

Today's CDMO. **Inspired by tomorrow.**
Labor and Human Rights Policy



1. Purpose/Objectives

- 1.1 Respect for human rights is a fundamental value of PCI Pharma Services ("PCI" or "the Company"). We are committed to supporting, respecting, and protecting human rights in our relationships with our employees, suppliers, business partners, and local communities. PCI's goal is to exemplify this commitment both in our own business activities and in our business relationships with external stakeholders.
- 1.2 PCI complies with all applicable laws and regulations in its business activities and supports internationally recognized human rights, such as those expressed in the United Nations Global Compact (UNGC) and the International Labour Organization's (ILO) Declaration on Fundamental Principles and Rights at Work.

2. Scope

- 2.1 This policy applies to all sites under PCI's control in all geographies and all employees, including subcontractors, interns, and any other person carrying out work on behalf of PCI.
- 2.2 Training is mandatory in accordance with PCI's standard processes every two years through the Company's Electronic Learning Management System or equivalent.
- 2.3 PCI expects suppliers and contractors to abide by this policy as well. The Company has a Supplier Code of Conduct and ESG Supplier Charter that is shared with business partners at the start of their relationship with PCI. In its Supplier Code of Conduct and ESG Supplier Charter, PCI states that it expects its suppliers to protect human rights, uphold labor and social standards in accordance with international labor standards, and ensure that anti-discrimination and anti-corruption policies are in place across their business operations.
 - 2.3.1 PCI expects suppliers and contractors to abide by the PCI Modern Slavery/Ethical Statement in accordance to the UK Modern Slavery Act of 2015. The statement can be found on the PCI website.
 - 2.3.2 Suppliers are also advised that as a PCI business partner, they must comply with all applicable national laws on wages and working hours as well as international standards regarding child labor and minimum wage.

3. Responsibilities

- 3.1 The policy owner is the Chief People & Sustainability Officer. They will implement this policy in PCI's operations.
- 3.2 Management is responsible for ensuring employees have the necessary resources to comply with this policy.
- 3.3 All employees must read, understand, and comply with this policy in their daily tasks and report any non-compliance through the appropriate channels.
- 3.4 PCI takes our responsibility to respect human rights seriously. For this reason, respect for human rights is reflected and embedded in the PCI Code of Ethics and Business Conduct and several of our Corporate and Local Policies. The PCI Code of Ethics and Business Conduct and PCI policies serve as our standards of conduct, which we use to navigate the decisions and actions that we face as employees, leaders, and as an organization.



- 3.5 PCI has time-bound qualitative and quantitative targets, action plans, and KPIs to ensure continuous progress on our commitments.
- 3.6 PCI strives to foster an environment where employees feel safe to speak up, express their ideas, concerns, and issues, without fear of retaliation.
- 3.7 PCI is committed to preventing human rights abuses and addressing any negative human rights impacts if they occur.
- 3.8 This Policy will be available on PCI's website and included in company's MasterControl training process.

4. Definitions and Acronyms

- 4.1 **Child:** Every human being below the age of 18 years.
- 4.2 **Child Labor:** Defined as work that 'deprives children of their childhood, their potential and their dignity, and that is harmful to physical and mental development.
- 4.3 **Collective Bargaining:** A voluntary process through which employers and workers discuss and negotiate their relations, in particular terms and conditions of work. Participants include employers themselves, trade unions, or representatives freely designated by the workers.
- 4.4 **Diversity:** Differences between people generally recognized as gender, disability, ethnicity, sexual orientation, religion, age, etc.
- 4.5 **ESG:** Environmental Social Governance
- 4.6 **Forced Labor:** Any work or services that people are forced to do against their will or under the threat of punishment.
- 4.7 **Freedom of Association:** A respect for the right of all employees to freely and voluntarily establish and join groups for the promotion and defense of their occupational interests.
- 4.8 **Human Trafficking:** Use of violence, threats, or coercion to transport, recruit, or harbor people in order to exploit them for monetary gain.
- 4.9 **Inclusion:** Integrating all people to generate a feeling of belonging regardless of personal traits.
- 4.10 **ILO:** International Labor Organization
- 4.11 **Modern Slavery:** Exploitation of a person for someone else's monetary gain, where the exploited person cannot refuse or leave because of threats, violence, coercion, deception, and/or abuse of power.
- 4.12 **UNGC:** United Nations Global Compact

5. Policy Detail

5.1 Child Labor, Forced Labor & Human Trafficking

- 5.1.1 PCI prohibits the use of all forms of forced labor, modern forms of slavery, and any form of human trafficking across operations and the supply chain.
 - 5.1.1.1 PCI requires all key suppliers and business partners to agree to comply with PCI's Supplier Code of Conduct, the ESG Supplier Charter, and the Modern Slavery Statement as referenced above. PCI also requires all suppliers to warrant that they are not aware of any conduct or circumstances within any part of their business or supply chain anywhere in the world that may constitute slavery and human trafficking.



5.1.1.2 As part of PCI's Global ESG Program, PCI has time-bound qualitative and quantitative targets, action plans, and KPIs to ensure compliance and continuous progress on our commitments in this area.

5.1.2 PCI will provide training to all employees and key Personnel on child labor, forced labor, and human trafficking.

5.1.3 PCI prohibits the hiring of individuals that are under 18 years of age for positions in which hazardous work is required. PCI will permit the hiring of part-time employees in non-hazardous roles at or above the local legal minimum working age, but in no circumstances will PCI permit the hiring of children under the age of 16.

5.1.4 PCI does not engage in or condone the unlawful employment or exploitation of children.

5.1.5 In the case any form of child labor, forced labor, and/or human trafficking is identified, PCI will take the necessary steps to remedy and mitigate the incident by working with the victim(s) to identify appropriate response to the violation and monitor the effectiveness of the implemented remedy.

5.2 External Stakeholder Human Rights

5.2.1 PCI commits to identifying salient human rights issues and potential risks to external stakeholders through materiality assessments within the local communities we live and work in. In the case any are identified, the company will work to mitigate the adverse human rights impacts arising from company's activities.

5.2.2 PCI will promote educational programs and communications campaigns focusing on this topic, as part of the company's efforts to strengthen internal and public knowledge on external stakeholders' human rights.

5.3 Diversity, Discrimination, and Harassment

5.3.1 PCI is committed to being a high-performing organization built on the foundation of a diverse and inclusive workforce, with individuals and teams working to blend a wide range of talents, preferences, and perspectives. PCI endeavors to reflect the diversity of the communities in which we operate and to cultivate a workplace that provides each employee with respect and the opportunity to grow, contribute and reach their greatest potential.

5.3.1.1 PCI is committed to equal opportunity and will not tolerate discrimination or harassment. We work to maintain workplaces that are free from discrimination or harassment on the basis of race, sex, color, national or social origin, ethnicity, religion, age, disability, sexual orientation, gender identification or expression, political opinion, or any other status protected by applicable law.

5.3.1.2 The bases for recruitment, hiring, placement, development, training, compensation, and advancement at the Company are qualifications, performance, skills, and experience.

5.3.1.3 PCI does not tolerate disrespectful or inappropriate behavior, unfair treatment, or retaliation of any kind.

5.3.1.4 Harassment is not tolerated in the workplace and in any work-related circumstance outside the workplace.

5.3.1.5 As part of PCI's Global ESG Program, PCI has time-bound qualitative and quantitative targets, action plans, and KPIs to ensure compliance and continuous progress on our commitments in this area.

5.4 Safe and Healthy Workplace

5.4.1 The safety and health of our employees is of paramount importance. Our policy is to provide a safe and healthy workplace and comply with applicable safety and health laws and regulations, as well as internal requirements.

5.4.2 PCI works to provide and maintain a safe, healthy, and productive workplace by addressing and remediating identified risks of accidents, injury and health impacts.



- 5.4.3 As part of PCI's Global ESG Program, PCI has time-bound qualitative and quantitative targets, action plans, and KPIs to ensure compliance and continuous progress on our commitments in this area.

5.5 Working Conditions

- 5.5.1 PCI compensates employees competitively relative to the industry and local labor market, ensuring full compliance with applicable minimum wage, work hours, overtime, and benefits laws, as well as with terms of applicable collective bargaining agreements.
- 5.5.2 PCI is committed to fostering personal and professional development and encourages employees to balance their work and personal responsibilities.
- 5.5.3 PCI is committed to maintaining a workplace that is free from violence, harassment, intimidation and other unsafe or disruptive conditions due to internal and external threats.
- 5.5.4 Security safeguards for employees are provided, as needed, and are maintained with respect for employee privacy and dignity.

5.6 Freedom of Association and Collective Bargaining

- 5.6.1 PCI respects our employees' right to form, join, or not to join a labor union without fear of reprisal, intimidation, or harassment.
- 5.6.2 Where employees are represented by a legally recognized union, PCI is committed to establishing a constructive dialogue with their freely chosen representatives. The Company is committed to bargaining in good faith with such representatives.

5.7 Ethical Conduct

- 5.7.1 PCI is committed to acting fairly and ethically in our business practices. Our Code of Ethics and Business Conduct provide more details and covers the following topics: Work Environment; Compliance with Laws and the Code; Company Property, Information and Business Practices; and Conflict of Interest.

5.8 Information Security

- 5.8.1 PCI is committed to ensuring the security, accuracy and confidentiality of all our information assets. PCI is committed to protecting confidential, restricted and proprietary information of its own operation and third parties. Our Code of Ethics and Business Conduct provides more details and covers the following topics: Confidential, Restricted, and Proprietary Information; Cybersecurity; Intellectual Property / Work Product; Accuracy and Integrity of Business Records; Records and Information Management; Business Communications; and Privacy of Personal and Third Party, Nonpublic Data.

5.9 Targets

- 5.9.1 General Targets:
- 5.9.1.1 Train 100% of employees on the Policy in 2026
- 5.9.1.2 Provide PCI's business partners with the Policy starting in 2027.
- 5.9.2 Child Labor, Forced Labor & Human Trafficking targets:
- 5.9.2.1 Train 100% of employees on child labor, slavery, and human trafficking issues by 2026.
- 5.9.2.2 Perform risk assessments to identify operations exposed to potential child and/or forced labor.



- 5.9.3 External Stakeholder Human Rights targets:
 - 5.9.3.1 Provide 8 hours of company paid Community Impact volunteer time off for employees by 2026.
 - 5.9.3.2 Provide corporate matching support to regular employees for eligible donations to approved non-profit organizations.
- 5.9.4 Freedom of Association and Collective Bargaining targets:
 - 5.9.4.1 Ensure that employees have access to a formal worker representative body with established communication channels.
 - 5.9.4.2 Implement quarterly town hall meetings or equivalent forums to facilitate open dialogue and direct feedback between employees and management.
- 5.9.5 Ethics targets:
 - 5.9.5.1 Train all employees on ethics issues (including corruption, fraud, money laundering, and conflict of interest) by 2026.
 - 5.9.5.2 Establish a due diligence procedure in 2025 to evaluate third parties.
 - 5.9.5.3 Implement a risk assessment process to evaluate risks.

5.10 Reporting for Employees

- 5.10.1 Any employee who believes a conflict exists between the language of this policy and the laws, customs and practices where he or she works, or who has questions about this policy or would like to confidentially report a potential violation of this policy, should raise those questions and concerns with local management, Human Resources, or the Legal Department.
- 5.10.2 Employees can also report suspected policy violations through the compliance hotline, which permits anonymous reporting. The Lighthouse Services, LLC PCI Ethics Hotline information is posted in our facilities and is intended to supplement, not replace, other channels for communicating questions and concerns within the organization. Callers cannot be identified through caller ID.
 - 5.10.2.1 In order to ensure a timely investigation takes place, you should report as many facts as possible (who, what, when, where, etc.). While you can report complaints anonymously to the Hotline, the Company's ability to conduct a thorough investigation may be limited if it does not have the opportunity to speak with you as part of its investigation.
 - 5.10.2.1.1 In the United States, dial 1-(855) 724-7827
 - 5.10.2.1.2 Internationally, dial 0-(808) 189-1029
 - 5.10.2.2 The Hotline is available 24 hours a day, 7 days a week and is operated by specially trained third-party representatives. Callers are given a case number and have the opportunity to call back to check on the status of their report.
- 5.10.3 No reprisal or retaliatory action will be taken against any employee for raising concerns under this policy.
- 5.10.4 The Company will investigate, address, and respond to the concerns of employees and will take appropriate corrective action in response to any violation of this policy.



- 5.10.5 If you are an officer, director, manager, or supervisor and a PCI employee, contractor, customer, or business partner reports to you that they or anyone else may have observed a violation of this policy, you must report this immediately by contacting Human Resources or the Legal Department. You may neither keep the complaint confidential nor investigate the complaint on your own.
- 5.10.6 An officer, director, manager or supervisor also must report immediately to Human Resources or the Legal Department a potential violation of this policy which they witness or of which they otherwise become aware, even in the absence of a complaint or objection.

5.11 Participating in Investigations

- 5.11.1 Employees are expected to cooperate fully and honestly in any investigations conducted by the Company of alleged violations of this policy. Failure to cooperate may be cause for corrective action up to and including termination of employment. Any individual who knowingly and in bad faith provides false, incomplete or misleading information as part of an investigation (whether such individual is the complainant, the accused or a witness) will be subject to corrective action up to and including termination of their employment or business relationship with the Company.

5.12 Appeal Procedure

- 5.12.1 If you are not satisfied with how your complaint has been handled, for whatever reason, you may appeal the outcome by addressing a complaint to the Local Compliance Officer in Human Resources or the Company's Chief Compliance Officer. Your appeal communication should be in writing to help ensure that the facts are clear with the issue that you wish to have reviewed. While we encourage you to be detailed, it is sufficient to say "I wish to appeal the decision on [or outcome of] my discrimination / harassment / retaliation / accommodation complaint." You also may appeal by using the Lighthouse Services, LLC PCI Ethics Hotline discussed above.

5.13 Sanctions for Violations of the Company's Labor and Human Rights Policy

- 5.13.1 Any officer, director, manager, supervisor, employee or non-employee who, after appropriate investigation, has been found to have engaged in activities in violation of this policy (even if not unlawful) will be subject to appropriate corrective/disciplinary action, up to and including termination of the person's employment or other relationship with our Company. The corrective action will be prompt and proportionate, designed not only to remedy the wrong but also to prevent future harm.
- 5.13.2 Any officer, director, manager or supervisor who fails to make a report immediately as required by this policy will be subject to appropriate corrective action, up to and including termination of the person's employment relationship with our Company.

5.14 Review

- 5.14.1 To ensure the continued validity and accuracy of this policy, an annual review will be carried out by the Policy Owner listed in the "Responsibilities" section of this document.

6. References

- 6.1 POL-00010 PCI Code of Ethics and Business Conduct
- 6.2 PCI's Supplier Code of Conduct

