftung) as general partner incorporated under the laws of the Principality of Liechtenstein (the 'Parent Company'). It wholly owns Grünenthal GmbH (the 'GmbH'), which is the active pharmaceutical entity. This is a limited liability company incorporated under German law with its corporate seat in Aachen, managing Grünenthal's pharmaceutical business since its establishment under the name Chemie Grünenthal GmbH in 1946. Both the Parent Company and the GmbH have a dual management system characterised by a separation of personnel between the management and supervisory bodies, as further explained below.

#### Advisory Board (Beirat)

The advisory board members (Beiratsmitglieder) are elected by the limited partners of the Parent Company ('Principal Shareholders') respectively the shareholder of the GmbH. Pursuant to the partnership agreement of the Parent Company, the members of the advisory board of the Parent Company and the advisory board of the GmbH have to be identical (the 'Advisory Board'). The Advisory Board (Beirat) appoints the managing directors (Geschäftsführer) of the GmbH, who form the 'Corporate Executive Board'. The Advisory Board (Beirat) supervises Grünenthal's management. For significant actions, such as acquisitions, license deals, and major strategic decisions, the Corporate Executive Board requires the approval of the Advisory Board (Beirat).

The Advisory Board (Beirat) comprises five external, independent voting members with significant expertise in relevant industries (e.g., pharmaceuticals, legal, finance) and four internal members who represent the Principal Shareholders. The four internal members do not have voting rights, meaning that 100% of the voting members and 56% of all members are independent. One of the five external voting members (20%) and three of the four non-voting members (75%) are female.

#### Breakdown of members of administrative, management and supervisory bodies by gender and other aspects of diversity (in headcount): Advisory Board (Beirat)<sup>1</sup>

Gender	Executive	Non-executive	Total	Gender diversity ratio
Female	1	3	4	44%
Male	4	1	5	56%
Other	0	0	0	0%
Total	5	4	9	100%
<b>Percentage of independent board members</b>	<b>56%</b>	-	-	-

<sup>1</sup> No changes occurred compared to 2024.

The five voting members are:

- Dr. Pär Johansson, chairman of the Advisory Board (Beirat) and of the Supervisory Board (Aufsichtsrat), a lawyer specialising in corporate law and M&A.
- Dr. Petra Danielsohn-Weil, a pharmaceutical industry leader with expertise in strategy, operations, and commercialisation.
- Dr. Gotthard Kleine, a strategic consultant supporting organisational development, ethical business practices, and patient advocacy.
- Franz Wynands, a tax consultant and accountant ensuring financial oversight, risk management, and regulatory compliance.
- Dr. Martin Zügel, a healthcare executive offering expertise in business development, private equity, and pharmaceutical strategy.

The Advisory Board (Beirat) also has an audit committee and a personnel committee to manage specific governance tasks.

### **Corporate Executive Board**

The Corporate Executive Board is Grünenthal's senior leadership decision-making body and is responsible for the overall operational management and execution of the company's strategy. In line with its role under ESRS GOV-1, the Board has overall responsibility for the oversight of environmental, social and governance (ESG) matters, including the integration of sustainability considerations into business strategy and operations, responsible business conduct, and the management of ESG-related impacts, risks and opportunities (IROs). The Board also oversees and approves sustainability-related reporting.

As ESG impacts, as well as related risks and opportunities, affect nearly all business areas, overall accountability for ESG matters rests with the Corporate Executive Board. In accordance with ESRS GOV-2, the Board ensures access to appropriate sustainability-related expertise by delegating specific responsibilities to designated subject-matter experts, such as the Human Rights Officer and the Occupational Safety Officer (Arbeitsschutzbeauftragter), and through the Corporate Responsibility Board. The cross-functional composition of the Corporate Responsibility Board provides collective expertise covering all material sustainability matters.

Corporate Executive Board members receive comprehensive training, for example on anti-corruption, corporate responsibility, and ethical conduct, ensuring informed decision-making at the highest level.

Since 2009, no member of the Principal Shareholders' family is part of the Corporate Executive Board anymore. The Corporate Executive Board comprises four executive members, the Chief Executive Officer (CEO), Chief Financial Officer (CFO), Chief Scientific Officer (CSO) and Chief Commercial Officer (CCO), who collectively have experience in relevant roles and sectors across the globe:

- Gabriel Baertschi, Chairman and CEO, with over 20 years of pharmaceutical experience and expertise in transformation leadership.
- Jan Adams, M.D., CCO and former CSO, with extensive experience in R&D and corporate strategy.
- Prof. Dr. med. Uli Brödl, CSO (as of February 2025), with more than 15 years of industry experience.
- Fabian Raschke, CFO, with a strong background in corporate controlling and financial leadership.

**Breakdown of members of administrative, management and supervisory bodies by gender and other aspects of diversity (in headcount): Corporate Executive Board<sup>2</sup>**

Gender	Executive	Non-executive	Total	Gender diversity ratio
Female	0	0	0	0%
Male	4	0	4	100%
Other	0	0	0	0%
Total	4	0	4	100%
<b>Percentage of independent board members</b>	<b>100%</b>	-	-	-

**Executive Board Team**

The Executive Board Team comprises the Corporate Executive Board members plus Victor Barbosa, Head Global Operations, Leen Hofkens, Head Global Human Resources, Sebastian Köhler, General Counsel, and Quentin Le Masne de Chermont, Head Corporate Strategy and Portfolio Management. This team defines the mid-term and long-term corporate strategy to make Grünenthal's vision of a World Free of Pain a reality. While the Corporate Executive Board members are all male, one of the Executive Board Team members is female.

**Supervisory Board (Aufsichtsrat)**

The GmbH has an additional third co-determined supervisory board (Aufsichtsrat), with powers limited to the extent as legally permitted (the 'Supervisory Board'). The Supervisory Board (Aufsichtsrat) supports the governance structure by providing additional oversight and approving actions of the Corporate Executive Board in case these are subject to approval by corporate bylaws. The three members of the Supervisory Board (Aufsichtsrat) are Dr. Pär Johansson (chairman), Christina Plath and Sabine Hees (employee representative). Two of the three Supervisory Board members (Aufsichtsratsmitglieder) are female.

**Breakdown of members of administrative, management and supervisory bodies by gender and other aspects of diversity (in headcount): Supervisory Board (Aufsichtsrat)<sup>3</sup>**

Gender	Executive	Non-executive	Total	Gender diversity ratio
Female	2	0	2	67%
Male	1	0	1	33%
Other	0	0	0	0%
Total	3	0	3	100%
<b>Percentage of independent board members</b>	<b>100%</b>	-	-	-

**Embedding sustainability into governance**

Grünenthal's Corporate Responsibility Board serves as the central body for sustainability governance. It comprises qualified leaders across Grünenthal's business functions such as the Global Compliance & Responsibility Officer, the Head Global Environment, Health and Safety (EHS) & Sustainability, the Head Global Drug Safety and Qualified Person for Pharmacovigilance, the Head Global Quality Assurance and

<sup>2</sup> No changes occurred compared to 2024.

<sup>3</sup> No changes occurred compared to 2024.

others, that are responsible for managing material impacts, risks and opportunities. In the reporting period, it was chaired by the Head of Responsibility.

The Corporate Responsibility Board acts as both a decision-making body and sounding board for all matters related to Corporate Responsibility. Its key duty is to implement, continuously develop and drive Grünenthal's Corporate Responsibility Strategy through its Corporate Responsibility Programme. The programme aims to create a net-positive impact for society in the focus areas of Patient, People and Planet. It sets ambitious sustainability targets for Grünenthal's material topics and contributes to transparent reporting. Progress is monitored via metrics that are tracked continuously as part of the internal company Group Scorecard. The Corporate Responsibility Board works towards a company-wide, consistent and yet localised implementation of the Corporate Responsibility Programme and gives guidance to employees working on it. Apart from internal stakeholders, the Corporate Responsibility Board engages in a continuous dialogue with external interest groups.

The Corporate Responsibility Board meets quarterly to review sustainability performance. It reports regularly to the Corporate Executive Board and the Advisory Board (Beirat) via the Global Compliance & Responsibility Officer.

### **Employee representation and governance framework**

Grünenthal has established works councils in Chile, France, Germany, Italy and Spain, complying with local legislation to ensure employee representation. In Germany, the Works Constitution Act defines the functions, rights, and responsibilities of the works councils, enabling structured negotiations on social, occupational health and safety, and environmental matters. At the European level, the European Works Council (EWC) represents employees across EU member states and the European Economic Area (EEA), ensuring cross-border employee consultation. National organisations with at least 150 employees – currently Germany, Italy, and Spain – are entitled to appoint members to the EWC, which convenes annually.

## **GOV-2 Information provided to and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies**

### **Reporting structures and information flow**

Grünenthal has established a robust governance framework to ensure that its administrative, management, and supervisory bodies are consistently informed about sustainability matters. The Corporate Responsibility Board reports directly to the Corporate Executive Board through annual reporting cycles and ad hoc updates when necessary. This structure ensures timely communication on material impacts, risks, and opportunities, as well as updates on the implementation of due diligence processes and the effectiveness of sustainability policies, targets, metrics, and actions.

The Global Compliance & Responsibility Officer plays a vital role in reporting to the Corporate Executive Board, the Supervisory Board (Aufsichtsrat) and the Advisory Board (Beirat) respectively. These reports include critical updates on training initiatives, healthcare interactions, audit outcomes, emerging compliance concerns, and significant developments. Both the Corporate Responsibility Board and the Corporate Executive Board serve as active decision-making bodies, ensuring alignment of sustainability strategies with Grünenthal's corporate objectives, particularly regarding the Compliance Management System.

### **Consideration of sustainability-related impacts, risks, and opportunities**

Grünenthal's Corporate Responsibility Programme integrates sustainability into the core of its business operations. It is designed to manage ESG on a global scale and address material impacts through targeted

initiatives. The responsibility for overseeing this programme has been delegated by the Corporate Executive Board to the Corporate Responsibility Board, ensuring consistent oversight.

### **Strategic oversight**

The Corporate Responsibility Board conducts periodic reviews to assess key ESG risks and opportunities, ensuring alignment with Grünenthal's long-term corporate strategy and objectives. This includes evaluating both the potential positive and negative impacts of strategic decisions on stakeholders and the environment.

### **Major transaction decisions**

Before approving significant business transactions, Grünenthal conducts a thorough due diligence involving all relevant business areas on a global level, including Quality Assurance, Manufacturing and Supply Chain Management, Legal and Compliance, Drug Safety, Medical and Medical Information, Commercial, Finance, HR and others. Once a recommendation is reached, it is discussed in detail by the Corporate Executive Board, involving also all key functional stakeholders. This includes detailed discussion of the risks and opportunities as well as business impacts associated with the respective transaction. Amongst others, Grünenthal verifies that all patient-related safety measures and processes meet company standards, examines sustainability and efficiency of the entire production and supply chain, and ensures that the acquisition target has been carefully reviewed in relation to all business relationships with third parties. The company ensures that legal, ethical and sustainable considerations are thoroughly evaluated and prioritised alongside commercial benefits.

### **Material impacts, risks, and opportunities**

While Grünenthal has identified a range of material ESG impacts across its operations, it has not identified any material ESG-related risks or opportunities. The material impacts, that can be mapped to Grünenthal's material topics, were reviewed and revalidated in the current reporting period by the Corporate Responsibility Board and Corporate Executive Board, building on the detailed double materiality analysis process conducted in 2024 (details in section '[IRO-1 Description of the processes to identify and assess material impacts, risks and opportunities](#)'). All identified impacts, risks and opportunities were integrated into the corporate strategy and are listed at the beginning of the corresponding report section.

### **Monitoring and performance mechanisms**

Grünenthal ensures the continuous monitoring of its sustainability performance through key governance mechanisms. Targets for material topics are reviewed and approved annually by the Executive Board Team and formulated in a Group Scorecard. Progress is tracked throughout the year using metrics embedded in the internal Group Scorecard. This tracking provides transparent and actionable insights to the Executive Board Team, reinforcing Grünenthal's commitment to continuous improvement in sustainability practices.

This approach ensures that Grünenthal's administrative, management, and supervisory bodies are not only well-informed but also actively engaged in driving sustainability performance across the organisation.

## **GOV-3 Integration of sustainability-related performance in incentive schemes**

### **Characteristics of Grünenthal's incentive schemes**

Grünenthal has implemented remuneration policies and incentive schemes designed to align individual performance with the company's strategic goals, including sustainability objectives. The remuneration prin-

principles, implemented into our remuneration policy, aim to attract and retain top talent by offering competitive, market-aligned compensation. Grünenthal's compensation package consists of base pay, variable pay and other fringe benefits.

Regarding variable pay, a key component of Grünenthal's incentive schemes is the Short-Term Incentive (STI) programme, which provides a variable compensation component and rewards employees for achieving agreed upon priorities within a financial year. These priorities are defined through a global, uniform target-setting process, ensuring that corporate goals are cascaded down to the individual level.

The STI programme applies to most employees, including members of the administrative and management bodies, starting with the Corporate Executive Board. Members of the Advisory Board (Beiratsmitglieder) are excluded from the STI programme, as they are not employees. Supervisory Board members (Aufsichtsratsmitglieder) who are employees are included in the STI programme. Sales employees and certain tariff-covered employees, who are subject to separate incentive schemes, are excluded from the global STI programme.

The STI bonus payout is determined by two factors:

1. Employee performance: Assessed through an annual performance rating.
2. Corporate performance: Measured via the Corporate Factor, which is derived from the Group Scorecard. This scorecard assesses the company's performance across key priorities, including financial results, innovation, growth, cultural transformation, and sustainability advancements. The evaluation of these priorities, including sustainability-related metrics which account for 5% of the Corporate Factor calculation, takes place annually and directly influences the Corporate Factor, thereby impacting STI payouts for employees, including senior executives.

By linking personal contributions to overall business goals, the STI programme promotes transparency and employee involvement. It encourages exceptional performance by offering financial rewards tied to both personal achievements and the company's success.

Sustainability is explicitly integrated into Grünenthal's STI programme. In the Culture area of the Group Scorecard, a key priority is the progress made in implementing the company's Corporate Responsibility Programme, which is shaped by our material topics. We have defined annual operational targets for each of our material topics to reach our mid- and long-term ambitions. Target achievement is transparently measured. For example, for the topic of Patient Safety, we regularly track the target to achieve 97% 'on-time' submissions to authorities for Individual Case Safety Reports. Climate-related performance is included through annual operational targets that contribute to our near-term objectives published under **ESRS E1 – Climate Change**. These targets are part of the Group Scorecard and influence the Corporate Factor. Climate goals are not reflected in any other remuneration components than the STI programme. The achievement level for all targets defines target achievement for the overall sustainability priority and thus influences the Corporate Factor by a defined percentage. By linking the Corporate Factor directly to sustainability targets feeding into the Group Scorecard, both individual contribution and corporate achievements for sustainability are being incentivised.

### **Approval and update processes for incentive schemes**

The Corporate Executive Board plays a central role in overseeing and approving the terms of Grünenthal's incentive schemes in alignment with Grünenthal's Global Remuneration Policy and Remuneration Framework. The Group Scorecard serves as the foundation for the calculation of the Corporate Factor. It is reviewed, validated, and approved by the Corporate Executive Board annually at the end of the financial year to ensure alignment with the company's strategic vision and evolving objectives.

## GOV-4 Statement on due diligence

Core elements of due diligence	Paragraphs in the due diligence statement
a) embedding due diligence in governance, strategy and business model	SBM-1, SBM-3, S1.SBM-3, GOV-2
b) engaging with affected stakeholders in all key steps of the due diligence	SBM-2, S1-2, S1-3, S4-2, S4-3, G1-1
c) identifying and assessing adverse impacts	IRO-1, G1.IRO-1
d) taking actions to address those adverse impacts	S1-3, S4-3, G1.MDR-A, G1-3
e) tracking the effectiveness of these efforts and communicating	S1-3, S1-4, S4-3, S4-4, G1.MDR-A, G1-3

## GOV-5 Risk management and internal controls over sustainability reporting

At Grünenthal, robust risk management and internal control processes are integral to ensuring the accuracy, reliability, and transparency of our sustainability reporting.

### Key features of our risk management and internal control framework for sustainability reporting

#### Risk management

Our risk management approach is centred on evaluating potential risks based on their likelihood and potential impact on Grünenthal. Regarding our sustainability objectives, we prioritise risks that could significantly affect these objectives and take proactive steps to mitigate them. This includes a quarterly review and update to the risks identified, followed by escalation to the Enterprise Risk Management Board to ensure ongoing management where appropriate. Grünenthal's Enterprise Risk Management Board convenes four times a year, with two full-member meetings and two smaller monitoring sessions in between. Sustainability reporting is not explicitly included in our risk management yet but will be in the future. The risk assessment framework is periodically reviewed and updated to address emerging challenges and maintain its effectiveness.

#### Ongoing improvements to risk management

While a comprehensive ESG risk management for the supply chain exists, a structured approach to fully integrate ESG risks from own operations as well as sustainability reporting risks into the regular risk management system, and to monitor opportunities, is under development. As an evolving area of corporate governance and responsibility for Grünenthal, further work is needed to ensure that our risk evaluation and management systems are adequately calibrated to ESG topics. For example, current risk assessment methods are more closely mapped to the evaluation of financial impact. Looking forward, proposals will be made to revise this framework to include a broader range of risk drivers.

Over the course of 2025, the Risk Management programme itself was subject to evolution and update. A new governance system, assessment methodology and management process was implemented and

will fully replace the existing system from Q1 2026. Consultation on points of collaboration with the ESG team is ongoing.

### **Sustainability reporting risks and mitigation measures**

In 2024, Grünenthal proactively conducted a voluntary ESRS-based report to identify data and process gaps. This structured analysis of sustainability reporting risks examined potential risks related to the accuracy, completeness, consistency, and ESRS compliance of reported information. While no material risks regarding sustainability reporting were identified, certain data points could not yet be fully reported in the first year and Grünenthal was transparent regarding these data points in the last report. In 2025, the company enhanced its alignment with the ESRS and addressed previously identified gaps. The report reflects a partial application of the ESRS framework, with S1-16 as the only Disclosure Requirement not disclosed.

### **Internal controls and data governance**

In 2025, Grünenthal strengthened internal controls through a review of data collection procedures, assessment of supporting documents, and evaluation of compliance with ESRS requirements. As part of this review, Grünenthal developed guidance on data collection and proof requirements to ensure clarity, consistency, and comparability across reporting periods. Findings are discussed with relevant business areas and corrective actions are implemented where needed. The review and related improvements are ongoing and will continue into 2026.

### **Review and assurance**

An annual, multi-tier internal review validates data accuracy and completeness with department heads and senior management participating in approvals.

## Sustainability strategy

### SBM-1 Strategy, business model and value chain

#### Significant groups of products and services offered

Grünenthal is a leading pharmaceutical company focused on pain therapies with over 75 years of experience in developing, manufacturing and commercialising innovative treatments, over 50 of those specialised on pain. Its integrated capabilities span the entire value chain, from research and development (R&D) to its vertically integrated manufacturing, regulatory, and commercialisation expertise, generating commercial and production synergies across the company's portfolio and acquired brands.

The company's core therapeutic area, pain, represents a significant burden for people and society, which remains a major unmet medical need. Grünenthal offers patients a range of treatment options, including opioids, and is committed to transforming the future of pain management. The company acknowledges the benefits and risks associated with opioid treatment and has a track record of distributing opioids in Europe with the highest ethical standards.

#### Key products

Grünenthal's product portfolio comprises a complementary mix of innovative, patent protected brands and a portfolio of mature, largely off-patent established brands with continued high brand awareness. As of August 2025, Grünenthal acquired the commercial rights to the product Cialis™ for Mexico, Brazil and Colombia, further strengthening Grünenthal's position in Latin America.

Our products are sold in approximately 100 countries in the world, either directly or indirectly through partners, and are promoted and/or sold to a diverse customer base, including physicians, pharmacies, hospitals, buying groups, wholesalers, and institutions. Grünenthal's revenue from product sales is diversified by geography, product type, and therapeutic area, which helps to limit dependence on any single country or geographic region, product type or therapeutic area.

Key brands include Crestor™, Moventig™, Nebido™, Nexium™, Norspan™, Palexia™, Qutenza™, Tramal™, Transtec™, Vimovo™, Versatis™, Zaldiar™, Zomig™ and the Grünenthal Meds Portfolio (13 brands, including Abstral™, PecFent™, Oramorph™, Movantik™, Rectogesic™).

#### Key services

We aim to pursue our vision of a World Free of Pain and address critical, unmet medical needs, with a focus on developing highly innovative, non-opioid pain treatments and increasingly extending beyond this into pain-related areas such as epilepsy, itching and neurodegenerative diseases.

Grünenthal's research and development capabilities span the entire product life cycle, from early research, including target identification and validation, to clinical and technical development, regulatory expertise and lifecycle management. This enables the company to pursue projects across all development phases.

With deep expertise in pain treatment, Grünenthal integrates R&D, manufacturing, regulatory and commercial capabilities, allowing it to compete successfully with both larger diversified and smaller specialist players. Over the years, the company has demonstrated its ability to drive the commercial success of innovative drugs, such as Tramal™, Palexia™, Versatis™ and Qutenza™, and achieved multiple successful product launches underscoring its commercial capabilities and the continued high unmet medical need in pain treatments.

Headquartered in Aachen, Germany, Grünenthal operates five specialised production facilities, ensuring vertical integration from active pharmaceutical ingredient ('API') production to packaging. These facilities are located in Germany, Switzerland, Italy, Chile and Ecuador. In addition to manufacturing Grünenthal's own products, the production facilities also operate as full-service contract manufacturing organisations ('CMOs') for external customers.

Grünenthal's Contract Manufacturing Business, Grünenthal PRO, offers high-quality manufacturing solutions to global customers, including:

- Biopharma assembly and packaging.
- Unit dose nasal spray filling and packaging.
- Bulk production of solids, semi-solids, and liquids.
- Packaging of patches, blisters, wallets, sachets, or sticks.
- Hormone and controlled drug production.
- Production of selected Active Pharmaceutical Ingredients (APIs).

**Significant markets and customer groups served**

Grünenthal operates in the pharmaceuticals sector of the global healthcare industry and has a total of 4,149 employees.<sup>4</sup>

**Number of employees (in headcount)**

Region	2025	2024
Europe	2,700	2,803
Latin America	1,258	1,358
USA	189	196
Asia	2	2
<b>Total</b>	<b>4,149</b>	<b>4,358</b>

Based on the product portfolio, the company continues to be primarily active in the growing pain and analgesic market, one of the largest therapeutic areas globally. Demand for innovative and effective therapies continues to drive growth in the global chronic pain therapy market and the broader pharmaceutical and prescription drug markets. Grünenthal has a strong presence in Europe, the United States, and Latin America.

Customers include healthcare organisations, such as hospitals, pharmacies and pharma wholesalers as well as healthcare professionals, who in turn can provide patients in need with our products. Grünenthal has no products and services that are banned in certain markets.

**Total revenue (in million Euro)**

	2025	2024
Net Revenue	1,797	1,798

<sup>4</sup> The headcounts disclosed throughout this Sustainability Statement include apprentices and cover all entities of the Group. The employee number presented in the Group Management Report (Konzern-Lagebericht) (4,098 employees) excludes apprentices and therefore differs in scope.

### Sustainability-related goals

Given the prevalence and debilitating effects of pain, Grünenthal is committed to transforming the future of pain management. We believe that the often chronic nature of pain makes patient education and adherence to the highest ethical standards imperative.

Grünenthal integrates sustainability into its core strategy, with patient safety and product quality forming the foundation of its approach. As a global leader in pain management, Grünenthal is committed to addressing unmet medical needs by developing innovative treatments that improve patient outcomes and quality of life. Beyond patient wellbeing, Grünenthal's sustainability goals focus on workforce development, environmental responsibility, and ethical business conduct.

1. **Workforce development:** Grünenthal prioritises safety, fair working conditions, and an inclusive work environment, fostering a culture of equity, belonging, and professional growth among employees.
2. **Environmental responsibility:** Efforts are concentrated on reducing environmental impact, implementing innovative solutions for sustainability in operations, and embracing environmentally friendly practices in packaging and production.
3. **Ethical business conduct:** Acting with integrity and adhering to high ethical standards form the foundation of Grünenthal's corporate responsibility.

Grünenthal actively collaborates with stakeholders, ensuring that sustainability strategies reflect the needs and expectations of diverse groups. This engagement fosters long-term, sustainable relationships, which are further detailed in the '[SBM-2 Interests and views of stakeholders](#)' section.

### Grünenthal's strategic alignment with material sustainability matters

Grünenthal operates in a highly regulated pharmaceutical environment. The company manufactures and commercialises pharmaceuticals and is active on the global healthcare market. Based on our product portfolio, we continue to be primarily active in the pain and analgesics market, one of the largest therapeutic areas globally. Our vision of a World Free of Pain aligns seamlessly with our commitment to sustainability, especially the social aspect. We regularly evaluate our products, services, and markets to ensure alignment with our sustainability objectives:

- **Patient-centric approach:** The wellbeing of patients serves as the foundation for our operations and innovations. This patient-centric approach inherently intersects with key sustainability matters, as it prioritises access to effective treatments, promotes ethical practices in patient care, and underscores the importance of long-term societal health. It further includes ensuring a positive benefit-risk balance and the effective communication and mitigation of risks associated with the use of our products. Grünenthal's quality management and pharmacovigilance systems are designed to ensure the highest levels of product safety throughout manufacturing processes and improve health outcomes for patients worldwide. Sustainability-related challenges in this area include regulatory compliance and market access to ensure medicines are approved and available when needed, and patient inclusion in R&D to address unmet medical needs. We develop, commercialise and distribute our products in line with highest ethical and scientific standards, according to the Grünenthal code of conduct and industry standards in collaboration with patient representatives, healthcare professionals, business partners and authorities. Our Opioid Responsibility Framework promotes responsible communication and marketing practices throughout the value chain.
- **People-focused initiatives:** Grünenthal fosters an inclusive and supportive work environment for all employees. Sustainability-related challenges include attracting and retaining talent, maintaining

employee engagement, and ensuring safe and equitable working conditions. Grünenthal regularly assesses working conditions and gathers employee feedback through initiatives such as Great Place to Work® surveys, to track progress against strategic objectives. Employees are empowered to contribute to an inclusive culture and participate in awareness activities. ESG objectives are embedded in performance management to ensure alignment with strategic priorities.

- **Planet-focused efforts:** Grünenthal's Planet-focused efforts encompass climate action as well as pollution prevention and control programmes within the company's own operations and its supply chain. Sustainability challenges include environmental impacts from manufacturing, as well as ESG risks in the value chain. These are addressed through a Group-wide climate roadmap aligned with science-based targets, the expansion of renewable electricity use at manufacturing sites, ESG-based supplier engagement, and certified environmental management systems that systematically identify, control, and monitor environmental risks. In 2025, Grünenthal's targets were validated by the SBTi, confirming its strong commitment and alignment with global pharma leaders. The company also advanced supplier engagement, enabling greater collaboration with key partners (see section '[E1.MDR-M / E1.MDR-T / E1-4 Metrics and targets in relation to climate change](#)' for climate-change related targets).

Our strategy also embraces sustainable development. It does so by integrating environmental, social, and governance considerations into decision-making processes which ensures that the advancement of pain management and adjacent diseases is achieved responsibly and inclusively. This alignment shows that Grünenthal's strategic priorities are also supportive of global sustainability goals – e.g., SDG 3: Good health and wellbeing.

### **Business model, value chain and sourcing of inputs**

Grünenthal's business model integrates patient-centric research, manufacturing, and distribution to deliver high-quality treatments addressing unmet medical needs. We advance research in pain and adjacent diseases and develop pharmaceutical products through a combination of organic growth, internal R&D, and strategic acquisitions. Grünenthal also places particular importance on engagement with patients, patient-representation groups and healthcare professionals.

Our value chain begins with research and development, where we collaborate with academic institutions and healthcare experts to design innovative pain therapies. Raw materials such as APIs (Active Pharmaceutical Ingredients), chemicals and finished or semi-finished goods are sourced from verified suppliers, prioritising quality and ethical practices to ensure safe, efficient and reliable product supply to patients. Manufacturing takes place in our advanced facilities, ensuring compliance with rigorous quality, safety, and environmental standards. Finished products are distributed through a global network, supported by logistics partners to ensure timely and equitable access for patients. The company has a strong focus to ensure safe, efficient and reliable product supply to patients. Grünenthal also works closely with healthcare professionals to enhance the safe and effective use of our therapies, integrating stakeholder feedback to continuously improve outcomes across the value chain.

Grünenthal's upstream value chain involves approximately 7,000 global suppliers. The company's largest categories of procurement include semi- and finished goods coming from external suppliers accountable for approximately 36% of spend in 2024. Suppliers are concentrated in Europe and North America with approximately 68% of suppliers accounting for approximately 88% of spend generated in 2024. Approximately 6% of Grünenthal suppliers are defined as ESG-sensitive due to the risk attached to the supplier location and the industry type (e.g., country regulations around working conditions, pollution, etc.).

Grünenthal assesses those suppliers identified as ESG-sensitive on an annual basis (risk abstract analysis). The information reported reflects the most recent completed assessment cycle. An updated assessment is currently in progress and is expected to be finalised in the next reporting cycle. Based on the latest results, approximately 75% of ESG-sensitive suppliers have been included in the ESG in-depth assessment, which is part of the third-party due diligence management system. For more information see section 'G1.MDR-A Ethical business culture actions'. The regular risk assessments and dialogue activities focus on upholding high standards for ethics, environmental management, and social impact. The downstream value chain encompasses distributors and customers, ensuring the uninterrupted delivery of high-quality treatments.

Grünenthal measures its impact across a spectrum of stakeholder groups, ensuring that its operations deliver tangible benefits for customers, investors, R&D and industry business partners, employees, healthcare professionals and organisations, as well as communities, which are further detailed in the 'SBM-2 Interests and views of stakeholders' section.

## SBM-2 Interests and views of stakeholders

Grünenthal operates in a dynamic environment characterised by diverse stakeholder groups with varying demands and expectations. Acting as a reliable and trustworthy partner supports Grünenthal's ability to attract talented employees, fulfil the expectations of investors and shareholders, and overall maintain strong relationships with all key stakeholders.

### Overview of key stakeholder groups

Grünenthal has identified the following key stakeholder groups, that either have a strong influence on the company or are significantly impacted by its operations: Patients, patient experts, caregivers, and patient organisations; employees; healthcare professionals and healthcare organisations; payers and budget holders; governments, policymakers, and regulators; investors; R&D partners; industry business partners; suppliers and communities. The stakeholder groups are annually validated and refined as necessary.

### Engagement with key stakeholder groups

Grünenthal actively engages with its stakeholders through open dialogue and conducts an analysis of the information gathered from Grünenthal counterparts and main contact partners for each stakeholder group. Engagement activities include feedback platforms, regular meetings, conferences, and formal consultations to understand the specific needs and expectations of each group. Two groups of affected stakeholders are especially to be highlighted as crucial for Grünenthal and under SBM-2: The company's own workforce (S1.SBM-2) as well as Consumers and end-users (S4.SBM-2), which for Grünenthal are patients, patient experts, caregivers, and patient organisations:

1. **Employees (S1.SBM-2):** We want all employees to feel valued, respected, included and empowered to do their best, bring great ideas to the table and develop their full potential. Our Values & Behaviours are the foundation of our culture. They guide our decision-making and provide clarity to our teams around the world about how we want to work together to achieve successful outcomes for our company and our patients. Grünenthal cultivates an inclusive and performance-driven culture by actively engaging with its workforce and seeking feedback through for example employee feedback platforms, regular Town Hall meetings, bi-annual Great Place to Work® surveys and internal 360-degree leadership feed-back. The latter provides targeted leadership feedback for line and project managers on how they drive team performance and development and bring the company's Values & Behaviours to life. Employees are encouraged to regularly discuss their development goals with their people manager to create Personal Development Plans that

drive growth in current roles and future opportunities. These efforts ensure employees are informed, aligning them with the company's mission and priorities, and create a work environment where they feel valued and motivated to contribute to Grünenthal's success. Additionally, the European Works Council (EWC) ensures flow of information as well as engagement possibilities for employees across Europe (see section '[GOV-1 The role of the administrative, management and supervisory bodies](#)'). For more information, see the section '[S1-2 Processes for engaging with own workforce and workers' representatives about impacts](#)'.

- 2. Patients, patient experts, caregivers, and patient organisations (S4.SBM-2):** Patients are the focus of our company's mission and vision. Grünenthal's innovative therapies deliver therapeutic value to patients worldwide, addressing critical needs in pain management and adjacent diseases while enhancing quality of life. We work closely with patients, caregivers and patient organisations to understand their needs and expectations, including co-creating solutions with patient organisations. These collaborations have supported advances in pain management and the implementation of the World Health Organisation's International Classification of Diseases (ICD)-11 codes for pain. Our patient-centric approach extends beyond product development, encompassing education programmes that promote the responsible use of pain medications. For more information, see the section '[S4-2 Processes for engaging with consumers and end-users about impacts](#)'.
- 3. Healthcare professionals (HCPs) and healthcare organisations (HCOs):** We aim to equip healthcare professionals with the latest medical knowledge related to Grünenthal's products – to enhance patient care and treatment outcomes. We focus on providing healthcare professionals with education, including Continuing Medical Education (CME), that supports their efforts to ensure the best possible care to patients, while also ensuring clear communication of risks associated with the use of our products and appropriate mitigation strategies, including the provision of up-to-date product labels. Our educational initiatives give healthcare professionals information about advances in pain management to support them in making well-informed treatment decisions. We also interact with healthcare professionals via roundtables, webinars, symposia and partnerships to gain a deep understanding of unmet medical needs, as well as to optimise disease management strategies together and contribute to scientific exchange.
- 4. Payers and budget holders:** Grünenthal engages continuously and regularly in constructive dialogue with governments, medical insurance systems and medical associations to ensure sustainable access to medicines. The care of pain patients is in the mutual interest of all parties and is at the centre of the discussions. Discussions focus on addressing unmet medical needs, ensuring fair reimbursement, improving healthcare outcomes, and defining appropriate remuneration for medical services/delivery for pain patients. In recent years, and very particularly in 2025, Grünenthal has actively collaborated with all those involved in the care of pain patients in Germany to improve both the care itself and its funding, to elevate the accessibility of patients with peripheral neuropathic pain to the innovative pain care. During 2025, Grünenthal Spain conducted a Study on the Continuity of Care for pain patients jointly with several healthcare associations to understand how care is coordinated across care levels, the challenges and to propose opportunities for improvement of care. The study showed that there is great variability in the referral and caring of pain patients across the Spanish healthcare system, with mixed implementation of existing protocols and care pathways. These results were then shared at a workshop with representatives for healthcare responsibility from the regional governments in Spain.

5. **Governments, policymakers, and regulators:** Grünenthal maintains regular dialogue with regulatory bodies, with a particular focus on development and compliance activities to ensure continuous alignment with applicable regulatory requirements. Furthermore, the company actively contributes to policy discussions and the development of new regulations through engagement in national and international trade associations.
6. **Investors:** Grünenthal engages with investors through quarterly results calls, meetings, and conferences, providing transparency about its strategy, R&D efforts, and ESG activities. The company's strong financial performance, strategic execution, and industry-leading ESG ratings – recognised by MSCI ((p)AA), Sustainalytics (low ESG risk), and EcoVadis (gold medal status) – support access to international capital markets, reinforcing shareholder confidence in its long-term vision and strategy.
7. **R&D partners:** Grünenthal collaborates with clinics, academic institutions, Contract Research and Clinical Organisations, and biotech companies to accelerate the development of life-changing medicines. By adopting green pharmaceutical research and development processes, Grünenthal reduces its environmental footprint while optimising outcomes for patients.
8. **Industry business partners:** Grünenthal works closely with industry business partners to expand its product portfolio, ensure uninterrupted supply, and drive global business growth. The company continues to strengthen its partnership network to support newly acquired products and enhance patient access worldwide.
9. **Suppliers:** Grünenthal maintains mutually beneficial relationships with its suppliers, engaging in dialogue to uphold standards for quality, ethics, and environmental management across the supply chain. In 2025, the Responsible Sourcing Toolkit to guide ESG alignment among the suppliers was launched and in collaboration with the PSCI, Grünenthal organised the first PSCI Decarbonization Summit to accelerate Scope 3 emissions reduction through shared action and industry dialogue.
10. **Communities:** Grünenthal's commitment to social responsibility reflects our ambition to make a positive contribution to society and the people within it – reaching beyond the pharmaceutical sector. Our activities cover a broad spectrum of initiatives and organisations that advance social well-being in many forms. These include efforts to promote physical and mental health – such as our long-standing support for hospice and palliative care projects – as well as initiatives that strengthen the public good, protect vulnerable groups, foster the responsible use of natural resources, and help minimise negative impacts on the climate. In addition, we provide emergency relief to communities affected by crises and natural disasters. A cornerstone of our engagement is the Grünenthal Foundation for the Support of Thalidomide-Affected People, whose mission is to improve the living conditions of those affected sustainably. Maintaining an open and continuous dialogue with the community and its representatives is particularly important to us, as it ensures that assistance reaches where it is needed most.

### Selection of Grünenthal's association memberships

- International Federation of Pharmaceutical Manufacturers & Associations (IFPMA)
- International Society for Pharmaceutical Engineering, Inc. (ISPE)
- International Trademark Association (INTA)
- Interpat – The biopharmaceutical Intellectual Property think tank
- Pharmaceutical Supply Chain Initiative (PSCI)
- United Nations Global Compact

- European Federation of Pharmaceutical Industries and Associations (EFPIA)

### Integration of stakeholder interests into strategy and business model

Grünenthal's ongoing stakeholder dialogue provides valuable insights that enable the company to refine strategies and deliver targeted, impactful solutions. As a result of stakeholder dialogue, Grünenthal's strategy and business model is well aligned with stakeholder interests, and no changes were made during the reporting period. Patient needs guide our focus on developing innovative solutions for pain management and adjacent diseases, and patient-centric initiatives, such as education programmes and co-created therapies. Feedback from investors drives our emphasis on transparency, sustainable growth, and ESG priorities, while employee input informs workplace improvements, professional development programmes, and diversity initiatives. Structured engagement mechanisms, including feedback platforms and board meetings, ensure continuous alignment with evolving stakeholder expectations. Grünenthal's Executive Board Team stays informed about key stakeholder interests and feedback through regular updates via various channels and formats, e.g. Great Place to Work®, Global Town Halls for all employees, Investor Call updates and Compliance and Responsibility updates. Currently, no concrete steps to amend the business model are planned. The strategy is being constantly refined to best manage positive and negative impacts, as well as risks and opportunities.

### SBM-3 Material impacts, risks and opportunities and their interaction with strategy and business model

#	ESG category	Material topic	Type of impact	Impact <sup>5</sup>	Value chain	Affected stakeholders
1	Environmental	<b>Climate change</b>	Actual negative	<b>Emissions from production-related processes</b>	Upstream, own operations	Environment
2	Environmental	<b>Pollution</b>	Potentially negative	<b>Environmental pollution (water)</b>	Own operations	Local communities
3	Social	<b>Own workforce</b>	Potentially negative	<b>Workplace safety and health protection</b>	Own operations	Employees, on-site contractors
4	Social	<b>Own workforce</b>	Actual positive	<b>Fair working conditions and remuneration</b>	Own operations	Employees, potential employees, suppliers
5	Social	<b>Own workforce</b>	Actual positive	<b>Diversity, inclusion and equal opportunities</b>	Upstream, own operations	Employees, potential employees
6	Social	<b>Own workforce</b>	Actual positive	<b>Training and development</b>	Own operations, downstream	Employees, potential employees
7	Social	<b>Consumers and End-users – Personal safety</b>	Potentially negative	<b>Patient safety</b>	Downstream	Patients

<sup>5</sup> All impacts are assessed for all three time-horizons. For details, see section 'BP-2 Disclosures in relation to specific circumstances'.

#	ESG category	Material topic	Type of impact	Impact <sup>5</sup>	Value chain	Affected stakeholders
8	Social	<b>Consumers and End-users – Personal safety</b>	Potentially negative	<b>Safe pain management through responsible use of opioids</b>	Own operations, downstream	Employees, healthcare professionals, patients, partner companies and their employees
9	Social	<b>Consumers and End-users – Personal safety</b>	Potentially negative	<b>Product quality</b>	Entire value chain	Patients, healthcare professionals, regulators, employees, suppliers, distributors
10	Social	<b>Consumers and End-users – Access to healthcare</b>	Actual positive	<b>Access to healthcare</b>	Downstream	Patients, society
11	Social	<b>Consumers and End-users – Research and development</b>	Actual positive	<b>Improving patients' quality of life through innovative medicines</b>	Downstream	Patients
12	Governance	<b>Business conduct</b>	Actual positive	<b>Ethical business culture</b>	Entire value chain	Investors, suppliers, authorities
13	Governance	<b>Business conduct</b>	Potentially negative	<b>Corruption and bribery (prevention, detection and incidents)</b>	Entire value chain	Investors, employees, patients, regulatory bodies

### Climate change

The impact of GHG emissions from production-related processes reflects the company's environmental footprint, due to the energy-intensive nature of pharmaceutical manufacturing and input-sourcing, emphasising the need for effective mitigation strategies from producing companies such as Grünenthal to address climate change.

### Pollution

The impact of environmental pollution of water arises from chemical residues across Grünenthal's own operations, emphasising the need for effective mitigation strategies to identify and address water pollution.

### Own workforce

The impacts related to workplace safety, fair working conditions, diversity, inclusion, and equal opportunities and training highlight critical areas of Grünenthal's social responsibility towards its own workforce, emphasising the company's role in fostering a safe, equitable, and inclusive work environment while promoting employee growth.

### Consumers and End-users – Personal safety

The impacts related to personal safety of consumers and end-users emphasise the importance of ensuring the safety, efficacy, availability and quality of Grünenthal's pharmaceutical products through rigorous patient safety and quality control measures and of addressing safe treatment of pain through the responsible use of opioids.

### **Consumers and End-users – Access to healthcare**

The IRO related to access to healthcare emphasises the importance of facilitating access to pain treatment, including expanded access programmes or compassionate use, providing patients with the potential benefit of treatment not yet widely available. Ensuring the availability and affordability of these treatments can have a significant positive impact on public health, especially in underserved regions.

### **Consumers and End-users – Research and development**

The impact related to research and development emphasises the creation of innovative medicines, enhancing treatment effectiveness and patient outcomes and improving the quality of life for patients experiencing chronic or acute pain and adjacent diseases.

The two material topics ‘Consumers and End-users – Access to healthcare’ and ‘Consumers and End-users – Research and development’ are distinctive to Grünenthal’s business model and not provided for in the ESRS standards, which is why we have made company-specific disclosures for these topics.

### **Business conduct**

The IROs related to business conduct focus on ensuring ethical business culture including adherence to legal requirements and industry standards, as well as addressing industry specific risks such as corruption and bribery.

These material topics are all of particular relevance to Grünenthal. It takes responsibility to address and manage the related IROs and Grünenthal is already integrating these into its strategy and operations.

### **Resilience of our strategy and business model**

While no separate, company-wide resilience analysis is being conducted, the requirements of ESRS 2 SBM-3 §48(f) are addressed by Grünenthal. For climate-related risks and opportunities, a climate risk analysis is being carried out in line with ESRS E1. Grünenthal assesses climate risks for short-term (up to 1 year), medium-term (1-5 years) and long-term (> 5 years) horizons as defined by the ESRS (see ‘E1.SBM-3 Material impacts, risks and opportunities and their interaction with strategy and business model’). Grünenthal plans to conclude the analysis in 2026. The results from Origgio are currently being processed and will form the basis for a resilience plan assessing the company’s adaptability under different climate scenarios and defining corresponding mitigation and adaptation measures. For all other material sustainability topics, resilience is ensured through existing target-setting, action, and monitoring processes. These processes enable continuous management of identified impacts, risks, and opportunities and include regular performance reviews based on key metrics.

### **Changes compared to previous reporting period**

During the current reporting period, Grünenthal has reassessed its material impacts in accordance with the ESRS double materiality requirements. This reassessment has led to the following changes:

#### **Environmental Area – Pollution**

The previously reported material impact “Environmental pollution (land, air, water) including the supply chain” has been refined. Based on a disaggregated analysis of various pollution aspects and in alignment with ESRS E2 requirements, only water-related pollutants in own operations met the materiality criteria. Consequently, the impact has been redefined as “Environmental pollution (water) (in own operations)”. This adjustment ensures more accurate representation of actual environmental impacts and aligns with the scope of pollutant data available for reporting.

### **Governance Domain – Business conduct**

The impact “Responsible use of AI” has been reclassified from material to not material. This change reflects the current state of AI deployment within Grünenthal, where the number of use cases remains limited. While the topic continues to be monitored due to its strategic relevance, it no longer meets the materiality threshold under ESRS G1 for this reporting cycle.

These changes were validated through internal workshops and reviewed by the Corporate Responsibility Board and the Corporate Executive Board, as part of the annual double materiality assessment review.

## **IRO-1 Description of the processes to identify and assess material impacts, risks and opportunities**

### **Overview of the double materiality analysis process**

Grünenthal applies a structured ESRS-compliant process to identify and assess material impacts, risks, and opportunities (IROs). It involves reviewing prescribed and company-specific sustainability topics across all organisational levels. Results are validated by the Corporate Executive Board and presented to the Advisory Board (Beirat). Comprehensive data from multiple sources ensure alignment with the company’s corporate strategy, governance, products, workforce, and environmental context.

### **IRO assessment**

A stakeholder and value chain analysis formed the basis for identifying relevant IROs, covering all business divisions, regions, and activities from sourcing to product use. Stakeholder relevance and feedback were validated through internal proxies and integrated into the assessment. Additional sources included internal due diligence, risk management, benchmarking, regulatory frameworks, media, and peer analysis. These took into account risks potentially arising from identified impacts as well as any dependencies. In 2025, stakeholder input and value chain mapping were reviewed and updated where relevant.

Topic experts rated IROs using a five-point scale assessing impact severity and likelihood, incorporating short-, medium-, and long-term time horizons (up to one, five, and more than five years) as defined in BP-2. In 2024, the financial assessment followed Grünenthal’s risk management framework, using a ten-point scale for magnitude and probability of occurrence. While Grünenthal’s risk management process and the IRO assessment process in the context of the double materiality analysis are not yet formally integrated, this process aimed to ensure their alignment in content and ratings. These were multiplied, and a materiality threshold of 50/100 applied. In 2025, the scales were adjusted to mirror the impact assessment scales from one to five. Only sustainability-related risks were included, and none were identified as material. The overall score of the assessed IROs was compared to a materiality threshold of three. For IROs rated as material or medium (scores of 2–2.99, so called case-by-case IROs), the ESRS topic list was used to determine which associated topics were likely to be considered material and guide subsequent workshops.

### **Finalisation and validation of material topics**

In 2024, Grünenthal conducted workshops across organisational levels, including the Corporate Responsibility Board, to finalise material topics. Based on the IRO assessment, these workshops reviewed ESRS sub-topics and company-specific issues and, in 2025, reassessed case-by-case IROs and excluded topics and validated final outcomes. This iterative process ensured diverse input and served as internal control, with final validation by the Corporate Responsibility Board.

### **Update and validation of results in 2025**

In 2025, Grünenthal reviewed all steps of the DMA process conducted in 2024, including the long list of IROs rated by experts in the IRO assessment, the ratings and reasonings for ratings, as well as materiality

of topics and sub-topics. Updates focused on the reassessment of the AI-related IRO and the disaggregation of IROs regarding pollution, while the original 2024 assessment structure and data were retained. As part of the update in 2025, Grünenthal adopted a new scaling system for the assessment of risks and opportunities. As described above (see sub-section 'IRO assessment' above), risks and opportunities were no longer rated on a 10-point-scale, but on a 5-point-scale, same as the impacts. The categories assessed did not change from 2024 to 2025. For this process, the topic experts were asked to review the IRO assessment, while consolidated results were presented to and validated by the Corporate Executive Board and presented to the Advisory Board (Beirat).

### **E1.IRO-1 Description of the processes to identify and assess material climate-related impacts, risks and opportunities**

Climate-related impacts were already being tracked and reported in the form of GHG emissions in the past. The IRO assessment by Grünenthal topic experts and discussion of IROs on management level mirrors the process described above (see section 'IRO-1 Description of the processes to identify and assess material impacts, risks and opportunities'). As a result, emissions from production-related processes were identified as actual negative material impact.

In 2025, Grünenthal launched a comprehensive climate risk and opportunity assessment across its operations and value chain, in line with CSRD and ESRS E1 requirements. This ongoing process evaluates physical and transition risks over short-, medium-, and long-term horizons, using climate scenario analysis to align with financial planning and strengthen corporate resilience. The assessment will provide a consolidated understanding of climate-related impacts and support Grünenthal's strategic transition toward a low-carbon economy. Grünenthal has started its climate and transition risk analyses for one of its five manufacturing sites, Origgio, in 2025, and plans to finalise it in 2026. Grünenthal plans to start the analysis for the remaining four manufacturing sites in 2026. Concrete findings from the completed climate risk and transition analysis will be integrated into the double materiality analysis and risk management.

### **E2.IRO-1 Description of the processes to identify and assess material pollution-related impacts, risks and opportunities**

Grünenthal has not yet screened for pollution-related impacts, risks and opportunities at local site level or consulted possibly affected communities. However, during the double materiality analysis, pollution of water was assessed as a material negative impact of Grünenthal's business activities. The assessment incorporated input from topic experts at the Group level and management-level workshops with participation from various stakeholders or their proxies.

### **G1.IRO-1 Description of the processes to identify and assess material business-conduct-related impacts, risks and opportunities**

The process for identifying and assessing material business-conduct-related impacts, risks and opportunities mirrors the description in section 'IRO-1 Description of the processes to identify and assess material impacts, risks and opportunities'.

## **IRO-2 Disclosure requirements in ESRS covered by the undertaking's sustainability statement**

An overview of the ESRS disclosure requirements addressed in this report is provided in the chapter titled 'ESRS Index'. Information is classified as material or non-material based on our double materiality assessment (see section 'IRO-1 Description of the processes to identify and assess material impacts, risks and opportunities'), conducted in accordance with the criteria outlined in ESRS 1, section 3.2. Data points are deemed material if they relate to our identified material impacts and provide relevant insights to support users of this report.

## Environment

### E1 – Climate change

#### E1.SBM-3 Material impacts, risks and opportunities and their interaction with strategy and business model

Type of impact	Impact
Actual negative	Emissions from production-related processes

Grünenthal has initiated a comprehensive climate risk and opportunity assessment across its operations and value chain, in line with CSRD and ESRS E1 requirements. This process evaluates physical and transition risks over short-, medium-, and long-term horizons using climate scenario analysis to strengthen resilience and align with financial planning (see [‘E1.MDR-A / E1-3 Climate Change Actions’](#)). Grünenthal’s annual greenhouse gas inventory shows what categories of emissions are most prominent and could be targets for emission reduction initiatives.

#### Scope and methodology

The resilience analysis will focus on Grünenthal’s own operations, providing a targeted framework to identify and address vulnerabilities. Grünenthal will apply the Task Force on Climate-related Financial Disclosures (TCFD) methodology to ensure the analysis adheres to established best practices and delivers meaningful insights.

The CO<sub>2</sub> footprint is being calculated according to the GHG protocol, an initiative which supplies global standardised frameworks to measure and manage greenhouse gas emissions, therefore helping to track progress towards climate goals. For more details regarding scope and methodology, see section [‘E1-6 Gross Scopes 1, 2, 3 and Total GHG emissions’](#).

#### Time horizon and progress

Grünenthal will set the resilience analysis within a 2050-time horizon, aligning with long-term climate action goals. However, the company has not conducted any resilience analysis to date, and results are not yet available. Results are anticipated for 2026 and will be included in sustainability reporting once available. Grünenthal’s greenhouse gas inventory is being calculated annually with more information available in section [‘E1-6 Gross Scopes 1, 2, 3 and Total GHG emissions’](#).

#### Adaptation and strategic alignment

Grünenthal’s strategy and business model have not been adapted in response to climate-related risks at this stage. The findings from the ongoing evaluations will be important when considering future strategy or operational adjustments and help to ensure that the company’s operations remain resilient to the challenges posed by climate change.

### E1-1 Transition plan for climate change mitigation

Grünenthal’s comprehensive “Planet Strategy Plan” covers the reduction of fossil energy consumption, minimisation of waste, and improvement of water efficiency. It serves as a transition plan to support its climate change mitigation efforts, with the overarching goal of achieving its validated SBTi targets by 2030. The plan outlines the company’s decarbonisation strategy, focusing on reducing greenhouse gas emissions across Scope 1 and Scope 2 by 55% by 2030 from a 2020 baseline.

For Scope 1, Grünenthal is prioritising gas reduction projects, such as the installation of heat pumps at the Aachen Corporate Centre and the Mitlödi manufacturing site to substitute gas consumption. For Scope 2, the company has already achieved a significant milestone by transitioning to 100% renewable electricity across all manufacturing sites in 2024.

Regarding its Scope 3 emissions, Grünenthal has set a supplier engagement target aiming for 74.1% of Grünenthal's suppliers by emissions covering purchased goods and services and upstream transportation and distribution to have validated science-based targets or be committed to have science-based targets validated by 2028 via an aligned action plan with Grünenthal (in line with the validated SBTi near-term targets). Grünenthal plans to set a Scope 3 emissions reduction target by 2027.

While Grünenthal has largely established the mitigation aspects of the transition plan relating to emissions reductions in Scope 1 and Scope 2, the company still needs to define specific actions to meet the targets. These actions will ensure that the plan's implementation is both effective and aligned with Grünenthal's decarbonisation objectives.

Grünenthal has no economic activities covered by delegated regulations on climate adaptation or mitigation under the Taxonomy Regulation. Grünenthal has not yet formally assessed nor identified risks related to locked-in GHG emissions,<sup>6</sup>, but is maintaining the flexibility to achieve targets by selecting projects aligned with business requirements.

Grünenthal's climate transition plan is integrated into its overall business strategy and financial planning. Actions align with priorities like operational efficiency, compliance, and resilience, and are approved through standard investment governance – without a separate climate budget. This approach helps ensure initiatives are viable and scalable. The plan is approved by the CEO and Global Operations Board, with progress reviewed via the Planet Roadmap to embed climate considerations into strategic decisions. Details on already implemented actions can be found in section '[E1.MDR-A / E1-3 Climate change actions](#)'.

### **Financial and resource allocation**

As part of its Planet strategy, Grünenthal concluded the installation of the heat pump in Mitlödi with an investment of approximately 3.7 million Euro in 2025 and is working on other projects related to energy efficiency and consumption reduction or the electrification of fossil based systems, such as the dual use heat pump in the main office building at its Aachen headquarters.

## **E1.MDR-P / E1-2 Climate change policies**

At Grünenthal, the Policy on Occupational Safety, Health and Environmental Protection, and Energy, or for short the Environment, Health and Safety (EHS) Policy, is a fundamental component of our commitment to sustainability and regulatory compliance which offers orientation for all actions with possible impacts related to the environment, health and safety. It describes Grünenthal's commitment to actively address climate change and reduce greenhouse gas emissions within its operations and value chain, treating these efforts – alongside occupational safety, environmental protection, and energy efficiency – with the same responsibility and systematic approach as applied to quality, productivity, and effectiveness.

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<sup>6</sup> Locked-in emissions are estimates of future GHG emissions that are likely to be caused by the undertaking's key assets or products sold within their operating lifetime.

The EHS policy further underlines the commitment to comply with all relevant laws, regulations and other requirements related to environmental protection and report on environmental issues. Grünenthal is committed to protecting the environment by reducing its negative impact on water pollution. The organisation invests in safe, energy efficient, and sustainable technologies, minimises waste, especially hazardous waste, and prioritises sustainability in resource use and procurement. The policy does not, however, provide concrete operational guidance or specifically focus on renewable energy issues. Operationalisation of the policy is handled at each location as well as at Grünenthal's headquarters for larger initiatives.

Besides the EHS policy, Grünenthal uses its leverage and relationships with suppliers to communicate expectations related to its suppliers' environmental management. The company's Responsible Sourcing Standards for Business Partners, the Procurement Policy and the related Responsible Sourcing practices, as well as the Statement on Human Rights and Environmental Standards, cover among other aspects, environmental management in the supply chain and foster a collaborative approach to addressing climate change. The policies each cover a number of aspects and are described in more detail in the respective chapters (see 'E2 – Pollution', 'S1 – Own workforce' and 'G1 – Business conduct').

### **Policy scope**

The EHS Policy's scope includes Grünenthal's own operations and suppliers. This inclusive scope ensures that environmental standards are upheld across our upstream value chain, without exception. Topics other than emissions and energy aspects are addressed as well, e.g., water management, waste and pollution (see chapter 'E2 – Pollution').

### **Accountability and local adaptation**

The CEO is responsible for approving the EHS Policy, underscoring its importance at the highest levels of the organisation. Accountability for implementing the policy lies with leadership teams at each manufacturing site. Each site adopts the policy in the local language and includes site-specific commitments, roles and responsibilities to ensure effective application. Additionally, our Planet Committee, which includes project leads and EHS Managers from our global sites, meets monthly to oversee initiatives that align with the EHS Policy, including energy efficiency, water conservation and waste management.

### **Alignment with third-party standards**

Grünenthal's EHS Policy is implemented in alignment with international environmental standards and conventions, including ISO 14001:2015, corporate environmental standards, aspects of the United Nations Sustainable Development Goals, and the Greenhouse Gas Protocol. These frameworks guide our efforts in minimising our environmental footprint and enhancing transparency and accountability.

### **Stakeholder consideration**

The policy-setting process included input from internal stakeholders by including feedback from EHS Managers as the site representatives as well as proxies for external stakeholders, ensuring that diverse perspectives were considered in shaping the EHS Policy. In addition, feedback is gathered during external ISO audits to further refine and improve the policy. The finalised policy is also available on the Grünenthal corporate website, providing a direct channel for stakeholders to raise concerns and suggest improvements for the Grünenthal Policy content.

### **Accessibility and implementation**

The EHS Policy is made publicly accessible via Grünenthal's contract manufacturing website Grünenthal PRO. This ensures that all stakeholders, including those directly involved in its implementation, can easily access the document and understand its provisions.

## **E1.MDR-A / E1-3 Climate change actions**

Grünenthal is committed to advancing sustainability through initiatives focused on energy efficiency, GHG reduction, the adoption of environmentally friendly technologies and practices as well as employee and supplier engagement in sustainability.

Grünenthal is initiating projects to tackle the expected levers of its production emissions, such as green electricity and heat pumps. Since the climate risk analysis is still underway, specific climate scenarios have not yet been considered to identify additional impact levers. This will follow once the analysis is complete. Upon completion of the climate risk analysis for Grünenthal's locations, individual adaptation measures will be defined depending on risks identified.

### **Scope of key actions**

In order to achieve its environmental targets, Grünenthal has established a comprehensive environmental data management system, aligned with its EHS Policy and rooted in internationally recognised standards, including ISO 14001:2015, corporate environmental standards, the United Nations Sustainable Development Goals, and the Greenhouse Gas Protocol. This system enables Grünenthal to systematically collect and analyse data from its manufacturing sites, helping to improve efficiency and for example reduce energy consumption.

However, reducing GHG emissions across Grünenthal's value chain requires the participation of all involved organisations. Grünenthal has launched a supplier engagement programme and aims to use this as leverage to lower emissions throughout its operations.

The annual update of the GHG inventory at our sites and throughout the up- and downstream value chain ensures transparency and tracks our progress. These efforts are guided by our Planet Roadmap, which sets clear goals to reduce emissions, conserve water, and promote sustainable practices such as eco-friendly packaging and responsible sourcing.

Following the ongoing physical and transitory climate risk analysis, Grünenthal plans to identify levers and initiate actions to mitigate and prevent these risks and design actions to best adapt to the changing climate conditions – both within its own operations and along the value chain.

### **Time horizon for completion**

The key actions are aligned with Grünenthal's 2030 strategy, which is built on SBTi principles to meet near-term climate goals.

### **Actions taken and progress achieved**

#### **Own operations:**

Grünenthal has made substantial progress in reducing company-wide emissions by adopting the SBTi framework and introducing a Corporate Environmental Impact Assessment (EIA) standard. Investments in energy efficiency and renewable energy across Grünenthal's manufacturing sites in Mitlödi, Origgio, Quito, and Santiago, as well as the headquarters in Aachen, have notably reduced Scope 2 CO<sub>2</sub> emissions. For instance, the API manufacturing site in Mitlödi is expected to reduce its Scope 1 and 2 emissions in 2026, after a successful installation of a heat pump in late 2025.

Looking forward, Grünenthal is planning to complete a series of actions related to energy efficiency and reduction of energy consumption, such as heat recovery measures, improvement of thermal plant efficiency, as well as more regular actions including room temperature reduction during weekends.

**Supplier engagement:**

Grünenthal applies a global supplier maturity model across all regions in which it operates, classifying suppliers into three categories – Advanced, Intermediate and Beginners – based on their climate management maturity. This annual global maturity assessment incorporates a detailed, supplier level breakdown of Grünenthal’s total GHG inventory. As part of this process, suppliers whose emissions collectively account for approximately 74.1% of Scope 3 emissions in Categories 3.1 (Purchased Goods and Services) and 3.4 (Upstream Transportation and Distribution) are identified and defined as ‘suppliers in scope’ of the Supplier Engagement Programme. Advanced suppliers – predominantly located in regions with more mature decarbonisation frameworks, such as Europe and North America – maintain a robust GHG inventory, have validated science-based targets in line with the Paris Agreement, and are progressing on decarbonisation plans, including transitioning to 100% renewable electricity (Scope 2). This globally applied approach ensures that supplier prioritisation reflects both emission relevance and geographic-specific risk considerations, including suppliers located in high-risk countries.

Grünenthal has been actively advancing its supplier engagement strategy to align with science-based targets. In 2025, the company achieved a key milestone by validating its climate targets through the Science Based Targets initiative (SBTi). To embed sustainability across operations, Grünenthal continues to strengthen understanding and awareness of sustainability topics within the Procurement and ESO teams, integrate ESG supplier performance into purchasing decisions, and provide the Responsible Sourcing Toolkit for Business Partners. This toolkit outlines expectations, initiatives, targets, and supporting materials to drive climate action. Additionally, Grünenthal co-hosted the first PSCI Decarbonisation Summit, with 50% of strategic suppliers in attendance, reinforcing collaboration on decarbonisation. The company continues to monitor progress through its sustainability collaboration platform, where strategic suppliers share updates on their climate targets. As a result of the 2025 initiatives, Grünenthal confirmed that 69% of its suppliers in scope (accountable for 74.1% of the emissions mentioned above) have already validated science-based targets.

In 2026, Grünenthal will continue targeted supplier engagement, especially with beginner-level suppliers, supported by PSCI resources and tailored action plans. At the same time, the company will strengthen Scope 3 management by integrating primary supplier data into the GHG inventory to support the development of Grünenthal’s Scope 3 reduction-targets. External expertise will help build internal capability and ensure alignment with CSRD and ESRS requirements.

**Key actions taken and planned, expected outcomes, alignment with policy objectives, and time horizons**

Category	Examples of key actions	Outcomes	Contribution to policy objectives	Time horizon
Energy efficiency and consumption reduction	Connection of steam generation with campus hot water supply (Aachen + Origgio)	Reduction in energy consumption (notably gas and electricity); reduction in Scope 1 and 2 emissions	Aligned with GHG reduction policy and energy intensity KPIs	2026–2030
Use of renewable energy	Photovoltaic installations (Aachen)	602 t CO <sub>2</sub> e <sup>7</sup> reduction in 2025	Supports decarbonisation of electricity use and long-term net-zero targets	Fully implemented in 2025

<sup>7</sup> CO<sub>2</sub>e stands for CO<sub>2</sub> equivalent. It is a metric measure used to compare the emissions from various greenhouse gases on the basis of their global-warming potential (GWP), by converting amounts of other gases to the equivalent amount of carbon dioxide with the same global warming potential. See: [https://ec.europa.eu/eurostat/statistics-explained/index.php?title=Glossary:Carbon\\_dioxide\\_equivalent](https://ec.europa.eu/eurostat/statistics-explained/index.php?title=Glossary:Carbon_dioxide_equivalent)

Category	Examples of key actions	Outcomes	Contribution to policy objectives	Time horizon
Electrification	Heat recovery and heat pumps (Origgio)	1,300 t CO <sub>2</sub> e reduction expected	Moves energy mix away from fossil fuels	2025–2027
Fuel switching and process improvements	Electric boilers (Origgio)	221 t CO <sub>2</sub> e reduction expected	Substitution of fossil fuels with 100% green energy	2030

### Financial and resource allocation

Grünenthal has allocated significant financial resources towards realising its Planet strategy. In 2025, Grünenthal finalised the installation of a heat pump in Mitlödi, investing approximately 3.7 million Euro. Other relevant initiatives, such as the dual use heat pump in the main office building at the Aachen headquarters, relate to energy efficiency and consumption reduction or the electrification of fossil-based systems. Many of these projects relate to heating and chilling processes.

## E1.MDR-M / E1.MDR-T / E1-4 Metrics and targets in relation to climate change

### Metrics

Grünenthal evaluates the performance and effectiveness of its environmental actions by using various metrics:

- Energy in MWh
- Potential pollution levels
- GHG emissions for all scopes measured in metric tons
- Percentage of reduction achieved for Scope 1 and 2 in the reporting year compared with the previous year

These metrics provide insights into the material impacts, risks and opportunities associated with the company's sustainability initiatives.

The methodologies used for data collection and analysis rely on robust sources. Energy-related data are derived from meter readings, ensuring precision and consistency in measurement. Meters are calibrated and regularly maintained. For information related to the calculation of GHG emissions, see section 'E1-6 Gross Scopes 1, 2, 3 and Total GHG emissions'.

### Targets

Grünenthal has established clear sustainability targets aligned with its Policy on Occupational Safety, Health and Environmental Protection, and Energy (EHS Policy) objectives. The emission reduction targets are aligned with the benchmarks set under the EU Paris Agreement to limit global warming to 1.5 degrees Celsius. Monthly monitoring and robust evaluation processes ensure that the effectiveness of policies and actions is consistently tracked against material sustainability-related impacts. Each month, the site-level EHS teams convene with the Global EHS function to review performance. During these meetings, each manufacturing site presents an update on monthly performance metrics and outlines corrective actions where deviations from established targets have been identified.

The year 2020 has been selected as the baseline for Grünenthal's emissions target setting due to its status as the first year with complete and consistent emissions data coverage across Scope 1, Scope 2, and Scope 3 categories. This includes all relevant sources such as stationary and mobile combustion, and

electricity consumption (both market-based and location-based). The baseline aligns with the company's internal climate strategy and its SBTi-aligned target-setting methodology. Despite the COVID-19 pandemic, operational emissions in 2020 remained representative of typical activity levels, particularly in core manufacturing and logistics, and were comparable to adjacent years. Emissions profiles from 2021 to 2023 confirm the stability and relevance of this baseline for tracking progress. In 2025, Grünenthal secured SBTi approval for its near-term targets.

### Climate change targets

Targets 2025	Progress 2025	Status
Reduce Scope 1 and Scope 2 greenhouse gas emissions by 50% <sup>8</sup> by 2030 compared to 2020 (in line with our SBTi commitment for near-term targets)	43% reduction achieved for Scope 1 and Scope 2 since 2020	On track
Reduce greenhouse gas emissions by 4.2% each year until 2030 (absolute reduction, tonnes) (based on a 3% reduction in normalised energy consumption) <sup>9</sup>	3.0% reduction achieved for Scope 1 and 2 in 2025 vs 2024	On track
<b>Target 2026-2030<sup>10</sup></b>		
Reduce absolute Scope 1 and Scope 2 greenhouse gas emissions by 55% <sup>11</sup> by 2030 from a 2020 baseline (in line with our validated SBTi near-term targets)		

### Scope 3

By 2027, Grünenthal plans to set a measurable target to manage emissions, focusing on Scope 3. In 2025, the company embedded ESG principles into purchasing decisions. It also launched a supplier engagement programme with quarterly reporting in Procurement and ESO. In 2026, Grünenthal will introduce a framework to improve data quality using suppliers' primary data and define Scope 3 carbon-reduction targets.

### Nature and scope of targets

The SBTi reduction targets for GHG emissions are relative in nature and are defined centrally at the Grünenthal headquarters and operationalised at the site level and then managed by EHS managers and leadership teams. These targets encompass all greenhouse gas emissions of Grünenthal's own operations where Grünenthal has operational control as well as those of its suppliers and are aligned with Grünenthal's broader sustainability ambitions.

### Period and milestones

Broken down to yearly targets, progress is evaluated through monthly performance reviews. These regular check-ins help Grünenthal maintain focus on incremental achievements while working towards its long-term objectives. The targets reported above are set for 2030.

<sup>8</sup> Thereof Scope 1 reduction by 42%, Scope 2 reduction by 77%

<sup>9</sup> This target will be discontinued from 2026 onwards and replaced by the mentioned SBTi targets for all emissions scopes.

<sup>10</sup> This target will replace the previously reported Scope 1 and 2 target (above) without significant changes. Therefore, a new base year has not been applied, in line with the three-year guideline for base years relative to the first reporting year (see [E1 AR 25](#)).

<sup>11</sup> Thereof Scope 1 reduction by 42%, Scope 2 reduction by 77%

### Methodologies, scientific basis, and evaluation processes

To evaluate the effectiveness of its policies and actions, Grünenthal conducts a yearly validation of its Impact, Risk and Opportunity assessment. Strengths, Weaknesses, Opportunities, Threats (SWOT) analyses, performed in accordance with ISO 45001 and ISO 14001 standards, provide additional insight into potential risks and opportunities. Internal audits, global external ISO audits, and performance data from monthly tracking further reinforce the company's ability to monitor and refine its approach.

### Stakeholder involvement

EHS managers are actively involved in the discussion and refinement of targets for the upcoming year. These targets are aligned with the manufacturing council, members of which include the Head Global EHS & Sustainability, Head Global Quality Assurance and Site Directors, to gain valuable stakeholder input ensuring feasibility and relevance.

## E1-5 Energy consumption and mix

All business areas of our company are classified as high climate impact sectors according to the NACE definition (Delegated Regulation (EU) 2022/1288 of the Commission). Our production of pharmaceuticals is allocated to Section C, 'Manufacture of basic pharmaceutical products and pharmaceutical preparations.' The calculation of our energy intensity thus accounts for the total energy requirement in proportion to net revenue of the Grünenthal Group (see most recent [Grünenthal Report, Strategy & Financials chapter](#) on Grünenthal's corporate website)<sup>12</sup>.

### Energy consumption and mix (in MWh)

Energy consumption	2025 <sup>13</sup>	2024
Fuel consumption from coal and coal products	—	—
Fuel consumption from crude oil and petroleum products	178	1,529
Fuel consumption from natural gas	87,258	89,046
Fuel consumption from other fossil sources	—	—
Consumption of purchased or acquired electricity, heat, steam, and cooling from non-renewable sources	942 <sup>14</sup>	—
<b>Total non-renewable energy consumption</b>	<b>88,378</b>	<b>90,575</b>
Share of non-renewable sources in total energy consumption	75.7%	78.5%
Fuel consumption for renewable sources (including biomass, biogas, non-fossil fuel waste, renewable hydrogen)	5,756	663
Consumption of purchased or acquired electricity, heat, steam, and cooling from renewable sources	19,912	24,144
Consumption of self-generated non-fuel renewable energy	2,700	—
<b>Total renewable energy consumption</b>	<b>28,368</b>	<b>24,807</b>
Share of renewable sources in total energy consumption	24.3%	21.5%
<b>Total energy consumption</b>	<b>116,746</b>	<b>115,381</b>
Energy intensity (in MWh/million Euro)	65 <sup>15</sup>	62

<sup>12</sup> The more detailed Grünenthal Financial Statements are publicly available in the company register (<https://www.unternehmensregister.de/>)

<sup>13</sup> 2025 figures include estimated data for the fourth quarter of 2025.

<sup>14</sup> 2025 figure includes estimations for the full year of 2025 due to incomplete primary data for the reporting period and will be refined as data accuracy improves.

<sup>15</sup> Net revenue for 2025 is 1,797 million Euro

## E1-6 Gross Scopes 1, 2, 3 and Total GHG emissions

### Changes in reporting scope and boundaries

Regarding organisational boundaries, Grünenthal has expanded its scope from previous years, and is for the first time fully including two additional entities in the 2025 reporting:

- Grünenthal Meds: a joint venture with Kyowa Kirin International established in 2023 and based in the UK, of which Grünenthal holds a 51% stake.
- Averitas (Grünenthal's U.S. entity focused on one product for the US market: Qutenza™) and Valinor (Valinor Pharma acquired by Grünenthal in Q3-2024) and integrated into Averitas by Q3 2025. Both companies are treated as one entity in this year's GHG inventory.

The inclusion of these two new entities has a slight impact on the year-on-year data comparability with 2024.

Certain exclusions, however, were necessary due to data gaps or irrelevance. Downstream transportation represents only 1% of total GHG emissions in 2025, meaning its exclusion does not materially affect the emissions profile. Emissions from sold products were deemed irrelevant, as Grünenthal does not produce goods emitting GHG during use. Additionally, processing emissions from sold products were not calculated due to the diversity of intermediate products and their varied applications. Franchises and investments, not being part of Grünenthal's operational model, were also excluded from the reporting scope.

Based on improved data availability as well as accounting accuracy, data reported for 2024 was updated. The Scope 3 greenhouse gas emissions reported in the previous year were estimated by applying a combined scaling factor based on aggregate spend across the three most material categories (3.1, 3.4 and 3.6). In this year's report, the 2024 Scope 3 emissions have been updated considering the following changes:

- More robust actual data replaced the current Scope 3 data, which was prepared based on assumptions.
- For Scope 3.1, actual data and emissions data for the Joint Venture Grünenthal Meds were included.

In addition, a data quality review for Scope 2 led to updated electricity figures for several subsidiaries, correcting earlier assumptions related to renewable electricity shares, office-based upscaling, and provider certificates. As a result of this review, data for two affiliates were updated to correct misinterpretations in the previous reporting cycle. Emission factors for the 2024 inventory were updated based on the latest publication dates for several publications including the IEA Emission Factors for Energy to ensure cohesion with the emission factors used in 2025.

Together, these refinements strengthen the accuracy and reliability of the 2024 baseline and support improved comparability with the 2025 reporting cycle.

## Greenhouse gas (GHG) emissions<sup>16</sup>

	Retrospective					Milestones and target years			
	Base year (2020)	2023	2024	2025	% 2025 / 2024	2025	2030	2050	Annual % target / Base year
<b>Scope 1 GHG emissions</b>									
Gross Scope 1 GHG emissions (t CO <sub>2</sub> e <sup>17</sup> )	22,643 <sup>18</sup>	18,137	19,429 <sup>19</sup>	18,909	-2.7%				
Percentage of Scope 1 GHG emissions from regulated emission trading schemes (%)	n/a	n/a	n/a	n/a	n/a				
<b>Scope 2 GHG emissions</b>									
Gross location-based Scope 2 GHG emissions (t CO <sub>2</sub> e)	12,442	7,927	4,997 <sup>20</sup>	5,208	+4.2%				
Gross market-based Scope 2 GHG emissions (t CO <sub>2</sub> e)	10,122	3,248	161 <sup>21</sup>	209	+29.8%				
<b>Significant Scope 3 GHG emissions</b>									
Total Gross indirect (Scope 3) GHG emissions (t CO <sub>2</sub> e)		367,840	342,471 <sup>22</sup>	326,037	-4.8%				
1 Purchased goods and services		308,085	302,786 <sup>23</sup>	282,138	-6.8%				
2 Capital goods		4,900	7,246 <sup>24</sup>	10,330	+42.6%				
3 Fuel and energy-related activities (not included in Scope 1 or Scope 2)		5,055	3,386 <sup>25</sup>	3,260	-3.7%				
4 Upstream transportation and distribution		28,729	7,215 <sup>26</sup>	12,446	+72.5%				
5 Waste generated in operations		2,515	1,759 <sup>27</sup>	1,106	-37.1%				
6 Business travel		9,646	11,135 <sup>28</sup>	8,990	-19.3%				
7 Employee commuting		4,952	5,645 <sup>29</sup>	4,284	-24.1%				
12 End-of-life treatment of sold products		3,957	3,299 <sup>30</sup>	3,483	+5.6%				
<b>Total GHG emissions</b>									
Total GHG emissions (location-based) (t CO <sub>2</sub> e)		393,904	366,897 <sup>31</sup>	350,154					
Total GHG emissions (market-based) (t CO <sub>2</sub> e)		389,193	362,061 <sup>32</sup>	345,155					

<sup>16</sup> Grünenthal does not produce biogenic emissions.

<sup>17</sup> CO<sub>2</sub>e stands for CO<sub>2</sub> equivalent. It is a metric measure used to compare the emissions from various greenhouse gases on the basis of their global-warming potential (GWP), by converting amounts of other gases to the equivalent amount of carbon dioxide with the same global warming potential.

<sup>18</sup> New base line in line with SBTi validation as of July 2025.

<sup>19</sup> Different from the data reported in 2024 (19,512 t CO<sub>2</sub>e) due to improvements in data accuracy.

<sup>20</sup> Different from the data reported in 2024 (6,265 t CO<sub>2</sub>e) due to overall improvements in data accuracy and the correction of misinterpreted data for two affiliates.

<sup>21</sup> Different from the data reported in 2024 (540 t CO<sub>2</sub>e) due to overall improvements in data accuracy and the correction of misinterpreted data for two affiliates.

<sup>22</sup> Scope 3 data different from the data reported in 2024 (350,501 t CO<sub>2</sub>e) due to the replacement of estimates with actual data.

<sup>23</sup> Scope 3 data different from the data reported in 2024 (292,859 t CO<sub>2</sub>e) due to the replacement of estimates with actual data.

<sup>24</sup> Scope 3 data different from the data reported in 2024 (no data available for this category) due to the replacement of estimates with actual data.

<sup>25</sup> Scope 3 data different from the data reported in 2024 (no data available for this category) due to the replacement of estimates with actual data.

<sup>26</sup> Scope 3 data different from the data reported in 2024 (27,961 t CO<sub>2</sub>e) due to the replacement of estimates with actual data.

<sup>27</sup> Scope 3 data different from the data reported in 2024 (no data available for this category) due to the replacement of estimates with actual data.

<sup>28</sup> Scope 3 data different from the data reported in 2024 (9,632 t CO<sub>2</sub>e) due to the replacement of estimates with actual data.

<sup>29</sup> Scope 3 data different from the data reported in 2024 (no data available for this category) due to the replacement of estimates with actual data.

<sup>30</sup> Different from the data reported in 2024 (no data available for this category) due to the replacement of estimates with actual data.

<sup>31</sup> Scope 3 data different from the data reported in 2024 (376,278 t CO<sub>2</sub>e) due to the replacement of estimates with actual data.

<sup>32</sup> Scope 3 data different from the data reported in 2024 (370,553 t CO<sub>2</sub>e) due to the replacement of estimates with actual data.

	Retrospective			% 2025 / 2024	Milestones and target years			Annual % target / Base year
	Base year (2020)	2023	2024		2025	2025	2030	
Location-based emissions intensity (t CO <sub>2</sub> e / million Euro)		216.5	204.04 <sup>33</sup>	194.85 <sup>34</sup>				
Market-based emissions intensity (t CO <sub>2</sub> e / million Euro)		214	201.35 <sup>35</sup>	192.07 <sup>36</sup>				

### Methodologies and assumptions for GHG calculations

All greenhouse gas emissions have been calculated by external consultants in accordance with the GHG Protocol methodology, which ensures alignment with best practices in emissions reporting and supports transparency and accuracy. The GHG Protocol Corporate Accounting and Reporting Standard covers the accounting and reporting of seven greenhouse gases covered by the Kyoto Protocol – carbon dioxide (CO<sub>2</sub>), methane (CH<sub>4</sub>), nitrous oxide (N<sub>2</sub>O), hydrofluorocarbons (HFCs), perfluorocarbons (PCFs), sulphur hexafluoride (SF<sub>6</sub>) and nitrogen trifluoride (NF<sub>3</sub>). Emission factors come primarily from the UK Department for Energy Security and Net Zero (DESNZ) 2024/2025, the International Energy Agency (IEA) electricity grid factor, the Association of Issuing Bodies (AIB) residual mix factors, the Environmental Protection Agency (EPA) 2025 (waste), Ecoinvent 3.10.1 (activity-based) and Exiobase 3.8.2 (spend-based).

For all entities within the accounting scope as described above, data collection covers Q1–Q3 with Q4 upscaled, typically by adding 33% (for details see section ‘BP-2 Disclosures in relation to specific circumstances’ above). This change compared to the previous methodology will lead to more accurate assumptions as described below.

Scope 1 and 2 emissions were calculated using activity data wherever available, complemented by conservative m<sup>2</sup> based estimates where data gaps remained, and applying emission factors from DESNZ 2024/2025, IEA grid averages, and AIB residual mix factors. Both market-based and location-based Scope 2 emissions are reported.

Scope 3 emissions were assessed using a category-specific approach combining activity-based factors from Ecoinvent 3.10.1 and spend-based factors from Exiobase 3.8.2; all negative entries, double counts and items already covered under Scopes 1, 2 or other Scope 3 categories were removed.

Methodological improvements in 2025 include correction of Incoterms-related double counting in upstream transportation, reallocation of certain downstream shipment lines, refinement of capital goods classification, and broadened use of activity-based data. Data gaps and assumptions used are transparently disclosed and will be addressed in subsequent reporting cycles, where feasible.

### Reconciliation to financial statements

GHG emissions intensity is calculated as total emissions (tonnes of CO<sub>2</sub>e<sup>37</sup>) divided by net revenue. Net revenue is disclosed in the company’s annual Grünenthal Report and in its financial statements. The latest financial statements are available via the company register, where the last uploaded reports are from 2024

<sup>33</sup> Different from the data reported in 2024 (209.28 t CO<sub>2</sub>e) due to improvements in data accuracy.

<sup>34</sup> Net revenue for 2025 is 1,797 million Euro (in comparison: 2024 was 1,798.2 million Euro).

<sup>35</sup> Different from the data reported in 2024 (206.9 t CO<sub>2</sub>e) due to improvements in data accuracy.

<sup>36</sup> Net revenue for 2025 is 1,797 million Euro (in comparison: 2024 was 1,798.2 million Euro).

<sup>37</sup> CO<sub>2</sub>e (CO<sub>2</sub> equivalent) is a metric measure used to compare the emissions from various greenhouse gases on the basis of their global-warming potential (GWP), by converting amounts of other gases to the equivalent amount of carbon dioxide with the same global warming potential. See: [https://ec.europa.eu/eurostat/statistics-explained/index.php?title=Glossary:Carbon\\_dioxide\\_equivalent](https://ec.europa.eu/eurostat/statistics-explained/index.php?title=Glossary:Carbon_dioxide_equivalent)

(published in 2025)<sup>38</sup>. This approach ensures alignment with financial reporting, facilitating transparent and standardised emissions disclosures.

**Continuous improvement**

Grünenthal remains committed to enhancing the accuracy and scope of its emissions reporting. The company works on improving its data availability and to include previously excluded data sources, particularly from joint ventures and downstream transportation. In parallel, Grünenthal aims to further decarbonise its operations by reducing gas consumption across its global facilities.

**Disclosure of types of contractual instruments, Scope 2 GHG emissions**

The methodology applied in 2025 is consistent with the approach introduced in the prior reporting year, under which only electricity procured under contracts with a 100% renewable energy share qualifies as renewable energy.

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<sup>38</sup> The Grünenthal Financial Statements are publicly available in the company register (<https://www.unternehmensregister.de>).

## E2 – Environmental pollution (water)

### E2.SBM-3 Material impacts, risks and opportunities and their interaction with strategy and business model

Type of impact	Impact
Potentially negative	Environmental pollution (water)

Pollution of water has been identified as a material, potentially negative impact for Grünenthal, primarily linked to its own operations, in particular wastewater generated from pharmaceutical manufacturing, including API production. No material impacts to different kinds of pollution, nor risks or opportunities related to pollution were identified in the double materiality assessment.

The potential impact is concentrated at production sites and may affect water bodies if wastewater is not properly managed. Grünenthal addresses this impact through integrated wastewater and waste management systems, continuous monitoring, site-specific risk assessments, and preventive maintenance, which are embedded in operational decision-making. These measures aim to prevent and mitigate environmental harm in the short to medium term and are complemented by emergency preparedness and incident response procedures. Grünenthal is directly involved in this impact through its activities and reported no leakages at its locations in 2025.

#### E2.MDR-P / E2-1 Pollution policies

##### Pollution policies

Grünenthal's Policy on Occupational Safety, Health and Environmental Protection, and Energy (EHS Policy), is key to its efforts in addressing climate change (see chapter 'E1 Climate change'), as well as pollution. The policy comprehensively applies to all Grünenthal's operations, ensuring alignment with regulatory compliance and international standards. The policy is implemented by the local EHS teams with the support of local leadership teams. EHS performance is regularly reviewed by the site directors and once a year presented to the Chief Executive Officer.

The company's global wastewater standard provides guidance on managing, sampling and reporting wastewater quality in compliance with local regulations. Manufacturing sites adopt individual approaches for wastewater treatment based on local discharge requirements, with all practices documented and accessible globally.

#### E2.MDR-A / E2-2 Pollution actions

Grünenthal recognises the detrimental impact of pollution across its own operations, and, in line with its EHS policy, is committed to a holistic approach to minimise it. Through ongoing wastewater management, pollution risk reduction measures, and permanent incident response and emergency preparedness, Grünenthal expects to avoid pollution incidents in its own operations. At its own sites, Grünenthal realises projects and action plans addressing water pollution.

### **Wastewater and waste management**

All wastewater sources are systematically identified and documented via detailed drainage plans, including discharge points and receptors. Wastewater undergoes treatment in line with national and international standards, with parameters such as pH, chemical oxygen demand (COD), and total suspended solids (TSS) monitored continuously. Monitoring results are retained for six years to ensure traceability, according to Grünenthal's standard operating procedure (SOP). Waste management policies mandate source segregation, proper labelling, and secure storage, reducing the risk of cross-contamination and facilitating appropriate handling of hazardous waste streams.

### **Pollution risk reduction measures**

Risk assessments are conducted for all high-risk operations, particularly those involving hazardous substances or wastewater discharge. Sites are required to develop and maintain Waste and Wastewater Management Plans as well as Spill Management Plans, which include both mitigation and contingency measures. Preventive maintenance and inspections of critical infrastructure – such as tanks, drains, and storage facilities – are integral to pollution control. All new construction projects undergo Environmental Impact Assessments (EIAs), covering the full life cycle of the project and considering cumulative and transboundary environmental effects.

### **Incident response and emergency preparedness**

To minimise environmental harm in the event of an incident, Grünenthal enforces a standardised spill response protocol that includes immediate containment, root cause investigation, and corrective actions. Emergency contact procedures with relevant authorities are built into site plans. Additionally, the company's Wastewater Standard addresses unplanned discharge scenarios, including those resulting from extreme weather events. Once per year training and emergency drills ensure staff preparedness and reinforce a culture of environmental responsibility. In 2025, there were no leakages at Grünenthal locations.

In 2025, as part of the ESRS implementation roadmap, a gap analysis was conducted to compare pollutants listed in Annex II of the E-PRTR. The outcome will inform an action plan to ensure that all listed substances are either monitored and reported across all sites or assessed for materiality in accordance with ESRS requirements. However, non-EU sites will not be able to analyse all pollutants during 2025; therefore, where relevant substances are not currently monitored, the feasibility of implementing consistent measurement protocols will be evaluated as part of the action plan.

### **Financial and resource allocation**

No significant capital expenditures (CapEx) or operating expenses (OpEx) were incurred for the actions in the reporting period.

## **E2.MDR-M / E2.MDR-T / E2-3 Metrics and targets in relation to pollution**

### **Metric**

Grünenthal monitors pollution of water (in mg/l, kg/m<sup>3</sup> and value in kg) for all pollutants listed in Annex II of Regulation (EC) No. 166/2006 (E-PRTR)<sup>39</sup> (see section 'E2-4 Pollution of water' for details).

<sup>39</sup> <https://eurlex.europa.eu/eli/reg/2006/166/oj/eng> Pollutants surpassing the threshold for releases according to Annex II of Regulation (EC) No. 166/2006 (E-PRTR) to be reported under ESRS regulation.

## Target

Grünenthal is committed to minimising and controlling pollution across its operations. Emissions to water are a key focus area, particularly given the challenges of managing wastewater in pharmaceutical production. Special standards apply to sites producing Active Pharmaceutical Ingredients, ensuring stringent measurement and reporting of active ingredient volumes and effluent disposal.

In 2025, the company set the following voluntary target related to pollution in its own operations:

### Target 2026-2030

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Keep the pollutant load in wastewater discharges from manufacturing activities below the thresholds listed in Annex II of Regulation (EC) No. 166/2006 (E-PRTR) each year until 2030.

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The target was set involving internal Grünenthal experts. The focus on water pollution aligns with regulatory requirements and the company's EHS Policy, which prioritises wastewater management in pharmaceutical production.

## E2-4 Pollution of water

### Pollution from own operations

Grünenthal measures pollution to water from its own operations. None of the water pollutants surpassed the threshold according to Annex II of Regulation (EC) No. 166/2006 (E-PRTR) in 2025, as in 2024. The comparative information disclosed in the previous Responsibility Report 2024 reported exceedance of E-PRTR thresholds. This was the result of a misinterpretation of data. Following the correction, we confirm that no water pollutants exceeded the applicable E-PRTR reporting thresholds in 2024.

Other pollution categories were not identified as material and thus are not part of this report.

### Pollution-related performance and compliance at Grünenthal operations

Grünenthal uses external measurement laboratories to analyse air emissions and wastewater samples, ensuring that methodologies comply with regulatory requirements and accord with the monitoring frequency stated in the respective permits. The data collected for pollution-related accounting and reporting is derived from external measurement reports, where data stems from both measurements and estimates.

While direct measurements are prioritised wherever technically feasible and legally required, calculated or estimated values are also used in specific cases where:

- Continuous or spot emission monitoring is not installed,
- The emission source is small or standardised, or
- Reliable activity data and regulatory emission factors are available.

The use of estimation methods is compliant with national and international guidelines (e.g., IPCC, EEA, national environment or health ministries).

The company does not operate installations under the scope of the Industrial Emissions Directive (IED) or EU Best Available Techniques (BAT) Conclusions, and no compliance schedules, derogations or enforcement actions are applicable. Additionally, Grünenthal has not adopted the EU BAT standards for evaluating its environmental performance against BAT-AEL (Best Available Techniques – Associated Emission Levels) or BAT-AEPL (Best Available Techniques – Associated Energy Performance Levels). No instances of non-compliance have been identified to date.

## Social

### S1 – Own workforce

#### Managing Grünenthal’s own workforce

#### S1.SBM-3 Material impacts, risks and opportunities and their interaction with strategy and business model

Type of impact	Impact
Actual positive	Fair working conditions and remuneration (own workforce)
Potential negative impact	Workplace safety and health protection
Actual positive	Training and development
Actual positive	Diversity, inclusion and equal opportunities

Grünenthal has identified fair working conditions and remuneration, training and development, as well as the promotion of diversity, inclusion and equal opportunities to be material positive impacts for its own workforce. Workplace safety and health protection relates to potential negative impacts for the company’s employees. These material impacts originate from Grünenthal’s business activities and the company’s management of its own workforce. The impacts are the basis for strategy formation, which includes target setting and action plans.

There are currently no material impacts stemming from climate transition actions of plans. Also, no material risks or opportunities were identified for Grünenthal related to its own workforce identified during the double materiality analysis.

#### Types of employees and non-employees subject to material impacts

All people in Grünenthal’s workforce that can be materially impacted by the company are included in the reporting scope. Grünenthal’s workforce primarily comprises individuals with fixed term or permanent contracts, including regular employees, those in training roles such as interns and apprentices, and inactive employees such as those on parental leave or long-term sick leave. Agency staff and consultants, while essential to some operations, are generally not included in the category of ‘own workforce’. HR data for Grünenthal Meds and Valinor employees is included in this chapter.

In terms of workplace safety and health, the reporting scope extends to contractors working on Grünenthal premises for accident statistics. Although safety data is tracked across the organisation, the primary focus remains on manufacturing sites, where operational risks are most prevalent.

#### Ensuring fair working conditions and remuneration

Grünenthal strives to create a positive working environment that motivates and engages its workforce. The company is committed to ensuring fair working conditions and remuneration as well as a safe and eco-friendly workplace.

#### Managing workplace safety and health protection

Grünenthal takes safety management seriously, with robust processes, systems, and rules in place to ensure a safe workplace for all employees. There are risks related to the nature of operations at Grünenthal, leading to health and safety being identified as a potential negative impact for Grünenthal’s workforce. Relevant activities in question include the handling of hazardous materials and execution of high-risk tasks,

such as working at heights, hot work (e.g., welding), and confined space entry. Specific high-risk activities are identified through workforce engagement and site-specific risk assessments.

Grünenthal has established a proactive approach to managing risks and establishing a safety-first culture, contributing to workplace safety and health. The company's Vision Zero initiative reflects its ambition of achieving zero recordable workplace accidents. This ambitious vision is supported by mandatory Health & Safety standards – such as those on Hot Work, Work at Height and Confined Space Entry - and preventive measures across all sites. For example, at manufacturing locations, employees actively observe colleagues' safety behaviour, report not only accidents but also near misses, and provide constructive feedback to correct potential issues before accidents occur.

Safety topics are regularly shared and discussed in forums such as MDL (Manufacturing Daily Line-up meetings) and safety committees at each site, fostering an inclusive approach to risk awareness. Additionally, training and awareness programmes contribute to employee engagement on these topics such as the Global EHS Day celebration and the Family Day at site to involve children and family with safety awareness.

### **Fostering training and development**

Every employee at Grünenthal is considered a talent, and the company actively promotes growth and development for all team members. Leaders work closely with their teams to create tailored Personal Development Plans (PDPs) and regularly review performance and career progression. All employees have the option for these reviews and PDPs, but they are not mandatory. Grünenthal aims for a participation rate of 90%. The company invests in its people by providing learning opportunities, such as additional responsibilities, training, and mentoring programmes. Employees are encouraged to take ownership of their development, discuss aspirations and identify areas for improvement with their managers.

### **Promoting diversity, inclusion and equal opportunities**

Grünenthal's comprehensive Diversity & Engagement Strategy unites and expands existing local and global events and initiatives with the vision that all employees feel valued, respected, included and empowered to do their best, contribute great ideas and reach their full potential. This strategy generates a significant positive impact by fostering an environment where diverse perspectives and experiences are actively celebrated. Employees benefit from a culture of inclusion supported by programmes such as leadership workshops, mentoring schemes, and partnerships with external initiatives like 'Mujeres en Farma' in Spain, which promotes female leadership in the pharmaceutical industry. These efforts have earned recognition through awards for diversity and inclusion, reinforcing Grünenthal's reputation as an attractive and equitable employer.

To promote diversity and inclusion in recruitment while maintaining merit-based decision-making, the company has implemented structured training on unconscious bias and inclusive leadership reinforcing equitable practices across all functions. Grünenthal also fosters innovation and engagement by enhancing employee satisfaction and performance through learning opportunities, community involvement, and creating a workplace that reflects the diversity of society.

### **Understanding of vulnerable groups within its own workforce**

Grünenthal recognises that certain groups of employees – such as junior or inexperienced workers, night shift staff, or those exposed to hazardous tasks – may face heightened risks in terms of workplace safety and health. To address these risks, the company has implemented tailored training and assessment protocols, including specialised training plans for roles in maintenance and production, and strict adherence to minimum age requirements and competency assessments for specific positions. In addition to physical safety, Grünenthal has developed targeted initiatives to support employees who are more vulnerable to

discrimination and inequality such as underrepresented groups or individuals with disabilities. The Diversity & Engagement Strategy explicitly addresses individual differences, ensuring that all employees have access to equal opportunities and a safe, supportive environment.

### **Human rights safeguards for Grünenthal's workforce**

Grünenthal is firmly committed to upholding human rights, aiming to safeguard fair working conditions and eliminate risks of child labour within its workforce. The company has not identified any of its operations as being at significant risk of exploitative labour practices.

Through its Global People Policy, Grünenthal fully supports and complies with local and international regulations prohibiting child labour. Business partners are also required to align with Grünenthal's ethical commitments, which include respecting fundamental rights and refraining from employing underage workers. For more details, see sections '[S1.MDR-P / S1-1 Fair working conditions and remuneration policies and company agreements](#)' and '[S1.MDR-P / S1-1 Diversity, inclusion, and equal opportunities policy: Managing workforce impacts](#)' regarding working conditions and diversity, inclusion and equal opportunities.

### **Geographic considerations**

Grünenthal's manufacturing sites are located in Chile, Ecuador, Germany, Italy, and Switzerland. The company's proactive adherence to international ethical guidelines such as the UN Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises, combined with continuous monitoring and risk assessment processes such as the yearly ESG risk assessment in the supply chain (covering the GSCA requirements), provides assurance that risks of forced or child labour are effectively minimised. The risk monitoring system in compliance with the GSCA framework for the supply chain includes the in-depth ESG assessment, adverse media monitoring and our Ethics Helpline.

## **S1-2 Processes for engaging with own workforce and workers' representatives about impacts**

### **Employee perspectives in decision-making**

Grünenthal integrates workforce insights into its decision-making processes. In Chile, France, Germany, Italy and Spain – where required by local legislation – works councils play a significant role in shaping workforce-related company agreements and policies. Local works councils engage with their members in accordance with national legislation, covering the topics and frequency of communication. For example, in Germany, the works council advocates for employee interests in areas such as compensation, social and personnel issues, occupational health and safety, environmental protection and workplace organisation.

Grünenthal engages with its own workforce regarding key employee-related impacts, risks and opportunities, in particular fair working conditions, diversity and inclusion, and occupational health and safety. Engagement covers all employees and is organised through both top-down and bottom-up processes. Depending on the specific communication channel, different roles and functions, most commonly HR business partners, Communications and leadership teams, lead the engagement of employees. Local HR managers are responsible for engaging with works councils.

At Group level, strategic priorities are defined through the Group Scorecard and approved by top management. These priorities are communicated to all employees via global and local communication chan-

nels, including the global intranet and townhall meetings. Employees' perspectives on the implementation of these priorities are incorporated through regular dialogue between employees and their managers, including discussions on individual objectives aligned with the Scorecard priorities.

In addition, employees are involved in responsibility-related initiatives addressing material workforce-related impacts through dedicated engagement formats such as employee surveys (including the Great Place to Work® survey, where employees can anonymously evaluate the company's leadership and culture), focus groups and interviews. These formats are used to gather feedback on topics including working conditions, diversity and inclusion, and occupational health and safety.

The results of these engagements are reviewed by management and are considered when refining initiatives, defining action plans and prioritising measures to address the identified impacts, risks and opportunities. Progress against the Group Scorecard priorities is tracked on a quarterly basis and shared with employees, supporting ongoing feedback loops between workforce input and management decision-making.

### **Mechanisms for employee engagement**

Regular communication, such as global and local townhalls and intranet articles, informs employees about corporate priorities and performance.

Grünenthal also celebrates and recognises employee contributions through various awards and community-building events. The most prestigious awards, the Global Excellence Awards, are selected by the Corporate Executive Board annually and recognise exceptional contribution to Grünenthal's Group Scorecard. In 2025, the company launched YOU, a global recognition platform that enables every employee to acknowledge and celebrate the contributions, behaviours and impact of colleagues across all teams and organisational levels. Additional recognition programmes such as the GO Superheroes and HR Excellence Awards celebrate achievements within functional areas.

Social events, such as regional gatherings and team-building activities, further enhance engagement. These include regular seasonal campus events at Grünenthal's headquarters and the annual GO Day within the Global Operations business unit, encouraging collaboration across sites and global functions.

### **Inclusion of marginalised and vulnerable employees**

Grünenthal welcomes and includes employees who may be vulnerable or marginalised. Specific measures, such as the representation of youth and apprentices (Youth Committee) as well as disabled employees through their own elected representatives, ensure their voices are heard and their needs addressed. The Diversity and Engagement Council, comprising leaders across business units, plays a key role in driving inclusion initiatives. The Council advises on Grünenthal's diversity strategy and aims to enhance representation of potentially vulnerable or marginalised groups.

To further support inclusivity, the company addresses language and accessibility barriers by simplifying and translating communication materials to ensure they are comprehensible to all employees. Additionally, intranet content can be translated into a chosen language, promoting broader access and understanding.

### **Removing barriers to engagement**

Grünenthal recognises that engagement is most effective when barriers to participation are minimised. For example, in Italy, event planning explicitly considers the needs of employees with disabilities to ensure they can participate fully.

Employees on parental or long-term leave are kept informed through accessible updates on the intranet and other communication channels. Flexible working models enable global collaboration and career growth, regardless of location, fostering a sense of inclusion and accessibility.

Additionally, meetings where participants are dialling in from different time zones or working part-time are scheduled at times that are feasible for all. In many cases, sessions are offered multiple times to accommodate diverse availability, ensuring that everyone has the opportunity to engage meaningfully.

### **S1-3 Processes to remediate negative impacts and channels for own workforce to raise concerns**

#### **Immediate action and prevention of recurrence**

Grünenthal is deeply committed to ensuring effective processes for addressing grievances and remedying negative impacts. If violations of human rights or environmental obligations are identified within Grünenthal's operations, measures are taken to stop the violation and avoid future occurrences. If such violations occur in the supply chain, Grünenthal conducts diligent investigations and works closely with suppliers to resolve the issues. Suppliers are required to allow audits, and contractual obligations are designed to enhance compliance (see section 'G1.MDR-P / G1-1 / G1-3 Ethical business culture, anti-corruption and anti-bribery policies'). Depending on the severity of a violation, Grünenthal may take actions ranging from requests for remediation up to the termination of the business relationship.

#### **Mechanisms for raising concerns**

Grünenthal encourages employees to speak up. To facilitate open communication, Grünenthal provides several mechanisms for raising concerns, including the Ethics Helpline (see 'Governance' chapter below). Employees are also encouraged to share feedback directly with their line managers, Human Resources representatives, local Compliance Officers, or – where applicable – works councils and union representatives. The effectiveness of grievance mechanisms is continuously monitored as described in section 'G1-1 continued'.

Protecting employees who raise concerns is a key priority for Grünenthal. The company's Code of Conduct explicitly prohibits retaliation against whistleblowers and mechanisms are in place to protect their identity and rights.

#### **Promoting awareness and trust**

Grünenthal fosters employee awareness of grievance channels through regular training sessions, workshops, and clear communication across multiple platforms, including the intranet and notice boards. The Great Place to Work® Trust Index recorded a score of 78%, reflecting a strong level of confidence among employees in the company's culture of transparency.

### **S1-6 Characteristics of Grünenthal's workforce**

All numbers include personnel numbers from Grünenthal Group, Grünenthal's 100% US affiliate Averitas, Valinor Pharma (100% acquired as of July 2024) and Grünenthal Meds (51% majority stake joint venture as of August 2023) – unless stated otherwise.

**Number of employees by gender (in headcount)<sup>40</sup>**

<b>Gender</b>	<b>2025</b>	<b>2024</b>
Female	2,076	2,203
Male	2,073	2,148
Other	0	1
Not reported	0	0
<b>Total</b>	<b>4,149</b>	<b>4,352</b>

**Number of employees in countries with significant employment (in headcount)<sup>41</sup>**

<b>Country</b>	<b>2025</b>	<b>2024</b>
Germany	1,146	1,221
Italy	614	617
Chile	456	541

**Number of employees by contract type, broken down by gender (in headcount)**

<b>Type of contract</b>	<b>2025</b>	<b>2024</b>
<b>Permanent</b>	<b>3,913</b>	<b>4,141</b>
Female	1,961	2,091
Male	1,952	2,049
Other	0	1
<b>Temporary</b>	<b>236</b>	<b>211</b>
Female	115	112
Male	121	99
Other	0	0
<b>Non-guaranteed hours</b>	<b>0</b>	<b>0</b>
Female	0	0
Male	0	0
Other	0	0
<b>Total</b>	<b>4,149</b>	<b>4,352</b>
Female	2,076	2,203
Male	2,073	2,148
Other	0	1

**Turnover (in headcount and percentage)**

<b>Turnover</b>	<b>2025</b>	<b>2024</b>
Turnover in headcount	718	733
Turnover in percentage	17.3%	16.6%

<sup>40</sup> The headcounts disclosed throughout this Sustainability Statement include apprentices and cover all entities of the Group, irrespective of their consolidation status, and refer to 31 December. By contrast, the employee number in the Group Management Report (Konzern-Lagebericht) represents the annual average and excludes apprentices; accordingly, the figures differ in both scope and reference period. Employee numbers are presented in the Group Management Report under the section "2.3.1 Financial Performance".

<sup>41</sup> Countries where the undertaking has at least 50 employees representing at least 10% of its total number of employees. Employee numbers are presented in the Group Management Report under the section "2.3.1 Financial Performance".

**Context information regarding employee data**

**Standardised reporting methodologies**

Grünenthal uses a standardised method to report employee data, primarily using full-time equivalent (FTE) calculations for financial reporting and headcount for sustainability reporting. These figures are derived from employee data recorded on the company’s Human Capital Management (HCM) system. A monthly and annual reporting process ensures consistency and accuracy in data collection and analysis.

**Reporting period and frequency**

Employee data is reported at the end of the financial year, specifically on 31 December unless full year numbers were required (for turnover). This methodology provides a consistent point of reference for annual evaluations and comparisons.

**Contextual information and data limitations**

While FTE and headcount figures form the foundation of employee reporting, certain categories, such as interns and inactive employees (e.g., those on long-term sick leave or parental leave), are not included in monthly or annual HR reporting.

**Cross-referencing with financial statements**

Employee numbers and related breakdowns are disclosed in Grünenthal’s Responsibility Report and referenced in its financial statements. The latest financial statements are available via the company register, where the last uploaded reports are from 2024 (published in 2025)<sup>42</sup>. These cross-references ensure that reported employee data aligns with the most representative figures in financial statements, enhancing transparency and accountability.

**S1-17 Incidents, complaints and severe human rights impacts**

**Reconciliation of fines, penalties, and compensation for discrimination or harassment**

Metric	2025	2024
Number of confirmed incidents of discrimination	4	2
Number of complaints filed through channels for people in own workforce to raise concerns (excluding number of confirmed incidents above)	5 of which 3 in progress 2 considered "unsubstantiated"	2
Amount of fines, penalties, and compensation for damages as a result of incidents and complaints	0	0

In the reporting year, there were nine complaints filed by employees which were investigated by the responsible Compliance Officer. Of those, three complaints are still under investigation and two were considered unsubstantiated. The four confirmed incidents of discrimination resulted in completed corrective actions (three “disciplinary measures” and one “improvement of process and training”).

<sup>42</sup> The Grünenthal Financial Statements are publicly available in the company register (<https://www.unternehmensregister.de>).

**Addressing human rights violations**

Grünenthal has established robust mechanisms to address alleged violations of human rights in its own business operations and its supply chain. The channels for reporting possible violations are the same as for addressing Compliance concerns (e.g. Ethics Helpline, Compliance Officer, HR, supervisor, works council etc.) All reported incidents are investigated by a team led by the responsible Compliance Officer. If a human rights violation is confirmed within Grünenthal’s own business operations, the responsible Local, Regional or Global Ethics Committee acts and takes immediate steps to resolve the issue and prevent recurrence, which may include revising internal procedures or introducing additional controls. If a human rights violation is identified in the supply chain, the Global Ethics Committee will decide on measures ranging from remedial action plans to the termination of the business relationship.

Grünenthal operates a robust compliance framework aligned with the GSCA, which focuses on suppliers. The company’s Statement of Compliance with Human Rights and Environmental Standards explicitly requires suppliers to meet human rights and environmental standards. Grünenthal actively collaborates with suppliers to address any identified risks, ensuring transparency and accountability throughout the supply chain.

**Severe human rights issues and incidents**

No severe human rights violations or incidents connected to Grünenthal’s own workforce have occurred. The company’s internal governance and monitoring processes aim to prevent such issues, and Grünenthal’s German Supply Chain Act working group ensures a proactive stance on potential risks along the supply chain. For more information on the GSCA working group, see section ‘[G1.MDR-A Ethical business culture actions](#)’.

Metric	2025	2024
Number of severe human rights issues and incidents connected to own workforce	0	0
Number of severe human rights cases where company played role securing remedy for those affected	0	0

## Fair working conditions and remuneration

### S1.MDR-P / S1-1 Fair working conditions and remuneration policies and company agreements

#### Policies to manage material impacts, risks, and opportunities related to fair working conditions and remuneration

Grünenthal is dedicated to fostering a workplace that empowers employees to thrive both professionally and personally. The company is committed to addressing any current or future material impacts, risks and opportunities related to its workforce to create a positive and inclusive work environment, ensuring compliance with local laws and exceeding legal requirements through a comprehensive policy framework<sup>43</sup> which includes company agreements. This way, Grünenthal strives to establish itself as an employer of choice while prioritising fairness, transparency and employee wellbeing. Grünenthal is firmly committed to upholding human rights and ensuring fair treatment for all employees, applicants and business partners. There were no significant changes to the workforce-related policies in the reporting year.

#### Comprehensive policy framework

At the core of Grünenthal's approach is the Global People Policy, which outlines commitments to fair working conditions, equitable remuneration, and a culture that promotes inclusivity and innovation. This policy applies to all Grünenthal employees, managers and contingent workers worldwide performing work for any legal entity of the Grünenthal Group, including contractors and personnel from outsourced service providers. The policy is fully aligned with international standards, including the International Labour Organisation (ILO) Conventions and the United Nations Universal Declaration of Human Rights. Grünenthal does not have a tracking mechanism in place yet. In addition to the Global People Policy, Grünenthal adheres to other key frameworks and standards, including:

- **Code of Conduct:** Guiding ethical behaviour and decision-making of all employees across the organisation. Additionally, it outlines the company's expectations regarding human rights compliance.
- **Policy on Occupational Safety, Health and Environmental Protection, and Energy (EHS Policy):** Ensuring safe and healthy working conditions in Grünenthal's own operations and among its suppliers (see section on '[Workplace safety and health protection](#)' for details).
- **Ethics Helpline Policy:** Providing employees and external stakeholders with a confidential platform for reporting concerns.
- **Statement of Compliance with Human Rights and Environmental Standards:** Reinforcing Grünenthal's dedication to internationally recognised guidelines such as the UN Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises and International Labour Organisation (ILO) Conventions on Discrimination (Employment and Occupation) (Convention C111, 1958 (No. 111)), Freedom of Association and Protection of the Right to Organise (Convention C087, 1948 (No. 87)) and Equal Remuneration (Convention C100, 1951 (No. 100)). It explicitly prohibits any form of discrimination based on race, gender, religion or other protected characteristics, as well as the use of child labour and forced labour.

By integrating these standards into its operations, Grünenthal ensures respect for human rights across its global supply chains and within its own business units. For more information, see section '[S1.SBM-3 Material impacts, risks and opportunities and their interaction with strategy and business model](#)'. Grünenthal's broader human rights approach extends beyond its own operations: see chapter '[G1 – Business conduct](#)' regarding human rights in the supply chain.

<sup>43</sup> The term 'policies', in the context of working conditions, explicitly includes the contents of company agreements.

Implementation of these policies is overseen by the respective functional leads, such as the Global Head of HR for the Global People Policy. To ensure consistent standards while accommodating regional and country legislation, local policies are developed, maintained and accountable to the Head of HR for the territory. For Germany, the Head of HR Germany is responsible for all company and works council agreements for Germany.

### **Key contents of working conditions policies and agreements**

Grünenthal's policies are designed to provide attractive working conditions by offering diverse roles, growth opportunities and an extensive range of benefits including healthcare and pension, in the context of the local market. Benefits may include medical insurance, company car, fitness allowance as well as membership and service fees, training or education, additional holidays, special discounts and other support. These policies fully comply with local laws and regulations while incorporating collective bargaining agreements and company-wide standards that go beyond statutory requirements. Other key areas covered include:

- **Working time regulations based on local legislation:** General schedules, daily working hours, special leave policies, and bridging days (Germany).
- **Compensation structures:** Transparent frameworks for base salaries, variable pay, allowances, and rules for work on Sundays or public holidays.
- **Employee development:** Personal development plans, training opportunities, and tailored local social services.
- **Workplace safety:** see section '[Workplace safety and health protection](#)' below.

### **Communication and accessibility of policies**

Grünenthal prioritises transparency and accessibility in communicating its policies to ensure employees understand their rights, responsibilities, and available resources. Policy documents are readily accessible via the company's intranet or local workspaces, providing ongoing access for all stakeholders.

## **S1.MDR-A / S1-4 Fair working conditions and remuneration actions**

Grünenthal demonstrates a strong commitment to fostering a supportive and inclusive work environment and avoiding negative impacts on its employees by implementing flexible policies, innovative initiatives, and robust measures that address material impacts, mitigate risks, and deliver positive outcomes for its employees. These efforts are closely aligned with the company's broader sustainability and business goals, creating a workplace where employees can thrive both professionally and personally. In geographies with active works councils (Chile, France, Germany, Italy and Spain), the local works councils are involved in discussions regarding new agreements.

Grünenthal's SmartWork Hybrid Model enables eligible employees, i.e., all employees whose activities permit participation and if they are personally suitable, to manage their flexible working arrangements. This continued approach allows for a combination of remote and on-site work, tailored to individual roles and responsibilities. The model emphasises trust and focuses on results rather than strict working hours or locations. In addition to the SmartWork approach, Grünenthal has implemented trust-based working hours for exempt employees.

Employees are supported with the necessary infrastructure to ensure productivity from any location, and family-friendly measures, such as an on-site childcare centre at the Aachen headquarters, enhance work-life balance. This measure has been progressively implemented since 2021.

Grünenthal has implemented comprehensive measures to promote equal pay and pay equity. These include a transparent job family and levelling framework, which ensures that salaries are based on objective, gender-neutral criteria. Regular salary reviews, transparent progression structures, and equitable pay for employees returning from leave further reinforce this commitment. The company is also taking steps to enhance transparency in recruitment. For instance, Grünenthal is excluding prior salaries from recruitment decisions and plans to have the pay range or rate posted in job advert and/ or to have it available on request to all candidates before any interview. Future plans also include disclosing potential pay gap data in accordance with the EU pay transparency directive.

In 2025, Grünenthal implemented a new campus concept at its headquarters in Aachen, consolidating teams in Grünenthal’s most modern buildings. The project contributed to improve resource efficiency and reduce our environmental footprint. At the same time, the concept aims to enhance overall working conditions and employee well-being by creating an attractive and supportive working environment. Workspaces were upgraded with coworking areas, a barista bar, and lounge spaces to enhance collaboration and employee experience.

To track and ensure effectiveness of actions, Grünenthal uses the exchange with local works councils and the Great Place to Work® survey, which takes place every other year. Additionally, there are other non-standardised surveys run by local HR teams, tailored to specific needs, such as occasional mood check polls.

**Financial and resource allocation**

Capital expenditures (CapEx) for the implementation of the new campus concept amounted to approx. 1.4 million Euro in the reporting year, operating expenses (OpEx) were approx. 1.2 million Euro in 2025.

**S1.MDR-T / S1-5 Fair working conditions metrics and targets**

**Metric**

Grünenthal’s aim is to ensure that no employee is disadvantaged in terms of pay, regardless of gender. To adequately track performance regarding fair working conditions, Grünenthal will track the following metric focussed on gender neutral pay going forward:

<b>Metric</b>	<b>2025<sup>44</sup></b>
Adjusted gender pay gap ratios in all countries with more than 50 employees	46% of countries are within $\pm 1.5\%$ of zero
	39% fall between $\pm 1.5\%$ and $\pm 3.0\%$
	15% fall between $\pm 3.0\%$ and $\pm 5.0\%$

For the reporting year, the results for all 13 countries with more than 50 employees fall within the  $\pm 5\%$  threshold defined by the EU Gender Pay Gap Directive.

We use a regression model to calculate the differences between the unadjusted and adjusted gender pay gap across different countries. This model takes into account objective, gender-neutral factors that are in line with our compensation philosophy, such as job level, job family, performance and personal development within the company.

<sup>44</sup> Numbers excluding Grünenthal Meds.

The analysis is based on Total Actual Cash as of 31 December 2025. Total Actual Cash consists of guaranteed base salaries for 2025, including Christmas bonus, holiday pay, and variable compensation consisting of short-term and long-term bonuses as well as other benefits (e.g. production/shift payments, meal vouchers, home office costs, and car costs). The type and amount of benefits and variable pay depend on the job and local procedures. For employees in field teams, the sales incentive is included. The analysis covers all employees<sup>45</sup>, tariff and non-tariff on fixed-term and open-ended contracts, as well as trainees and students.

## Target

Grünenthal's overarching goal is to positively impact the lives of its employees while enabling their best performance. To achieve this overarching goal and manage the identified material impact of 'Fair working conditions and remuneration', Grünenthal pursues the following target from 2026 onwards:

### Target 2026-2030

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Reduce the adjusted gender pay gap to below 1.5% by 2030 in all countries with more than 50 employees, ensuring greater equality and fairness within the organisation.

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### Inclusive target setting and feedback process

Grünenthal actively involves its workforce in shaping and refining its strategies (see 'S1-2 Workforce engagement' above). Priorities are reviewed and refined each year to reflect focus areas and initiatives for the following year (which may change for example based on local and global developments and market trends). The metrics to measure the success of the respective key initiatives are defined and reported by employees in the different business areas in close collaboration with the management board members. During this process, they are supported by the Corporate Strategy team. This not only allows for incorporation of employee input and feedback but also ensures shared ownership.

Grünenthal employs robust mechanisms to monitor performance of its positive impacts including annual reviews of strategic initiatives as well as surveys such as the Great Place to Work® (GPTW) and 360-degree Leadership feedback to assess employee engagement and satisfaction with the company's progress towards the communicated goals.

## S1-8 Collective bargaining coverage and social dialogue

In Europe, colleagues in Austria, Belgium, France, Germany, Italy, the Netherlands and Spain are covered by collective bargaining agreements. In Latin America, affiliates in Brazil and Chile have collective bargaining agreements in place. The outcomes of collective agreements negotiated between Grünenthal and the works councils in these countries apply to all employees, irrespective of their individual representation status. Overall, around 60 percent of Grünenthal employees are covered by collective bargaining agreements.

In Germany, 96% of Grünenthal employees are covered by collective agreements such as collective bargaining agreements or company agreements which meet at least the standards set in the collective bargaining agreements but go beyond them in scope and content. These agreements establish comprehensive working conditions and terms of employment for most of Grünenthal's workforce in Germany. The remaining 4% of employees not covered by these agreements include those at the equivalent Global Grade 16 job level (Vice President) or higher.

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<sup>45</sup> Excluding higher top management

Grünenthal ensures representation for employees across Europe through its European Works Council (EWC). This council facilitates dialogue between employer and employee representatives at a European level, enabling the sharing of perspectives to support the growth, competitiveness and employment of Grünenthal across Europe. For more information, see also ‘Employee representation and governance framework’ in the section ‘GOV-1 The role of the administrative, management and supervisory bodies’ for more details on the EWC.

Grünenthal Meds has no collective bargaining agreements in place. Non-employees within Grünenthal’s workforce, such as contractors or agency workers, are not subject to the company’s collective bargaining agreements.

Workers’ representatives exist for all establishments in France, Germany, Italy, and Spain enabling all employees in these locations to partake in social dialogue.

**Collective bargaining coverage and social dialogue<sup>46</sup>**

Coverage Rate	Collective Bargaining Coverage				Social Dialogue	
	Employees – EEA (for countries with > 50 employees representing > 10% of total employees)		Employees – non-EEA		Workplace representation – EEA only (for countries with > 50 employees representing > 10% of total employees)	
	2025	2024	2025	2024	2025	2024
0 - 19%	-	-	North America, Asia	-	-	-
20 - 39%	-	-	Latin America	-	-	Italy
40 - 59%	-	-	-	-	-	-
60 - 79%	-	-	-	-	-	-
80 - 100%	Germany <sup>47</sup> , Italy	Germany <sup>48</sup> , Italy	-	-	Italy, Germany	Germany

**S1-10 Adequate wages**

The company’s Compensation Philosophy provides a comprehensive framework for designing and managing compensation programmes, ensuring adequate wages for all employees in line with industry benchmarks.

**S1-11 Social protection**

All employees in Grünenthal’s own workforce are covered by social protection through public programmes or company benefits, ensuring income security in cases of sickness, unemployment, employment injury, parental leave, and retirement. Social security frameworks vary across countries in which

<sup>46</sup> Numbers excluding Grünenthal Meds.

<sup>47</sup> This figure includes employees covered directly through collective bargaining agreements or works agreements, which meet at least the standards set in the collective bargaining agreements but go beyond them in scope and content.

<sup>48</sup> This figure includes employees covered directly through collective bargaining agreements or works agreements, which meet at least the standards set in the collective bargaining agreements but go beyond them in scope and content.

we operate, and Grünenthal provides additional benefits where applicable to complement national systems.

At present, Grünenthal has not identified employee groups excluded from social protection schemes across its operational countries. Ongoing assessments ensure all employees have adequate income security through public or employer-sponsored measures.

Income protection in case of sickness, unemployment coverage, employment injury and disability protection, parental leave benefits as well as retirement security is granted according to local labour and social laws.

### S1-15 Work-life balance metrics

#### Family-related leave

<b>Metric</b>	<b>Male</b>	<b>Female</b>	<b>Not reported</b>	<b>Total</b>
Employees entitled to take family-related leave	100%	100%	0%	<b>100%</b>
Entitled employees that took family-related leave	0.2% (8 headcount)	2.7% (111 headcount)	0.02% (1 headcount)	<b>2.9%</b> <b>(120 headcount)</b>

## Workplace safety and health protection

### S1.MDR-P / S1-1 Policies related to workplace safety and health protection

For managing the safety and health related material impact, Grünenthal's policy and standards cover 100% of its employees. The **EHS Policy** provides the overarching guidance to ensure that all operational activities comply with applicable health and safety laws, regulations and other relevant requirements, supporting the prevention and mitigation of work-related injuries and ill health.

The Health and Safety Critical Standards and the Health and Safety Excellence Standards translate this guidance into mandatory controls, behavioural expectations and best-practice measures to manage occupational health and safety risks and prevent adverse impacts. They provide detailed guidance, particularly for manufacturing sites, where each location is regularly assessed against the relevant aspects of each standard.

The **Health and Safety Critical Standards** cover the topics of site governance and assurance, contractor management, work at height, lock out tag out, hot work, electrical safety, emergency preparedness, confined space entry, hazardous materials handling, safety behaviour, safe operations of forklift trucks, and machine guarding.

The **Health and Safety Excellence Standards** guide employees in excavation, occupational health & safety, construction, equipment and project commissioning, lifting operation and lifting equipment, warehouse operation and racking, compressed gas cylinders and pressurised systems, scaffolds and mobile elevated working platforms, as well as cutting tools and hand safety.

#### Scope of the policies

The EHS Policy applies to all Grünenthal employees, contractors and suppliers. It encompasses all activities and operations within our organisational remit, ensuring alignment with our overarching sustainability objectives. We ensure that health and safety are taken into account regarding the procurement of goods and services and at the start of new projects. We also expect our suppliers to actively promote occupational safety and health protection. Additionally, we have a Contractor Safety Standard in place, aiming to ensure the safety of contractors working at Grünenthal sites. The Standard covers the management of contractors from the contractor approval process, the controlled site access, the permit to work, and up to the controlled site exit. The local Health and Safety site team and job supervisor conduct periodic random inspections of approved contractors on site to ensure good contractor management practice.

#### Accountability and governance

The EHS Policy is signed off by members of the Corporate Executive Board, reflecting its strategic importance and the commitment of Grünenthal's highest leadership. Grünenthal's EHS departments, supported by site directors and safety committees, play a central role in managing health and safety impacts. These internal functions implement targeted actions to address negative impacts and drive positive outcomes, ensuring alignment with the company's zero-accident vision.

#### Alignment with third-party standards

The development and implementation of the policies are informed by internationally recognised standards, including ISO 45001:2018. This benchmark guides our approach to occupational safety, and health protection, reinforcing Grünenthal's dedication to global best practices. Manufacturing sites are certified according to ISO 45001.

**Stakeholder engagement and accessibility**

We actively promote awareness of occupational safety, health protection, environmental stewardship, energy efficiency, and sustainability among our employees and relevant stakeholders. See section '[S1-2 Workforce engagement](#)' for more information. The policies are made accessible to all potentially affected stakeholders and those responsible for its implementation via Grünenthal's internal intranet platform. This ensures transparency and enables easy access for consultation, fostering alignment and accountability across the organisation.

**S1.MDR-A / S1-4 Workplace safety and health protection actions**

Grünenthal's health and safety strategy is driven by a zero-accident vision, underpinned by the use of leading KPIs such as near-miss reporting and behavioural safety observations.

**Seven-step strategy**

In 2020, we implemented a seven-step strategy to enhance health and safety. The action plan is made up of six operational steps or achievements, with the aimed for result being step 7 – Vision Zero (zero recordable workplace accidents at Grünenthal). Currently, the focus lies on the safety culture initiative (step 6).

1. A behavioural observation programme was implemented for accident investigation. The programme helped identifying potential hazards and implementing corrective measures. In high-risk areas such as production, inexperienced workers receive specialised training to ensure their safety.
2. Next, the Health and Safety Critical Standards (see '[S1.MDR-P](#)') were developed, and a gap analysis and maturity assessment conducted in relation to the standards for each site.
3. Step three is the achievement of 100% scores regarding Health and Safety Critical Standards along with the development of comprehensive risk assessment and action plans for each manufacturing site.
4. Step four refers to the definition of countermeasures of risk assessment and a programme for safety culture through engagement.
5. Step five entails implementation and gap analysis for the Health and Safety Excellence Standards (see '[S1.MDR-P](#)').
6. Step six describes the achievement of 100% scores for all Health and Safety Standards (Critical and Excellence), with active participation of employees in Health and Safety improvement for their work areas.
7. The final milestone, step seven, is the achievement of zero accidents at the workplace.

**Risk assessment and inclusion of vulnerable workforce perspectives**

Grünenthal conducts comprehensive risk assessments for activities at each site, actively involving machine operators. These assessments cover for example machine operation, exposure risks during processes, and high-risk tasks. This inclusive approach ensures that potential barriers to engagement are identified and addressed, enabling all employees, including those in vulnerable situations, to contribute to safety discussions.

### **Workforce engagement in identifying operational improvements**

In cases of incidents or accidents, Grünenthal employs a participatory approach to investigation and improvement. This includes affected individuals and witnesses directly, as well as department heads to identify root causes and implement corrective actions.

For preventative health measures, exchange with employees takes place. Following our Great Place to Work® surveys, we conduct workshops, focus group discussions, and interviews – where needed – to gain deeper insights from employees on how Grünenthal can further enhance its health measures. The outcomes of these follow-up activities are then integrated into local HR plans and initiatives. In Germany for example we include specific questions in the Great Place to Work® survey on health measures also following a legal framework (Psychologische Gefährdungsbeurteilung).

### **Scope of key actions**

Our safety initiatives are focused primarily on manufacturing sites, where operational complexities require stringent risk management. Additionally, our suppliers are required to self-disclose safety performance, extending our safety framework across the value chain.

### **Time horizon for implementation**

Actions at manufacturing sites are defined based on individual risk assessments and priorities. This ensures that resources and efforts are allocated effectively to mitigate risks and enhance safety standards within a structured timeframe. The seven-step strategy started in 2020 and does not have a fixed end date. As the journey is ongoing, relevant assessments are conducted and appropriate measures implemented each year to move closer to reaching zero accidents at the workplace.

### **Resources allocated**

Each Grünenthal site has a dedicated Environment, Health and Safety (EHS) team to oversee the implementation of health and safety measures. We conduct external risk assessments at API sites and ensure all locations maintain ISO certifications. While exact financial figures are not disclosed in this year's report due to limited data availability, health and safety expenditures form an integral part of the annual budget, covering both capital expenditures (CapEx) and operating expenses (OpEx).

The financial resources allocated to health and safety initiatives, including EHS team operations, external risk assessments and certification costs, are embedded within the company's annual budget. These expenditures are aligned with Grünenthal's overall commitment to operational excellence and sustainability.

### **Workforce involvement in decision-making**

Grünenthal ensures that workers and their representatives play an integral role in shaping health and safety programmes. For specific information on their involvement in the design and implementation of safety measures, see section '[S1-2 Workforce engagement](#)'.

## **S1.MDR-M / S1-14 / S1.MDR-T / S1-5 Workplace safety and health protection metrics and targets**

### **Metrics**

Grünenthal employs a comprehensive set of metrics to evaluate health and safety performance, with a key focus on achieving its zero-accident vision. Leading indicators are especially for the manufacturing sites, where safety and health risks are highest.

Health and safety related data covers both employees and non-employees working on Grünenthal premises, such as contractors or agency staff. Non-employees' work-related accidents are included in total numbers but excluded from accident rate calculations and from calendar days lost, as their working hours are not tracked. Health and safety data related to Grünenthal Meds and Valinor are included in this report.

### Health and safety metrics

Metric	2025	2024 <sup>49</sup>
Work-related accidents	22	22
of which work-related injuries	22	22
Rate of work-related (recordable) accidents <sup>50</sup>	2.77	2.78
Calendar days lost to work-related (recordable) injuries	628	788.2 <sup>51</sup>
Fatalities <sup>52</sup>	0	0
Percentage of employees covered by ISO-certified Health & Safety management system	100% at manufacturing sites 55% of total workforce	100% at manufacturing sites 37% of total workforce <sup>53</sup>

### Methodologies and assumptions behind metrics

Metrics are presented and discussed at the monthly EHS review meetings between global EHS and site EHS representatives. All accident and near-miss data are reported using the Quentic system, which is also used to automatically compile the numbers from all Grünenthal manufacturing sites. Accidents from non-manufacturing sites (affiliates) are compiled manually by global EHS through meetings with the site representatives.

### Accountability and governance

Performance against these targets is tracked regularly, with EHS Managers providing monthly updates to the Senior Leadership Team (SLT). Additionally, safety meetings at both site and global levels ensure ongoing engagement and accountability.

### External validation

All Grünenthal manufacturing sites are certified under ISO 45001, an internationally recognised standard for occupational health and safety management systems. Additionally, external assessments are conducted at API sites to verify compliance of EHS processes with safety protocols. Periodic reviews by insurance companies further validate the robustness of our health and safety measures.

### Target

Grünenthal has a zero-accident vision and, in 2025, has defined the following target to improve workplace safety and health protection:

#### Target 2026-2030

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Reduce the recordable accident rate by 70% at Grünenthal from 2024 baseline<sup>54</sup> by 2030

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<sup>49</sup> Health & Safety data related to Grünenthal Meds and Valinor were not included in 2024 numbers.

<sup>50</sup> Calculated by dividing the number of accidents by the total number of hours worked by all employees and multiplied by one million.

<sup>51</sup> Generally, 'days lost' refers to calendar days. However, in 2024, some business areas reported workdays instead.

<sup>52</sup> Refers to accidents resulting in casualties.

<sup>53</sup> Number for 2024 did not take into consideration colleagues working at headquarters out of manufacturing.

<sup>54</sup> Baseline 2024 is a recordable accident rate of 2.78.

By the end of FY2025, the reduction of the recordable accident rate at Grünenthal from a 2024 baseline was 0.4%. The target was set up by Global EHS and approved by the Corporate Executive Board Team. EHS Managers and Site Directors from each site develop and refine annual goals to achieve the 2030 target. These are subsequently aligned with the Global Operations Board to ensure strategic oversight and accountability. The involvement of these key stakeholders ensures that targets are practical, relevant, and site-specific.

## S1-2 Workforce engagement in managing workplace safety and health protection impacts

### Engagement to inform decisions and activities

In addition to general engagement channels (see section 'Managing Grünenthal's own workforce' above), Grünenthal actively engages its workforce to manage actual and potential health and safety impacts. Safety committees are established at each site, providing a formal platform for employees to share their perspectives and contribute to decision-making. Additionally, regular Manufacturing Daily Line-up (MDL) meetings are held, ensuring continuous dialogue and feedback from the workforce.

### Stages, types, and frequency of engagement

Engagement occurs at multiple stages and through various channels:

- **Safety committees:** These committees (in manufacturing sites) meet monthly or quarterly, depending on site-specific needs, to discuss and address safety-related concerns and initiatives.
- **Manufacturing Daily Line-up (MDL) meetings:** These meetings are conducted daily or weekly, serving as an ongoing platform for workforce engagement and communication of key safety updates and actions. Participants include:
  - Site MDL: Site Director and site leadership team
  - Function MDL: Head of Department and reporting functions
  - Area MDL: Managers and team leaders/ coordinators/laboratory heads
  - Shopfloor MDL: Team leaders/coordinators and operators
  - Shift handover: Coordinators

### Operational responsibility for engagement

The Site Director holds operational responsibility for ensuring workforce engagement. This role oversees the effective implementation of engagement activities, ensuring that input from the workforce informs the organisation's approach to managing health and safety impacts.

## S1-3 Channels for raising workplace safety and health protection concerns

### Specific channels for raising concerns

In addition to general channels for raising concerns (see section 'Managing Grünenthal's own workforce' above), Grünenthal provides its workforce with accessible and reliable channels to raise health and safety concerns. At each manufacturing site, a fully staffed Environment, Health and Safety (EHS) Department is available to address Health and Safety matters directly. Moreover, employees at the manufacturing sites can use the Quentic and MS Forms systems to raise EHS-related concerns or report accidents, incidents, near misses, or make behavioural safety observations (BSO). The raised and addressed issues are being reviewed, tracked and reported in the monthly EHS review meetings between global EHS and site EHS representatives. Actions are raised and monitored against the reported issues. This procedure ensures the effectiveness of the channels for raising concerns.

Additionally, during the daily meetings between team leaders/coordinators and operators (Shopfloor Manufacturing Daily Line-up meetings), operators can report to their supervisors, who can in turn inform EHS Managers of any EHS-related issues.

**Accessibility of channels for the workforce**

All members of Grünenthal's workforce, including employees and contractors, have access to EHS Managers at their respective sites. These managers act as primary points of contact, offering direct access to address safety-related concerns or needs.

## Training and development

### S1.MDR-P / S1-1 Training and development policies

The Global Management of Training and Qualification Policy defines the framework for adequate training and qualification of all Grünenthal employees. This ensures that they can fulfil their duties and responsibilities and that all legal requirements are met, including documentation. The policy applies to all employees globally and provides clear processes to document and align training with quality standards. Employees are encouraged to seek additional training or coaching if they feel underqualified for specific tasks, fostering a culture of continuous learning and accountability.

The Global People Policy sets out principles for talent development and inclusion, promoting a workplace where employees can thrive and grow. Grünenthal adopts the 70/20/10 learning strategy, which emphasises practical experiences, collaborative learning, and formal training:

- 70% on-the-job learning, enabling development through real-world experiences.
- 20% learning from interactions, such as mentoring and collaboration.
- 10% formal training, including courses and seminars.

Employees are encouraged to take ownership of their personal development through regular conversations with their managers, while leaders play a key role in supporting individual growth by identifying strengths and areas for improvement.

Both policies reflect Grünenthal's commitment to fostering a productive, inclusive and supportive work environment.

#### **Policy implementation and accessibility**

Responsibility for implementing the training and qualification policy 'Global Management of Training and Qualifications' lies with Global Quality Assurance. Communication and transparency are central to ensuring policy effectiveness. Policies are made accessible through Grünenthal's training platforms.

### S1.MDR-A / S1-4 Training and development actions

Grünenthal recognises that adaptability and continuous growth are essential in a fast-evolving business environment. To this end, the company's Performance & Development Management approach serves as a cornerstone for employee growth. This framework promotes regular dialogue between employees and their line managers, enabling them to align on development goals and actions that culminate in a robust Personal Development Plan. These plans are tailored to help employees grow professionally and personally, either in their current roles or in preparation for future opportunities.

The Global HR Development team supports equity of access to development resources by providing structured frameworks, tailored training opportunities, and access to diverse learning platforms. These are supplemented by functional training that include mandatory industry and role specific training.

Grünenthal supports employee capability-building with comprehensive training and development frameworks, particularly at manufacturing sites. Programmes include:

- Buddy systems and mentoring for junior and inexperienced workers.

- Specialised training for high-risk roles, ensuring compliance with safety protocols and minimum age requirements.
- Development initiatives linked to the Succession and Development Management Process, which identifies and nurtures high-potential employees for business-critical roles.

**Delivering positive workforce impacts**

Grünenthal fosters leadership excellence and personal growth through the Essential Leadership Skills and Personal Attributes (ELSPAs) framework. This ensures that leadership development, hiring and feedback processes are aligned with the company’s values. ELSPAs are embedded into the organisation through interactive e-learning modules, workshops and tailored guidelines, equipping leaders with practical tools to support team growth.

Key programmes that deliver positive workforce impacts include:

- Global Operations (GO) Leadership Academy: Training nearly 300 managers globally to enhance leadership, accountability and team engagement.
- Chief Commercial Organisation (CCO) Academy: Providing tailored training plans for customer-facing employees, resulting in improved engagement and high participation rates.
- Recognition awards: Celebrating employee contributions to reinforce a culture of appreciation.
- Revised employee onboarding programme: Launched in 2025 and available for all countries, this initiative aims to provide new employees with a strong start in global roles.

**Workforce training and development and resource allocation**

Grünenthal allocates significant resources to its workforce initiatives. The Global HR Development team partners closely with business areas to prioritise and allocate resources for training and development. Programmes such as the GO Leadership Academy and CCO Academy reflect the company’s investment in creating a high- performing and inclusive workplace.

No significant current or future capital expenditures (CapEx) and operating expenses (OpEx) are allocated to manage the material impacts.

**S1.MDR-M / S1-13 / S1.MDR-T / S1-5 Metrics and targets used to evaluate performance**

**Metrics**

Grünenthal tracks its training and development performance with the following metrics:

**Employees who have personal development plan in place**

Metric	2025	2024 <sup>55</sup>
Percentage of employees who have an active personal development plan (PDP) in place <sup>56</sup>	83% active PDPs	84% active PDPs

<sup>55</sup> Not included in the audit scope of the Responsibility Report 2024.

<sup>56</sup> Our calculation is based on two factors. First, we identified all employees who have a PDP with at least one development goal. We then calculated the number of employees who have updated their PDP in general in the reporting period and calculated the ratio between these two figures.

Personal Development Plans (PDPs) are living documents that support employees' performance and professional growth throughout their career at Grünenthal. Eligible<sup>57</sup> employees can establish a PDP collaboratively with their line manager and maintain it on a voluntary basis. Employees are encouraged to regularly review the PDP with their line managers, at least annually. Active PDPs are those reviewed or updated during the reporting period; not all employees may update it each year. PDP status is tracked via the reporting functionality of the SAP MyView Human Experience Management Suite, and aggregated reports by function and geography are shared with HR Business Partners without disclosing individual-level data. The percentage of active PDPs is used as a metric to track progress on Grünenthal's target to strengthen its culture of continuous learning and development and is included in the Group Scorecard.

Additionally, going forward, Grünenthal will monitor its performance in training and development by tracking the following metric:

**Employees who respond positively to the Great Place to Work<sup>®</sup> survey question: "I'm offered training and development to develop professionally"<sup>58</sup>**

Metric	2025	2024 <sup>59</sup>
Percentage of employees who respond positively to the Great Place to Work <sup>®</sup> survey question: "I'm offered training and development to develop professionally"	69%	69%

The percentage of employees responding positively to the statement "I'm offered training and development to develop professionally" is derived from the standardised employee survey conducted by Great Place to Work<sup>®</sup> using a scientifically developed and validated methodology. All employees were invited to participate in the most recent online survey (September 2024; 4,262 invited; 3,763 respondents; 88% response rate). The metric represents the share of respondents selecting the defined positive response options in line with the provider's scoring model. Based on the high participation rate, the results are statistically robust. Key limitations relate to self-reporting and potential non-response bias, and the metric reflects employee perceptions at a specific point in time.

**Employees with regular performance and/or career development reviews**

Metric	Female Share	Male Share	Total
Employees with regular performance and / or career development reviews	95.2% 1,976 headcount	93.3% 1,935 headcount	94.3% 3,911 headcount

The metric includes employees who have completed either both a performance review and a career development review, or at least one of the two.

<sup>57</sup> Eligibility for a PDP applies to active employees with a contract duration of more than six months, excluding Corporate Executive Board and Works Council members, certain employee classifications (agency workers, apprentices, contractors, doctoral candidates, interns, trainees, working students), and employees scheduled to leave within the next six months.

<sup>58</sup> Metric covers Grünenthal Group only. Grünenthal Meds did not participate in the most recent Great Place to Work<sup>®</sup> survey conducted in 2024. As the survey is carried out biennially, the 2024 results remain valid and applicable for the reporting year 2025.

<sup>59</sup> Not included in the audit scope of the Responsibility Report 2024.

A performance review is a mandatory annual process based on the employee’s priorities. Each employee is automatically assigned an assessment form in the SAP MyView Human Experience Management Suite. The review is conducted collaboratively between employees and their line managers, during which employee priorities – derived from and aligned with the company’s key priorities in the Group Scorecard – are agreed. The process includes structured guidance to ensure all participants are informed of required actions, following a roadmap that covers setup, review, assessment, discussion, and signatures from all relevant parties. The entire performance review process is tracked in SAP MyView.

A career development review is a voluntary annual process based on the employee’s PDP in SAP MyView.

**Average training hours of employees**

Metric	Female Share	Male Share	Total
Average number of training hours / employee	3.0 training hours	2.5 training hours	2.75 training hours

The reported figures are based on learning data extracted from Coursera, LinkedIn Learning, and Grünenthal’s internal Learning Management System (SAP MyView Learning), covering voluntary learning activities only. LinkedIn Learning and Coursera are leading on-demand learning platforms offering training opportunities to support professional development. Grünenthal’s Learning Management System in SAP MyView provides training to all employees worldwide, both for courses defined in personal development plans, such as non-functional trainings on leadership or soft skills, and product-related trainings.

Where participant-level attendance data was not systematically captured, participant numbers were calculated using a documented and consistently applied estimation approach. This applies to several additional webinars – mainly on Diversity & Inclusion topics – that were largely open sessions without participant tracking, as well as to the training sessions at Grünenthal Meds; the total figures therefore comprise both recorded data and reasonable estimates.

Data is provided by the Global People & Organisational Development team. Additional voluntary learning activities at Grünenthal, such as local initiatives, country-specific programmes, Leadership Academy offerings, and functional trainings, are not centrally tracked and are therefore not included in these figures.

**Target**

In 2025, Grünenthal has set a concrete target to manage training and development:

**Target 2026-2030**

Strengthen the culture of continuous learning and development through more than 90% of our employees having a personal development plan in place, and over 80% of our employees rate the Great Place to Work® question “I’m offered training and development to develop professionally” positively by 2030

Previously established sustainability targets that were not aligned with ESRS requirements have been discontinued and replaced with new SMART targets that fully reflect ESRS-aligned metrics, timelines, and performance expectations. In setting the target and monitoring progress, Grünenthal involved and continues to involve key internal stakeholders. The objective to strengthen continuous learning and development is embedded in the annual Group Scorecard, aligned with the Executive Board Team and monitored quarterly as a strategic HR priority as defined by the HR Leadership Team. The ambition to achieve a positive

rating for the Great Place to Work® question on training and development is based on the latest survey results (69% in 2024), where this topic was identified as an area of focus by the HR Leadership Team in alignment with the Executive Board Team. Progress is reviewed biennially through the Great Place to Work® survey cycle.

## Diversity, inclusion, and equal opportunities

### S1.MDR-P /S1-1 Diversity, inclusion, and equal opportunities policy: Managing workforce impacts

#### Key contents of the policy

Grünenthal's Global People Policy forms the cornerstone of its approach to managing work- force-related impacts. The policy focuses on fostering a work environment that supports professional and personal growth, underpinned by equity, diversity, inclusion and employee engagement.

The policy addresses four main topics:

- Promoting fair employment practices and ensuring all employees are treated equitably
- Fostering an inclusive environment where diversity is viewed as a driver of innovation, enabling teams to collaborate effectively
- Providing Grünenthal employees with a supportive work environment that enables professional development, diverse roles, and access to a comprehensive range of benefits
- Encouraging active participation and fostering a culture of mutual respect and psychological safety

The policy explicitly commits to eliminating any form of discrimination or harassment, and to promoting inclusion by addressing issues related to race, gender, age, religion, sexual orientation, social origin, disability and other protected characteristics. Employees are expected to adhere to these principles and relevant anti-discrimination laws. Through its Diversity & Engagement Strategy, Grünenthal seeks to achieve psychological safety and belonging for all employees, with specific measures to eliminate bias in hiring, compensation and career progression. Moreover, all employees are entitled to family-related leave.

#### Policy scope and accountability

The Global People Policy applies to all Grünenthal employees, managers and contingent workers worldwide performing work for any legal entity of the Grünenthal Group, including contractors and personnel from outsourced service providers.

The Head of Global Human Resources, who is a member of the Executive Board Team, is responsible for overseeing the policy's implementation, supported by the Corporate Executive Board. The Diversity & Engagement Council, composed of senior leaders across business areas, plays a key role in setting strategic goals, monitoring progress and advising on diversity and inclusion matters.

#### Alignment with international standards

Grünenthal's Global People Policy aligns with globally recognised frameworks, including the United Nations Universal Declaration of Human Rights (1948) and International Labour Organisation (ILO) Conventions, such as the Discrimination (Employment and Occupation) Convention, 1958 (No. 111), Freedom of Association and Protection of the Right to Organise Convention, 1948 (No. 87) and the Equal Remuneration Convention, 1951 (No. 100).

#### Stakeholder consideration and accessibility

Grünenthal promotes awareness of diversity, equality and inclusion matters among our employees and relevant stakeholders. See section '[S1-2 Processes for engaging with own workforce and workers' representatives about impacts](#)' for more information.

To ensure transparency, all policies are available through platforms such as MasterControl, where employees are trained to ensure understanding at all levels. Platforms for raising questions or concerns are available, and employees can consult managers, HR, or works council representatives for clarification.

### **Grievance mechanisms and continuous improvement**

Grünenthal has established robust grievance mechanisms, including the Ethics Helpline, which allows employees and external stakeholders to report any concerns, including potential incidents of discrimination, confidentially and anonymously in their preferred language. The Ethics Helpline is a confidential internet-based platform managed by Grünenthal's Global Compliance Team and provided and maintained by a third-party vendor. It can be used 24/7 by employees including those of our business partners or any other individual. Every complaint or concern is investigated by our Compliance Organisation, and if the allegation refers to a potential substantial violation of human rights and/or environmental protection obligation, the Human Rights Officer shall directly undertake the investigation. Grievances are thoroughly investigated, with findings used to improve internal processes and training.

All employment decisions at Grünenthal are guided by structured processes that emphasise job-related factors, including skills, qualifications, and experience of the individual, and explicitly prohibit discrimination based on any personal attributes, including gender, race, ethnicity, which are unrelated to the role.

To mitigate risks such as biased job requirements, Grünenthal retrospectively monitors diversity of the new hires. Training for creating inclusive job descriptions, standardised interview processes, and bias-reduction are in place for hiring managers to ensure merit-based decisions. Discrimination or bias, if identified, is promptly addressed through remedial actions, including process changes and enhanced monitoring. Additionally, Grünenthal keeps up-to-date records on recruitment, training and promotion to ensure transparent visibility of employee opportunities and progression.

Grünenthal evaluates the effectiveness of its policies and actions through internal monitoring, external ESG ratings and annual reviews. Tools such as the Great Place to Work® (GpW) survey and 360-degree leadership feedback survey provide actionable insights into areas for improvement. Findings are analysed by working groups, which propose actions that are reviewed by leadership and integrated into organisational strategies.

### **Accessibility to individuals with disabilities**

The company is also committed to ensuring that its facilities are accessible to individuals with disabilities.

## **S1.MDR-A / S1-4 Diversity, inclusion and equal opportunities actions**

### **Advancing diversity and inclusion**

Grünenthal is committed to fostering a culture of inclusion and achieving gender parity in leadership roles. The Leadership Learning Labs are a cornerstone of Grünenthal's efforts, a programme designed to raise awareness and develop inclusive leadership skills across the Group. This initiative offers learning opportunities on an ad hoc basis and equips leaders with tools to recognise and address biases, foster diversity, and build inclusive teams. Additionally, Grünenthal organises cultural celebrations, such as International Women's Day and the World Day for Cultural Diversity and Girls in Science to enhance understanding and strengthen team cohesion. Multilingual communication efforts and English language classes further support inclusion by ensuring accessibility for all employees.

To further strengthen its inclusive culture, Grünenthal integrates feedback mechanisms. In 2024, the Great Place to Work® survey included additional statements focused on key aspects of inclusion, such as diversity as a strength, respect for individual identity, openness to differing opinions, and managerial support for diverse perspectives.

The survey results, presented during the Global Townhall and shared with the Diversity & Engagement Council, indicated positive trends. For instance, 86% of employees viewed diversity as a strength, while 81% felt encouraged by their managers to share differing opinions. These results provide actionable insights that guide Grünenthal's continuous improvement efforts in building an inclusive workplace.

For information regarding equal pay and pay equity, see '[S1-10 Adequate wages](#)' in the section '[Fair working conditions and remuneration](#)'.

### **Governance and strategic oversight for diversity & engagement**

The Global HR Development Team is responsible for implementing training and initiatives, while the Diversity & Engagement Council provides oversight and ensures alignment with corporate objectives. Composed of senior executives from various business areas, the Council meets quarterly to review progress and advise on strategic goals. Additional governance is provided by the Corporate Responsibility Board, which oversees diversity-related targets and activities.

To ensure the effectiveness of its diversity-related actions, Grünenthal incorporates defined metrics into its Global Scorecard and Corporate Responsibility Scorecard. These metrics track progress on cultural and diversity-related targets and provide a foundation for continuous improvement. To support transparency and engagement, these metrics are shared and discussed with relevant workforce representative bodies and communicated to the wider workforce through channels such as Townhalls. Feedback from employee surveys and training sessions is regularly reviewed to refine and adapt initiatives.

### **Financial and resource allocation**

No significant capital expenditures (CapEx) or operating expenses (OpEx) were incurred for the actions in the reporting period.

## S1.MDR-M / S1-9 / S1.MDR-T Diversity, inclusion and equal opportunities metrics and targets

Diversity metrics include numbers from Grünenthal Group, Grünenthal Meds and Valinor.

### Metrics

Grünenthal employs the following metric to adequately track its performance regarding its target to manage diversity, inclusion and equal opportunities:

#### Percentage of middle management and senior leadership roles held by males / females

Below, Grünenthal reports gender diversity figures for middle management and senior leadership roles, which are based on its internally transparent and externally validated job level structure. According to this structure, middle management typically refers to Director or Senior Director roles while senior leadership refers to Vice President or Executive Vice President roles.

Metric	2025
Male	62.7% (282 headcount)
Female	37.3% (168 headcount)
<b>Total</b>	<b>100%</b> <b>(450 headcount)</b>

#### Top management level diversity<sup>60</sup>

We have decided to measure the gender share in our executive leadership positions, defined as global grade 16 or higher. We extracted data from our human capital management system as of 31 December 2025, to calculate the relative share of female and male employees within this leadership tier.

Metric	2025		2024 <sup>61</sup>	
	Headcount	Share	Headcount	Share
Female	32	31.7%	36	35%
Male	69	68.3%	66	65%
Other	0	0%	0	0%
Not reported	0	0%	0	0%
<b>Total</b>	<b>101</b>	<b>100%</b>	<b>102</b>	<b>100%</b>

#### Employee age distribution

In terms of age diversity, Grünenthal established standardised age brackets to ensure consistency in reporting over time. For the Grünenthal Group, corresponding data was also extracted from the SAP MyView Human Experience Management Suite as of 31 December 2025 to determine representation across defined age groups.

<sup>60</sup> Top management refers to all employees assigned a grade 16 or higher (Vice President level) within Grünenthal's role-based classification system.

<sup>61</sup> Numbers for 2024 excluding Grünenthal Meds and Valinor as no detailed data was available. The scope of the employees of the two companies is less than 5%.

Metric	2025		2024 <sup>62</sup>	
	Headcount	Share	Headcount	Share
Age group				
Under 30	487	11.7%	463	11%
30-50	2,312	55.7%	2,413	56%
Over 50	1,350	32.5%	1,406	33%
<b>Total</b>	<b>4,149</b>	<b>100%</b>	<b>4,282</b>	<b>100%</b>

## Targets

In 2025, Grünenthal has set the following target to manage diversity, inclusion and equal opportunities.

### Target 2026-2030

Achieve annual progress toward gender parity in middle management and senior leadership roles by 2030.

The company actively involves stakeholders, including executive leadership, cross-functional teams, employees and the Diversity & Engagement Council, in shaping its targets. Insights are gathered through interviews, surveys and workshops, enabling strategies that reflect both global objectives and local needs.

Grünenthal's current targets align with international commitments, including equity, diversity, and inclusion principles outlined in the Responsibility Report.

Targets are tracked regularly to ensure consistent progress and alignment with the company's broader strategic priorities.

<sup>62</sup> Numbers for 2024 excluding Grünenthal Meds and Valinor as no detailed data was available. The scope of the employees of the two companies is less than 5%.

## S4 – Patient

### Managing consumers and end-users

#### S4.SBM-3 Material impacts, risks and opportunities and their interaction with strategy and business model

All consumers and end-users who can be materially impacted by Grünenthal's products are included in the scope of this disclosure. While there were no material risks or opportunities identified for Grünenthal during the double materiality analysis, the following impacts originating from Grünenthal's activities as a manufacturer of medicine for consumers and end-users – in Grünenthal's case, patients – were identified:

Type of impact	Impact
<b>Personal safety of consumers and end-users</b>	
Potential negative <sup>63</sup>	Patient safety
Potential negative <sup>64</sup>	Product quality
Potential negative <sup>65</sup>	Safe pain management through responsible use of opioids
<b>Access to healthcare</b>	
Actual positive	Access to healthcare
<b>Research and development</b>	
Actual positive	Improving patients' quality of life through innovative medicines

#### Personal safety of consumers and end-users

Grünenthal's products are primarily aimed at the treatment of patients in pain, complemented by a range of products which address numerous indications across multiple therapeutic areas. If used as intended, the products have a positive impact on patients but also are associated with risks to patients. Grünenthal includes all consumers and end-users who could be materially impacted by the company's operations in the scope of this disclosure. This encompasses patients who use Grünenthal products, patient experts, caregivers and patient organisations, and also intermediaries such as healthcare organisations and healthcare professionals, who play an important role in educating about our products and prescribing them responsibly. Patients in particular rely on accurate and accessible information and education by their healthcare professionals, to be informed about risks when using a Grünenthal product and to avoid negative impacts of Grünenthal products through misuse.

Rigorous testing quality control, and regulatory compliance ensure the safety, reliable availability, efficacy and quality of pharmaceutical products. This protects patients, helps improve their health and fosters trust. While any medicine may cause side effects, Grünenthal's priority is to ensure that the therapeutic benefits of the medicine outweigh the risks.

Our comprehensive Pharmacovigilance system ensures effective and timely risk identification and mitigation throughout the entire lifecycle of Grünenthal's medicinal products (see section 'S4.MDR-M / S4.MDR-

<sup>63</sup> The identified potential negative impacts are related to individual incidents or to specific business relationships, rather than being systemic in nature.

<sup>64</sup> The identified potential negative impacts are related to individual incidents or to specific business relationships, rather than being systemic in nature.

<sup>65</sup> The identified potential negative impacts are related to individual incidents or to specific business relationships, rather than being systemic in nature.

T / S4-5 Patient safety metrics and targets' for an in-depth description). This enables healthcare professionals to be fully informed and prevent or mitigate potential risks. Additionally, it enhances patient awareness of product-associated risks, making it easier for them to relate any adverse events to the product. The Pharmacovigilance Department's key actions (see section 'S4.MDR-A / S4-4 Patient safety actions' for an in-depth description) improve product safety and risk awareness, benefiting patients, patient experts, caregivers, patient and healthcare organisations as well as healthcare professionals, ultimately contributing to safer healthcare outcomes.

Certain patient groups may face specific risks depending on the nature of the product and the disease being treated. Special risk groups include:

- Paediatric patients
- Elderly patients
- Pregnant patients

It is critical for Grünenthal to maintain a reliable supply of its products to ensure that patients, especially those at greater risk and who rely on pain medication, receive their treatments and can successfully manage their pain.

No material risks or opportunities have been identified for consumers and end-users in the reporting period.

#### **Access to healthcare**

Manufacturing essential pharmaceutical products is critical to global healthcare. Grünenthal is committed to balancing profitability with social responsibility, ensuring the availability and affordability of essential medicines for patients in underserved regions. Given the widespread unmet need for acute, chronic, and palliative pain management, Grünenthal prioritises these regions and therefore contributes to improved public health.

#### **Research and development**

There is a substantial unmet need in chronic pain management, as current treatments do not fully address patient needs, and some can pose safety, tolerability or addiction concerns. Grünenthal seeks to develop innovative pain management medicines that offer improved efficacy with fewer tolerability and safety risks. To enhance decision-making in clinical development, Grünenthal integrates human data-driven insights and novel algorithms to optimise the design of clinical trials. The use of digital biomarkers, such as smart watches and telemetry devices to monitor patients' mobility, heart rates and sleep patterns, may provide deeper insights into potential new therapies and reduces the burden on patients of recording this data.

Innovative medicines may present unforeseen safety risks during clinical trials. As all new drug candidates may show a safety signal in development, Grünenthal adheres to strict regulatory requirements to ensure patient safety. Rigorous preclinical testing and risk identification measures are implemented early in the development process to minimise potential safety concerns. By applying these safeguards, Grünenthal upholds the highest patient protection standards throughout drug development while advancing pain management solutions.

### **S4-2 Processes for engaging with consumers and end-users about impacts**

Grünenthal's engagement with consumers and end-users is structured within the framework of regulatory compliance and product safety requirements. Regarding patient safety, the company does not engage

directly with patients or healthcare professionals beyond the established interactions with competent regulatory authorities. These interactions ensure that all safety measures, including risk assessments and product safety updates, align with global, national, and regional requirements.

Beyond regulatory engagement, Grünenthal provides mechanisms for patients and healthcare professionals to access information regarding its products. The company maintains a Medical Information Service to respond to safety-related inquiries and ensures that product information, including patient leaflets and prescribing guidelines, is available through official channels. While these engagements remain indirect, they ensure that all patients, including particularly vulnerable patients, and healthcare professionals have access to accurate and up-to-date information.

Grünenthal engages reactively through its product quality complaints mechanism, which allows healthcare professionals and patients to report concerns related to drug safety, quality and efficacy. These interactions are essential for ensuring that any reported concerns are reviewed and addressed systematically.

#### **Responsibility for ensuring engagement**

For patient safety, stakeholder engagement is ensured by the Head of Drug Safety, who is also Qualified Person for Pharmacovigilance for EU and UK. This senior professional is also Chief Medical Officer.

For product quality, Grünenthal's Global Head of Quality Assurance is responsible for ensuring that engagement with relevant stakeholders happens. Engagement activities are managed by Quality Assurance management positions and Qualified Persons.

### **S4-3 Processes to remediate negative impacts and channels to raise concerns**

Grünenthal maintains formal channels for consumers and end-users to raise concerns about patient safety, product quality and access to healthcare. These channels are designed to ensure that safety-related issues, adverse events and product quality complaints are systematically recorded, assessed and addressed in compliance with regulatory obligations. While our Ethics helpline policy specifies that individuals are protected from retaliation when using the helpline, Grünenthal has no dedicated policy for the reporting channel regarding possible negative impacts of Grünenthal products. This process is heavily regulated, protecting individuals from retaliation. Moreover, they can also make their reports under the protection of confidentiality of data.

Patients and healthcare professionals can report suspected adverse drug reactions or safety concerns through Grünenthal's corporate website, under the protection of confidentiality of data and against any reprisals. The company's pharmacovigilance system ensures that all reported cases are entered into a safety database for evaluation, with necessary updates to product information leaflet implemented following approval by national authorities. Grünenthal also provides a Medical Information Service, allowing healthcare professionals – as one of Grünenthal's key stakeholder groups to seek guidance on safety-related enquiries. This service as well as the sales team offer them additional support, helping to clarify questions and build trust in the system. Product quality complaints can be submitted through the designated reporting channels provided on Grünenthal's local websites and product leaflets. Reports are systematically tracked and investigated, ensuring that identified concerns are mitigated in a timely manner. The effectiveness of this system is assessed through ongoing monitoring and trend analysis, allowing Grünenthal to proactively address emerging safety or quality issues.

The operational responsibility lies with the Head of Global Quality Assurance, supported by Quality Assurance management and Qualified Persons, who ensure timely and effective responses. Feedback is provided to the reporting party, and actions are taken to address the concerns raised.

For more information on the ethics helpline policy, see chapter '[G1 Business conduct](#)'.

Grünenthal does not maintain explicit human rights policy commitments specifically related to patient policies.

## Personal safety of consumers and end-users

### Patient safety

#### S4.MDR-P / S4-1 Patient Safety Policy

##### Key contents of the policy

Grünenthal's Drug Safety Policy provides a comprehensive framework for a global, quality-assured pharmacovigilance system. Its key objective is to effectively identify and mitigate safety concerns across the entire lifecycle of all its medicinal products and therefore for all potential patients. This applies to human-use products for which Grünenthal holds legal responsibilities, such as marketing authorisations, or acts as a sponsor of clinical trials. The policy also applies to delegated responsibilities managed through licence partners. We are committed to adhering to global, national, and regional legal or regulatory requirements while ensuring the performance of our pharmacovigilance system is consistently overseen by the Qualified Person for pharmacovigilance and monitored by all relevant corporate entities. In the reporting year, no significant changes were made to the Drug Safety Policy.

##### Policy scope and accountability

The Drug Safety Policy applies to all Grünenthal employees across its legal entities with marketing authorisations or sponsorship roles in clinical trials. The Corporate Executive Board is ultimately accountable for the implementation of this policy.

##### Alignment with international standards

Grünenthal's pharmacovigilance system aligns with internationally harmonised guidelines such as the International Council for Harmonisation of Technical Requirements for Pharmaceuticals for Human Use (ICH) guidelines. The system is also fully compliant with key legal and regulatory frameworks, including EU Directive 2001/83/EC, Good Pharmacovigilance Practices guidelines from the European Medicines Agency (EMA) and the Federal Food, Drug, and Cosmetic Act (Chapter 21) of the US Food & Drug Administration FDA.

By aligning with the individual international guidelines named in the sections describing policies used to manage impacts on consumers and end-users in this section and the ones following, Grünenthal naturally respects patients' human rights in accordance with the Guiding Principles on Business and Human Rights and OECD Guidelines for Multinational Enterprises.

Grünenthal had no severe human rights issues and incidents connected to consumers and end-users in the reporting year.

##### Human rights issues

Metric	2025	2024
Number of severe human rights issues and incidents connected to consumers and end-users	0	0

For more details on Grünenthal's general approach to human rights, see '[S1.MDR-P / S1-1 Fair working conditions and remuneration policies and company agreements](#)'.

##### Stakeholder consideration and accessibility

By complying with these international and regional regulations and guidelines, the Drug Safety Policy reflects the interests of key external stakeholders – such as health authorities, health-care professionals,

and patients – while prioritising transparency and safety. When implementing these guidelines, Grünenthal incorporates input from internal stakeholders involved in regulatory compliance, including the Regulatory Affairs, Medical Affairs, and Quality Assurance teams. These internal stakeholders can access the Drug Safety Policy through the Grünenthal Training Management System, which provides targeted training to ensure a comprehensive understanding and proper implementation.

## **S4.MDR-A / S4-4 Patient safety actions**

### **Key actions undertaken by the pharmacovigilance department**

Consumers and end-users play a vital role in supporting positive patient outcomes, as pharmacovigilance relies on spontaneous reports of safety information related to Grünenthal's products. The pool of spontaneous reports is the foundation for all key actions undertaken by the Pharmacovigilance Department, ultimately ensuring that new and important information regarding the benefit-risk profile of our products is available to patients and healthcare professionals.

The key actions upholding patient safety and ensuring regulatory compliance, which extend from Grünenthal's business activities to the downstream value chain to consider potentially all affected patients, comprise:

1. Ensuring the collection of safety information from all available sources, such as literature, spontaneous reporting systems, and solicited data collection systems. This data is stored on a central database, assessed and reported to competent authorities and partner companies per legal and contractual obligations.
2. Reviewing available data to identify new safety signals and assess and validate new safety signals when applicable. This process enables the identification of new risks or new aspects of known risks associated with the use of Grünenthal products.
3. Implementing appropriate risk minimisation measures on identifying new or evolving risks. This includes updating Summaries of Product Characteristics and Patient Information Leaflets as part of routine risk minimisation or introducing additional measures where necessary.
4. Preparing periodic reports that summarise safety information, new signals, and risks, subsequently submitted to competent authorities.
5. Overseeing all processes to ensure compliance with national laws and the effective operation of safety systems, thereby delivering expected results. This includes tracking of metrics and dissemination of training.
6. Creating and managing a comprehensive pharmacovigilance system master file, which includes detailed documentation of the pharmacovigilance system, including annexes that outline Marketing Authorisation Holder status and ongoing activities.

All actions apply in all countries where Grünenthal's products are authorised. As part of Grünenthal's compliance with applicable EU regulations, the company regularly prepares Risk Management Plans (RMPs) to document the safety profile of its medicinal products, including important risks and required pharmacovigilance activities to mitigate or remediate material negative impacts on patients. Where necessary, Grünenthal implements additional risk minimisation measures, such as educational materials developed in close alignment with Competent Authorities and targeted at healthcare professionals or patients.

Proposed measures, including packaging or formulation adaptations, are reviewed and approved by Competent Authorities. Coordination with other marketing authorisation holders may be required for aligned implementation. Grünenthal's pharmacovigilance system is regularly inspected by Competent Authorities worldwide. Observations are addressed through corrective and preventive action (CAPA) plans, whose implementation is subject to authority verification.

### **Leveraging business relationships**

The Grünenthal Group has dedicated pharmacovigilance agreements with partner companies to effectively manage material impacts on consumers and end-users. These agreements clearly define the respective responsibilities, tasks, and decision-making rights of all parties involved. They also establish frameworks for the seamless exchange of safety-related information, supporting timely and coordinated responses to emerging safety concerns.

Grünenthal also participates in industry forums such as the European Federation of Pharmaceutical Industries and Associations (EFPIA) to exchange knowledge and promote best practices in patient safety.

### **Timeline and financial resources**

The Pharmacovigilance Department's key actions are ongoing and will continue as long as Grünenthal holds its Marketing Authorisation. Grünenthal tracks the progress of key actions disclosed in previous years through metrics (see section '[S4.MDR-M / S4.MDR-T / S4-5 Patient safety metrics and targets](#)'). Financial resources for these activities were allocated in the 2025 Pharmacovigilance Budget, ensuring that the necessary capabilities and infrastructure were in place to effectively safeguard patient safety. No significant capital expenditures (CapEx) or operating expenses (OpEx) were incurred for the actions in the reporting period. To maintain a high standard of regulatory compliance and operational efficiency, Grünenthal invests in regular external training. This ensures that Grünenthal Drug Safety personnel remain up to date with their qualifications. Additionally, Grünenthal upgrades software and tools and develops proprietary IT innovations to perform key actions more efficiently.

## **S4.MDR-M / S4.MDR-T / S4-5 Patient safety metrics and targets**

### **Metrics**

The Grünenthal Group uses multiple metrics to monitor and evaluate the performance and effectiveness of its pharmacovigilance system to best manage patient safety. These are:

1. Number of pharmacovigilance inspection findings that resulted in a warning and/or penalty
  - Competent Authorities may issue formal warnings or financial penalties when the inspection results in the identification of a direct compromise to patient safety, regulatory non-cooperation or when the Marketing Authorisation Holder fail resolve the Inspection findings (minor, major or critical) with an adequate CAPA Plan accepted by the Authority.
2. Percentage of on-time submission average for Individual Case Safety Reports (ICSR) to health authorities
  - Timely and accurate reporting of individual case safety reports (ICSRs) to health authorities is a critical element of our approach to manage patient safety and regulatory compliance. The percentage of ICSRs submitted within the required timeframes serves as a key indicator of the effectiveness of our pharmacovigilance system. This metric enables us to proactively mitigate potential adverse impacts on patient wellbeing, product safety, and business continuity. Grünenthal receives safety information through multiple channels, including online forms and a widely publicised email address, both accessible to external stakeholders, including

healthcare professionals and patients. All reports are reviewed by the Case Processing team and processed in the Argus database, which is configured to meet country-specific regulatory timelines and automatically generates reports for health authorities. The Apex tool then evaluates timeliness and compliance, enabling the Pharmacovigilance team to monitor performance via the defined metric.

3. Number and percentage of employee pharmacovigilance training assignments (Module 1) completed via e-learning in the reporting period
  - Ensuring that employees are adequately trained in pharmacovigilance requirements is essential for managing potential risks related to patient safety, regulatory compliance, and product stewardship. The number of pharmacovigilance training assignments completed represents a key indicator of our efforts to embed safety awareness and operational responsibility across our workforce. This metric supports the effective management of potential adverse impacts, enhances risk mitigation capabilities, and reinforces our commitment to responsible business practices. All new colleagues are automatically assigned the relevant training based on their internal job codes within the digital MasterControl training platform. Completion of each training module must be confirmed through a formal sign-off by the employee. The system automatically tracks the assignment status and monitors completion rates.

All metrics are designed in alignment with national and regional regulations<sup>66</sup>. These metrics aim for 100% compliance, recognising that operational constraints may occasionally prevent achieving this ideal. To address performance gaps, predefined thresholds are in place, initiating Corrective and Preventive Action Plans whenever a metric falls below the established standard.

### Pharmacovigilance metrics

Metric	2025	2024
Number of employees invited for pharmacovigilance e-learning training assignments (Module 1) <sup>67</sup> in the reporting period	4,334	4,541 <sup>68</sup>
Number of employee pharmacovigilance training assignments (Module 1) completed via e-learning in the reporting period	4,307	4,502 <sup>69</sup>
Percentage of employee pharmacovigilance training assignments (Module 1) completed via e-learning in the reporting period.	99.4%	99.1% <sup>70</sup>
Percentage of on-time submission average for Individual Case Safety Reports (ICSR) to health authorities	98.0%	96.4%

<sup>66</sup> Including EU Directive 2001/83/EC, EU Directive 2001/20/EC, EU Regulation (EC) No. 726/2004, EU Regulation (EC) 1901/2006, EU Implementing Regulation (EU) No. 520/2012, the Human Medicines Regulations 2012 (UK), 21CFR314.80 (USA) and pharmacovigilance regulations from all countries where Grünenthal holds a Marketing Authorisation.

<sup>67</sup> General pharmacovigilance training relevant to all employees. An additional module of pharmacovigilance training is offered to departments responsible for activities affected by pharmacovigilance regulations (e.g., commercial areas setting up market research activities).

<sup>68</sup> The 2024 figure is based on the last 12-month cycle. The scope of this training metric changed in 2025 to reflect the reporting period.

<sup>69</sup> The 2024 figure is based on the last 12-month cycle. The scope of this training metric changed in 2025 to reflect the reporting period.

<sup>70</sup> The 2024 figure is based on the last 12-month cycle. The scope of this training metric changed in 2025 to reflect the reporting period.

<b>Metric</b>	<b>2025</b>	<b>2024</b>
Number of pharmacovigilance inspection findings that resulted in a warning and/or penalty	0	Not tracked for 2024

### Targets

In 2025, Grünenthal set a measurable, outcome-oriented target to effectively and systematically manage the topic of patient safety.

#### Target 2026-2030

Operate an excellent patient safety management system with

- no pharmacovigilance inspection findings resulting in warnings and/or penalties,
- 100% annual pharmacovigilance employee training and
- >95% on-time Individual Case Safety Report submissions to health authorities worldwide each year until 2030

The targets are based on national and regional regulatory frameworks, such as Directive 2001/83/EC, the Federal Food, Drug, and Cosmetic Act (Chapter 21) of the US Food & Drug Administration FDA, and international harmonised guidelines, including the International Council for Harmonisation of Technical Requirements for Pharmaceuticals for Human Use (ICH) topics E2E Pharmacovigilance Planning and E2D Post-approval Safety Data Management.

Relevant proxies at Grünenthal are consulted to include consumer perspectives in the target setting process, performance tracking and considering further actions based on performance.

## Product quality

### S4.MDR-P / S4-1 Product Quality Policy

#### Key contents of the policy

Grünenthal's Good Practice (GxP) Quality Policy establishes the framework under which our Global Quality Assurance Department designs, implements and maintains an effective Pharmaceutical Quality Management System. This system ensures that all products provided by Grünenthal, for any patients, are safe, reliable and comply with regulatory requirements. To uphold this commitment, Grünenthal's Global Quality Assurance ensures compliance with internal codes, international guidelines and national regulations, focusing on:

- **Quality Management System** – Ensures all products, processes, documentation, and product dossiers meet their intended use requirements.
- **Quality risk management** – Implements measures to prevent, minimise or eliminate risks affecting product safety, efficacy or quality
- **Event management, recalls and product quality complaints** – Provides processes to assess and address adverse events, recalls or complaints, ensuring timely investigation and resolution.
- **Organisation and personnel** – Establishes training programmes to ensure personnel understand the Quality Management System, industry codes of practice, and company Standard Procedural Documents.
- **Facilities, utilities, equipment and computerised systems** – Ensures that these components are properly designed, maintained and decommissioned as needed.
- **GxP processes and controls** – Develops and validates robust processes and systems in accordance with applicable regulatory requirements.

In the reporting year, no significant changes to the GxP Quality Policy were made.

#### Policy scope and accountability

The Grünenthal GxP Quality Policy applies to all employees within the Grünenthal Group who are involved in GxP-related activities. Leadership is responsible for ensuring compliance with quality assurance policies and procedures. Ultimate accountability for implementing and overseeing the GxP Quality Policy lies with the Grünenthal Corporate Executive Board.

#### Alignment with international standards

Grünenthal's GxP Quality Policy ensures full compliance with international and national regulations in all territories where the company's products are distributed. This includes EU Directive 2001/83/EC, EU Regulation (EC) No. 726/2004, EU Good Manufacturing Practice Guidelines (EudraLex Volume 4), ICH Guidelines Q8 to Q12 and USA CFR Chapter 21 Parts 210 – 211.

#### Stakeholder consideration and accessibility

Global Quality Assurance integrates key stakeholder interests, including those of patients, healthcare professionals, and regulatory authorities, by ensuring compliance with internal codes of practice and relevant international and national regulations.

Signals or complaints from end-users in the market are systematically processed through a Complaints Investigation Process. This mechanism ensures that any reported concerns are thoroughly examined, and, when necessary, trigger additional measures. Where relevant, patients and healthcare professionals are informed about the affected product. If patient safety or product quality is at risk, our Recall Process is initiated to promptly remove the product from the market, minimising any potential harm.

Moreover, regulatory authorities conduct regular inspections. Each one is managed through a structured Inspection Management Process, which allows for the rapid assessment of any observed non-conformities. Impact analyses determine the root causes and necessary corrective and preventive actions (CAPA). Should an assessment indicate a potential risk to product efficacy or patient safety, immediate steps are taken to communicate with healthcare professionals and patients or to withdraw the affected product from the market.

Grünenthal uses its training management system to ensure that the GxP Quality Policy is effectively distributed and communicated to relevant stakeholders – the Global Quality Assurance team and leadership roles responsible for or influencing compliance with GxP good quality practices. Additionally, all Grünenthal employees involved in GxP tasks follow a role-specific Training Curriculum, ensuring on-the-job learning. External individuals on Grünenthal campuses are either supervised by Grünenthal personnel or receive equivalent training to maintain compliance. Before collaborating, external partners undergo screening and Quality Auditing to verify that their policies align with Grünenthal's standards.

## S4.MDR-A / S4-4 Product quality actions

### Key actions under the Quality Management System

The law requires corrective and/or preventive action to address actual or potential negative impacts on consumers and end-users due to product quality. Grünenthal uses quality risk management and root cause analyses to determine the appropriate actions to minimise any negative impact of its products and ensure that products have the intended effect on patients in a risk-based approach on a case-by-case basis. The company has implemented the following key actions under its Quality Management System to prevent negative patient outcomes:

- Alignment of all GxP processes and systems with all applicable legal and regulatory frameworks.
- Consistent application of a structured quality risk management approach to address potential quality concerns effectively.
- Review, investigation and follow up with feedback on 100% of Quality Events, Deviations, and Product Quality Complaints (including those received from patients and healthcare professionals)
- Assurance that highly qualified Quality Staff operate within a robust Quality Management framework, assuring Right First-Time operations, continuous improvement of product efficacy and patient safety, and continuous improvement of internal processes and systems.
- Maintenance of a Regulatory Intelligence Process to proactively adapt to worldwide pharmaceutical regulations.
- Implementation and continuous monitoring of Product Quality metrics and targets.

Any observed negative trends or missed targets are investigated as deviations in line with our internal procedures. Root causes are systematically identified and addressed through a Corrective and Preventive Action (CAPA) plan to mitigate or remediate potential adverse impacts.

### Scope of key actions

The key actions apply to all GxP-related processes, operations, and systems within Grünenthal. The GxP framework encompasses Good Manufacturing Practice, Good Distribution Practice, Good Clinical Practices and Good Laboratory Practices (see '[S4.MDR-P / S4-1 Research and development policy](#)').

### Leveraging business relationships and engagement in industry initiatives

Grünenthal has implemented Technical Quality Agreements with partner companies that define responsibilities, tasks, information sharing and decision rights in order to best manage negative impacts that could

affect patients. Moreover, Grünenthal engages with other pharmaceutical companies on issues concerning patient health and safety as an active member of the European Federation for Pharmaceutical Industries and Associations.

**Timeline and financial resources**

Maintaining an active and effective Quality Management System is an ongoing, permanent regulatory requirement mandated by all global health authorities. As such, Grünenthal’s Quality Management System remains continuously operational to meet evolving compliance standards. All activities of the Global Quality Assurance department (GQA) relate to the material sustainability issue of product quality. The annual Global Quality Assurance Budget provides the necessary financial resources to support the implementation and sustainability of the quality management initiatives. Specific capital expenditures (CapEx) or operating expenses (OpEx) information is excluded from this year’s report due to limited data availability.

**S4.MDR-M / S4.MDR-T / S4-5 Product quality metrics and targets**

**Metrics**

Grünenthal’s Quality Management System performance is assessed through a set of metrics which are designed to monitor and assess key quality processes that ensure consistent quality risk management. Depending on the metric, these are gathered automatically by the management systems or manually. In any case, these metrics are analysed to facilitate continuous improvement, ensuring compliance with ICH Q9 (Quality Risk Management). Performance outcomes are regularly reviewed during Global Quality Assurance (GQA) department meetings and Quality Management reviews and reported to relevant management and executive personnel.

<b>Metric</b>	<b>2025</b>
Rate of major and critical deviations from Grünenthal’s and current industry quality standards (as a percentage of major and critical deviations vs total number of batches processed)	2.26% (296 deviations vs 13,093 batches processed)
Rate of justified market product quality complaints (in parts per million)	8 ppm (1,159 units vs 144,599,074 units marketed)

The major and critical deviation rate represents the number of major and critical deviations identified during manufacturing relative to the total number of batches manufactured within the reporting period. It measures significant process and quality failures per batch and serves as an indicator of manufacturing robustness, Good Manufacturing Practice (GMP) compliance, and the effectiveness of the pharmaceutical quality system.

In this context, deviations are assessed against both externally defined industry quality standards and internally defined company quality standards. Industry quality standards are primarily based on current Good Manufacturing Practice (cGMP), the globally recognised regulatory framework requiring manufacturers to apply the latest state of science and technology. Grünenthal’s quality standards represent the internal policies, procedures, and control systems established to operationalise these principles within the company’s specific manufacturing environment.

Major and critical deviations are events that affect product quality attributes or process parameters and may pose an actual or potential risk to patients and/or involve non-compliance with applicable regulatory requirements, with critical deviations reflecting situations where the potential impact to patient safety or compliance is more significant. All such deviations are investigated and documented in accordance with

applicable GMP requirements, including scientifically sound impact assessment, root cause analysis, and implementation of appropriate corrective and preventive actions (CAPA).

The product quality complaints rate represents the number of marketing units involved in justified product quality complaints, relative to the total number of internally manufactured unit packs placed on the market (as 12 months rolling average). The calculation is based on the assumption that all complaints are accurately reported, categorised and represent genuine product quality issues. This allows the metric to serve as an indicator of manufacturing consistency, product reliability and customer experience. The metric may be affected by underreporting of incidents or regional discrepancies in reporting behaviour.

## Targets

In 2025, Grünenthal has set the following targets to manage product quality:

### Targets 2026-2030

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Keep rate of major and critical quality deviations related to Grünenthal's internally manufactured products (active pharmaceutical ingredients, drug substances and drug products) below 5% each year until 2030.

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Keep product quality complaint rate for all products internally manufactured by Grünenthal to a maximum of 7 parts per million (ppm) by 2030

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Relevant proxies at Grünenthal are consulted to include consumer perspectives in the target setting process, performance tracking and considering further actions based on performance.

## Safe pain management through responsible use of opioids

### S4.MDR-P / S4-1 Responsible use of opioids policies

Grünenthal is committed to ensuring the safe and appropriate use of its medicines, particularly opioid-based treatments for pain management. Recognising both the essential role of opioids in addressing severe pain and the risks associated with their misuse, the company has implemented the **Opioid Responsibility Framework**. This framework regulates our internal processes and processes of our commercial business partners effectively. It ensures a shared understanding within Grünenthal and provides clear guidance to external stakeholders on the ethical and scientific principles underpinning opioid use.

#### Key contents of the framework

At the core of this framework is the **Opioid Charter** (The Grünenthal Charter on the Responsible Medical Use of Opioid Analgesics in Pain Patients), which defines Grünenthal's commitment to developing, commercialising and distributing opioid analgesics in line with the highest ethical and industry standards. The company actively works to minimise the risks of non-medical use while maintaining patient access to effective pain management.

Additionally, the **Opioid Communication Guidance** with the title "Communicating about our opioids/products" sets out principles for responsible promotional and non-promotional content. It ensures that all language and imagery used in presentations, publications and marketing materials provide a factual and balanced representation of opioid-based treatments.

The **Opioid Statement** (Statement regarding the responsible use of opioid-based medicines) serves as a concise reference outlining key considerations for opioid-based pain management. It addresses the risk-benefit profile of these medicines and is integrated into all opioid-related promotional and non-promotional materials, ensuring clarity and transparency across communications. In 2024, language was further clarified with specific guidance for acute, chronic and all types of pain, sharpening the emphasis that opioid medications are not authorised for all types of pain. Additionally, language guidance from the U.S. Centers for Disease Control and Prevention (CDC) was considered.

#### Opioid Responsibility Framework for commercial business partners

Grünenthal applies its Opioid Responsibility Framework to its commercial business partners that commercialise opioids on our behalf. This includes the above and, depending on the level of risk exposure (the business partner's scope of activities such as healthcare interactions and use of promotional materials), a set of compliance clauses ensuring a tailored risk mitigation strategy.

Grünenthal maintained its Opioid Responsibility Framework without changes during the reporting year.

#### Scope and accountability

The Opioid Responsibility Framework is applicable to all opioid analgesics that are part of Grünenthal's product portfolio and all employees with duties directly or indirectly associated. Moreover, healthcare professionals are included in the scope where relevant, as patient contact occurs through them. The regional Responsible Opioid Usage Boards (ROUB) implement the framework, while the global ROUB will supervise and ensure adequate implementation.

#### Alignment with international standards

Grünenthal has implemented its Opioid Responsibility Framework beyond regulatory requirements. Our Opioid Statement as one central document of our Opioid Responsibility Framework refers to the Centers for Disease Control and Prevention (CDC) Clinical Practice Guideline for Prescribing Opioids for Pain –

United States 2022, the U.S. Department of Health and Human Services (DHHS), the OECD Health Policy Addressing Problematic Opioid Use in OECD Countries, as well as other key relevant publications on the responsible use of opioids. For further information, see Grünenthal's Opioid Statement on its corporate website.

#### **Stakeholder considerations and accessibility**

The Opioid Responsibility Framework has patients' health, safety and wellbeing at its core – their needs are the ones most relevant in this regard. The framework and associated policies are available in their respective version (for external or internal use) on the internet and intranet, respectively. Moreover, the Opioid Statement for example, is included in all opioid-branded and opioid-related communication materials.

### **S4.MDR-A / S4-4 Responsible use of opioids actions**

#### **Key actions under the Opioid Responsibility Framework**

The main ongoing action under the Opioid Responsibility Framework in the reporting year was two-fold: First, the training of employees in the Opioid Responsibility Framework and second, fostering commitment to responsible use among commercial partners through risk-based classification into different tiers of partners (see chapter '[G1 - Business Conduct](#)') and respective risk-based mitigation measures, such as document reviews and training for partners.

Grünenthal has established a global Responsible Opioid Usage Board (ROUB) at headquarters level, which supports the Corporate Executive Board in overseeing the governance of the responsible use of opioids. The ROUB comprises relevant functions such as the General Counsel, the Chief Medical Officer, the Global Compliance & Responsibility Officer and a Senior Legal Counsel (Head Legal Europe). The global ROUB is an escalation and challenging body for fundamental decision-making on all topics regarding the commercialisation of opioids. At the same time, it monitors and controls adherence to the Opioid Responsibility Framework via the local opioid boards.

All regions, in which Grünenthal commercialises opioids, have local Grünenthal Responsible Opioid Usage Boards. These boards produce biannual reports detailing adherence to training requirements and conversion rates for the mandatory use of the Opioid Statement in all interactions of sales teams and other Grünenthal employees with healthcare professionals. The regions are also required to conduct spot checks on opioid-related materials and provide feedback on their findings. Furthermore, they share minutes from their opioid board meetings, which occur at least twice a year. Each region operates under its own Standard Operating Procedure for opioid board governance.

If any Grünenthal entity identifies insufficiently trained healthcare professionals on the responsible use of opioids or other findings regarding key actions on the responsible use of opioids, an action plan is required to address the gap and mitigate potential negative impacts.

Grünenthal established a dedicated governance framework for the responsible use of opioids in 2020. This framework is continuously reviewed and refined by local and global Responsible Opioid Usage Boards (ROUB) to ensure it remains effective and responsive to emerging risks.

Any potential or actual negative impact identified through routine monitoring or spot checks triggers an adequate response. Local ROUBs implement immediate action plans for less severe findings, such as rescheduling missed training. More serious cases are escalated through the Ethics Helpline process, as outlined in chapter '[G1 - Business Conduct](#)', ensuring thorough investigation and remediation.

Where material patient impacts are reported, Grünenthal's drug safety department leads the response. If root cause analysis identifies issues related to commercial practices, the global ROUB assesses and recommends necessary changes. This may include adjustments to product design, marketing or sales processes.

The company ensures that remedy processes are accessible and effective through a structured governance system, supported by clear escalation routes and continuous oversight. Where appropriate, Grünenthal also engages in cross-industry collaboration to support responsible opioid use more broadly.

### Scope of key actions

The scope of actions includes Grünenthal's own operations related to opioids and its partners downstream. Employees in Sales functions within the commercial organisation undergo annual training on the Opioid Statement and medical training on the responsible use of opioids. These personnel are required to inform all relevant healthcare professionals (such as healthcare professionals with whom we communicate about our opioids) about the Opioid Statement on a regular basis, at least annually, with their activities recorded in the Customer Relationship Management (CRM) system. In addition, employees in Medical Affairs, Market Access, and other relevant functions also receive training on the Opioid Statement and responsible use of opioids.

By providing partner training on the Opioid Communication Guidance "Communicating about our opioids/products", we aim to expand our governance and safeguarding measures to our partners. For details, see section '[S4.MDR-M / S4.MDR-T / S4-5 Responsible use of opioids metrics and targets](#)' below.

The Opioid Communication Guidance "Communicating about our opioids/products" specifies when and how the Opioid Statement is to be integrated into internal and external materials. Depending on risk-based tiering criteria, promotional opioid-related content from Commercial Partners is subject to governance-led medical reviews before review and dissemination.

### Leveraging business relationships and engagement in industry initiatives

Grünenthal leverages its relationships with business partners to foster advocacy for safe pain management through the responsible use of opioids. To this end, the Opioid Responsibility Framework promotes responsible communication and marketing practices throughout the value chain.

Grünenthal actively participates in external activities, such as field visits and conferences related to pain management, for example the International Association for the Study of Pain (IASP) World Congress on Pain, the European Pain Federation (EFIC) Congress and PAINWeek. The Opioid Statement is consistently communicated in all our interactions at such conferences and in field visits to raise awareness and address the safe treatment of pain through the responsible use of opioids. For more information, see also '[S4.MDR-A / S4-4 Patient safety actions](#)'.

### Timeline and financial resources

These actions are carried out without interruption to maintain compliance and safeguard patient safety. Through these structured and continuous efforts, Grünenthal ensures the effectiveness of its Opioid Responsibility Framework in promoting patient safety and mitigating risks associated with opioid products. No significant capital expenditures (CapEx) or operating expenses (OpEx) were incurred for the actions in the reporting period.

### Effectiveness tracking and assessment

Grünenthal evaluates its actions using context-specific standards and metrics. Grünenthal regularly conducts reviews of literature and guidance on opioid use and pain management to ensure the relevance and

accuracy of the Opioid Statement. For instance, in March 2024, it was determined that the Opioid Statement required an update based on the latest available literature and guidance, and the respective changes were made. For more information, see also ‘[S4.MDR-A / S4-4 Patient safety actions](#)’.

## S4.MDR-M / S4.MDR-T / S4-5 Responsible use of opioids metrics and targets

### **Metrics**

Grünenthal monitors the performance and effectiveness of its Opioid Responsibility Framework through the following metric:

<b>Metric</b>	<b>2025</b>
Number and percentage of commercial business partners which were active in the reporting year, and which promoted and/or resold Grünenthal’s opioid-containing products which received training on the Opioid Communication Guidance “Communicating about our products/opioids” within the previous 4 years	16 (64% <sup>71</sup> ) (25 active in total)

By providing partner training on the Opioid Communication Guidance "Communicating about our opioids/products", we aim to expand our governance and safeguarding measures to our partners. This is necessary as the primary responsibility for commercialising our products may lie with these partners. The training is delivered predominantly online and lays down principles for promotional content, focusing on ethical responsibility concerning opioid usage. Through the targeted training, we ensure that our high standards are known and adhered to and that the information our partners provide to healthcare professionals remains balanced and appropriate. This enables healthcare professionals addressed by our partners to assess the risks and benefits of our products for patients in an informed manner. The metric reflects the effectiveness of these efforts in relation to our partners.

In scope are partners who require mandatory training and are commercially active. Grünenthal’s Medical Affairs department delivers or organises trainings and documents completion for audit and reporting purposes. The KPI numerator consists solely of those in-scope, commercially active partners for whom Medical Affairs has documented completed training in the form of calendar invitations, ensuring that the resulting percentage reflects verified compliance against a clearly bounded and auditable population. The metrics are evaluated at the global level by the Responsible Opioid Usage Board (ROUB), with regional and partner-specific assessments conducted twice a year.

The global Corporate Responsibility Board has established and set the above metric in internal discussions in alignment with medical and drug safety functions. It has then been rolled out at regional level. Performance data is included in Grünenthal’s Responsibility Report and monitored via a data control matrix.

In addition to training commercial business partners, Grünenthal reinforces the responsible use of opioids through continuous training for relevant employees and targeted communication with healthcare professionals; these activities form part of the broader governance framework but are not within the scope of the ESRS metric reported.

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<sup>71</sup> The remaining 36% include commercial business partners that have been trained but fall outside of the defined scope. Numbers excluding Grünenthal Meds.

## **Target**

In alignment with the overarching objective of the Opioid Responsibility Framework, in 2025 Grünenthal has set the below target which aims to address safe pain management through the responsible use of opioids:

### **Target 2026-2030**

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Ensure robust risk management for the responsible use of opioids by verifying that 100% of commercial business partners, which are active in the reporting year, and which promote and/or resell Grünenthal's opioid-containing products, have received training on the Opioid Communication Guidance "Communicating about our products/opioids" within the previous 4 years by 2030.

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There is no direct involvement of consumers or end-users in target setting or in the decision on how to track performance regarding the targets for the Responsible use of opioids.

## Access to healthcare

### S4.MDR-P / S4-1 Access to healthcare policy

Access to healthcare has been newly identified as a material topic for Grünenthal, highlighting its importance in reducing healthcare disparities and improving patients' quality of life specifically in low- and middle-income countries. To address this, we are developing a new Access to Healthcare strategy including a global policy, scheduled for formal launch in 2026. The policy's implementation will ultimately be overseen by the Global Compliance & Responsibility Officer to ensure the integration of ethical, regulatory and social standards across Grünenthal's operations, driving meaningful and sustainable outcomes. Grünenthal had no dedicated access to healthcare policy during the reporting period.

### S4.MDR-A / S4-4 Access to healthcare actions

As part of our operational targets for access to healthcare in 2025, the key actions in this field are currently under development as there are no active ESRS-aligned actions for this topic yet. While Grünenthal has a track record of providing drug donations to patients in need, for example in Venezuela and Ukraine, we are committed to adopting a new strategy and strong governance to maximise the impact in this field. No significant capital expenditures (CapEx) or operating expenses (OpEx) were incurred for the actions in the reporting period.

### S4.MDR-M / S4.MDR-T / S4-5 Access to healthcare metrics and targets

#### Metric

Going forward, to monitor the company's performance regarding access to healthcare, Grünenthal will track the following metric:

Metric	2025
Number of patient support initiatives in low- and middle-income countries (LMICs) since 2025	0

Grünenthal tracks the number of new patient support initiatives implemented in low- and middle-income countries since 2025. These initiatives aim to provide direct or indirect access to healthcare to patients that otherwise do not or only have very limited access. This includes donations of pharmaceutical products or programmes designed to enhance health literacy and empower informed healthcare decisions.

#### Target

In 2025, Grünenthal has set a measurable, outcome-oriented target for facilitating access to healthcare.

#### Target 2026-2030

Set up 3 patient support initiatives in low- and middle-income countries by 2030, of which at least one is

- a donation of Grünenthal products to meet local medical needs and
- a programme aimed at improving health literacy and enabling informed healthcare decisions, thereby contributing to reduced disease burden and improved health equity.



## Sustainability Statement

Grünenthal Group

Relevant proxies at Grünenthal are consulted to include consumer perspectives in the target setting process, performance tracking and considering further actions based on performance.

## Research and development

### S4.MDR-P / S4-1 Research and development policy

#### Key contents of the policy

Our research and development (R&D) framework encompasses three key regulatory pillars:

- **Good Clinical Practice (GCP):** Ensures ethical conduct during clinical trials and safeguards the welfare of human participants.
- **Good Laboratory Practice (GLP):** Focuses on rigorous preclinical research, governing non-clinical laboratory testing.
- **Good Manufacturing Practice (GMP):** Oversees the production processes to maintain the quality and safety of pharmaceutical products.

Grünenthal-specific Standard Operating Procedures (SOP) and project-related Clinical Development Plans further support our commitment to develop innovative medicines. Together, these guidelines ensure that all parties involved in the clinical development process adhere to strict standards, minimising risks and safety issues for patients. They provide the framework that guides our R&D efforts to enhance the development of new medicines using cutting-edge methods, tools and data evaluation while ensuring the safety, well-being, and rights of patients participating in clinical trials are upheld. The insights and advancements gained from these efforts help shape the criteria for clinical candidates during research and are subsequently integrated into clinical development plans for relevant programmes.

In the reporting year, no significant changes to the R&D framework occurred.

#### Policy scope and accountability

The key regulatory pillars of our R&D framework, which equally applies to all patients, are international quality standards established by regulatory authorities such as the U.S. Food and Drug Administration (FDA), the European Medicines Agency (EMA) and other international regulatory bodies. The practices they outline are designed to ensure that pharmaceutical products are consistently produced and controlled according to quality standards. Accordingly, there are no exclusions or limitations within the regulatory pillars.

Our Clinical Development Plans outline the transition from a research project into the development stage, detailing objectives, success criteria, studies and milestones across all future stages.

The responsibility for implementing the R&D framework lies with the employees of the organisation, including Project Leads and project teams. The accountability lies with the Head of Research, the Head of Development and the Chief Scientific Officer (CSO) who is a member of Grünenthal's executive committee.

#### Stakeholder considerations and accessibility

Patients remain the primary stakeholders under our R&D framework. To assess efficacy and safety of new drugs, patients are actively recruited into trials throughout the entire clinical development process. Continuous training and education of personnel involved in the performance of clinical studies are essential for maintaining compliance with GMP, GLP and GCP. Patients participating in trials are informed about the nature of the regulations and standards and provide informed consent before enrolment. Clinical and project leads ensure effective patient engagement in studies where patient (representative) feedback is necessary.

## S4.MDR-A / S4-4 Research and development actions

### Key actions in the field of research and development

The key actions in the field of research and development for 2025 were part of three subprojects:

1. The De Novo Molecule Generation sub-project focuses on the research and development of Machine Learning tools to design new molecules with the potential to relieve pain. Key actions include:
  - Integration of targeted in-house artificial intelligence (AI) methods to help design potent and novel molecules, for example to prevent the opening of ion channels that produce a pain signal in pain neurones (ion channel inhibitors).
  - Development of Machine Learning models predicting unwanted activity of ion channels contributing to the electrical activity of the heart (hERG activity), to support all research programmes in selecting safer molecules for synthesis with lower cardiovascular risks.
2. The Deep Pain Patients Phenotyping sub-project is dedicated to advancing Machine Learning tools to evaluate big volumes of data in novel ways to identify outcomes for pain patients (deep phenotyping). Key actions include:
  - Implement deep learning AI model using neural networks to predict data evolution over time (neural ordinary differential equations (ODE)), enhancing accuracy in complex predictions and confirmation of reproducibility of published results from clinical studies in pain patients.
  - Evaluate and optimise the above neural ODE methodology using data from a completed phase I study.
  - Apply neural ODEs to gain additional insights into safety and scientific aspects in a phase I study.
  - Use neural ODEs to support study design and dose assessment for a phase II study in a rare indication.
3. The Digital Biomarker sub-project explores the potential of measurable characteristics, such as patients' mobility and sleep patterns, that indicate biological processes, disease progression, or treatment response, collected via digital devices (digital biomarkers), to supplement patient-reported outcomes. Key actions include:
  - Assess whether algorithms from an external project on digital mobility outcomes monitoring the daily gait of people with mobility problems require adaptation for application in pain studies conducted by Grünenthal.
  - Analyse mobility and sleep data collected via medical grade wearable devices in an ongoing internal clinical study in neuropathic pain.
  - Assess mobility and patients' compliance data from an external project using biometric and biological data for the diagnosis and treatment of pain patients.

Once proposed improvements derived from these sub-projects receive endorsement, we integrate them into the strategy for future programmes by updating Clinical Development Plans and study protocols. For 2026 onwards, new key actions related to the targets for 2026-2030 will be developed.

### Scope of key actions

The key actions undertaken by the R&D organisation focus on developing innovative methods, generating data-driven outcomes and implementing advanced tools.

The main scope of developing innovative methods is to accelerate and improve ongoing research projects focusing on several targets involved in pain pathways. The research projects team can benefit from Machine Learning models to design potent and novel molecules, as well as predicting unwanted activity to better develop promising new assets in pain.

The main scope of generating data-driven outcomes and implementing advanced tools is to support the clinical development of internal pain assets. The project teams benefit from new predictive scientific data and insights into safety to better design upcoming clinical studies. In addition, they may benefit from the recommendation and implementation of new digital endpoints into clinical studies aiming to assess patients' activity, mobility and sleep. These new digital endpoints will provide additional and more objective data on the treatment effect of new drugs.

Key limitations for these activities can include strategic changes to programmes, limited budget to perform additional studies, or limited internal capacities.

**Timeline and financial resources**

The targeted time frame for the completion of these key actions was until the fourth quarter of 2025. Budget allocation is guided by an internal prioritisation of projects, ensuring that resources are directed towards initiatives with the highest strategic importance. No significant capital expenditures (CapEx) or operating expenses (OpEx) were incurred for the actions in the reporting period.

**Effectiveness tracking and assessment**

Project teams, research teams, and the research and development boards systematically review and discuss findings and outcomes derived from R&D activities and decide on action points. These discussions, action points and quantitative and qualitative progress are captured in meeting minutes.

**S4.MDR-T / S4.MDR-M / S4-5 Research and development targets and metrics**

**Metrics**

To adequately track its performance against its R&D targets, Grünenthal employs the following metrics:

<b>Metric</b>	<b>2025</b>
Percentage of clinical development programmes in which patient advocacy groups are involved in the design	33%
Percentage of R&D programmes that address non-pain indications	14%

R&D programmes refer to the end-to-end process of developing new medicines, encompassing pre-clinical research activities, including laboratory research, as well as subsequent clinical development in humans.

Clinical development programmes refer exclusively to the human clinical trial phase of medicinal product development aiming to establish safety, efficacy and benefit-risk-profile in humans.

Particularly in the context of clinical development, dialogue with patient advocacy groups, including patient representatives and organisations, is vital for informing and optimising the development strategy with relevant, patient-centric insights. Within the framework of advisory boards, roundtables, patient and

caregiver interviews, and similar formats, patients contribute to the design of a development programme by sharing their experiences with unmet patient needs and their expectations for new treatment options.

## **Targets**

In 2025, Grünenthal set the following two targets for material impacts related to the topic of Research and Development:

### **Targets 2026-2030**

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Ensure patient advocacy groups are involved in the design of 100%<sup>72</sup> of Grünenthal-sponsored clinical development programmes by 2030, and their recommendations are taken into account.

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Expand Grünenthal's R&D efforts beyond pain and engage in related indications, including rare/orphan diseases (such as Duchenne muscular dystrophy), by building a pipeline that – in 2030 – comprises 50% non-pain R&D programmes.

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### **Stakeholder involvement in target setting**

Although patients were not directly involved in the target setting process for Research and Development targets, relevant insights into their perspectives and needs were integrated through alternative methods. This included findings from stakeholder dialogues, exchanges with healthcare professionals, and analyses of existing data sources. Among these were interviews with pain specialists and key opinion leaders, analysis of internal and external patient databases, results from previous clinical studies and recommendations from the literature. Grünenthal will engage with patient organisations where appropriate.

Relevant proxies at Grünenthal are consulted to include consumer perspectives in performance tracking and considering further actions based on performance.

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<sup>72</sup> except when multiple programmes target the same indication, in which case shared patient advocacy input may be applied

**Governance**  
**G1 – Business conduct**

**Ethical business culture, anti-corruption and anti-bribery**

Grünenthal has not identified material risks or opportunities related to business conduct for the organisation, however it has identified the following material impacts on governance-related topics:

Type of impact	Impact
Actual positive	Ethical business culture
Potentially negative	Corruption and bribery (prevention, detection and incidents)

**G1.MDR-P / G1-1 / G1-3 Ethical business culture, anti-corruption and anti-bribery policies**

Integrity is one of the five core values that define Grünenthal’s culture and shape the behaviour of its employees. We believe in fostering a speak-up culture, where employees feel empowered to identify and report questions, concerns or doubts. Grünenthal also insists that all business partners act lawfully and with integrity. We promote our culture through dedicated people initiatives and by applying our Code of Conduct. To evaluate the effectiveness of our cultural efforts, we rely on insights from the Great Place to Work® (GPTW) survey and review trends and cases reported through our Ethics Helpline. Grünenthal follows a strong set of policies, targets and measures to manage its material impacts related to ethical business culture, compliance and the prevention of corruption and bribery in particular. The following sections provide details on these matters and of further relevant processes.

Grünenthal regards legal compliance and ethical business practices as fundamental and self-evident responsibilities. The company therefore implements its global and local policies and procedures to foster an ethical business culture, ensure compliance and prevent corruption and bribery. These policies align with regulatory requirements, international standards and Grünenthal’s organisational values, ensuring consistent governance across Grünenthal’s own global operations.

**Code of Conduct**

Our mature Compliance Management System is accompanied by a clear framework, which is based on a global Code of Conduct that brings together specific policies that outline our high standards for legal, ethical and responsible business conduct. These policies cover topics including anti-corruption, anti-money laundering, data privacy and digital ethics. The Code of Conduct applies to all employees and all business operations ensuring consistent global adherence to ethical, legal and responsible standards in daily operations.

To ensure our standards regarding ethical business culture are upheld in our supply chain as well, Grünenthal has implemented policies on responsible sourcing practices:

**Global Procurement Policy**

Grünenthal’s Global Procurement Policy establishes guidelines for the procurement of goods and services. The policy integrates principles of fairness, competition, and confidentiality while ensuring that procurement practices align with the company’s Code of Conduct for Business Partners and Grünenthal’s State-

ment of Compliance with Human Rights and Environmental Standards. The policy's framework encompasses three aspects. Firstly, the standard procurement processes cover demand-to-contract, supplier relationship management, and purchase-to-pay procedures. Secondly, they encourage the procurement of goods and services in a manner that upholds ESG principles. And thirdly, special provisions address unique or non-standard procurement scenarios. The policy incorporates the Responsible Sourcing Programme, further strengthening Grünenthal's commitment to ethical supply chain practices.

### **Responsible Sourcing Standards for Business Partners**

Grünenthal's Responsible Sourcing Standards for Business Partners communicate the company's ESG expectations (requirements and ambition) for their suppliers. These standards outline efforts to increase the company's supply chain ESG maturity and data transparency. They also support efforts to contribute to the 1.5° C goal of the Paris Climate Agreement, and to meet increasing regulatory requirements (for example the German Supply Chain Act) through close collaboration.

### **Responsible Sourcing Toolkit for Business Partners**

The toolkit explains how Grünenthal embeds ESG into purchasing decision-making and provides guidance around processes, initiatives, and further training material to work effectively with suppliers, including evaluating and improving ESG performance throughout the regular exchange and collaboration.

### **Code of Conduct for Business Partners**

The Code of Conduct for Business Partners reflects Grünenthal's responsibility to operate in full compliance with applicable laws and regulations and with the highest ethical standards beyond its own operations. This responsibility explicitly incorporates international human rights standards and covers forced labour. The document mandates legal compliance, integrity and respect in all business partner interactions, highlights health and safety as a priority, and it provides mechanisms for employees of business partners to report concerns without fear of reprisal. Its application scope extends compliance obligations to the supply chain, requiring sub-suppliers to uphold equivalent standards.

### **Policies on the prevention of corruption**

Grünenthal's Anti-Corruption Policy serves as a cornerstone for its preventive efforts, providing clear guidance on avoiding corruption in any business interactions. It clarifies acceptable practices for avoiding conflicts of interest. Employees are instructed to avoid granting or receiving any advantage that could improperly influence business decisions, ensuring all actions are based on legitimate business interests, fair market value and proper documentation. Approval flows and value thresholds are locally defined in collaboration with compliance teams, to safeguard against improperly influencing the business decision of a third party.

The Grünenthal Healthcare Interactions Policy and the Patient Interactions Policy provide guidance for compliant interaction with patients and healthcare professionals. With the Anti-Corruption Policy, the Healthcare Interactions Policy and the Patient Interactions Policy, Grünenthal therefore provides clear guidance, including practical examples, to ensure compliance and prevent improper influence, especially in interactions with healthcare organisations and healthcare professionals.

Key safeguards include rules on gifts, hospitality, sponsorships and donations, complemented by local implementation measures, standard contract templates and a fair market value tool to prevent overcompensation. Comprehensive training, such as Healthcare Interactions Training (HCI Training), along with third-party due diligence, ensure consistent application across all activities.

### **Ethics Helpline Policy**

In accordance with EU and national legislation, Grünenthal provides a confidential platform available for anyone within or outside of Grünenthal to report concerns or breaches of compliance and related topics such as human rights violations or working conditions in the supply chain. The policy protects good-faith reporters and ensures that concerns are addressed promptly and thoroughly by our Compliance Organisation, or even the Supervisory Board (Aufsichtsrat).

### **Accountability**

The Corporate Executive Board is the most senior level responsible for policy implementation. Leadership teams approve training matrices to ensure employees receive targeted training on relevant policies.

The governance and responsibilities for partner- and procurement-related policies are as follows:

- **Global Procurement Policy:** Head of Global Operations and Head of Global Procurement and External Supply Organisation.
- **Responsible Sourcing Standards for Business Partners:** Head of Global Operations and Head of Global Procurement and External Supply Organisation.
- **Code of Conduct for Business Partners:** Global Compliance & Responsibility Officer.

### **Alignment with third-party standards**

Grünenthal is committed to respecting human rights and complying with environmental standards, in accordance with our corporate values and national law, and international guidelines, conventions and principles. To maintain industry-leading compliance practices, Grünenthal respects and aligns with industry standards (e.g., the European Federation of Pharmaceutical Industries and Associations (EFPIA), the International Federation of Pharmaceutical Manufacturers & Associations (IFPMA), the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH) regulation and the Principles for Responsible Supply Chain Management from the Pharmaceutical Supply Chain Initiative), but also the Universal Declaration of Human Rights (UDHR) of the United Nations, the Paris Agreement on climate change adopted on 12 December 2015, and the Labour Standards of the International Labour Organisation (ILO) to cover topics related to cooperation with business partners and ensuring human rights along the value chain.

Our commitments are also reflected in our company guidelines, such as our Code of Conduct, Code of Conduct for Business Partners, Global People Policy, Environmental, Health & Safety Policy, Responsible Sourcing Standards for Business Partners, and Enterprise Risk Management Policy.

### **Policy implementation and accessibility**

Grünenthal ensures policies are accessible and understood across the organisation. They are distributed through a read-and-sign system on Grünenthal's policy management platform, MasterControl. All employees are also required to participate in mandatory compliance training courses (for details see sections '[G1-1 continued](#)' and '[G1.MDR-A / G1-3 Prevention and detection of corruption and bribery actions](#)'). In addition, key policies, including the Code of Conduct, Code of Conduct for Business Partners, Anti-Corruption Policy, are available on Grünenthal's corporate website to promote transparency with external stakeholders, while others are made available to the relevant stakeholders only, such as the Global Procurement Policy or the Code of Conduct for Business Partners. The latter for example is disseminated to suppliers during the onboarding process before a business relationship is entered into and periodically thereafter ensuring clarity on expectations and responsibilities from the outset of the business relationship. Depending on the associated risk, suppliers are required to sign the document. Regular communication of our Anti-Corruption Framework to employees and leadership aims to reinforce a culture of integrity, and to ensure all interactions are ethical, transparent, and compliant with regulatory standards. All compliance

policies and relevant training materials are available in several languages, including English, French, German, Italian, Portuguese and Spanish.

Relevant proxies for affected stakeholders were included in the policy process to consider their interests. However, no direct involvement of stakeholders took place.

## **G1.MDR-A Ethical business culture actions**

To uphold its ethical business culture, Grünenthal maintains adherence to applicable compliance standards and aims to continuously strengthen its governance framework. The requirements of the German Supply Chain Act (GSCA) are implemented and embedded into our processes. The GSCA imposes significant due diligence obligations on companies in Germany. The Act aims to ensure compliance with human rights and environmental standards related to topics such as child labour, occupational health and emissions of hazardous substances, throughout the supply chain. Grünenthal's Human Rights and Environmental Officer is responsible for monitoring the effective implementation of the German Supply Chain Act into the various areas of responsibility within the company.

To comply with the legal requirements as described above (e.g., GSCA) and industry standards, Grünenthal has implemented a Third-Party Due Diligence (TPDD) process and ESG Risk Assessment and Monitoring. These efforts aim to ensure that ethical business practices are upheld throughout our supply chain.

### **Third-party due diligence process**

This risk-based TPDD system is tailored to address the varying levels of supplier risks depending on the type of product or service, geographical location, and spend. The TPDD framework includes:

- Due diligence questionnaire: Potential business partners that meet certain requirements, e.g. turnover thresholds, complete a detailed questionnaire during onboarding and at regular intervals thereafter (one, two or three years, depending on the risk level), collecting governance, contact, and operational data for risk evaluation. This data is enriched with automated findings from independent sources, e.g. sanction lists, subject to human review.
- Risk categorisation: Suppliers are categorised as high, medium, or low risk. High-risk suppliers undergo more stringent due diligence measures, including higher levels of internal approval.
- Compliance training: Training sessions and presentations ensure that employees and stakeholders are well-versed in the TPDD process and its compliance requirements.
- Continuous monitoring and updates: Grünenthal reviews and updates the TPDD process regularly to ensure alignment with evolving regulatory requirements and emerging risks.

This structured approach enables Grünenthal to maintain robust compliance with standards such as the GSCA while addressing ethical and reputational risks proactively.

### **ESG risk assessment and monitoring**

As part of Grünenthal's comprehensive TPDD process, an ESG risk management system ensures that relevant risks, including those related to human rights and the environment, can be mitigated. Grünenthal follows a two-step risk assessment process. In the first step, suppliers are assessed based on abstract risks such as the type of business activity and country of location. Based on this assessment, a risk profile

is created, and prioritisation is carried out, identifying higher-risk suppliers, known as ESG-sensitive suppliers. In the second step, specific human rights and environmental risks related to these ESG-sensitive suppliers are assessed through an in-depth ESG assessment. This process gathers additional information through questionnaires and requests for certificates to ensure further transparency in the supply chain. Here, medium- and high-risk suppliers are subject to closer oversight. Following the defined governance, an internal review process to define the action plan ensures transparency and accountability. The procurement organisation is responsible for starting the supplier dialogue for the implementation of the preventive/remedial actions and close monitoring is part of Procurement's internal metrics.

### **Training and capacity building**

The ESG risk management system has been rolled out to the Procurement and External Supply Organisation (ESO), with corresponding training material and communication templates provided to ensure effective implementation. The programme includes training on the ESG risk assessment process, roles and responsibilities, and reporting. Awareness sessions on Grünenthal's risk prioritisation and internal exchanges with relevant stakeholders, as well as regular updates on metric performance and progress, have been key for fully understanding the ESG risk management. We are continually developing new training courses for our employees and updating existing ones to meet changing legal requirements.

### **Industry collaboration**

Grünenthal actively collaborates with other companies through the Pharmaceutical Supply Chain Initiative (PSCI). This partnership promotes shared standards and practices for responsible supply chain management, leveraging collective expertise to address complex ESG challenges, such as initiatives for decarbonisation in the supply chain reflect in the first PSCI Decarbonization summit.

### **Governance and reporting**

The German Supply Chain Act Working Group includes a representative each of Human Resources, Environment, Health and Safety, Compliance, Procurement and Responsible Sourcing, and is responsible to approve the risk prioritisation, suppliers' ESG risk status and related measures. A supply chain sustainability management and collaboration platform supports the in-depth ESG assessment, adverse media monitoring, and progress on preventive and remedial measures communicated to the suppliers identified with higher risk.

### **Financial and resource allocation**

No significant capital expenditures (CapEx) or operating expenses (OpEx) were incurred for the actions in the reporting period.

## **G1.MDR-A / G1-3 Prevention and detection of corruption and bribery actions**

Grünenthal's anti-corruption and anti-bribery measures are continually refined to adapt to regulatory changes and emerging risks. The organisation's Global Compliance Management System (CMS) integrates compliance, business ethics and risk management into a cohesive framework. Regular updates are made to policies, training materials and operational tools, ensuring Grünenthal remains at the forefront of compliance best practices.

The Global Compliance & Responsibility Officer and the compliance team actively monitor these initiatives, providing regular updates to the Corporate Executive Board, Supervisory Board (Aufsichtsrat) and Advisory Board (Beirat). This dynamic approach allows Grünenthal to identify areas for improvement and implement changes that strengthen its commitment to ethical conduct.

### **Detection and reporting mechanisms**

In order to identify and report potential incidents of corruption, Grünenthal employs a range of mechanisms that ensure accessibility and confidentiality. Employees are encouraged to report any concerns through several channels as outlined in section 'G1-1 continued' below. This system guarantees confidentiality and reinforces trust among employees and stakeholders.

To make sure compliance measures are effective, Grünenthal conducts regular affiliate audits including anti-corruption topics as part of its annual risk-based audit plan, typically carrying out two local Compliance Audits and two local Business Activities Audits each year. Additional audits evaluate adherence to policies and efficiency of processes and identify potential risks. Compliance audits, led by Internal Audit, form an essential part of Grünenthal's detection strategy. These audits, conducted on a rotational schedule, assess corruption risks globally and for affiliates. In the reporting period, Grünenthal identified no significant corruption risks.

### **Procedures for addressing incidents**

Grünenthal has established comprehensive procedures for investigating and addressing corruption and bribery allegations.

The Compliance Organisation is responsible for conducting investigations of alleged compliance violations. Investigations are conducted neutrally, confidentially, and in strict compliance with labour and data protection laws. Grünenthal's Compliance Officers play a pivotal role in advising the business on compliance matters and, in case of incidents, lead investigations. They are separate from the chain of management involved in the matter by having a solid reporting line to the Global Compliance & Responsibility Officer, therefore ensuring independence. They regularly, depending on local needs but at least quarterly, provide updates to the Local Leadership Teams ensuring transparency and accountability.

Ethics committees meet as needed to decide on appropriate measures to be taken in cases where reported compliance incidents have been investigated, and a violation has been identified. They ensure that decisions are guided by a standardised charter.

### **Training and awareness**

Our comprehensive anti-corruption framework is communicated to all employees and to the Executive and Advisory Board (Beirat) members. Compliance policies are rolled out via Master Control and assigned to the employees of the relevant target group and need to be signed off. Training is an integral component of Grünenthal's anti-corruption strategy. All employees and the Executive Board Team receive mandatory compliance training tailored to their roles (see section 'G1-1 continued'). Specific target groups, such as employees interacting with healthcare professionals, participate in annual Healthcare Interactions Training (HCI), which covers the implementation of legal and other obligations into Grünenthal's processes. Topics such as appropriate interactions with healthcare professionals and healthcare organisations, ethical handling of gifts and fair market value compensation of third-party services are addressed in detail. Practical examples and Grünenthal-specific case studies are incorporated into these training sessions to enhance understanding and applicability.

## **G1.MDR-M / G1.MDR-T / G1-4 Ethical business culture, anti-corruption and anti-bribery, metrics and targets**

### **Metrics**

To track the effectiveness of its governance measures, Grünenthal tracks and reports the number of confirmed cases of corruption within the organisation during the reporting period as a key indicator of policy

effectiveness and adherence to legal, ethical and responsible standards. Corruption cases are captured in the Ethics Helpline tool. Grünenthal found no confirmed cases of corruption, including among actors across its (local) value chains, and the company was not involved in any public legal cases regarding corruption or bribery in 2025. Thus, there were no convictions or fines.

Metric	2025	2024
Confirmed cases of corruption	0	0

With regard to anti-corruption training, the following metrics are being tracked through the training tool MasterControl:

**Anti-corruption training metrics**

In 2025, the so-called CCC eLearning (Corporate Responsibility, Conflict of Interest, Code of Conduct) was revised and was not trained during the reporting period. The Anti-Corruption training was continuously provided to the relevant target group (all employees who interact with healthcare professionals, healthcare organisations and/or patients) via our HCI Training. The CCC eLearning will be replaced by a newly designed Ethics Training, which will be rolled out to all employees in 2026 and re-trained on an annual basis.

Metric	2025	2024
Number and percentage of employees in the relevant target group that received anti-corruption training via our tailored face-to-face (including virtual) training on HCI in the year	100% (1,199 of 1,199)	96% (1,339 of 1,392) (excluding Valinor)

**Compliance monitoring metrics**

Going forward, with regard to the use of AI in compliance monitoring, the following metrics will be tracked:

Metric	2025
Number of AI-driven compliance spot checks	0
Percentage of sample size of total population for each AI-driven compliance spot check	0%

Compliance spot checks constitute a targeted, periodic review of a risk-based sample of activities, transactions, documents, or behaviours to verify adherence to policies, legal requirements, and internal controls. These metrics are tracked by counting each fully completed AI-enabled spot check cycle and calculating the percentage of unique reviewed items against the total eligible population for that specific scope and period.

With regard to the use of AI in the Internal Audit programme, Grünenthal will track these metrics going forward:

Metric	2025
Percentage of high-risk processes monitored with AI-driven testing	5%
Percentage of high-risk processes with ≥75% automated testing	n/a for 2025, metric from 2026 onwards
Percentage of medium-risk processes with ≥50% automated testing	n/a for 2025, metric from 2026 onwards

High-risk processes are defined as business processes that, when assessed using Grünenthal's risk matrix from its Enterprise Risk Management, are likely to fall within the 'critical' area of the company heatmap based on their assessed impact and likelihood. The failure or significant compromise of such processes could materially affect strategic objectives, financial integrity, operational continuity, legal or regulatory standing, or reputation.

AI-driven testing denotes the application of artificial intelligence to automatically analyse large datasets, identify anomalies, and assess control effectiveness, thereby enhancing audit quality and efficiency.

These metrics show how AI is used within Internal Audit by distinguishing where it is applied and how extensively it automates testing. The first metric indicates how many of Grünenthal's most critical processes already use AI. The second metric shows how much of the audit work is automated in high-risk processes, and the third does the same for medium-risk processes. Overall, the first metric focuses on breadth of AI use, while the second and third focus on the depth of automation.

The metrics are tracked by identifying all high- and medium-risk processes, determining the share that undergo AI-driven or predominantly automated testing, and measuring the proportion of each risk category that meets the defined automation thresholds.

### Third-Party Due Diligence metrics

Progress towards the ambition to fully digitalise the TPDD process by 2030 (see 'Targets' section below) is currently monitored through outcome-oriented due diligence metrics that serve as baseline and proxy indicators of process scalability, effectiveness and decision quality.

The number of active business partners assessed, including the risk-based breakdown, reflect Grünenthal's capacity to perform due diligence at scale. The metric helps to understand if the risk criteria and process are well calibrated. In addition, the ratio of 'no-go' decisions to total assessments provides insight into the robustness of risk screening and escalation. While these metrics do not yet directly measure the degree of digitalisation, Grünenthal considers observed improvements to be, at least partly, attributable to enhanced digital process support and standardisation, with further efficiency, completion-rate and documentation improvements expected as full digitalisation is implemented. In 2025, Grünenthal began measuring the level of digitalisation of its TPDD process to establish a baseline and monitor progress toward full digitalisation.

Together, the third-party due diligence metrics assess compliance, ethical and reputational risks arising from business relationships across our organisation. The metrics are being tracked through a combination of the software systems SAP, CRM and the new digital TPDD tool ORO.

Metric	2025	2024
Number of active business partners in the reporting year which have undergone a TPDD assessment, <sup>73</sup> and breakdown by risk level <sup>74</sup>	Total assessments: 5,681 thereof: 4,051 low-risk (71.3%) 1,596 medium-risk (28.1%) 34 high-risk (0.6%)	Total assessments: 3,941 thereof: 3,249 low-risk (82.4%) 675 medium-risk (17.1%) 17 high-risk (0.4%)

<sup>73</sup> The number of active business partners refers to business partners with whom there were financial transactions (invoices) in 2025 and/or 2024, and which underwent a TPDD assessment in 2025 or in previous years.

<sup>74</sup> Referring not to the suppliers' ESG risk sensitivity but instead to their compliance, ethical and/or reputational risk.

Metric	2025	2024
Number of business partners considered a 'no-go' <sup>75</sup> versus number of TPDD performed <sup>76</sup>	2 'no-go' versus 5,681 assessments performed	1 'no-go' versus 3,941 assessments performed
Number and percentage of TPDD assessments executed and documented in Grünenthal's TPDD tool in the reporting year	2,162 (79%) assessments performed in digital tool versus 2,725 total (other assessments performed manually)	n/a

### Supplier risk assessment metrics

As an integral part of the ESG Risk Assessment and Monitoring, the ESG risk management in the supply chain is monitored through regular reporting and defined metrics, focusing on risks specifically related to human rights and the environment in our supplier relationships:

- Percentage of suppliers assessed for ESG risks
- Response rate: Percentage of suppliers answering the ESG in-depth assessment
- Number of medium- and high-risk suppliers under close monitoring

Regular reporting on these metrics facilitates ongoing evaluation, highlighting progress as well as areas for improvement and contributing to Grünenthal's ESG risk monitoring.

As part of the ESG risk management framework, Grünenthal is implementing targeted ESG audits for medium-risk suppliers operating in high-risk countries. These audits are carried out by an independent third party with expertise in environmental and social audits and are aligned with the PSCI framework to ensure robust and standardised evaluation.

### Targets

Within our governance framework, Internal Audit is mandated to provide independent assurance over risk management, processes and controls. The integration of new technologies such as AI enhances assurance quality by enabling more efficient, data-driven monitoring and strengthened control effectiveness.

In 2025, Grünenthal has set the following goals to manage its ethical business culture, anti-corruption and anti-bribery efforts from 2026 onwards:

#### Targets 2026-2030

Use AI in Compliance monitoring to increase spot checks from four to eight per year and doubling sample size compared to 2023 by 2030. By doing so, focus resources to high-risk reviews and root-cause analysis.

Use AI in Internal Audit programme to monitor key high-risk processes, automating at least 75% of testing for high-risk areas and 50% for medium-risk, using scheduled or event-driven analytics by 2030.

Fully digitalise the Third-Party Due Diligence process, transforming it into a state-of-the-art workflow with industry-leading completion rates by 2030

<sup>75</sup> Business partners with whom Grünenthal decides not to start a business relationship or stop an existing one due to compliance, ethical and/or reputational concerns.

<sup>76</sup> TPDD assessments in 2025 or in previous years.

We shaped these ambitions by incorporating feedback from key stakeholders across Compliance, Internal Audit, Legal, IT, and business teams, ensuring they reflect shared priorities and practical needs.

## G1-1 – continued

### **Mechanisms for reporting and investigating concerns**

Grünenthal provides several accessible channels for employees and external stakeholders, such as business partners and local communities, to report concerns and unethical behaviour, including any behaviour inconsistent with the Code of Conduct, compliance policies or local laws. Reports can be made directly to managers, HR, the Legal department, the works council or the Compliance Organisation. Additionally, and in conformity with the requirements for anonymous reporting outlined in the EU Whistleblowing Directive and in the German Whistleblowing Protection Act (Hinweisgeberschutzgesetz), Grünenthal offers the Ethics Helpline, a web-based reporting platform complemented by a telephone hotline. Employees can find information about the Ethics Helpline in the Ethics Helpline Policy, on Grünenthal's intranet or on physical notice boards and posters at its offices. In 2025, the company strengthened its corporate culture and compliance awareness through a global, multilingual compliance communication campaign for all employees, including non-desk-based staff such as production. The initiative promotes a strong speak-up culture, raises awareness of the company's Ethics Helpline, and positions Compliance Officers as trusted advisors of the business. Our Compliance Management System is guided by the principles of IDW PS 980 (German Institute of Public Auditors' Standard on Compliance Management Systems), the campaign supports effective governance and risk mitigation. Employee involvement across all functions and ongoing multichannel communications on various compliance topics will continue in 2026 to maintain awareness and engagement with the company's values and compliance culture.

All Compliance Officers receive training on how to handle reports received via the Ethics Helpline. External parties can find details on how to report concerns on Grünenthal's corporate website, in contracts and in Grünenthal's Code of Conduct for Business Partners. This system operates 24/7 in seven languages, ensuring accessibility and confidentiality. Importantly, IP addresses are not traced, and reports can be submitted in the reporter's native language. Grünenthal's Code of Conduct underscores the importance of open and transparent reporting while guaranteeing full confidentiality for those who choose to raise concerns.

The effectiveness of grievance mechanisms is continuously monitored. Reports submitted via the Ethics Helpline are reviewed by the compliance team or the Chairman of the Supervisory Board (Aufsichtsrat) in case a member of the Compliance & Responsibility organisation is accused, with remedial actions initiated as necessary. Grünenthal's Human Rights Officer oversees the assessment of processes where human rights or environmental issues are affected. Grünenthal is conducting risk-based reviews and audits to ensure alignment with best practices. Outcomes and trends are then reported to the Corporate Executive Board and Supervisory Board (Aufsichtsrat).

Reported incidents will be investigated confidentially and neutrally by the Compliance Organisation following a plausibility check and in accordance with applicable data protection laws. The organisation employs a tiered decision-making structure to ensure appropriate oversight. Local and regional Ethics Committees handle compliance incidents within their jurisdiction, while the Global Ethics Committee addresses cases with significant implications, such as systemic violations or incidents involving senior management.

Investigative processes follow a standardised charter to maintain consistency. Depending on the nature of the reported allegation, departments such as HR or Internal Audit may be involved. If the allegation refers to a potential substantial violation of human rights and/or environmental protection obligations, the

Human Rights Officer will directly undertake the investigation. All investigations adhere to the principles of fairness, transparency and the presumption of innocence, allowing individuals involved to present their perspectives.

### **Safeguards for reporting irregularities and prevention of misconduct**

Grünenthal ensures a safe environment for employees and stakeholders to report irregularities. Retaliation against those who report concerns in good faith is strictly prohibited and treated as a compliance violation. The organisation has committed to protecting whistleblowers' confidentiality, and individuals making malicious or false reports are held accountable.

Grünenthal employs a range of preventive efforts to mitigate risks and promote ethical practices. Key policies include the Anti-Corruption Policy, which provides detailed guidance on interactions with public officials, gifts, and the Healthcare Interactions Policy, which governs engagements with healthcare professionals. Where applicable, our policies are supported by tools such as fair market value calculators, system-based approval workflows, and global/local contract templates to prevent misconduct and ensure consistency.

### **Training and awareness initiatives**

Training is central to Grünenthal's Compliance Management System. All new employees receive our Compliance Framework (Code of Conduct including main compliance policies) via our training system MasterControl. Until 2024, all new employees also received training via the so-called CCC eLearning, with dedicated modules on 'Corporate Responsibility', 'Conflict of Interest', and 'Code of Conduct'. This eLearning was revised and will be replaced by an Ethics Training to be rolled out in 2026 to all employees and re-trained on an annual basis. The CCC eLearning was not trained during the reporting period. Additionally, each year the Corporate Executive Board as well as regional/local Leadership Teams approve a training matrix that includes target- group- specific and locally relevant courses on topics such as data privacy, healthcare interactions and business partner compliance. Employees in roles with high risk of corruption and bribery, e.g., all employees who interact with healthcare professionals, healthcare organisations and/or patients such as sales functions employees from marketing functions and Medical, receive multiple tailored face-to-face training courses annually, while all staff participate in e-learning modules on key compliance areas. To ensure adequate accessibility for all, compliance policies and relevant training materials are available in seven different languages.

### **Continuous improvement and monitoring**

Grünenthal actively monitors its compliance systems to ensure their effectiveness. Internal Audit conducts regular compliance audits (see section '[G1.MDR-A / G1-3 Prevention and detection of corruption and bribery actions](#)'), and findings are reported to the Corporate Executive Board and Advisory Board (Beirat). This reporting structure ensures that leadership remains informed and can get actively involved in strategic compliance decisions. Additionally, Great Place to Work® survey results and external ESG ratings provide valuable insights to refine Grünenthal's compliance framework further.

## ESRS INDEX

### IRO-2 Disclosure Requirements in ESRS covered by the undertaking's sustainability statement

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GOV-2 Information provided to and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies	12
GOV-3 Integration of sustainability-related performance in incentive schemes	13
GOV-4 Statement on due diligence	15
GOV-5 Risk management and internal controls over sustainability reporting	15
SBM-1 Strategy, business model and value chain	17
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E2-2 Actions and resources related to pollution	42
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E2-4 Pollution of water	44

## **E3 – Water and marine resources**

Not included in this report, as the topic was deemed not material based on the DMA.

## **E4 – Biodiversity and ecosystems**

Not included in this report, as the topic was deemed not material based on the DMA.

## **E5 – Resource use and circular economy**

Not included in this report, as the topic was deemed not material based on the DMA.

## **Social**

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S1-15 Work-life balance metrics	58
S1-17 Incidents, complaints and severe human rights impacts	51

**S2 – Workers in the value chain**

Not included in this report, as the topic was deemed not material based on the DMA.

**S3 – Affected communities**

Not included in this report, as the topic was deemed not material based on the DMA.

**S4 – Patient**

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S4.SBM-3 Material impacts, risks and opportunities and their interaction with strategy and business model	75
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<b>Disclosure Requirement</b>	<b>Page in the report</b>
G1-1 Business conduct policies and corporate culture	99, 108
G1-3 Prevention and detection of corruption and bribery / Ethical business culture action	99, 102, 103
G1-4 Ethical business culture, anti-corruption and anti-bribery, metrics and targets	104

The table below illustrates the datapoints in ESRS 2 and topical ESRS that derive from other EU legislation as listed in ESRS 2 Annex B and indicates where the data points can be found in this sustainability statement and which data points are categorised as ‘not relevant’ or ‘not material’.

<b>Disclosure Requirement and related data-point</b>	<b>SFDR reference</b>	<b>Pillar 3 reference</b>	<b>Benchmark Regulation reference</b>	<b>EU Climate Law reference</b>	<b>Page in the report</b>
ESRS 2 GOV-1 Board's gender diversity paragraph 21 (d)	x		x		9

Disclosure Requirement and related data-point	SFDR reference	Pillar 3 reference	Benchmark Regulation reference	EU Climate Law reference	Page in the report
ESRS 2 GOV-1 Percentage of board members who are independent paragraph 21 (e)			x		9
ESRS 2 GOV-4 Statement on due diligence paragraph 30	x				15
ESRS 2 SBM-1 Involvement in activities related to fossil fuel activities paragraph 40 (d) i	x	x	x		Not relevant
ESRS 2 SBM-1 Involvement in activities related to chemical production paragraph 40 (d) ii	x		x		Not relevant
ESRS 2 SBM-1 Involvement in activities related to controversial weapons paragraph 40 (d) iii	x		x		Not relevant
ESRS 2 SBM-1 Involvement in activities related to cultivation and production of tobacco paragraph 40 (d) iv			x		Not relevant
ESRS E1-1 Transition plan to reach climate neutrality by 2050 paragraph 14				x	30
ESRS E1-1 Undertakings excluded from Paris-aligned Benchmarks paragraph 16 (g)		x	x		30
ESRS E1-4 GHG emission reduction targets paragraph 34	x	x	x		35
ESRS E1-5 Energy consumption from fossil sources disaggregated by sources (only high climate impact sectors) paragraph 38	x				37
ESRS E1-5 Energy consumption and mix paragraph 37	x				37
ESRS E1-5 Energy intensity associated with activities in high climate impact sectors paragraphs 40 to 43	x				37

Disclosure Requirement and related data-point	SFDR reference	Pillar 3 reference	Benchmark Regulation reference	EU Climate Law reference	Page in the report
ESRS E1-6 Gross Scope 1, 2, 3 and Total GHG emissions paragraph 44	x	x	x		38
ESRS E1-6 Gross GHG emissions intensity paragraphs 53 to 55	x	x	x		38
ESRS E1-7 GHG removals and carbon credits paragraph 56				x	Not relevant
ESRS E1-9 Exposure of the benchmark portfolio to climate-related physical risks paragraph 66			x		Not relevant
ESRS E1-9 Disaggregation of monetary amounts by acute and chronic physical risk paragraph 66 (a)		x			Phase-in
ESRS E1-9 Location of significant assets at material physical risk paragraph 66 (c).					Phase-in
ESRS E1-9 Breakdown of the carrying value of its real estate assets by energy-efficiency classes paragraph 67 (c).		x			Phase-in
ESRS E1-9 Degree of exposure of the portfolio to climate-related opportunities paragraph 69			x		Phase-in
ESRS E2-4 Amount of each pollutant listed in Annex II of the E-PRTR Regulation (European Pollutant Release and Transfer Register) emitted to air, water and soil, paragraph 28	x				44
ESRS E3-1 Water and marine resources paragraph 9	x				Not material
ESRS E3-1 Dedicated policy paragraph 13	x				Not material
ESRS E3-1 Sustainable oceans and seas paragraph 14	x				Not material

Disclosure Requirement and related data-point	SFDR reference	Pillar 3 reference	Benchmark Regulation reference	EU Climate Law reference	Page in the report
ESRS E3-4 Total water recycled and reused paragraph 28 (c)	x				Not material
ESRS E3-4 Total water consumption in m <sup>3</sup> per net revenue on own operations paragraph 29	x				Not material
ESRS 2- SBM 3 - E4 paragraph 16 (a) i	x				Not material
ESRS 2- SBM 3 - E4 paragraph 16 (b)	x				Not material
ESRS 2- SBM 3 - E4 paragraph 16 (c)	x				Not material
ESRS E4-2 Sustainable land / agriculture practices or policies paragraph 24 (b)	x				Not material
ESRS E4-2 Sustainable oceans / seas practices or policies paragraph 24 (c)	x				Not material
ESRS E4-2 Policies to address deforestation paragraph 24 (d)	x				Not material
ESRS E5-5 Non-recycled waste paragraph 37 (d)	x				Not material
ESRS E5-5 Hazardous waste and radioactive waste paragraph 39	x				Not material
ESRS 2- SBM3 - S1 Risk of incidents of forced labour paragraph 14 (f)	x				45
ESRS 2- SBM3 - S1 Risk of incidents of child labour paragraph 14 (g)	x				45
ESRS S1-1 Human rights policy commitments paragraph 20	x				53, 70
ESRS S1-1 Due diligence policies on issues addressed by			x		53

Disclosure Requirement and related data-point	SFDR reference	Pillar 3 reference	Benchmark Regulation reference	EU Climate Law reference	Page in the report
the fundamental International Labor Organisation Conventions 1 to 8, paragraph 21					
ESRS S1-1 Processes and measures for preventing trafficking in human beings paragraph 22	x				53
ESRS S1-1 Workplace accident prevention policy or management system paragraph 23	x				59
ESRS S1-3 Grievance/complaints handling mechanisms paragraph 32 (c)	x				59, 63
ESRS S1-14 Number of fatalities and number and rate of work-related accidents paragraph 88 (b) and (c)	x		x		61
ESRS S1-14 Number of days lost to injuries, accidents, fatalities or illness paragraph 88 (e)	x				61
ESRS S1-16 Unadjusted gender pay gap paragraph 97 (a)	x		x		Only pilot findings on the gender pay gap are available, with no consolidated Group-level data yet in place.
ESRS S1-16 Excessive CEO pay ratio paragraph 97 (b)	x				No consolidated Group-coll-

Disclosure Requirement and related data-point	SFDR reference	Pillar 3 reference	Benchmark Regulation reference	EU Climate Law reference	Page in the report
					level data yet in place.
ESRS S1-17 Incidents of discrimination paragraph 103 (a)	x				51
ESRS S1-17 Non-respect of UNGPs on Business and Human Rights and OECD Guidelines paragraph 104 (a)	x		x		51
ESRS 2- SBM3 – S2 Significant risk of child labour or forced labour in the value chain paragraph 11 (b)	x				Not material
ESRS S2-1 Human rights policy commitments paragraph 17	x				Not material
ESRS S2-1 Policies related to value chain workers paragraph 18	x				Not material
ESRS S2-1 Non-respect of UNGPs on Business and Human Rights principles and OECD guidelines paragraph 19	x		x		Not material
ESRS S2-1 Due diligence policies on issues addressed by the fundamental International Labor Organisation Conventions 1 to 8, paragraph 19			x		Not material
ESRS S2-4 Human rights issues and incidents connected to its upstream and downstream value chain paragraph 36	x				Not material
ESRS S3-1 Human rights policy commitments paragraph 16	x				Not material
ESRS S3-1 Non-respect of UNGPs on Business and Human Rights, ILO principles or OECD guidelines paragraph 17	x		x		Not material

Disclosure Requirement and related data-point	SFDR reference	Pillar 3 reference	Benchmark Regulation reference	EU Climate Law reference	Page in the report
ESRS S3-4 Human rights issues and incidents paragraph 36	x				Not material
ESRS S4-1 Policies related to consumers and end-users paragraph 16	x				79, 84, 88, 93, 95
ESRS S4-1 Non-respect of UNGPs on Business and Human Rights and OECD guidelines paragraph 17	x		x		79, 84, 88, 93, 95
ESRS S4-4 Human rights issues and incidents paragraph 35	x				Not relevant
ESRS G1-1 United Nations Convention against Corruption paragraph 10 (b)	x				99
ESRS G1-1 Protection of whistleblowers paragraph 10 (d)	x				108
ESRS G1-4 Fines for violation of anti-corruption and anti-bribery laws paragraph 24 (a)	x		x		104
ESRS G1-4 Standards of anti-corruption and anti-bribery paragraph 24 (b)	x				104



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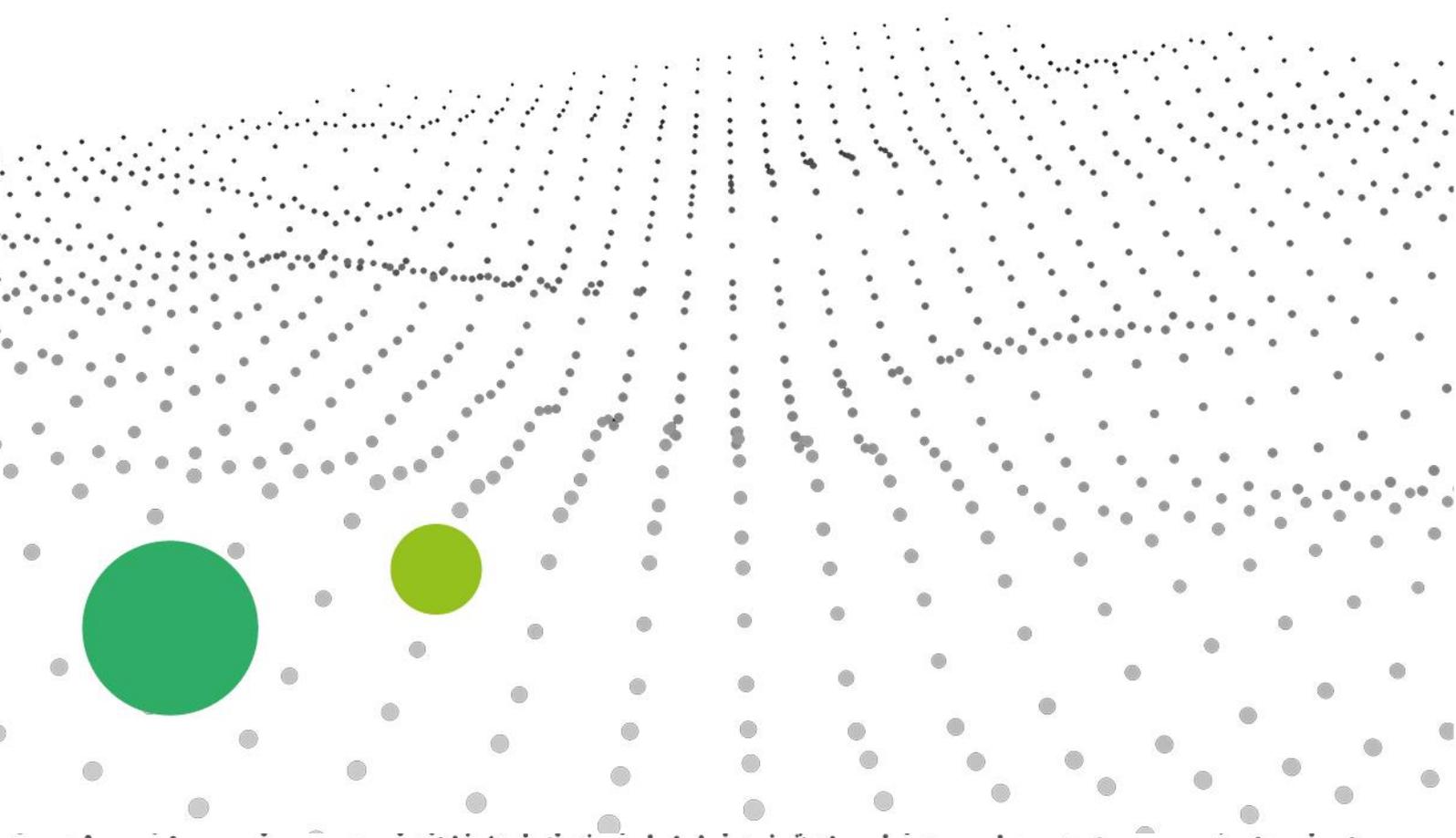
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# General Engagement Terms

for

## Wirtschaftsprüferinnen, Wirtschaftsprüfer and Wirtschaftsprüfungsgesellschaften [German Public Auditors and Public Audit Firms]

as of January 1, 2024

### 1. Scope of application

(1) These engagement terms apply to contracts between German Public Auditors (Wirtschaftsprüferinnen/Wirtschaftsprüfer) or German Public Audit Firms (Wirtschaftsprüfungsgesellschaften) – hereinafter collectively referred to as "German Public Auditors" – and their engaging parties for assurance services, tax advisory services, advice on business matters and other engagements except as otherwise agreed in writing (Textform) or prescribed by a mandatory rule.

(2) Third parties may derive claims from contracts between German Public Auditors and engaging parties only when this is agreed or results from mandatory rules prescribed by law. In relation to such claims, these engagement terms also apply to these third parties. A German Public Auditor is also entitled to invoke objections (Einwendungen) and defences (Einreden) arising from the contractual relationship with the engaging party to third parties.

### 2. Scope and execution of the engagement

(1) Object of the engagement is the agreed service – not a particular economic result. The engagement will be performed in accordance with the German Principles of Proper Professional Conduct (Grundsätze ordnungsmäßiger Berufsausübung). The German Public Auditor does not assume any management functions in connection with his services. The German Public Auditor is not responsible for the use or implementation of the results of his services. The German Public Auditor is entitled to make use of competent persons to conduct the engagement.

(2) Except for assurance engagements (betriebswirtschaftliche Prüfungen), the consideration of foreign law requires an express agreement in writing (Textform).

(3) If circumstances or the legal situation change subsequent to the release of the final professional statement, the German Public Auditor is not obligated to refer the engaging party to changes or any consequences resulting therefrom.

### 3. The obligations of the engaging party to cooperate

(1) The engaging party shall ensure that all documents and further information necessary for the performance of the engagement are provided to the German Public Auditor on a timely basis, and that he is informed of all events and circumstances that may be of significance to the performance of the engagement. This also applies to those documents and further information, events and circumstances that first become known during the German Public Auditor's work. The engaging party will also designate suitable persons to provide information.

(2) Upon the request of the German Public Auditor, the engaging party shall confirm the completeness of the documents and further information submitted as well as the explanations and statements provided in statement as drafted by the German Public Auditor or in a legally accepted written form (gesetzliche Schriftform) or any other form determined by the German Public Auditor.

### 4. Ensuring independence

(1) The engaging party shall refrain from anything that endangers the independence of the German Public Auditor's staff. This applies throughout the term of the engagement, and in particular to offers of employment or to assume an executive or non-executive role, and to offers to accept engagements on their own behalf.

(2) Were the performance of the engagement to impair the independence of the German Public Auditor, of related firms, firms within his network, or such firms associated with him, to which the independence requirements apply in the same way as to the German Public Auditor in other engagement relationships, the German Public Auditor is entitled to terminate the engagement for good cause.

### 5. Reporting and oral information

To the extent that the German Public Auditor is required to present results in a legally accepted written form (gesetzliche Schriftform) or in writing (Textform) as part of the work in executing the engagement, only that

presentation is authoritative. Draft of such presentations are non-binding. Except as otherwise provided for by law or contractually agreed, oral statements and explanations by the German Public Auditor are binding only when they are confirmed in writing (Textform). Statements and information of the German Public Auditor outside of the engagement are always non-binding.

### 6. Distribution of, a German Public Auditor's professional statement

(1) The distribution to a third party of professional statements of the German Public Auditor (results of work or extracts of the results of work whether in draft or in a final version) or information about the German Public Auditor acting for the engaging party requires the German Public Auditor's consent be issued in writing (Textform), unless the engaging party is obligated to distribute or inform due to law or a regulatory requirement.

(2) The use by the engaging party for promotional purposes of the German Public Auditor's professional statements and of information about the German Public Auditor acting for the engaging party is prohibited.

### 7. Deficiency rectification

(1) In case there are any deficiencies, the engaging party is entitled to specific subsequent performance by the German Public Auditor. The engaging party may reduce the fees or cancel the contract for failure of such subsequent performance, for subsequent non-performance or unjustified refusal to perform subsequently, or for unconscionability or impossibility of subsequent performance. If the engagement was not commissioned by a consumer, the engaging party may only cancel the contract due to a deficiency if the service rendered is not relevant to him due to failure of subsequent performance, to subsequent non-performance, to unconscionability or impossibility of subsequent performance. No. 9 applies to the extent that further claims for damages exist.

(2) The engaging party must assert a claim for subsequent performance (Nacherfüllung) in writing (Textform) without delay. Claims for subsequent performance pursuant to paragraph 1 not arising from an intentional act expire after one year subsequent to the commencement of the time limit under the statute of limitations.

(3) Apparent deficiencies, such as clerical errors, arithmetical errors and deficiencies associated with technicalities contained in a German Public Auditor's professional statement (long-form reports, expert opinions etc.) may be corrected – also versus third parties – by the German Public Auditor at any time. Misstatements which may call into question the results contained in a German Public Auditor's professional statement entitle the German Public Auditor to withdraw such statement – also versus third parties. In such cases the German Public Auditor should first hear the engaging party, if practicable.

### 8. Confidentiality towards third parties, and data protection

(1) Pursuant to the law (§ [Article] 323 Abs 1 [paragraph 1] HGB [German Commercial Code: Handelsgesetzbuch], § 43 WPO [German Law regulating the Profession of Wirtschaftsprüfer: Wirtschaftsprüferordnung], § 203 StGB [German Criminal Code: Strafgesetzbuch]) the German Public Auditor is obligated to maintain confidentiality regarding facts and circumstances confided to him or of which he becomes aware in the course of his professional work, unless the engaging party releases him from this confidentiality obligation.

(2) When processing personal data, the German Public Auditor will observe national and European legal provisions on data protection.

### 9. Liability

(1) For legally required services by German Public Auditors, in particular audits, the respective legal limitations of liability, in particular the limitation of liability pursuant to § 323 Abs. 2 HGB, apply.

(2) Insofar neither a statutory limitation of liability is applicable, nor an individual contractual limitation of liability exists, claims for damages due to negligence arising out of the contractual relationship between the

engaging party and the German Public Auditor, except for damages resulting from injury to life, body or health as well as for damages that constitute a duty of replacement by a producer pursuant to § 1 ProdHaftG [German Product Liability Act: Produkthaftungsgesetz], are limited to € 4 million pursuant to § 54 a Abs. 1 Number 2 WPO. This applies equally to claims against the German Public Auditor made by third parties arising from, or in connection with, the contractual relationship.

(3) When multiple claimants assert a claim for damages arising from an existing contractual relationship with the German Public Auditor due to the German Public Auditor's negligent breach of duty, the maximum amount stipulated in paragraph 2 applies to the respective claims of all claimants collectively.

(4) The maximum amount under paragraph 2 relates to an individual case of damages. An individual case of damages also exists in relation to a uniform damage arising from a number of breaches of duty. The individual case of damages encompasses all consequences from a breach of duty regardless of whether the damages occurred in one year or in a number of successive years. In this case, multiple acts or omissions based on the same source of error or on a source of error of an equivalent nature are deemed to be a single breach of duty if the matters in question are legally or economically connected to one another. In this event the claim against the German Public Auditor is limited to € 5 million.

(5) A claim for damages expires if a suit is not filed within six months subsequent to the written statement (Textform) of refusal of acceptance of the indemnity and the engaging party has been informed of this consequence. This does not apply to claims for damages resulting from scienter, a culpable injury to life, body or health as well as for damages that constitute a liability for replacement by a producer pursuant to § 1 ProdHaftG. The right to invoke a plea of the statute of limitations remains unaffected.

(6) § 323 HGB remains unaffected by the rules in paragraphs 2 to 5.

#### 10. Supplementary provisions for audit engagements

(1) If the engaging party subsequently amends the financial statements or management report audited by a German Public Auditor and accompanied by an auditor's report (Bestätigungsvermerk), he may no longer use this auditor's report.

If the German Public Auditor has not issued an auditor's report, a reference to the audit conducted by the German Public Auditor in the management report or any other public reference is permitted only with the German Public Auditor's consent, issued in a legally accepted written form (gesetzliche Schriftform), and with a wording authorized by him.

(2) If the German Public Auditor revokes the auditor's report, it may no longer be used. If the engaging party has already made use of the auditor's report, then upon the request of the German Public Auditor he must give notification of the revocation.

(3) The engaging party has a right to five official copies of the report. Additional official copies will be charged separately.

#### 11. Supplementary provisions for assistance in tax matters

(1) When advising on an individual tax issue as well as when providing ongoing tax advice, the German Public Auditor is entitled to use as a correct and complete basis the facts provided by the engaging party – especially numerical disclosures; this also applies to bookkeeping engagements. Nevertheless, he is obligated to indicate to the engaging party any material errors he has identified.

(2) The tax advisory engagement does not encompass procedures required to observe deadlines, unless the German Public Auditor has explicitly accepted a corresponding engagement. In this case the engaging party must provide the German Public Auditor with all documents required to observe deadlines – in particular tax assessments – on such a timely basis that the German Public Auditor has an appropriate lead time.

(3) Except as agreed otherwise in writing (Textform), ongoing tax advice encompasses the following work during the contract period:

- a) preparation and electronic transmission of annual tax returns, including financial statements for tax purposes in electronic format, for income tax, corporate tax and business tax, namely on the basis of the annual financial statements, and on other schedules and evidence documents required for the taxation, to be provided by the engaging party
- b) examination of tax assessments in relation to the taxes referred to in (a)
- c) negotiations with tax authorities in connection with the returns and assessments mentioned in (a) and (b)
- d) support in tax audits and evaluation of the results of tax audits with respect to the taxes referred to in (a)
- e) participation in petition or protest and appeal procedures with respect to the taxes mentioned in (a).

In the aforementioned tasks the German Public Auditor takes into account material published legal decisions and administrative interpretations.

(4) If the German Public auditor receives a fixed fee for ongoing tax advice, the work mentioned under paragraph 3 (d) and (e) is to be remunerated separately, except as agreed otherwise in writing (Textform).

(5) Insofar the German Public Auditor is also a German Tax Advisor and the German Tax Advice Remuneration Regulation (Steuerberatungsvergütungsverordnung) is to be applied to calculate the remuneration, a greater or lesser remuneration than the legal default remuneration can be agreed in writing (Textform).

(6) Work relating to special individual issues for income tax, corporate tax, business tax and valuation assessments for property units as well as all issues in relation to sales tax, payroll tax, other taxes and dues requires a separate engagement. This also applies to:

- a) work on non-recurring tax matters, e.g. in the field of estate tax and real estate sales tax;
- b) support and representation in proceedings before tax and administrative courts and in criminal tax matters;
- c) advisory work and work related to expert opinions in connection with changes in legal form and other re-organizations, capital increases and reductions, insolvency related business reorganizations, admission and retirement of owners, sale of a business, liquidations and the like, and
- d) support in complying with disclosure and documentation obligations.

(7) To the extent that the preparation of the annual sales tax return is undertaken as additional work, this includes neither the review of any special accounting prerequisites nor the issue as to whether all potential sales tax allowances have been identified. No guarantee is given for the complete compilation of documents to claim the input tax credit.

#### 12. Electronic communication

Communication between the German Public Auditor and the engaging party may be via e-mail. In the event that the engaging party does not wish to communicate via e-mail or sets special security requirements, such as the encryption of e-mails, the engaging party will inform the German Public Auditor in writing (Textform) accordingly.

#### 13. Remuneration

(1) In addition to his claims for fees, the German Public Auditor is entitled to claim reimbursement of his expenses; sales tax will be billed additionally. He may claim appropriate advances on remuneration and reimbursement of expenses and may make the delivery of his services dependent upon the complete satisfaction of his claims. Multiple engaging parties are jointly and severally liable.

(2) If the engaging party is not a consumer, then a set-off against the German Public Auditor's claims for remuneration and reimbursement of expenses is admissible only for undisputed claims or claims determined to be legally binding.

#### 14. Dispute Settlement

The German Public Auditor is not prepared to participate in dispute settlement procedures before a consumer arbitration board (Verbraucherschlichtungsstelle) within the meaning of § 2 of the German Act on Consumer Dispute Settlements (Verbraucherstreitbeilegungsgesetz).

#### 15. Applicable law

The contract, the performance of the services and all claims resulting therefrom are exclusively governed by German law.