

## 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 2025. 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 2025, the number of employees increased from 256 to 285.

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 2025, Buvidal was available in more than 20 countries, with estimated more than 70,000 patients in treatment by year end. In the US, the product is marketed under the brand name Brixadi® by Camurus' licensee, Braeburn.

During 2025 Camurus launched Oczyesa®, a novel self-administered long-acting octreotide subcutaneous autoinjector for the maintenance treatment of acromegaly. Oczyesa was launched in Germany and has been approved across the EU and in the UK for treatment of acromegaly. Preparation for the product to be launched in additional countries in 2026 is underway.

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 contract manufacturing 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. In December 2025, Camurus entered into an exclusive collaboration and license agreement with Gubra, a Danish company specialized in peptide-based drug discovery. The aim of this partnership is to create a long-acting therapeutic option for the treatment of hypoparathyroidism.

### 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 2025 Annual Report, p. 115-116](#)) 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 and 2025, 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 \(UNGCP\)](#). 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 full compliance with all applicable international, national, and regional laws and regulations, as well as with the UN Guiding Principles on Business and Human Rights. The company respects and operates in accordance with all internationally recognized human rights and labour rights, including:

- The UN Universal Declaration of Human Rights (1948)
- Fundamental human and labour rights as set out in the International Labour Organization (ILO) Conventions Nos. 29, 87, 98, 100, 105, 111, 138, and 182
- Article 32 of the UN Convention on the Rights of the Child

All of the above principles are upheld, both within Camurus’ own operations and across its supply chains. . 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 supply chains and identified focus areas and developed an action plan to ensure respect for human rights. 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)

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 significant vendors are expected to commit to Camurus Vendor Code of Conduct either by signing the code or by accepting the requirements of it in their master service agreement.

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, human rights, and labor standards

Camurus' employees are the company's most important asset, and the company strives to create a workplace guided by its values of innovation, quality, passion, collaboration, and ownership. Camurus' ambition is to maintain an inclusive, diverse, safe, and open work environment where employees can thrive, develop, and contribute to the company's goals, culture, and long-term vision.

Camurus applies collective bargaining agreements in the countries where such agreements exist. In 2025, a significant share of employees was covered by collective bargaining agreements and related labour protections in accordance with local legislation and market practices.

#### Health and safety

Providing a healthy, safe, and supportive work environment is an important matter for Camurus. Camurus aims to create a workplace where all employees can thrive and achieve their full potential in a physically, psychologically, and socially healthy environment. The company strives to minimize the risks of work-related injuries and illnesses, promote employee well-being, and achieve zero workplace accidents and zero stress-related long-term sickness.

Camurus has both local and global [Work Environment Policy](#) that all employees and hired consultants are required to follow. Work environment management is carried out systematically based on a management structure that includes the process phases of investigation, risk assessment, measures, and control. This way of working applies across all operations, regardless of country, and includes permanent and temporary employees, trainees, contractors, and consultants.

Line managers are responsible for their employees' work environment, while the HR Manager holds overall responsibility for coordinating and leading Camurus' systematic work environment management. In Sweden, where the majority of employees are based, a safety committee consisting of management, safety representatives, and employees works actively to identify, assess, and prevent work environment-related risks. Regular safety rounds, continuous risk assessments, and ongoing mitigation activities are conducted to support a safe workplace.

Camurus' emergency preparedness is governed by the company's crisis plan, which provides clear instructions for employee behaviour in emergency situations. Safety and well-being extend to all individuals present at Camurus' premises, including visitors and contractors.

Occupational health and safety training is a key component of Camurus' preventive approach. New employees receive workplace safety introductions, including information on emergency procedures, evacuation routes, safety equipment, and applicable health and safety rules. Employees in Sweden can also access ergonomic support and workplace health guidance for both office-based and hybrid working arrangements.

Camurus offers employees access to occupational healthcare, including confidential support services, physical and mental health support, and health insurance benefits adapted to local conditions. Employees in Sweden are invited to health assessments every two years and are offered seasonal vaccinations where relevant. Access to mental health counselling and medical support is available when needed.

In 2025, healthy work attendance reached 97.5 percent, exceeding the company's goal of at least 97 percent. Camurus also achieved its work environment goal of zero stress-related long-term sickness during the year.

Camurus does not tolerate any form of harassment, discrimination, or victimization. The company's approach to preventing harassment and victimization is integrated into its systematic work environment management and applies to all employees, trainees, consultants, contractors, and temporary staff. For more information, please see Camurus' Global and Local Work Environment Policy and [Harassment and Victimization Policy](#) .

### **Diversity, equity and inclusion**

Camurus is an international company guided by principles of diversity, equity, and inclusion (DEI). The company has zero tolerance for all forms of discrimination, harassment, victimization, or abusive treatment based on gender, gender identity or expression, ethnicity, nationality, religion or other belief, disability, sexual orientation, age, or any other grounds. These principles are embedded in Camurus' Code of Conduct and Diversity, Equity and Inclusion (DEI) Policy and apply to all employees, consultants, trainees, and temporary staff.

Camurus strives to recruit the most qualified candidates for each position, regardless of background, gender, gender identity, ethnicity, religion, age, disability, or sexual orientation. Diversity is actively valued and promoted through inclusive recruitment practices, DEI training for all employees, onboarding programs, and leadership accountability. All employees share responsibility for contributing to a respectful, diverse, and inclusive workplace culture and are encouraged to actively engage in DEI-related initiatives.

Camurus regularly assesses employees' sense of inclusion through its annual employee survey, which captures perceptions of fairness, belonging, respect, and equal opportunities across the organization. In 2025, the inclusion score was 8.7 on a scale of 1–10, reflecting a strong and inclusive workplace culture supported by respectful collaboration, clear values, and active leadership engagement.

The Human Resources (HR) function, led by the Head of HR who is a member of the Executive Management Team, holds overarching responsibility for coordinating DEI work and systematic work environment management across the organization. Line managers are responsible for their employees' work environment and for promoting inclusive behaviours and equal opportunities within their teams. Diversity and inclusion topics are also integrated into Camurus' sustainability

governance structures to ensure alignment with broader people, business, and sustainability priorities.

As part of its commitment to balanced representation and inclusive leadership, Camurus has established long-term ambitions to promote gender balance across management positions, the Executive Management Team (EMT), and the Board of Directors. Progress is monitored regularly through workforce and governance diversity indicators.

Camurus' salary policy prohibits discrimination in compensation and is based on the principle of equal remuneration for work of equal value. Salary levels and pay differences are monitored annually to support fairness, consistency, and compliance with equal pay principles.

Camurus also promotes an inclusive and accessible working environment by supporting employees through different life situations and needs, including parental support, flexible work arrangements, accessibility adaptations, ergonomic support, and respectful workplace guidelines designed to accommodate different working styles, sensitivities, and needs.

In addition, Camurus supports diversity through inclusive internship and labour market integration initiatives, including collaboration with Jobbsprånget in Sweden, which connects employers with foreign-born academics to support labour market inclusion and diversity of perspectives and experiences within the organization.

Internal communication and employee engagement also play an important role in fostering an inclusive culture. Through its global intranet and employee engagement initiatives, Camurus promotes transparency, dialogue, collaboration, and interaction across teams, functions, and geographic locations.

### Training

The company supports worker wellbeing and resilience through training, skills development, awareness programs, and employee support initiatives designed to promote fair working conditions and reduce vulnerability to exploitation. Camurus is committed to strengthening employee competence, awareness, and continuous learning across areas related to overall sustainability, responsible business conduct, human rights, diversity, and compliance. Through its digital learning platform, all employees are provided access to a wide range of training opportunities, enabling employees to take ownership of their professional development while ensuring alignment with company values, policies, and regulatory requirements.

Human rights topics are also integrated into onboarding programs for new employees to ensure awareness and shared responsibility from the start of employment.

In 2025, Camurus continued to expand its portfolio of learning and capability-building trainings, The learning platform also enables systematic collection of employee feedback on training quality, relevance, and improvement opportunities, supporting continuous enhancement of the training portfolio.

All employees underwent training in Camurus' sustainability & business ethics framework, including human rights, diversity and inclusion, anti-corruption, environmental protection and the company's efforts to combat all forms of modern slavery.

In 2025, Camurus also introduced and communicated its revised Code of Conduct as part of broader internal learning and engagement activities.

Training and competence management are fully integrated into Camurus' quality management system (QMS), ensuring that role-specific requirements, completed trainings, and competencies are systematically defined, delivered, and documented.

Camurus also supports employees' long-term career development through structured performance and development processes, individual development plans, mentoring opportunities, internal mobility, and access to external trainings, certifications, and academic programs where relevant. Annual and mid-year development discussions between employees and line managers are supported by a digital platform that enables goal setting, feedback, performance follow-up, and succession planning.

Management and leadership development remain an important focus area. In 2025, Camurus launched a new Global Leadership Programme and conducted management trainings focused on safety and trust, feedback culture, performance dialogue, leadership, and people management skills.

The Director Sustainability, together with HR, is responsible for overseeing sustainability- and responsible business-related training initiatives, while line managers are responsible for supporting employee development and ensuring completion of relevant role-specific training activities.

#### Vendor sustainability due diligence and risk management

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

Camurus' commitment to sustainable supply chains is embedded in its criteria for selecting and working with vendors. 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.

In addition to requiring rigorous product quality and GMP standards, Camurus conducts thorough assessments of significant tier 1 and tier 2 vendors' sustainability performance and compliance with Camurus' sustainability requirements in the company's Vendor Code of Conduct.

Significant vendors are defined as being vendors in R&D (including both clinical and non-clinical research), commercial production (including vendors of both raw materials, constituent parts and components), transport and distribution from whom Camurus procures products and/or services of more than SEK 500,000 per year.

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. To identify, monitor, and manage sustainability risks in its supply chains, Camurus has established a risk management process based on a due diligence approach. The holistic approach is characterized by both preventing and minimizing risks and promoting opportunities. The assessment covers all Camurus' material sustainability topics within the area of supply chains and is part of Camurus' continuous human rights due diligence process. The details of the process are described in Camurus' standard operating procedure [Vendor Sustainability Due Diligence and Risk Management](#).

All existing vendors within the scope of the risk management procedure, as well as potential new vendors, are subject to Camurus' sustainability risk assessment.

Camurus’ vendor sustainability due diligence and risk management process includes initial and thereafter regular continuous assessments of vendors based on sustainability criteria such as risks linked to human rights, and labor rights including modern slavery, environmental harm, corruption and deficiencies in sustainability governance. 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.

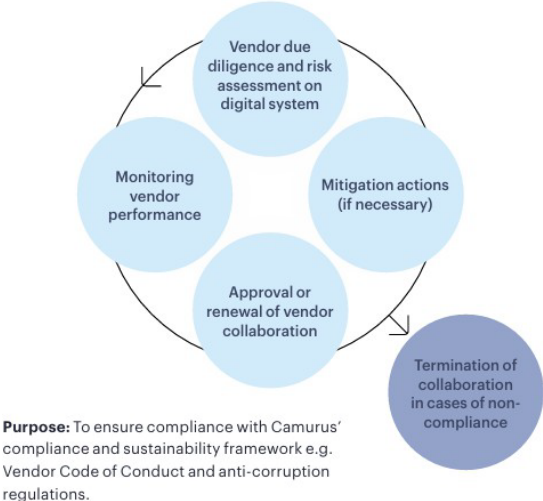
The risk management process consists of four main steps:

1. Identification and analysis of sustainability risks 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
4. Sharing results of due diligence and risk management assessment, and (if necessary), mitigating measures in collaboration with the vendor.

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 support effective monitoring of existing vendors and risk screening of potential new vendors, Camurus uses a digital risk management system based on the ITUC global rights index. The process flow is illustrated in the image below.

**Vendor sustainability risk management**



All vendors, regardless of the determined risk level, receive constructive feedback and the outcome of the assessment. Whereas medium-risk vendors’ performance is if needed followed up through performance monitoring meetings, if Camurus identifies a vendor as high or extreme risk, or determines that a vendor has breached the Vendor Code of Conduct, corrective actions and remediation measures are implemented to improve the vendor’s sustainability performance and mitigate or eliminate identified risks.

Camurus’ risk categorization is based on the following model

Vendor sustainability risk categorization model	
Level of Risk	Description
Low Risk	<ul style="list-style-type: none"> <li>• Structured and proactive ESG risk management</li> <li>• Detailed policies, monitoring, actions and goals on material ESG issues</li> <li>• Evidence of implementation</li> <li>• Detailed disclosure on performance and actions</li> <li>• Engagement and active participation in assessment</li> </ul>
Medium Risk	<ul style="list-style-type: none"> <li>• Structured and proactive ESG management</li> <li>• Policies, monitoring, and actions in place on material ESG issues</li> <li>• Partial disclosure on performance and actions</li> <li>• Engagement and active participation in assessment</li> </ul>
High/Extreme Risk	<ul style="list-style-type: none"> <li>• Lack of policies or actions on ESG material issues</li> <li>• Evidence of misconduct in specific areas</li> <li>• Lack of/no disclosure of performance in specific material areas</li> <li>• Minimal or no engagement or active participation in assessment</li> </ul>

In 2025, and in accordance with its Vendor Sustainability Due Diligence and Risk Management Policy, Camurus performed desk audits and conducted meetings with its most significant vendors (stakeholder dialogues). During these meetings, the risks of human rights and labor rights violations, including modern slavery, were addressed.

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. As a result of continuous vendor engagement, the vendor of the soy-based ingredient has certified that the soybean used for the raw material for Camurus' excipient is not grown in areas where there is a high risk of negative effects on land use, the climate, or human rights violations, and the same applies to opium poppy and sunflower sourcing.

Because Camurus is a relatively small customer when it comes to the consumption of raw materials, it 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 supply chain management.

In 2025 there have been no reported occurrences of modern slavery within Camurus' own organization or supply chains and Camurus has received no fines with regard to this issue.

Key performance indicator: 100% of new significant vendors were included in Camurus' sustainability risk management process in 2025.

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

Camurus has a multilingual whistleblowing platform available to both employees and external stakeholders, including third parties across the value chain. The platform enables anonymous and confidential reporting of suspected misconduct, human rights concerns, unethical behaviour, discrimination, harassment, corruption, or other violations, in accordance with the EU Whistleblower Protection Directive. Employees receive information and training on how to use the platform, including guidance on reporting procedures and how cases are handled. Reported matters are assessed, investigated, and addressed in accordance with established internal procedures.

The whistleblowing platform serves as Camurus' primary grievance mechanism for employees and third parties and applies across the company's operations and value chain. To strengthen its human rights governance, Camurus has also established formal procedures for addressing and remedying potential human rights violations in alignment with the UN Guiding Principles on Business and Human Rights. For more information about Camurus' whistleblowing procedure and to access the digital whistleblowing platform, please see [here](#). In 2025, no reports of human rights or labor rights violations were submitted through Camurus' whistleblowing platform. Two reports of discrimination within Camurus' own operations were submitted directly to HR and investigated and mitigated internally. The individuals involved were interviewed by HR and external mediation was offered and performed, with a successful result.

### **Goals for 2026**

- Monitor all significant 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.
- Maintain a high degree of inclusion amongst Camurus' employees by reaching a score equal to or above 8 in the relevant categories in the annual regular employee survey
- 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 on 1 June, 2026. For and behalf of Camurus Ltd.