



# Sustainability management system

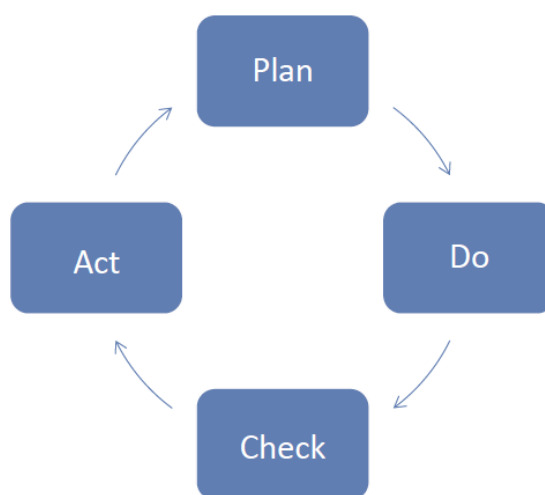
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## SCOPE

This SOP describes how Camurus manages its material sustainability aspects in a structured way to ensure that sustainability goals and continual improvement of sustainability performance are achieved. Camurus' sustainability management system, including Camurus' environmental management system, covers Camurus' value chain from R&D and manufacturing to distribution storage and sales, as well as effects linked to patients' use and disposal of Camurus' products.

## FLOW CHART

The Camurus' sustainability management follows the standard ISO 14001:2015 (18) and is based on the PDCA-cycle:



## ROLES AND RESPONSIBILITIES

Role	Responsibility and Obligations
Executive Management Team (EMT)	<ul style="list-style-type: none"> <li>Responsible for Camurus' sustainability work and performance.</li> <li>Decides on overall strategy.</li> <li>Carries out the annual management review of Camurus' sustainability management system.</li> <li>Ensures the availability of adequate skills, knowledge and allocation of necessary resources.</li> </ul>
Director Sustainability	<ul style="list-style-type: none"> <li>Manages Camurus' sustainability work in accordance with Camurus' sustainability policy, environmental policy, sustainability strategy and this SOP.</li> <li>Chairman of the Sustainability Committee.</li> <li>Communicates Camurus' overall sustainability performance in collaboration with the Communication Manager.</li> <li>Manages sustainability related documents according to this SOP.</li> </ul>

Role	Responsibility and Obligations
Sustainability Committee	<ul style="list-style-type: none"> <li>• Cross-functional Sustainability Committee that acts as active ambassadors and link towards the wider organization, supporting and implementing Camurus’ sustainability work in accordance with the sustainability strategy.</li> </ul>
Compliance Officer	<ul style="list-style-type: none"> <li>• Cooperates with the Director Sustainability within the focus area responsible business, including vendor management and sustainability risk and opportunity assessment.</li> </ul>
Communication Manager	<ul style="list-style-type: none"> <li>• Communicates Camurus’ overall sustainability performance in collaboration with the Director Sustainability.</li> </ul>

## PROCEDURE

This SOP should be read in conjunction with the Camurus’ sustainability policy and strategy, environmental policy, code of conduct, vendor code of conduct and the other policies and procedures listed in section 10. This SOP is also part of Camurus’ sustainability framework.

### Overview of Camurus’ sustainability framework

Camurus’ sustainability framework, which is governing Camurus’ sustainability work, consists of the following documents:

- Sustainability policy (1), environmental policy (2), code of conduct (3), anti-corruption policy (4), animal welfare policy (5) general guiding principles on sustainable procurement (8) and other sustainability related policies, see <https://www.camurus.com/sustainability/>.
- Sustainability strategy (containing focus areas and goals) (6)
- Sustainable development goals (SDG) mapping (10)
- Stakeholder analysis (11)
- Materiality analysis (12)
- SOP-0151 Sustainability management system
- Vendor code of conduct (7)
- SOP-0153 Vendor sustainability due diligence and risk management (9)
- SOP-0150 Anti-Corruption and compliance risk management of third-party intermediaries (13)
- Digital vendor sustainability management platform
- Sustainability risk and opportunity assessment
- Sustainability deviation management
- Sustainability reporting (sustainability chapter in the annual report and sustainability update chapter in quarterly financial report)

### Participation in the UN Global Compact

Camurus is a participant of the UN Global Compact and supports the Ten Principles of the United Nations Global Compact on human rights, labor, environment, and anti-corruption. Camurus is committed to making the UN Global Compact and its principles part of the strategy, culture and day-to-day operations of its company, and to engaging in collaborative projects which advance the broader development goals of the United Nations, particularly the Sustainable Development Goals.

In accordance with the UN Global Compact’s communication on progress policy, Camurus must annually report the company’s progress within the field of sustainability, especially the company’s efforts to implement the Ten Principles.

### Compliance obligations

Camurus maintains a list of the company’s compliance obligations related to its environmental and sustainability aspects. Compliance with obligations must be assessed regularly, at least once a year.

### The Annual Sustainability Management Cycle

Camurus’ sustainability management is based on the ISO 14001 standard (18) and follows the PDCA-cycle. The figure below shows the activities to be conducted within Camurus’ annual management cycle.

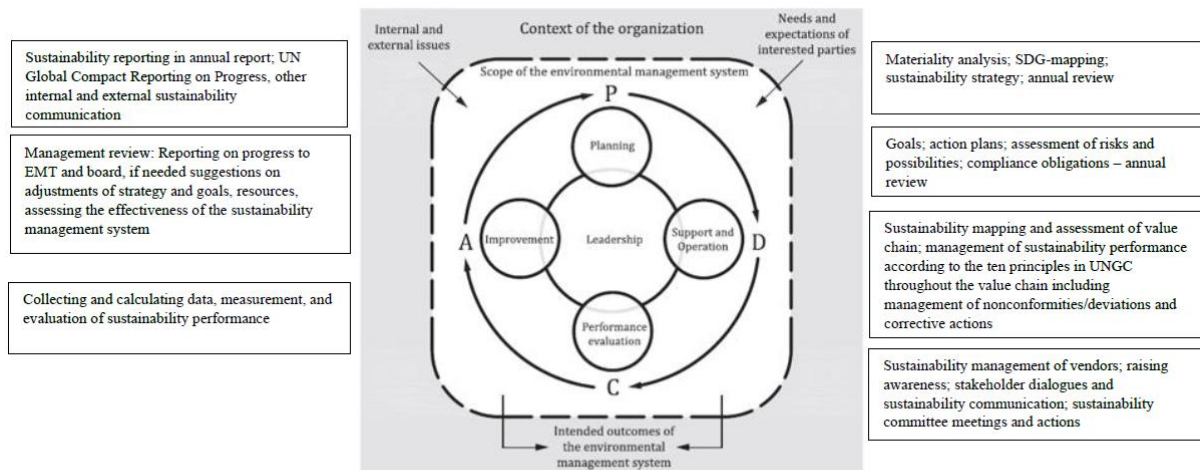


Figure 1 — Relationship between PDCA and the framework in this International Standard Source: ISO 14001: 2015 (18)

### Materiality analysis

Camurus materiality analysis shows Camurus’ material sustainability aspects based on two perspectives – importance to stakeholders and Camurus’ sustainability impact. A third layer to be added is the impact of sustainability matters on Camurus’ business and financial outcome (double materiality analysis). The materiality analysis must be reviewed annually in order to ensure timeliness and quality. All sustainability aspects that are linked to compliance obligations are material aspects for Camurus’ sustainability work.

### Sustainability strategy – setting sustainability goals

Camurus has developed a sustainability strategy with four focus areas (patient, people, planet and responsible business) and set sustainability goals within each focus area. The strategy builds on Camurus’ material sustainability aspects, shown in the company’s materiality analysis. The sustainability strategy must be reviewed annually to ensure timeliness and quality.

If there is a need for an update of the sustainability strategy, the Director Sustainability, in collaboration with the Sustainability Committee, prepares new goals/focus areas for EMT to decide on. Sustainability goals shall always follow the SMART-concept which means that the goals are

Specific, Measurable, Achievable, Realistic and Timely. In addition, the goals must be monitored, communicated and updated as appropriate. Related to its sustainability goals Camurus has to identify actions with timelines, resources, responsibilities and ways to monitor in order to ensure achievement.

### **Sustainability risk and opportunity assessment**

Camurus must assess its sustainability risks and opportunities annually and in the event of major changes within the company or its value chain. Based on the results of the risk and opportunity assessment, Camurus must mitigate risks and realize opportunities. Financial risks and opportunities linked to material sustainability aspects must also be considered.

### **Operating**

Camurus' sustainability work should cover the company's entire value chain, comply with all applicable legislation and other compliance obligations and lead to continual improvement. In its sustainability management Camurus applies a life cycle perspective that includes management of material sustainability aspects from R&D, manufacturing, transport, use and final disposal of products while complying with other relevant international and local legislations and good practices such as GCP, GDP, GMP, GVP. In order to drive a proactive sustainability work throughout Camurus' value chain material sustainability aspects must be mapped, quantified, managed, measured, evaluated and finally reported.

### **Sustainability management of vendors**

Camurus has established a vendor code of conduct that contains Camurus' sustainability requirements on vendors. This code shall either be part of Camurus' contracts with vendors or be signed by vendors separately e.g., existing vendors with contracts that do not contain Camurus' vendor code of conduct. There is no need for signing if the vendor can prove that its own code of conduct

To mitigate and prevent sustainability risks and promote sustainability opportunities in its supply chain Camurus applies a due diligence approach and risk assesses and follows up its vendors' compliance with the requirements of Camurus' vendor code of conduct. For Camurus' vendor sustainability management process see SOP-0153, Vendor sustainability due diligence and risk management (9).

### **Sustainability deviation management**

Deviation management is the process of identifying, assessing, correcting and preventing deviations from approved goals, policies, procedures, etc. According to Camurus' sustainability policy each employee is responsible for reporting sustainability related deviations and/or suggest improvements to the Director Sustainability, to the Compliance Officer or by using the Camurus' whistle blower system available on the intranet as well as the Camurus corporate website. Camurus has a non-retaliation rule and will ensure that there are no adverse work-related consequences for any employee who, in good faith, reports deviations.

The Director Sustainability and/or the Compliance Officer handle reported deviations by starting an investigation on the subject. The investigation includes among other things a root cause analysis and the identification of corrective and preventive actions. Depending on the nature of the deviation/suggestion for improvement the Director Sustainability and/or the Compliance Officer involve affected employees or third parties in remedial and preventive measures. All

deviations/suggestions for improvement and actions taken are documented in Camurus' deviation and improvement management file available on the internal sustainability SharePoint platform.

Note: GxP-related deviations are handled according to SOP-0046 (19).

### **Evaluating performance**

Camurus' sustainability performance must be annually evaluated against the company's sustainability goals. In its measuring plan Camurus has identified its sustainability key performance indicators (KPIs) related to its material sustainability aspects. Camurus must also take into account applicable national and international legislation when determining which performance indicators to be considered. Key performance indicators must be reported alongside other relevant sustainability information in the sustainability chapter of the company's annual report.

### **Emergency preparedness and response**

For implementation and managing of processes to prepare for and respond to potential emergency situations see the following documents:

- Camurus business continuity plan (GUI-0017) (15),
- Camurus facilities (SOP-0064) (16)
- Safety instructions for lab personnel (17).

### **Management review**

EMT shall annually review Camurus' sustainability management system to ensure its continuing suitability, adequacy and effectiveness. The following parameters shall be part of the management review:

1. actions from previous management reviews
2. changes in:
  - a. external and internal issues that are relevant to the management system
  - b. the needs and expectations of interested parties/stakeholders, including compliance obligations
  - c. risks and opportunities
3. the extent to which sustainability objectives have been achieved
4. information on the organization's sustainability performance, including trends in:
  - d. deviations and corrective actions
  - e. performance results throughout the supply chain
  - f. fulfillments of compliance obligations
  - g. audit results
  - h. outcomes from stakeholder dialogues
5. adequacy of resources
6. opportunities for continual improvement.

The output of the management review shall include the following:

1. conclusions on the continuing suitability, adequacy and effectiveness of the sustainability management system;
2. decisions related to continual improvement and realization of opportunities;

3. decisions related to any need for changes to the sustainability management system, including resources;
4. actions, when sustainability objectives have not been achieved;
5. opportunities to improve integration of the sustainability management system with other business processes, if needed;
6. any implications for the strategic direction.

Note: GxP-related Management Review are handled according to SOP-0101 (20).

### **Training and raising awareness**

Camurus is committed to driving a proactive sustainability work throughout its organization and the entire value chain. Raising awareness and involving all employees is key to being able to live up to this commitment. Camurus' employees are trained in relevant sustainability governing documents by Camurus' electronic quality management system. In addition, all employees must be trained in Camurus' overall sustainability work and management of material sustainability aspects every three years. The Director Sustainability and other sustainability roles within Camurus must be specially trained in the area of sustainability. New employees are required to participate in the Camurus' HR introduction program that contains a sustainability component. Sustainability updates are provided regularly at global information meetings and on the intranet. Camurus' cross functional Sustainability Committee also plays an active role by acting as ambassadors and link towards the wider organization and supporting and implementing Camurus' sustainability work.

### **Sustainability communication**

Communication of sustainability issues, performance, risks, opportunities, challenges, and progress is an important part of a company's sustainability work. Camurus' internal and external communication must always be transparent, reliable, accurate, timely, relevant, and compliant with all applicable legislation and comply with Camurus' Communication Policy (14).

External information should provide relevant stakeholders with correct and informative information to ease decision-making. Furthermore, stakeholder dialogues are an important part of Camurus' communication and provide relevant input to Camurus' materiality analysis. Stakeholders that are relevant to Camurus sustainability management system and their relevant needs and expectations (i.e. requirements) are identified in Camurus' stakeholder analysis (11).

Camurus reports its sustainability governance, performance, risks, opportunities and progress in the Company's annual report and in its UN Global Compact Communication on Progress and provides sustainability updates in the quarterly reports. Sustainability reporting must always comply with applicable legislation. Furthermore, sustainability information is provided at Camurus' corporate website (on the corporate website there is also a contact point for sustainability issues, questions) and in selected social media channels.

Internal sustainability communication is important to engage employees and build culture, and sustainability information is provided regularly at Camurus' global information meetings, at Sustainability Committee meetings and on Camurus' intranet.

### **Management of documents**

Documented information required by the sustainability management system shall be controlled to ensure availability, quality and protection. All documents that are material to the management system



must be version controlled and assessed regularly to ensure quality and timeliness. Governing documents, such as policies and SOPs are managed by and available in the Camurus’ electronic quality management system.

Other documents that are material to the sustainability management system are managed by the Director Sustainability and available on the internal sustainability SharePoint platform. The vendor code of conduct and sustainability forms to be completed by employees are available in Word/New/Sustainability.

## RECORDS AND ARCHIVE

Record type	Archive Location Hard Copy	Archive Location Electronic File
Governing documents (policies, SOPs)	NA	Camurus’ eQMS
Other documents that are material to the sustainability management system, such as strategy documents, deviation management documents, materiality analysis etc.	NA	Camurus’ sustainability SharePoint platform
Vendor code of conduct and sustainability related forms to be filled in by employees	NA	Word/New/Sustainability

## ABBREVIATIONS AND DEFINITIONS

CAM	Camurus
EMT	Executive Management Team
eQMS	Electronic quality management system
KPI	Key performance indicators
PDCA	Plan-do-check-act
SDG	Sustainable development goals
SMART (goals)	Specific, Measurable, Achievable, Realistic and Timely (goals)
UNGC	United Nations Global Compact

## REFERENCES

Governing documents:

1. GUI-0021 Sustainability policy
2. GUI-0025 Environmental policy
3. GUI-0016 Code of conduct
4. GUI-0022 Anti-corruption policy



5. GUI-0027 Animal welfare policy
6. Sustainability strategy (<https://www.camurus.com/sustainability/>)
7. Vendor code of conduct (<https://www.camurus.com/files/Sustainability/Vendor-Code-of-Conduct-230329.pdf>)
8. GUI-0026 General guiding principles on sustainable procurement
9. SOP-0153 Vendor sustainability due diligence and risk management
10. Sustainable development goals (SDG) mapping (sustainability sharepoint platform)
11. Stakeholder analysis (sustainability sharepoint platform)
12. Materiality analysis (sustainability sharepoint platform)
13. SOP-0150 Anti-Corruption and Compliance Risk Management of Third Party Intermediaries
14. GUI-0015 Communication Policy
15. GUI-0017 Camurus Business Continuity Plan
16. SOP-0064 Camurus facilities
17. Safety instructions for lab personnel
18. ISO standard 14001:2015
19. SOP-0046 Deviations and CAPAs
20. SOP-0101 Management Review Pharma