



Labour & Human Rights Policy

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1. Purpose

At INKE Group¹ (hereinafter referred to as "INKE Group" or the "Company"), we believe that sustainable business success is built on respect for people, ethical conduct and responsible business practices.

As a company dedicated to the development and manufacture of **Active Pharmaceutical Ingredients**, we recognize our responsibility to provide fair working conditions, promote equal opportunities, protect the health, safety and wellbeing of our people, and respect internationally recognized human rights throughout our operations and business relationships.

This Labor & Human Rights Policy establishes the principles and commitments that guide our actions regarding labour practices, employee wellbeing, diversity and inclusion, professional development, social dialogue and human rights.

The Policy supports the implementation of INKE Group's ESG Strategy and contributes to creating a workplace where people can develop their potential in a safe, respectful, inclusive and collaborative environment.

INKE Group is committed to conducting its activities in accordance with applicable laws and regulations, internationally recognized human rights standards, and the principles set out in its internal policies and governance framework.

¹ For the purposes of this Policy, the term "INKE Group" refers to Micromill Holding S.L. and its affiliated companies, which operate under a common corporate governance framework and are guided by shared principles, policies and management standards.

2. Scope

This Policy applies to all employees, managers, directors and members of the governing bodies of INKE Group companies, regardless of their position, contractual relationship or geographical location.

The principles and commitments set out in this Policy also apply, where appropriate, to temporary workers, interns, contractors and other individuals working on behalf of INKE Group.

INKE Group expects its suppliers, service providers, business partners and other stakeholders with whom it maintains business relationships to respect the principles contained in this Policy and to conduct their activities in a manner consistent with internationally recognized labour and human rights standards.

The Company promotes the adoption of equivalent principles throughout its value chain and seeks to integrate labour and human rights considerations into its business relationships and decision-making processes.

3. Human Rights & International Frameworks

INKE Group recognizes that respect for human rights is a fundamental responsibility of every business and an essential element of sustainable and responsible growth.

The Company is committed to respecting and promoting internationally recognized human rights and conducting its activities in accordance with the principles set out in the:

- **Universal Declaration of Human Rights,**
- **United Nations Guiding Principles on Business and Human Rights,**
- **United Nations Global Compact and the ILO Declaration on Fundamental Principles and Rights at Work.**
- **United Nations Convention on the Rights of the Child**
- **United Nations Standards of Conduct for Business on Tackling Discrimination against LGBTBI People**

INKE Group promotes a working environment based on dignity, respect, inclusion, equal opportunities and non-discrimination, where all individuals are treated fairly and with respect regardless of their personal characteristics, background or beliefs.

The Company maintains a zero-tolerance approach towards child labour, forced or compulsory labour, human trafficking, slavery and any other form of exploitation. These practices are strictly prohibited within INKE Group's operations and are not accepted within its business relationships or value chain.

INKE Group respects the rights of employees to freedom of association and collective bargaining, in accordance with applicable laws and regulations, and promotes constructive dialogue with employee representatives.

The Company is committed to preventing, identifying and addressing potential adverse impacts on human rights arising from its activities and business relationships. Potential concerns may be raised through the Company's grievance and reporting mechanisms, which are described in further detail within this Policy and related compliance documents.

INKE Group expects employees, contractors, suppliers and business partners to respect the principles contained in this Policy and to contribute to the protection and promotion of human rights throughout the value chain.

4. Our Commitments

INKE is committed to fostering a workplace where people are treated with dignity, respect and fairness and where labour and human rights are protected throughout the employee lifecycle. To achieve this objective, the Company promotes the following commitments:

- **Trust, Respect and Inclusion:** We promote a working environment based on trust, mutual respect, diversity and equal opportunities, where every individual is valued and treated fairly.
- **Open Communication and Employee Participation:** We encourage open, honest and transparent communication and promote mechanisms that enable employees to contribute ideas, raise concerns and actively participate in the continuous improvement of the organization.
- **Integrity and Ethical Conduct:** We conduct our activities with integrity and professionalism and expect employees and business partners to uphold the highest ethical standards in their actions and decisions.
- **Fair Working Conditions and Wellbeing:** We are committed to providing fair working conditions, supporting employee wellbeing and promoting a healthy balance between professional and personal responsibilities.
- **Learning, Development and Career Opportunities:** We support continuous learning, professional development and merit-based career opportunities, helping employees develop their capabilities and reach their full potential.
- **Health and Safety:** We are committed to providing and maintaining a safe and healthy workplace and to promoting a culture of prevention, participation and continuous improvement.
- **Collaboration and Recognition:** We foster teamwork, knowledge sharing and collaboration across the organization and recognize the contribution that employees make to our success.
- **Social Responsibility and Continuous Improvement:** We seek to create long-term value for our employees, customers, shareholders and communities through responsible business practices and a commitment to continuous improvement.

5. Core Human Rights

5.1. Employment Practices

INKE Group is committed to providing fair, ethical and responsible employment practices that promote equal opportunities, professional development, and respect for all individuals.

The Company complies with applicable labour laws, regulations and collective bargaining agreements in the countries where it operates and seeks to maintain employment practices that reflect the highest standards of integrity, fairness and respect.

Employment-related decisions, including recruitment, hiring, promotion, training, development and compensation, are based on objective criteria such as qualifications, competencies, performance, experience and business needs.

INKE Group promotes equal opportunities throughout the employee lifecycle and does not tolerate discrimination based on race, colour, nationality, ethnic origin, religion, age, disability, sex, gender identity, sexual orientation, marital status or any other legally protected characteristic.

The Company is committed to providing fair and equitable compensation practices, taking into consideration internal equity, individual contribution, market competitiveness and applicable legal requirements.

INKE Group promotes a workplace culture based on mutual respect, professionalism, collaboration and responsible behaviour, where all employees are treated with dignity and fairness.

The Company encourages managers to act consistently with these principles and to contribute to creating an environment that supports employee engagement, trust and long-term professional growth.

5.2. Working Conditions, Overtime and Rest Periods

INKE Group ensures that working conditions across all manufacturing plants, laboratories, and offices promote dignity, safety, and well-being, in strict compliance with local labor regulations, the Chemical Industry Collective Bargaining Agreement (Convenio de la Química), and ILO Conventions 1, 14, and 131.

- **Regulated Annual Working Hours:** In strict compliance with the chemical sector framework, INKE Group establishes a standard maximum working time of 1,744 annual hours. Shift patterns and schedules are structured transparently to ensure operational predictability and plant safety.
- **Mandatory Rest Periods & Shift Safety:** Operating a continuous chemical synthesis facility, INKE Group structurally manages shifts to prevent workplace fatigue and human error. The Company strictly enforces mandatory rest periods, guaranteeing that no employee can begin a new working day unless a minimum of twelve (12) consecutive hours of rest have passed since the end of their previous shift.
- **Voluntary and Premium Overtime:** Overtime work at INKE Group is 100% voluntary and shall never be used under systemic coercion or as a disciplinary measure. All authorized overtime hours are structurally compensated at a premium rate that exceeds the minimum thresholds mandated by local legislation.
- **Universal Right to Digital Disconnection:** To protect employee health and work-life balance, INKE Group maintains a strict Digital Disconnection Policy. This policy formally recognizes the right of all workers to disconnect from any work-related digital communications (emails, messages, phone calls) outside their official working hours. This right applies universally to 100% of the workforce, including on-site operational personnel, laboratory staff, and remote or teleworking employees.
- **Fair and Competitive Compensation:** INKE Group considers fair remuneration to be a cornerstone of worker dignity. The Company is committed to providing compensation that is fair, equitable and competitive, taking into account internal equity, market practices, employee contribution and applicable legal and collective bargaining requirements.
- **Equal Pay and Transparency:** INKE Group promotes the principle of equal pay for equal work or work of equal value and seeks to ensure that compensation decisions are based on objective, transparent and non-discriminatory criteria.

5.3. Diversity, Equity and Inclusion. Discrimination and Harassment.

INKE Group recognizes that diversity, equity and inclusion contribute to innovation, collaboration, employee wellbeing and long-term business success.

The Company is committed to fostering a workplace where all individuals are treated with dignity, respect and fairness, and where diversity of backgrounds, experiences, perspectives and ideas is valued and encouraged.

INKE Group promotes an inclusive working environment that provides equal opportunities to all individuals and does not tolerate discrimination, exclusion or unequal treatment based on race, colour, nationality, ethnic origin, religion, age, disability, sex, gender identity, gender expression, sexual orientation, marital status or any other legally protected characteristic.

The Company seeks to identify and remove barriers that may limit equal opportunities and is committed to promoting accessibility, inclusion and fair treatment throughout the employee lifecycle.

INKE Group believes that diverse teams strengthen decision-making, creativity and organizational performance and therefore encourages a culture in which all individuals can contribute, develop and reach their full potential.

INKE Group does not tolerate any form of discrimination, harassment, sexual harassment, intimidation or other conduct that may undermine the dignity, equality or wellbeing of individuals. The Company is committed to preventing and addressing such behaviours and to maintaining a working environment free from discrimination and harassment. Specific prevention, reporting, investigation and resolution mechanisms are established in the Protocol for the Prevention and Resolution of Harassment and Discrimination and in the Group's Speak-Up and Grievance Framework.

The principles, commitments and measures relating to diversity, equity and inclusion are further detailed in the ***Company's Diversity & Inclusion Policy, Equality Plan and Harassment Prevention Protocol***.

5.4. Learning, Development and Employability

INKE Group recognizes that attracting, developing and retaining talent is essential to achieving its strategic objectives and ensuring the long-term sustainability of the organization.

The Company promotes a culture of continuous learning, organizational development and knowledge sharing, encouraging employees to actively contribute to their professional growth and to the collective development of the organization.

INKE Group is committed to providing learning, development and career opportunities that support employee performance, future employability and the evolving needs of the business.

The Company promotes fair, transparent and merit-based people management practices throughout the employee lifecycle, including recruitment, selection, learning, development and internal promotion processes. Employment and career opportunities are accessible to all individuals based on objective criteria such as qualifications, competencies, performance, potential and business needs.

INKE Group is committed to ensuring that recruitment, selection, learning, development and promotion processes are conducted in a fair, transparent and merit-based manner, supporting equal access to opportunities and fostering professional growth across the organization.

The Company seeks to identify, develop and retain talent by fostering professional growth, supporting internal mobility and providing employees with opportunities to acquire new knowledge, skills and responsibilities throughout their careers.

The principles, responsibilities and procedures governing recruitment, selection, learning, development and internal promotion are further detailed in the ***Company's Selection Policy, Learning, Development and Organizational Learning Policy, Internal Promotion Policy*** and other related ***People policies***.

5.5. Social Dialogue and Employee Participation

INKE Group recognizes that open communication, employee participation and constructive social dialogue contribute to a positive working environment, stronger organizational performance and sustainable business success.

INKE Group encourages open, honest and transparent communication at all levels of the organization and seeks to create an environment in which employees feel able to express their views, raise concerns, share ideas and contribute to the continuous improvement of the Company.

Building on the principles of freedom of association and collective bargaining described in this Policy, the Company promotes constructive social dialogue, employee participation and meaningful engagement throughout the organization

The Company values employee feedback and promotes mechanisms that support consultation, participation and employee involvement in matters that affect employees, the workplace and the organisation as a whole. Such mechanisms may include employee representative structures, employee surveys, consultation forums, continuous improvement initiatives and other communication and participation channels established by the Company.

INKE Group is committed to fostering a culture of trust, collaboration and mutual respect, recognizing that meaningful dialogue and employee involvement contribute to better decision-making, organizational learning and long-term success.

INKE Group believes that effective employee participation requires accessible and trusted channels of communication. Employees are encouraged to communicate directly with their managers and with the People function to raise questions, seek support, share suggestions and express concerns through appropriate formal and informal communication mechanisms.

The principles and practices relating to employee representation, consultation, communication and engagement are further supported through the ***Company's People policies, employee representative structures and related governance mechanisms.***

5.6. Speak Up, Grievance Mechanisms and Non-Retaliation

INKE Group promotes a culture of integrity, transparency and accountability in which employees and other stakeholders are encouraged to raise concerns, report misconduct and seek guidance whenever they believe that a legal, ethical, labor, human rights or compliance-related issue may exist.

The Company is committed to maintaining accessible and appropriate mechanisms that enable concerns, complaints and grievances to be raised and addressed in a fair, timely and confidential manner.

INKE Group encourages individuals to report concerns in good faith and is committed to ensuring that all reports are assessed and managed in accordance with applicable procedures and governance mechanisms.

The Company does not tolerate retaliation, discrimination, intimidation or any adverse treatment against any person who, in good faith, raises a concern, reports a potential violation or participates in an investigation.

INKE Group is committed to protecting confidentiality, respecting due process and ensuring that concerns are handled objectively, fairly and with appropriate safeguards for all parties involved.

Inke Group provides confidential and accessible channels through which potential human rights violations can be reported (Ethics Channel). We guarantee that no one who reports in good faith will face retaliation.

All reports are investigated, and corrective action is taken when necessary.

The principles, responsibilities and procedures relating to reporting channels, grievance mechanisms, investigations, harassment prevention and whistleblower protection are further detailed in the ***Company's Code of Ethics, Whistleblowing Policy, Harassment Prevention Protocol*** and other related Compliance policies.

6. Safe and Healthy Workplace

INKE Group is committed to providing and maintaining a safe and healthy workplace for all employees, contractors and visitors.

The Company promotes a culture of prevention, risk awareness and continuous improvement, seeking to prevent work-related injuries, illnesses and unsafe conditions through effective management systems, employee participation and responsible behaviours.

Health and safety considerations are integrated into business activities and decision-making processes, with the objective of protecting people, assets and the environment.

The principles, responsibilities and commitments related to occupational health and safety are further detailed in the ***Company's Safety Policy***.

7. Responsible Business Relationships

INKE Group recognizes that respect for labour and human rights extends beyond its own operations and includes the relationships it maintains with suppliers, contractors, service providers, business partners and other stakeholders throughout its value chain.

The Company seeks to conduct business with organizations that share its commitment to ethical conduct, integrity, responsible business practices and respect for internationally recognized labour and human rights principles.

INKE Group requires suppliers and business partners to operate in accordance with applicable laws and regulations and to uphold standards relating to human rights, fair labour practices, health and safety, non-discrimination and ethical business conduct.

The Company promotes the integration of labour, human rights and ethical considerations into its business relationships and decision-making processes and seeks to identify and address potential risks that may arise within its value chain.

INKE Group expects employees, suppliers, contractors and business partners to act consistently with the principles contained in this Policy and to contribute to the protection and promotion of human rights and responsible labour practices.

The principles, responsibilities and requirements applicable to suppliers and business partners may be further detailed in the *Company's Code of Ethics, Supplier Code of Conduct, Human Rights due diligence processes and other related policies and procedures*.

8. Monitoring, Objectives and Continuous Improvement

INKE Group is committed to monitoring the implementation and effectiveness of this Policy and to continuously improving its labor and human rights practices.

To support the implementation of this Policy and contribute to the achievement of the Company's ESG commitments, INKE Group has established the following objectives:

- **Talent Development:** Implement a formal performance and development review process by 2027 and progressively increase employee participation, with the objective of reaching at least 90% coverage by 2028.
- **Diversity, Inclusion and Equal Opportunities:** Monitor diversity, inclusion and equal opportunity indicators annually and implement improvement actions where underrepresentation, pay gaps or barriers to equal opportunities are identified by 2027.
- **Employee Participation:** Conduct at least 1 employee consultation or survey initiative annually and implement action plans to address key improvement opportunities identified through the results.
- **Ethics and Compliance Culture:** Maintain mandatory Ethics, Compliance and Human Rights awareness programs and achieve full completion of the training required for each employee's role, including new hires and periodic refresher training where appropriate.
- **Respectful Workplace and Anti-Harassment:** Maintain a workplace free from discrimination, harassment and retaliation through periodic awareness initiatives, accessible grievance mechanisms and the timely assessment and management of reported concerns in accordance with applicable procedures. The Company shall review reported concerns annually and implement corrective or preventive actions where improvement opportunities are identified.

Progress against these objectives shall be monitored through relevant indicators and reviewed periodically through the Company's governance and ESG management processes to support continuous improvement.

9. Related Policies and Documents

This Policy should be read in conjunction with other INKE Group policies, procedures and governance documents that support its implementation, including but not limited to:

- *Code of Ethics*
- *Diversity & Inclusion Policy*
- *Safety Policy*
- *Whistleblowing Policy;*
- *Harassment Prevention Protocol;*
- *Teleworking Policy*
- *Digital Disconnection Policy*
- *Learning, Development and Organizational Learning Policy*
- *Selection Policy*
- *Internal Promotion Policy*
- *ESG Strategy*
- *Supplier Code of Conduct (where applicable)*

These documents provide further guidance, responsibilities, procedures and requirements relating to specific topics addressed in this Policy.

10. Governance

The implementation of this Policy is the responsibility of Management and all employees of INKE Group.

- The **Chief Executive Officer** (CEO) approves this Policy and demonstrates the Company's commitment to labour and human rights principles. The CEO is also responsible for promoting its effective implementation across INKE Group and for ensuring that adequate resources are available to support its application.
- The **Ethics & Compliance Committee** provides independent oversight of this Policy. The Committee monitors compliance with its principles, oversees grievance and whistleblowing mechanisms, reviews reported concerns and allegations, monitors progress against established objectives and indicators, and recommends corrective or preventive actions where appropriate. To ensure independence and objectivity, the Committee maintains a direct reporting line to the Board of Directors.
- The **People & Communication Area** is the owner of this Policy and is responsible for coordinating its implementation, consolidating relevant indicators, monitoring progress against established objectives, coordinating the periodic review process and proposing updates when required.
- **Relevant functional areas and departments**, including People & Communication, Health, Safety & Environment (HSE), Procurement and other management functions, are responsible for implementing and monitoring the commitments set out in this Policy within their respective areas of responsibility.

This Policy shall be formally reviewed at least every two years, or earlier where significant changes occur in legislation, business activities, organizational structure or stakeholder expectations. The review shall be coordinated by the People & Communication Area, reviewed by the Ethics & Compliance Committee and submitted to the Chief Executive Officer for approval

The implementation and effectiveness of this Policy, including progress against its objectives, shall be monitored periodically through relevant management processes, performance indicators and governance reviews.

All managers and employees of INKE Group, including members of senior management and the Board of Directors, are expected to comply with the principles contained in this Policy and to contribute to fostering a safe, respectful, inclusive and responsible working environment.