

## Modern Slavery Act Transparency Statement

Camurus recognizes that modern slavery is a global issue that may affect its own organization and supply chains alike. As a company, Camurus is committed to eradicating modern slavery in all forms by respecting and upholding the human rights of everyone within its own organization and its supply chains. Camurus is continuously implementing effective systems and controls to prevent and eliminate modern slavery. This includes applying a stringent due diligence approach within Camurus' supply chains to minimize the risk of modern slavery or other human rights abuses.

This statement is made pursuant to Section 54 of the UK Modern Slavery Act 2015. It constitutes Camurus' slavery and human trafficking statement for both the parent company and its subsidiaries for the financial year starting 1 January and ending 31 December 2024. The statement details policies, processes and actions taken by Camurus to identify, prevent and mitigate the challenges related to modern slavery and human trafficking within its organization and throughout the company's supply chains.

### Organization structure and supply chains

Camurus is an international, science-led biopharmaceutical company committed to developing and commercializing innovative, long-acting medicines for improving the lives of patients with severe and chronic diseases. Camurus engages in research, development, marketing and sales of pharmaceutical medicines. Camurus' products are based on the company's proprietary FluidCrystal® technology and are designed to address important unmet medical needs, with the potential to make a significant difference in the daily lives of patients. Camurus' pipeline includes products for the treatment of dependence, pain, cancer and endocrine diseases, which are developed in-house and in collaboration with international pharmaceutical companies. In 2024, the number of employees increased from 213 to 256.

Camurus' product Buvidal® buprenorphine injection depot is indicated for the treatment of opioid dependence within a framework of medical, social and psychological treatment, and intended for use in adults and adolescents aged 16 years or over. Buvidal is based on Camurus' proprietary FluidCrystal technology and is intended for weekly or monthly administration by healthcare professionals. In 2024, Buvidal was available in 24 countries, with estimated more than 60,000 patients in treatment by year end. In the US, the product is marketed under the brand name Brixadi® by Camurus' licensee, Braeburn.

Camurus has operations across Europe, the US, and Australia, with its headquarters in Lund, Sweden. Camurus has continued to build a broad pipeline of innovative products, including approved medicines, and established an effective commercial organization and supply chains in Europe, Australia, and since recently also preparing for own launch in the US. Camurus' supply chains include vendors of goods and services, including contract manufacturing of Camurus' products and product candidates. Vendors are generally contracted centrally, but each regional office also has local vendors for minor supplies of local goods and services. Having frequent communication with its significant vendors is of great importance to Camurus. Camurus therefore has monthly meetings

(stakeholder dialogues) for vendor assessment with its contract manufacturer and other significant vendors.

Alongside the in-house development projects, Camurus is collaborating with pharma and biotech partners in early-stage feasibility projects where the FluidCrystal technology is being assessed in combination with different active ingredients.

In June 2025, Camurus announced entering into a collaboration and license agreement with Eli Lilly and Company (“Lilly”) for long-acting FluidCrystal incretins.

### Camurus’ commitments

Camurus strives to ensure a high level of business ethics with vendors, healthcare professionals, patients, and other stakeholders. Camurus has implemented an improved vendor sustainability due diligence and risk management process, collaborating with vendors to minimize risks and boost sustainability performance across its supply chains.

As identified in Camurus’ materiality analysis ([see Camurus 2024 Annual Report, p. 55](#)) one of Camurus’ material sustainability aspects is sustainable supply chain management, including protecting human rights and labor rights and occupational health and safety.

In 2023, Camurus joined the UN Global Compact, committing to the ten principles within the areas of human rights, labor law, the environment, and anti-corruption. In 2024, the company continued to systematically incorporate these principles into its strategic frameworks, policy development, and operational practices, establishing them as foundational elements in its daily activities and stakeholder engagements.

In 2025, Camurus submitted its second [UN Global Compact Communication on Progress \(UNGC\)](#). It focuses on the five disclosure areas following the UN Global Compact’s 10 principles.

### Camurus’ policies and focus areas

All Camurus employees are expected to adhere to the company’s [Code of Conduct](#), which reflects its core values—passion, innovation, collaboration, ownership, quality, and sustainability. Comprehensive training in the Code of Conduct is provided to all staff.

Camurus is committed to providing a work environment where fundamental human rights are consistently upheld for all personnel. Furthermore, Camurus is committed to complying with the UN Guiding Principles on Business and Human Rights and to respecting all internationally recognized human rights. This includes but is not limited to the fundamental human rights at work as set out in the International Labor Organization (ILO) conventions, both within Camurus’ own operations and across the value chain. This commitment is also described in the company’s [Code of Conduct](#), [Vendor Code of Conduct](#) and [Diversity, Equity and Inclusion \(DEI\) Policy](#).

Camurus has carried out a mapping of its value chain and identified focus areas and developed an action plan to ensure respect for human rights throughout the value chain. The following focus areas have been identified:

- Supply chain: cultivation of raw materials
- Supply chain: distribution
- Patient health and well-being

- Employee health and well-being

In 2024, Camurus established a process to address and remedy potential human rights violations in alignment with the UN Guiding Principles on Business and Human Rights (see below)

Additionally, several important initiatives were taken to strengthen the framework for business ethics and regulatory compliance, with the aim of ensuring compliance with the strict ethical principles set by legislation and ethical codes and guidelines. The framework is based on the EFPIA's Code of Practice and covers anti-corruption, whistleblowing, and data protection issues. The compliance framework consists of [Camurus' governance documents](#) such as the company's [Code of Conduct](#), policies for [anti-corruption](#) and for [interactions with healthcare](#).

Through the compliance framework, Camurus aims to ensure:

- Compliance with applicable laws, regulations, ethical codes and Camurus' Code of Conduct
- Ethical behavior of Camurus' employees interacting with healthcare professionals and other third parties.

Camurus' sustainability requirements for vendors are outlined in the company's [Vendor Code of Conduct](#), which encompasses provisions related to human rights, and the prevention and mitigation of all forms of child labor and forced labor, including modern slavery in its various manifestations

All policies, procedures, and controls are continually reviewed based on an annual risk assessment. Additionally, Camurus has a documentation management system in place that updates its policies and standard operating procedures every three years or when required.

### Employee wellbeing

Camurus' employees are the company's most important asset, and the company strives to create a workplace instilled in its values – innovation, quality, passion, collaboration, and ownership. The ambition is to maintain an inclusive, diverse, and open work environment where employees can thrive and contribute to our goals and vision.

Camurus applies collective bargaining agreements in the countries where they exist. In 2024, 68 percent of Camurus' employees were covered by collective bargaining agreements.

Furthermore, Camurus is committed to complying with all applicable laws and regulations at international, regional, and national levels. This includes international conventions on human rights and labor laws, such as:

- UN's Universal Declaration of Human Rights (1948)
- The eight basic conventions of the International Labor Organization, no. 29, 87, 98, 100, 105, 111, 138 and 182
- UN's Convention on the Rights of the Child, Article 32

### Health and safety

Providing a healthy and safe work environment is an important matter for Camurus. Camurus has a [Global Work Environment Policy](#) that all employees and hired consultants are required to follow. Camurus aims to create a workplace that, from a physical, psychological, and social perspective, is healthy and wholesome for all employees and where the risks of work injuries and work-related illnesses are minimized, and zero accidents occur. Work environment management is carried out in a

systematic way based on a management structure that includes the process phases of investigation, risk assessment, measures and control. In 2024, healthy work attendance was 98 percent.

Camurus does not tolerate any form of harassment or victimization of any employee. This is why Camurus' approach to harassment and victimization is integrated in the management of the work environment and includes all permanent and temporary employees as well as trainees and consultants. For more information, please see Camurus' [Harassment and Victimization Policy](#).

### Diversity, equity and inclusion

Camurus' guiding principles include diversity, equity, and inclusion. There is a zero tolerance for all forms of discrimination, harassment, and abusive treatment based on gender, gender identity or expression, ethnicity, religion or other belief, disability, sexual orientation, age, or any other grounds. Camurus strives to always recruit the most qualified people for the position, regardless of background, gender, gender identity, ethnicity, religion, age, disability, or sexual orientation. Camurus values and actively promotes diversity among its employees, which is anchored in the company's DEI policy and DEI training. For more information, please see Camurus' [Code of Conduct](#) and [Diversity, Equity and Inclusion \(DEI\) Policy](#).

Line managers are responsible for their employees' work environment, while Camurus' Human Resources (HR) manager holds overall responsibility for coordinating and leading Camurus' systematic work environment management.

### Vendor sustainability due diligence and risk management

Risk management at Camurus is characterized by a holistic approach to prevent and minimize risks and promote opportunities. Camurus is aware that unmanaged sustainability risks may develop into direct business risks. Therefore, risk management is a key part of the company's business management.

Camurus operates in a highly regulated market with manufacturers and vendors primarily located in Europe and in the US. Camurus has implemented a structured vendor sustainability due diligence and risk management process to ensure vendors compliance with its Vendor Code of Conduct and mitigate risks across the supply chain. Director Sustainability is responsible for the vendor sustainability Due Diligence and risk management process and the supply chain mapping process.

Camurus has conducted its supply chain mapping through a series of internal workshops and one external workshop. The mapping is based on insights gathered during these sessions, along with internal supply chain data and data from contract manufacturing.

Camurus' vendor sustainability due diligence and risk management process includes initial and ongoing assessments of vendors based on sustainability criteria such as labor practices including modern slavery, environmental impact, human rights, and ethical business conduct. Vendors are evaluated through self-assessment questionnaires, risk-based screening, and where necessary audits. Identified risks are addressed through corrective action plans and continuous engagement to promote long-term compliance and improvement

The risk management process consists of four main steps:

1. Identification and analysis of sustainability risks (such as risks linked to human rights, and labor rights including modern slavery, environmental harms and anti-corruption) and opportunities across supply chains
2. Analysis and assessment of how the risks and opportunities affect Camurus' operations

3. Identification of measures to prevent or reduce risks and take advantage of opportunities, including the allocation of internal responsibility for enacting these measures.

Mitigation actions include conducting audits, implementing action plans (including grievance mechanisms and remediation) and joint projects with vendors to reduce risks and improve sustainability performance in the supply chain

To effectively conduct operational monitoring of the company's vendors, Camurus uses a digital risk management system based on the ITUC global rights index. Significant vendors (tier 1 and partially tier 2) in R&D (including non-clinical and clinical research), commercial production (including vendors of constituent components) as well as transport and distribution vendors are continually assessed.

Camurus continuously monitors its vendors' sustainability performance and compliance with the Camurus Vendor Code of Conduct, applying a risk-based approach. Vendors are categorized into one of four risk levels (low, medium, high, or extreme risk). Vendors identified as high or extreme risk are subject to enhanced due diligence measures. These may include targeted audits, collaborative performance improvement initiatives—such as tailored information and training, joint root cause analyses, and goal setting—as well as ongoing follow-ups. In cases of persistent non-compliance or severe breaches, Camurus may refrain from further contracting or terminate the business relationship altogether

In 2024, Camurus performed desk audits and conducted meetings with its most significant vendors (stakeholder dialogues), where the risks of human rights and labor rights violations including modern slavery were discussed. Camurus also conducted a number of compliance risk assessments of distributors and significant service providers, from an anticorruption and business ethics perspective. This included reviewing policies, process descriptions, and other documentation, as well as follow-up meetings with new and existing business partners, resellers, and others, such as companies representing Camurus in interactions with the healthcare sector or other similar stakeholders.

Because of the nature of Camurus' business, Camurus has assessed the risk of modern slavery within its own organization as minimal. Camurus estimates that there could be a potentially medium to *high risk* of human rights and labor rights violations in the supply chains specifically concerning sourcing of raw material (neither tier 1 nor 2), such as soy, sunflowers and opium poppy, as well as in transportation and distribution. Because Camurus is a "small" customer when it comes to the consumption of raw materials, Camurus does not have the leverage needed to require complete transparency from all its non-tier 1 and 2 vendors. Camurus recognizes this as a weakness in its risk assessment. By contacting its vendors throughout the supply chain, Camurus was however able to receive a certification from its soy vendor that the soybeans used for the raw material for Camurus' excipient are not being grown in areas where there is a high risk of negative effects on land use, biodiversity, the climate, or human rights violations.

There have been no reported occurrences of modern slavery within Camurus' own organization or supply chains, as well as no fines in this regard.

Key performance indicator: 100% of new significant vendors were included In Camurus' sustainability risk management process in 2024.

#### **Remediation and grievance mechanisms, policies and processes**

Camurus has a whistleblowing procedure and a digital whistleblowing platform, which is available internally via the company's intranet and externally via Camurus' website. Camurus takes suspected

misconduct very seriously, and the whistleblowing platform provides an easily accessible, secure and reliable mechanism for employees and third parties to report suspected misconduct involving the company. Any matters reported are thoroughly investigated and any necessary remedial action is taken. In 2024, the reporting tool was improved, and reporting can now be made in English, Spanish, French, German and Swedish, based on the reporter's language preference. There were no reports made regarding human rights violations or labor rights violations via Camurus' whistleblowing platform in 2024. For more information on Camurus' whistleblowing procedure and a digital whistleblowing platform, see [here](#). In 2024, three anonymous reports of discrimination were submitted through the employee survey. In response, Camurus conducted diversity training that included comprehensive information on anti-discrimination policies, reinforcing the company's zero-tolerance stance on discrimination in the workplace.

### Training

A highlight of 2024 was Camurus' continued development of the digital training platform with training in sustainability and responsible business. New training was implemented for employees in diversity, equality and inclusion, and for interactions with healthcare professionals.

Furthermore, all employees were trained in Camurus' Sustainability & Business Ethics. The training explains the meaning of sustainability, educates on Camurus' sustainability framework and management system, the different roles related to sustainability, as well as the employees' individual responsibilities.

Employees in all functions were digitally trained in responsible business, including business ethics and anti-corruption. All new employees at Camurus are trained in sustainability including the company's Sustainability Policy, Environmental Policy, Code of Conduct and Anti-Corruption Policy as part of their induction program. Moreover, all employees, as well as vendors, are continuously educated on all Camurus policies applicable to them. For employees in contact with healthcare professionals, patient organizations and other stakeholders, additional training was conducted in 2024 on the frameworks and policies surrounding such situations, including in representation with customers.

In 2024, Camurus participated in the UN Global Compact's Business and Human Rights Accelerator, a training program for companies to ensure respect for human rights. To promote diversity among its employees, Camurus additionally provides DEI training. During 2024, all employees were trained in Camurus' initiatives for fostering diversity and inclusion. The introduction training for new employees also includes these topics.

Camurus is committed to strengthening awareness of human rights and enhancing internal training on its human rights responsibilities. In 2025, all employees will undergo training on the company's sustainability framework, which includes Camurus' human rights commitments and its efforts to combat all forms of modern slavery. The Director of Sustainability is responsible for overseeing these training initiatives.

### Goals for 2026

- Monitor all vendors in the first tier within research and development, production and distribution regarding compliance with Camurus' Vendor Code of Conduct.
- Annual training of all Camurus employees and consultants in the company's Code of Conduct.
- Healthy attendance over 97%

- Ensure an open culture where employees feel safe to report suspected misconduct, including corruption, as well as a robust framework for monitoring within which any problems are identified and addressed

This statement was approved by the Executive Board of Directors for Camurus Ltd UK on June 26, 2025 and signed by Camurus AB's CEO and President Fredrik Tiberg.