SUSTAINABILITY STATEMENT

2025

Techdow
A Hepalink Company

Table of contents

Letter to Stakeholders

Dear Stakeholders,

I am pleased to present the third edition of our Sustainability Report, which reflects the path Techdow Pharma Italy has taken towards sustainable and responsible growth, fully in line with the values that guide our actions as a global company and Italy's leading distributor of heparin.

In a context where technological innovation is a key driver of development, we believe it is essential to systematically integrate environmental, social and governance (ESG) principles into our operations, with the aim of creating lasting value for all our stakeholders and making a positive contribution to the economic and social fabric.

Over the past nine years, Techdow Pharma Italy has consolidated its position, building an organisational structure comprising 14 direct employees and around 40 outsourced Pharmaceutical Representatives. The Company is a leading example of Italy's commercial excellence and forms part of the Hepalink Group, an internationally recognised organisation with which we share a strong, long-term industrial vision, while remaining firmly rooted in our distinctive values.

The Group's entrepreneurial nature enables us to adopt a medium- to long-term strategic approach, characterised by flexibility in decision-making and the ability to respond promptly to changes in the business environment. From this perspective, sustainability is a central element of our business model, not only as a guiding principle, but also as a driver of value creation, innovation and competitiveness. In fact, we have integrated ESG criteria into both our range of products and services and our operational processes to support a responsible digital transition.

Over the past year, we have further strengthened this commitment, translating it into tangible results.

In terms of environmental sustainability, we promote flexible working arrangements, including remote working, with a view to reducing travel, cutting energy consumption and helping to minimise our environmental impact.

As for gender diversity, women account for 66% of the Board of Directors and 69% of the workforce. We have also stepped up our efforts to raise awareness of ESG issues within our governance bodies, including through specific training programmes, and have incorporated sustainability criteria into our staff remuneration policies.

When it comes to corporate governance, we have implemented an organisational model in accordance with Legislative Decree 231/2001. Operational within the company for several years, the model has been ISO 9001:2015 certified since 2021 and obtained ISO 14064-1:2018 certification in 2023.

We are also committed to obtaining social responsibility certifications, including UNI/PdR 125:2022 on gender equality, which we achieved in 2024.

Our commitment to our employees' well-being and to achieving a healthy work-life balance is further underlined by the fact that, for the fifth consecutive year, we have been awarded the Great Place to

Work certification, which represents an important endorsement of our workplace culture by our staff. The “Best People First” project is another part of this initiative, aimed at promoting the development and recognition of internal talent.

In addition to the indicators required by current regulations for sustainability reporting, the Hepalink Group launched a further analysis of its business projects in 2024. This initiative has highlighted the Group’s tangible contribution to achieving the Sustainable Development Goals, enabling it to bring forward the target set out in the Sustainability Plan, which was originally scheduled for 2025, regarding the expansion of our range of innovative solutions aimed at improving ESG performance.

Finally, I would like to express my sincere gratitude to all our stakeholders for their trust and cooperation. This Report represents not only an opportunity to illustrate our performance, but also a renewed commitment to continuing on a path of sustainable, inclusive and responsible growth.

Giorgio Foresti
CEO Techdow Pharma Italy

Highlights

Environmental

442.92 MWh
of energy consumed

Organisational Carbon Footprint
in accordance with ISO 14064

3,708.18 tCO_2eq
of total location-based emissions

Scope 1 and 2 emissions represent < 3%
of our overall climate impact

Social

14 employees
79% women - 21% men

UNI PdR 125:2022
on gender equality

No accidents
at work

Great Place to Work Award®
2025

Best People First Project
dedicated to the professional development of the entire Techdow team

Social responsibility
research and community initiatives

Governance

ISO 9001 Certification
for quality management

Organisational Model
in compliance with Legislative Decree 231/2001

Whistleblowing
system in operation

No incidents of corruption
or bribery

The identity and history of Techdow

Techdow Pharmaceutical Co. was founded in 2004 in Shenzhen, China, and quickly established itself as a major player in the global pharmaceutical industry. Thanks to steady growth and a strong vocation for innovation, the company is now recognised as the world's leading producer of heparin and the first Chinese Big Pharma to obtain marketing authorisation for its drugs in Europe.

Techdow's international journey started in 2016 with the opening of its first branch in Poland. By 2017, the company had already established sites in Italy, Germany, Spain and the UK.

Techdow is also the only Chinese manufacturer of enoxaparin sodium to have successfully passed GMP checks in Europe, the US, Australia and Brazil. With a production capacity of 600 million pre-filled syringes and a network of over 40 global partnerships, the company is a leader in the production of low molecular weight heparin.

The Italian subsidiary, Techdow Pharma Italy S.r.l., stands out on the national scene for its commitment to the prevention and treatment of thromboembolic events, through the distribution of biosimilar enoxaparin sodium, an anticoagulant used in both prophylaxis and therapy.

Since November 2017, when Inhixa was launched on the Italian market, the company has experienced steady growth, consolidating its presence through a network based on medical-scientific information, collaborations with scientific organisations, and participation in regional tenders. In nine years, Techdow Pharma Italy has established itself as a key player across both the hospital and territorial healthcare sectors.

In recent years, Techdow has expanded its efforts into new therapeutic areas:

2024

- ✓ The company enters the gynaecological sector with the UBIGEL DONNA project, a spermidine-based treatment for vulvodynia, presented at a press conference in Montecitorio.

2023

- ✓ Inhixa is approved for reimbursement when used in the treatment of pulmonary embolism (PE) and deep vein thrombosis (DVT) and prevention of recurrence in patients with active cancer. In the course of the year, the INSIEME project was launched, dedicated to promoting cooperation with Italian emergency rooms.

2022

- ✓ The company receives the “Best Workplaces” award and is certified as a “Great Place to Work”, enhancing its corporate culture based on the values of Harmony, Honesty, Respect and Integrity (*Armonia, Onestà, Rispetto e Integrità/*AORI). In addition, the company takes its first step towards a new therapeutic field, oncology, with the inOnco project, which concludes a year later with a positive result in terms of information and training on PE and DVT for oncologists.

2021

- ✓ The results of the INHIXACOVID19 Study are presented at the SIMIT National Congress and the docufilm “Backstage” is released, a testimony of the company's commitment during the pandemic.

2020

- ✓ The company tackles the pandemic by digitising scientific information and launching the InhixaCovid19 study.

2019–2018

- ✓ Techdow strengthens its regional network and scientific information towards General Practitioners, consolidating its presence in hospital tenders.

2017–2016

- ✓ Inhixa is launched in Europe and gets EMA approval.

- ✓ Techdow looks to the future with the aim of expanding its portfolio in strategic therapeutic areas such as gynaecology, rheumatology and endocrinology while maintaining its central focus on quality, innovation and sustainability.

GENERAL INFORMATION

[ESRS 2]

General Information [ESRS 2]

This document contains the sustainability declarations of Techdow Pharma Italy, drawn up on a voluntary basis and in compliance with the principles of Directive 2022/2464/EU (CSRD - Corporate Sustainability Reporting Directive) and the relevant European Sustainability Reporting Standards (ESRS), implemented in Italy with Legislative Decree 125 of 6 September 2024.

In 2025, the European regulatory framework introduced significant changes: under the Omnibus Package and the "Stop the Clock" proposal, the start date for CSRD obligations was postponed by two years, while the scope of application was redefined to cover only companies with more than 1,000 employees and at least one of the following: €50 million in revenue or €25 million in equity. At the same time, the ESRS are currently being revised to simplify the structure, and are expected to be transposed by Member States by 2027.

In this evolving landscape, Techdow Pharma Italy has reaffirmed its commitment to comprehensive, reliable reporting that is consistent with European principles, adopting best practices even in the absence of regulatory requirements.

Therefore, while not currently subject to regulatory reporting requirements, the company has chosen to adopt a transparent approach aligned with European sustainability standards.

The report was prepared with the methodological support of Tecno ESG.

The reporting period is the 2025 financial year (1 January 2025 - 31 December 2025).

[BP-1] General basis for preparation of the sustainability statement

The sustainability statement has been prepared on an individual basis. The description of the disclosures places greater emphasis on own operations. In identifying and analysing impacts, risks and opportunities (IROs), the value chain was considered whenever the nature of activities, business relationships, geographies or other factors were deemed significant for Techdow Pharma Italy. The policies and actions adopted follow the same logic, where applicable. There are no omissions of classified, sensitive or specific information corresponding to intellectual property, know-how or innovation results, nor are there any particular disclosures concerning upcoming developments or issues under negotiation.

[BP-2] - Disclosures in relation to specific circumstances

Time horizons

In this statement, the time horizons defined in ESRS 1, i.e., short term (the year of the financial statement); medium term (up to five years after the end of the short term); and long term (beyond five years) were used.

Estimates

In cases where the metrics are subject to significant uncertainty, the assumptions, proxies and calculation methods are clearly outlined in the reference paragraph.

Changes in preparation or presentation of sustainability information and reporting errors in prior periods

The transition from the GRI standards to the ESRS in 2024 involved an update of the reporting model, but the data remain fully interoperable with the previously used standard. No reporting errors have been identified in previous periods.

Disclosures stemming from other legislation or generally accepted sustainability reporting pronouncements

This report does not include additional information prescribed by other legislation containing sustainability reporting requirements.

[GOV-1] The role of the administrative, management and supervisory bodies

The corporate structure of Techdow Pharma Italy

Techdow Pharma Italy is 100% owned by a sole shareholder, Techdow Pharma B.V., based in Amsterdam. It is managed by a Board of Directors established in 2024 and chaired by the Chairman of the Board Giorgio Foresti and Directors Shi Wen and Chen Juan.

Board of Directors

The Board of Directors (BoD) holds the powers for the ordinary and extraordinary management of Techdow to pursue the corporate purpose in compliance with the law and the articles of association, guaranteeing the management of corporate affairs, the legal representation of the company, and the preparation of the financial statements. The formalised procedure for appointing the Board of Directors, specifically the two members appointed to support the Chairperson, who also holds the role of Chief Executive Officer of the Company, is defined by the Chinese parent company Hepalink.

Specifically, the Board of Directors is the body responsible for the strategic and operational management of the company, with the task of defining long-term objectives and ensuring their achievement. It deliberates on business plans and major economic and financial operations, overseeing the use of resources and the most significant investment decisions. The BoD appoints and, if necessary, dismisses the Chief Executive Officer, the Supervisory Board and the management team, defining remuneration policies and monitoring their work to ensure the achievement of the company's objectives. In addition, it monitors compliance with statutory and regulatory provisions and ensures the efficiency of internal control systems. Finally, the BoD represents the company in relations with third parties, exercising the powers of signature and representation provided for in the articles of association.

The Board of Directors has a key role in promoting and coordinating the company's sustainability strategies, guiding projects and ensuring that they are fully integrated into operations.

Over the past two years, the company has gained specific expertise through a structured process of ESG Assessment, Sustainability Reporting, Organisational Carbon Footprint analysis, and implementation and maintenance of the Gender Equality Management System in accordance with UNI/PdR 125:2022. With this in mind, in 2024, the members of the Board of Directors participated in a training course dedicated to ESG issues, an opportunity to strengthen skills and raise awareness with a view to guiding corporate decisions in an increasingly responsible and long-term oriented manner.

These activities were carried out in conjunction with Tecno ESG, a specialised consulting firm, which contributed significantly to the organisation's strategic development in the area of sustainability. The process was followed directly by the management team and Operation Manager Milena Corneo, confirming the company's commitment to consolidating sustainable and inclusive governance, and by the Head of the Gender Equality Management System Giada Monguzzi.

First name Surname	Role within the BoD
Foresti Giorgio	Chair
Shi Wen	Director
Chen Juan	Director

Under the adopted multi-tier governance structure, the management of the company is entrusted to the Chief Executive Officer Giorgio Foresti. 100% of the members of the Board of Directors are aged over 50, and 67% are women.

The organisational structure and consulting areas in which the company operates are identified by the organisational chart, which has been extended in accordance with the Organisational, Management and Control Model pursuant to Legislative Decree 231/2001 (231 Model).

Control bodies

The statutory audit is managed by a specialised third party company (Emme & PS S.r.l.), whose task is to manage the bookkeeping and the correct recording of operating events in the accounting records; it also monitors whether the financial statements correspond to the accounting records and expresses an opinion on the financial statements.

The Supervisory Board (SB) of Techdow Pharma Italy S.r.l. is a collegial body composed of two external professionals with proven expertise in compliance matters pursuant to Legislative Decree 231/2001 and in internal control systems, with no conflict of interest. The composition and term of office of the SB are laid down by resolution of the Board of Directors.

The Supervisory Board is responsible for ensuring the effective functioning, compliance, implementation and updating of the Organisation, Management and Control Model (231 Model). Its responsibilities also include overseeing the timely implementation of whistleblowing channels and procedures, ensuring their effectiveness and accessibility. The Supervisory Board draws up reports on the implementation of the Model, indicates any critical issues and proposes corrective measures. There are two reporting lines: one to the Chair of the Board of Directors, and the other to the Board of Directors.

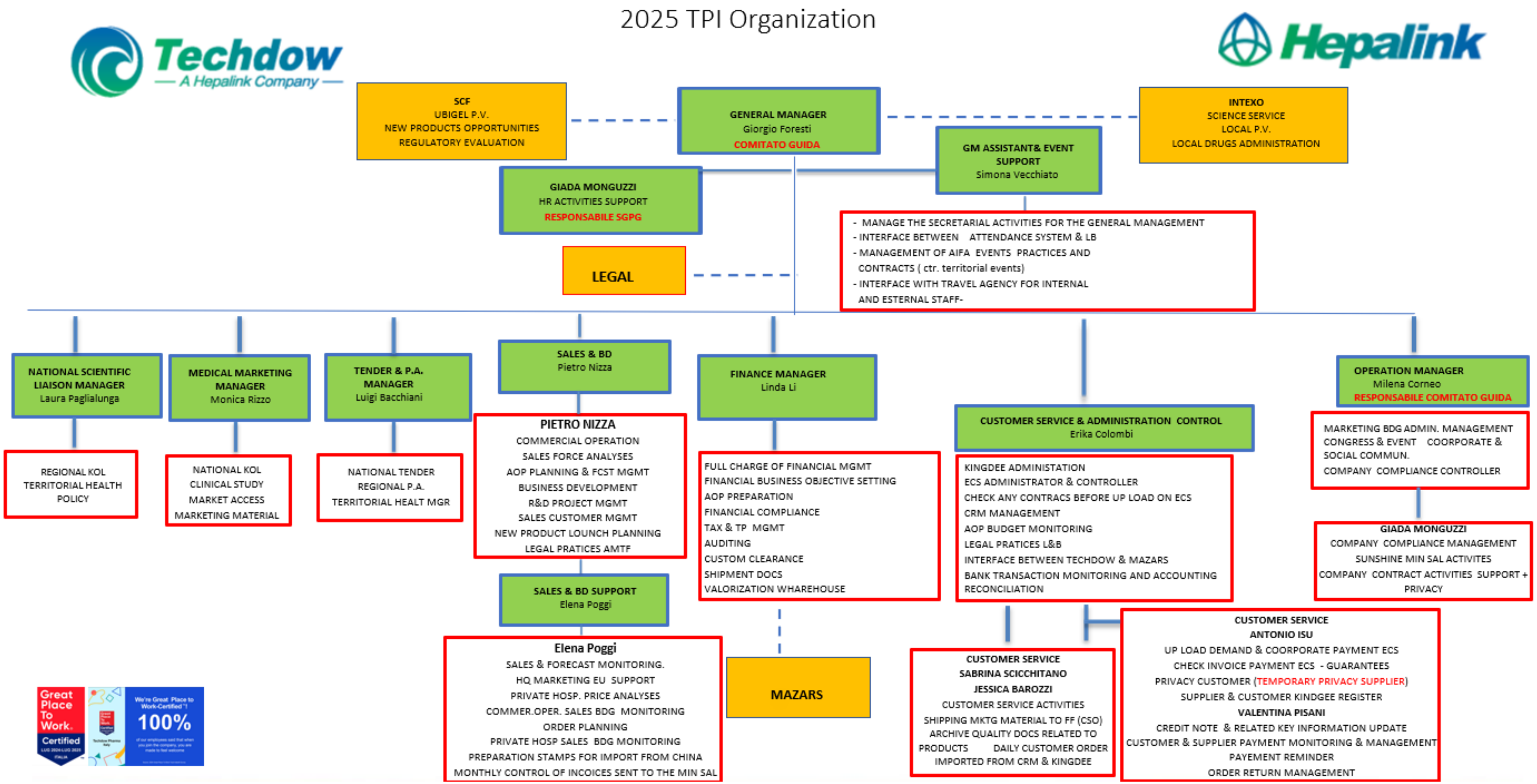
Management

Techdow's management structure consists of ten management functions, organised according to the organisation chart below.

The management functions are responsible for managing processes, controls and activities to effectively manage relevant impacts, risks and opportunities.

The process to update the 2025 organisational chart involved the establishment and appointment of the Steering Committee, its Chair, and the Head of the Gender Equality Management System.

In addition, a job description detailing the specific responsibilities of each employee according to their role within the company has been drawn up and shared with the Parent Company.


2025 TPI Organization
Techdow
A Hepalink Company
Hepalink
SCF
UBIGEL P.V.
NEW PRODUCTS OPPORTUNITIES
REGULATORY EVALUATION
GENERAL MANAGER
Giorgio Foresti
COMITATO GUIDA
INTEXO
SCIENCE SERVICE
LOCAL P.V.
LOCAL DRUGS ADMINISTRATION
GM ASSISTANT& EVENT SUPPORT
Simona Vecchiato
GIADA MONGUZZI
HR ACTIVITIES SUPPORT
RESPONSABILE SGPG
LEGAL
- MANAGE THE SECRETARIAL ACTIVITIES FOR THE GENERAL MANAGEMENT
- INTERFACE BETWEEN ATTENDANCE SYSTEM & LB
- MANAGEMENT OF AIFA EVENTS PRACTICES AND CONTRACTS (ctr. territorial events)
- INTERFACE WITH TRAVEL AGENCY FOR INTERNAL AND ESTERNAL STAFF-
NATIONAL SCIENTIFIC LIAISON MANAGER
Laura Paglialunga
REGIONAL KOL
TERRITORIAL HEALTH POLICY
MEDICAL MARKETING MANAGER
Monica Rizzo
NATIONAL KOL
CLINICAL STUDY
MARKET ACCESS
MARKETING MATERIAL
TENDER & P.A. MANAGER
Luigi Bacchiani
NATIONAL TENDER
REGIONAL P.A.
TERRITORIAL HEALT MGR
SALES & BD
Pietro Nizza
PIETRO NIZZA
COMMERCIAL OPERATION
SALES FORCE ANALYSES
AOP PLANNING & FCST MGMT
BUSINESS DEVELOPMENT
R&D PROJECT MGMT
SALES CUSTOMER MGMT
NEW PRODUCT LOUNCH PLANNING
LEGAL PRATICES AMTF
SALES & BD SUPPORT
Elena Poggi
Elena Poggi
SALES & FORECAST MONITORING.
HQ MARKETING EU SUPPORT
PRIVATE HOSP. PRICE ANALYSES
COMMER.OPER. SALES BDG MONITORING
ORDER PLANNING
PRIVATE HOSP SALES BDG MONITORING
PREPARATION STAMPS FOR IMPORT FROM CHINA
MONTHLY CONTROL OF INCOICES SENT TO THE MIN SAL
FINANCE MANAGER
Linda Li
FULL CHARGE OF FINANCIAL MGMT
FINANCIAL BUSINESS OBJECTIVE SETTING
AOP PREPARATION
FINANCIAL COMPLIANCE
TAX & TP MGMT
AUDITING
CUSTOM CLEARANCE
SHIPMENT DOCS
VALORIZATION WHAREHOUSE
MAZARS
CUSTOMER SERVICE & ADMINISTRATION CONTROL
Erika Colombi
KINGDEE ADMINISTATION
ECS ADMINISTRATOR & CONTROLLER
CHECK ANY CONTRACS BEFORE UP LOAD ON ECS
CRM MANAGEMENT
AOP BUDGET MONITORING
LEGAL PRATICES L&B
INTERFACE BETWEEN TECHDOW & MAZARS
BANK TRANSACTION MONITORING AND ACCOUNTING RECONCILIATION
CUSTOMER SERVICE
SABRINA SCICCHITANO
JESSICA BAROZZI
CUSTOMER SERVICE ACTIVITIES
SHIPPING MKTG MATERIAL TO FF (CSO)
ARCHIVE QUALITY DOCS RELATED TO PRODUCTS
DAILY CUSTOMER ORDER IMPORTED FROM CRM & KINGDEE
CUSTOMER SERVICE
ANTONIO ISU
UP LOAD DEMAND & COORPORATE PAYMENT ECS
CHECK INVOICE PAYMENT ECS - GUARANTEES
PRIVACY CUSTOMER (TEMPORARY PRIVACY SUPPLIER)
SUPPLIER & CUSTOMER KINDGEE REGISTER
VALENTINA PISANI
CREDIT NOTE & RELATED KEY INFORMATION UPDATE
CUSTOMER & SUPPLIER PAYMENT MONITORING & MANAGEMENT
PAYEMENT REMINDER
ORDER RETURN MANAGEMENT
OPERATION MANAGER
Milena Corneo
RESPONSABILE COMITATO GUIDA
MARKETING BDG ADMIN. MANAGEMENT
CONGRESS & EVENT COORPORATE & SOCIAL COMMUN.
COMPANY COMPLIANCE CONTROLLER
GIADA MONGUZZI
COMPANY COMPLIANCE MANAGEMENT
SUNSHINE MIN SAL ACTIVITES
COMPANY CONTRACT ACTIVITIES SUPPORT + PRIVACY
Great Place To Work. Certified
We're Great Place to Work-Certified™!
100%

[GOV-2] Information provided to and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies

Techdow's governance team has reviewed and approved this Sustainability Report, which includes information on policies, actions, targets and metrics for the financial year 2025.

Governance supports the integration of ESG factors into strategic planning and decision-making. In the first half of 2025, the management functions and Operation Managers were actively involved in the Double Materiality assessment process, carried out as part of the preparation of the 2024 report. The periodic bi-monthly meetings allowed for a comprehensive Double Materiality Assessment to be carried out, an opportunity to systematically review and assess all impacts, risks and opportunities (IROs) relevant to the company and to define the sustainability strategy. This activity was carried out with the support of external sustainability consultants.

The relevant IROs identified in the double materiality analysis process represent a framework that is consistent and aligned with the company's strategic objectives, risk analysis and previously adopted targets, as well as the current situation of the industry. The list of IROs can be found in the relevant section in chapter [SBM-3]. For this report, the outcome of the previous year's double materiality assessment remains valid, as no new impacts, risks or opportunities have been identified.

[GOV-3] Integration of sustainability-related performance in incentive schemes

There are currently no incentives or bonus components of remuneration linked to the achievement of sustainability objectives and/or targets.

[GOV-4] Statement on due diligence

The due diligence process is expressed in the following disclosure requirements set forth in ESRS 2 and the topical ESRS:

Core elements of due diligence	Paragraphs in the sustainability statement
a) Embedding due diligence in governance, strategy and business model	ESRS 2 GOV-2, ESRS 2 SBM-3
b) Engaging with affected stakeholders in all key steps of the due diligence	ESRS 2 GOV-2, ESRS 2 SBM-2, ESRS 2 IRO-1, ESRS 2 MDR-P: S1; G1
c) Identifying and assessing adverse impacts	ESRS 2 IRO-1, ESRS 2 SBM-3
d) Taking actions to address those adverse impacts	ESRS 2 MDR-A: E1; S1
e) Tracking the effectiveness of these efforts and communicating	ESRS 2 MDR-M: E1; S1; G1 ESRS 2 MDR-T[1]: S1; G1

Techdow Pharma Italy has internal procedures in place to prevent incidents of regulatory non-compliance or events that could in any way harm company personnel, external stakeholders and/or

[1] Information on policies (MDR-P), actions (MDR-A), metrics (MDR-M) and targets (MDR-T).

the company's reputation in general. The company operates in line with its Code of Ethics, Whistleblowing Procedures, a Supervisory Board and its Quality and Gender Equality Management System.

Currently, the company does not conduct any specific controls over environmental and social issues in the supply chain: due diligence activities are limited to the verification of environmental, social and governance regulatory compliance. The first step towards this was to conduct a materiality assessment, which allowed the company to identify relevant impacts, risks and opportunities related to ESG issues and to systematise its policies, actions and tools through this first sustainability reporting exercise structured on ESRS standards. The company's approach is based on the careful selection and verification of partners, favouring high standards of quality, safety and reliability. The procedures adopted - 231 Model and Code of Ethics - aim to prevent offences such as money laundering, self-money laundering, bribery between private individuals, corporate offences and organised crime, promoting an approach based on legality, transparency and integrity.

[GOV-5] Risk management and internal controls over sustainability reporting

Risks related the sustainability reporting process include: non-compliance with relevant regulations; tools and reliability of data flows; insufficient oversight and governance of sustainability information; inaccurate or incomplete data. The reporting process directly involves senior management, which takes responsibility for risk management by overseeing the report's compliance with regulatory standards and ensuring the direct collection, verification and processing of relevant data, in addition to verifying the accuracy of the quantitative indicators provided.

[SBM-1] Strategy, business model and value chain

Our business model

Techdow Pharma Italy S.r.l. operates in the wholesale and retail trade of pharmaceuticals and parapharmaceuticals. Techdow's mission is to provide high-quality pharmaceutical solutions to patients. Techdow is committed to continuous improvement and ensures that all products meet the highest quality standards. The company is oriented towards meeting the needs of patients, customers, employees, investors, regulatory officials and all stakeholders involved.

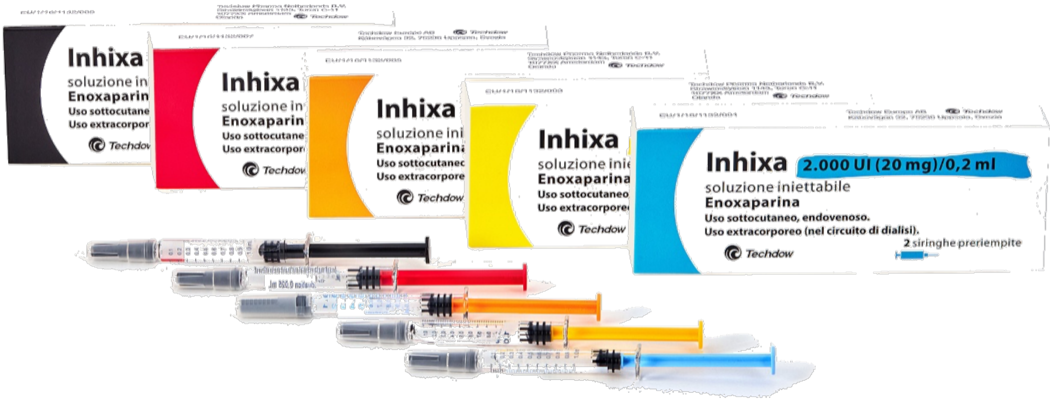
The main product marketed in Italy is biosimilar enoxaparin sodium, sold under the name “Inhixa”. This drug belongs to the category of heparins, and more specifically to heparinics, and is available as an injectable solution. Inhixa is indicated for the treatment of several conditions related to blood clotting. In particular, it is used for:

- the prevention of venous thromboembolism (VTE) in surgical patients at moderate or high risk, especially in orthopaedic or general surgery, including oncology;
- VTE prophylaxis in non-surgical patients with acute conditions (such as acute heart failure, respiratory failure or rheumatic diseases) with reduced mobility;
- the treatment of deep vein thrombosis (DVT) and pulmonary embolism (PE), except for cases requiring thrombolytic or surgical therapy;
- the prevention of thrombus formation in the extracorporeal circulation during haemodialysis;
- the treatment of acute coronary syndrome, including unstable angina and myocardial infarction without ST-segment elevation (NSTEMI), in combination with oral acetylsalicylic acid, as well as the treatment of acute myocardial infarction with ST-segment elevation (STEMI), including in patients managed exclusively with pharmacological therapy or intended for subsequent percutaneous coronary intervention (PCI).

During the pandemic, the company promoted and developed the “InhixaCovid19” study, authorised by AIFA. This was a multicentre study involving 14 Italian centres with the aim of evaluating the safety and anticoagulant efficacy of the drug in patients with Covid-19. The results of the study, presented at the 20th SIMIT National Congress in Milan in 2021, highlighted the company's commitment to research and to responding to emerging therapeutic needs.

In 2023, Inhixa achieved an important recognition as the first and only enoxaparin effective in the treatment of pulmonary embolism (PE) and deep vein thrombosis (DVT), as well as in the prevention of recurrence in cancer patients with active cancer. Our awareness of our role in the national health landscape is a constant driver of improvement and responsibility.

In 2024 Techdow became involved in the treatment of vulvodynia, an intimate disorder that can be transitory or chronic, which involves the activation of the painful nerve endings in the vulvar area up to the vaginal introitus (which in some cases extends to the anal and perianal area) through the distribution and sale of the Ubigel Donna medical device, capable of improving and supporting genitourinary trophism with high bioadhesive capacity on the tissues, forming a trophic film capable of supporting the recompaction of the epithelial and connective layers. Ubigel Donna adheres to the genitourinary tissues and gradually reduces discomfort. The nature of the product allows it to be used in combination with treatments for vaginal infections.


Inhixa
2.000 UI (20 mg)/0,2 ml
soluzione iniettabile
Enoxaparina
Uso sottocutaneo, endovenoso.
Uso extracorporeo (nel circuito di dialisi).
2 siringhe preriempite
Techdow


NEOPARIN
Enoksaparyna sodowa
roztwór do wstrzykiwań
10 000 j.m.
6000 j.m. (60 mg)/0,6 ml
8000 j.
4000 j.
2000 j.m. (20 mg)/0,2 ml


NDC 81952-115-07 ℞ only
HEPARIN
SODIUM INJECTION, USP
2,000 USP Units /2 mL
(1,000 USP Units/mL)
NOT FOR LOCK FLUSH
For Intravenous or Subcutaneous use
Preservative Free
25 Single Dose Vials
2 mL
Techdow
Derived from Porcine Intestinal Mucosa
HEPARIN
SODIUM INJECTION, USP
5,000 USP Units/mL
1 mL


UBIGEL
DONNA
Vulvodinia
Vulvodynia
UBIGEL
DONNA

Sustainability Strategy

Techdow Pharma Italy's sustainability strategy is based on an integrated approach that combines process quality, social equity, environmental responsibility and a growing ethical awareness. Through the adoption of internationally recognised standards, the company consolidates its commitment to sustainable growth, in line with its corporate vision and ESG goals. The certifications held and tools adopted are described below.

ISO 9001 - Quality Management System

✓ Techdow has adopted the ISO 9001 standard, which defines the requirements for improving the effectiveness and efficiency of business processes, with the aim of increasing customer satisfaction and ensuring continuous improvement.

UNI PdR 125:2022 - Gender Equality Management System

✓ The company has implemented the UNI PdR 125:2022 system, which provides for the adoption of specific KPIs (Key Performance Indicators) relating to equality and equal treatment policies within the organisation. The certification process was successfully completed in 2024 and was renewed for the first time in 2025.

Best People First Project - A programme for personal development and empowerment

✓ By year-end 2025, all staff had been involved in the Hengi “Best People First” project, which aims to nurture talent, develop the company’s organisational performance, conduct an annual analysis of the workplace atmosphere, and promote strategic recruitment, with a view to enhancing well-being and engaging the entire organisation in the company’s success.

ESG Assessment - Our first step towards complete awareness

✓ Aware of the impact of its activities on the internal and external environment, Techdow has voluntarily conducted an ESG Assessment. This tool made it possible to measure the company's environmental, social and governance performance, identify the most relevant ESG issues for the sector, and map stakeholders to build positive and mutually beneficial partnerships. The Assessment was conducted according to the GRI Standards.

Organisational Carbon Footprint - Measuring emissions

✓ Techdow started calculating greenhouse gas emissions according to UNI EN ISO 14064:2019 in 2023, updating the data in 2024 and 2025. The analysis makes it possible to identify inefficiencies and structure the basis for a mitigation strategy.

Sustainability reporting

✓ This report marks the third year of Techdow's commitment to increase transparency and ESG data sharing, aligning itself with the ESRS standards of the Corporate Sustainability Reporting Directive (CSRD) while maintaining interoperability with the GRI framework. This dual consistency allows the company to ensure international comparability, sector relevance and European regulatory adherence, strengthening its ability to measure, communicate and improve ESG performance. The report is not just an informative document, but a strategic tool to guide decisions, involve stakeholders and consolidate sustainability as a distinctive element of the business model.

Value chain

Techdow Pharma Italy's value chain consists of three stages: upstream, own operations and downstream, involving national and international players along the entire production and distribution cycle.

The initial phase is handled by the parent company Hepalink in China, which takes care of the pig rearing business, which represents the primary source of the biological material; extraction and processing to produce the heparin; packaging, storage and shipping logistics.

Subcontractors for the supply of energy, fuel and packaging materials are also involved in this phase. The lots are then transported to the port of Genoa where they are cleared through customs by Euromed Pharma Service S.r.l. (Euromed Pharma) and transported for storage at Euromed Pharma's logistics warehouse (Grezzago MI), quality controlled by Sciencepharma (Poland) and monitored through pharmacovigilance services managed by Intexo (Rome).

The Italian office, Techdow Pharma Italy (Assago), is responsible for order management, logistics coordination and the purchase of pharmaceutical stamps from the State Mint.

Distribution of lots to end customers is handled by Euromed Pharma, while heparin is used by hospitals and public and private healthcare facilities. Finally, used syringes are disposed of by companies specialised in the treatment of hazardous medical waste.

The figure below shows the production site of the Chinese parent company.

The business’ value chain is mapped on the following page. For each stage (upstream value chain, own operations, downstream value chain), activities, resources and relationships are indicated in italics and main actors in the chain are shown in bold.

Techdow Pharma Italy - Value Chain

<table>
<tr><th colspan="4">Upstream value chain</th><th>Own operations</th><th colspan="3">Downstream value chain</th></tr>
<tr><th colspan="4">Workers in the value chain</th><th>Own workforce</th><th colspan="3">Workers in the downstream value chain</th></tr>
<tr><td colspan="4">Heparin production, quality control and inbound logistics</td><td>Operational activities of Techdow Pharma Italy</td><td colspan="3">Distribution, sale, use and end of life</td></tr>
<tr><th>Subcontractors</th><th>Hepalink</th><th>Euromed Pharma</th><th>Sciencepharma Intexo</th><th>Techdow Pharma Italy</th><th>Euromed Pharma</th><th>Hospitals and private and/or contracted nursing homes</th><th>Special waste disposers</th></tr>
<tr><td rowspan="5">Procurement of energy carriers, packaging materials and fuel</td><td>Pig rearing</td><td rowspan="5">Withdrawal and storage</td><td rowspan="5">Quality control and pharmacovigilance</td><td rowspan="4">Job management</td><td rowspan="5">Transport</td><td rowspan="5">Purchase and use of heparin</td><td rowspan="5">Syringe disposal</td></tr>
<tr><td>Extraction of biological material</td></tr>
<tr><td>Heparin production</td></tr>
<tr><td>Packaging and storage</td></tr>
<tr><td>Transport</td><td>Purchase of pharmaceutical stamps</td></tr>
</table>

Techdow
A Hepalink Company

[SBM-2] Interests and views of stakeholders

To ensure an effective dialogue and strengthen links with stakeholders, Techdow structured a stakeholder mapping process, setting up channels of engagement, calibrating the frequency of engagement to the specific needs of each category, and identifying the relative objectives, so as to better understand and gather expectations and concerns and guide strategic decisions in a mutually beneficial relational context.

Through structured feedback and transparent dialogue, Techdow interacts with suppliers, customers, employees, trade unions, partners, regulators, banks, lenders, trade associations and certifiers, promoting constant discussion.

The identification of impacts was conducted with the direct involvement of the Owner and Operation Manager, integrating the input of expert consultants to ensure a thorough and reliable analysis.

Stakeholder	Engagement	Frequency	Targets
Banks and financial institutions	Institutional relations	Daily	Business efficiency and continuation
Employees	Employment relationship	Daily	Project sharing - pursuit of corporate objectives
Collaborators	Employment relationship	Weekly	Project sharing - pursuit of corporate objectives
Management	Employment relationship	Daily	Project sharing - pursuit of corporate objectives
Suppliers of goods	Supplier Portal	Ad hoc	Quality of supply
Service providers	Meetings	Ad hoc	Obtaining company certifications
Business partners	Code of conduct	Daily	Corporate objectives to be achieved
Customers	Customer Service	Daily	Customer satisfaction and achievement of business objectives
Distributors	Customer Service	Monthly	Corporate objectives to be achieved
Local governments	Regional and/or local communications	Monthly	Business efficiency and continuation
Social security and welfare Institutions	Tenders/supply of products	Monthly / Yearly	Business efficiency and continuation
Public control bodies	Approval of activities	Weekly	Business efficiency and continuation
Non-profit organisations	Donations	Ad hoc	Network expansion
Cultural and/or sports associations	Sponsorships and/or donations	Ad hoc	Network expansion
Universities	Scholarships	Ad hoc	Network expansion
Research centres	New product development	Ad hoc	Business efficiency and continuation
National/local newspapers	Institutional relations	Ad hoc	Corporate reputation and external communication
Trade Magazines	Institutional relations	Ad hoc	Corporate reputation and external communication
Certification bodies	Institutional relations	Ad hoc	Obtaining company certifications

[SBM-3] Material impacts, risks and opportunities and their interaction with strategy and business model

The following issues were identified as "material" in the double materiality assessment:

ESRS	Topic	Sub-topic
E1	Climate change	Climate change mitigation
		Energy
E4	Biodiversity and ecosystems	Impacts on the state of species
E5	Resource use and circular economy	Resources inflows, including resource use
		Resource outflows related to products and services
S1	Own workforce	Working conditions
		Equal treatment and opportunities for all
		Other work-related rights
S3	Affected communities	Communities' economic, social and cultural rights
S4	Consumers and end-users	Information-related impacts for consumers and/or end-users
		Social inclusion of consumers and/or end-users
G1	Business conduct	Corporate culture
		Management of relationships with suppliers including payment practices

The following table shows the relevant IROs identified by topic and sub-topic under RA16 of ESRS 1. For the topic of own workforce, sub-topics are also identified.

List of material topics

ESRS - Topic	Sub-topic	Material impacts, risks and opportunities[2]		Localisation[3] U	Localisation[3] OO	Localisation[3] D	Time horizon[4] ST	Time horizon[4] MT	Time horizon[4] LT
E1 - Climate change	Climate change mitigation	**Greenhouse gas emissions** from own operations (scope 1 and 2) and from the value chain (scope 3)	I_N actual	■	■	■	●	●	●
		Disruption of production due to **possible extreme weather events**	R	■				●	
	Energy	**Energy consumption** and use of non-renewable **energy sources**	I_N actual	■	■		●	●	●
E4 - Biodiversity and ecosystems	Impacts on the state of species	Dependence on **intensive livestock farming** for production	I_N actual	■			●	●	●
		Reputational risks linked to dependence on intensive livestock farming	R	■					●
		Financial and regulatory risks associated with the introduction of stricter environmental regulations related to livestock management	R	■					●
E5 - Resource use and circular economy	Resources inflows, including resource use	**Use of natural resources and dependence on living organisms** for heparin production	I_N actual	■			●	●	●
		Use of **mono-dose materials and non-recycled plastics**	I_N actual	■			●	●	●
		Operational disruptions associated with **adverse events** (e.g. animal diseases) **that reduce the availability of raw materials**	R	■					●
		Risk of **increasing costs of virgin raw materials** used for primary packaging	R	■				●	
	Resource outflows related to products and services	Contamination of water supplies and organisms by **pharmaceutical residues**	I_N potential			■			●

ESRS - Topic	Sub-topic	Material impacts, risks and opportunities	U	OO	D	ST	MT	LT

[2] I_N = negative impact, I_P = positive impact, R = risk, O = opportunity.
[3] U = upstream value chain, OO = own operations, D = downstream value chain.
[4] ST = short term: the period adopted by the company as the reference period for its financial statements, MT = medium term: up to five years from the end of the short term reference period, LT = long term: beyond five years.

Techdow
— A Hepalink Company —

ESRS - Topic	Sub-topic	Material impacts, risks and opportunities		U	OO	D	ST	MT	LT
S1 - Own workforce	Working conditions	**Health and safety** of employees with preventive practices and measures	I_P actual		■		●	●	●
		Employee satisfaction and well-being through support and enhancement **of work-life balance**	I_P actual		■		●	●	●
		Promotion of loyalty and motivation among employees through positive work-life balance	O		■		●		
	Equal treatment and opportunities for all	**Training and skills development programmes** to provide employees with professional development opportunities	I_P actual		■		●	●	●
		Support for **diversity, inclusion and equal opportunities** in career development and training	I_P actual		■		●	●	●
		Guarantee of **equal pay** for work of equal value between all genders	I_P actual		■		●	●	●
		Improving employee efficiency, **competitiveness** and **promoting innovation** through continuous training	O		■		●		
		Employee **retention**, **reduction in turnover** and **reputational** advantage, through active support of equal opportunities	O		■		●		
		Risk of not being able to attract **new resources with the necessary profiles and skills**	R		■			●	
	Other work-related rights	Violation of the **data protection and privacy** of employees	I_N potential		■		●	●	●
S3 - Affected communities	Communities' economic, social and cultural rights	Promoting **health education** in communities with donations to support universities and non-profit organisations	I_P actual		■		●		
		Support for **inclusive and solidarity initiatives** with a concrete contribution to access to sport for individuals with autism and rare syndromes	I_P actual		■		●		
		Opportunities to **attract and recruit new** highly qualified **resources** and opportunities for strategic partnerships with research institutions	O		■			●	
		Promotion of loyalty and motivation among employees through initiatives supporting social development in communities	O		■		●		
S4 - Consumers and end-users	Information-related impacts for	**Financial and legal risks in the event of product-related litigation** (e.g. health problems identified for a patient or clinical trial participant due to misreporting of drug information)	R			■		●	

Techdow
— A Hepalink Company —

	consumers and/or end-users	**Financial and legal** risks if the integrity, confidentiality or accessibility of **personal data** of patients or clinical trial participants is compromised	R	■				●	
	Social inclusion of consumers and/or end-users	**Accessibility** of products to all by ensuring a fair price	IP actual		■	■	●	●	●
G1 - Business conduct	Corporate culture	**Corporate ethics** and shared values of harmony, honesty, responsibility and integrity	IP actual		■		●	●	●
		Administrative fairness and transparency	IP actual		■		●	●	●
		Improved reputation through the promotion of responsible practices	O		■		●	●	●
	Management of relationships with suppliers including payment practices	**Legality, professionalism, impartiality and fairness** in relations with suppliers	IP actual	■	■		●	●	●
		Responsible sourcing of suppliers, with selection and verification of compliance with quality standards and health and safety and environmental protection regulations	IP actual	■	■		●	●	●

[IRO-1] Description of the processes to identify and assess material impacts, risks and opportunities

Techdow Pharma Italy has begun a double materiality process in compliance with the obligations prescribed by ESRS Standard 1 Chapter 3 "Double materiality as the basis for sustainability disclosures" and with the obligations of ESRS 2 IRO - 1. The process was also informed by the EFRAG IG 1 Materiality Assessment Guidelines.

In assessing impact materiality and determining the material matters to be reported, the following three steps are considered:

- Contextual understanding (business activities and relationships, other contextual information and stakeholder understanding): the output of this phase is reported in the mapping of the company's value chain and stakeholders;
- Identification of actual and potential impacts (both positive and negative), risks and opportunities related to sustainability issues through an analysis of company and industry documents;
- Impact and financial materiality assessment and consolidation of the results of the two dimensions of materiality for the determination of material topics, with the adoption of appropriate quantitative thresholds.

This process determined which impacts, risks and opportunities are identified and addressed by the undertaking as material, and which sustainability matters are material for reporting purposes.

As a first assessment, an industry analysis was carried out in order to explore the sustainability topics identified by competitors. The survey was extended to the Healthcare sector of the SASB (Sustainability Accounting Standards Board), with a specific focus on the "Biotechnology & Pharmaceuticals" industry. The survey led to the creation of a long list of industry IROs, mapped by topics and sub-topics. In addition to the industry analysis, the main sources for identifying IROs included: corporate documents (Sustainability Report 2023, Risk Assessment Document, 231 Model, Code of Ethics, Gender Equality Policy, internal procedures); international standards (SASB, TCFD, TNFD); and European standards and regulations (ESRS Set 1, SFDR, Taxonomy).

For actual negative impacts, materiality was assessed based on the severity of the impact, while for potential negative impacts it was based on severity and likelihood. Severity was calculated by combining magnitude, scope and irremediable character of the impact. In the case of a potential negative human rights impact, the severity of the impact takes precedence over its likelihood. For positive impacts, materiality was assessed according to the following aspects: magnitude and scope for actual impacts; magnitude, scope and likelihood for potential impacts. The materiality of risks and opportunities was assessed based on a combination of the likelihood of occurrence and the potential magnitude of the financial effects. The scales for magnitude, scope and irremediable character were set in a range from 1 to 5. Likelihood was rated from 0 to 1.

For each relevant IRO, the location within the value chain and the time horizon were identified. The process of identifying, assessing and managing relevant IROs was carried out for the first time in 2025 and will be integrated annually into the company’s risk management.

[IRO-2] Disclosure requirements in ESRS covered by the undertaking's sustainability statement

The disclosure requirements included in this sustainability statement and the disclosure elements of ESRS 2 and topical ESRSs that derive from other EU legislative acts are set out in Appendices I and III. Appendix II is devoted to the GRI content index to support interoperability.

Information on topics assessed as non-material

In general, the approach to determine materiality follows the criterion of operational control, which allows the company to select and report on issues that Techdow Pharma Italy is actually able to manage from an operational point of view.

The non-material topics determined following the ESRS materiality assessment are:

- E2 - Pollution: Techdow's own operations do not generate significant impacts on air, water, soil and do not involve the use of substances of concern or extreme concern. Issues associated with this topic in the value chain are not directly dependent on or manageable by the head office of Techdow Pharma Italy;
- E3 - Water and marine resources: water consumption related to Techdow's activities is negligible in terms of magnitude and use. Water consumption in the upstream value chain is not directly dependent on or manageable by Techdow;
- S2 - Workers in the value chain: the company makes reasonable efforts to collect information along the value chain, but currently has insufficient data to identify and assess the materiality of impacts, risks and opportunities associated with the topic. The company's commitment in this area will be developed in the coming years, with a view to responsibility and continuous improvement and with the aim of strengthening transparency and the management of social issues even beyond the direct operating perimeter.

Policies, actions and objectives which have not been adopted

The evolution of the European regulatory framework on sustainability has led Techdow Pharma Italy to integrate sustainability into its corporate strategy in an increasingly structured manner.

In this context, the company has already initiated concrete actions in the environmental, social and governance fields, as described in the thematic chapters in this document. However, some objectives represent strategic guidelines, which are currently not accompanied by quantitative indicators or measurable targets. Their definition and consolidation will depend on the evolution of the reporting system, regulatory compliance, and the internal development of measurement processes.

In line with the requirements of the ESRS standards, some topics relevant for the purposes of double materiality fall under the "phase-in" category, for which full reporting is not required in this financial year.

These include Topic E4 - Biodiversity and Ecosystems, the environmental and strategic materiality of which is recognised by Techdow in view of the fact that its business is closely linked to the extraction of heparin from animal sources. While the company has not yet adopted specific policies, actions or objectives in this regard, it is committed to monitoring regulatory developments and progressively evaluating management methods consistent with the principles of responsibility and sustainability.

The same approach applies to topics S3 - Affected Communities and S4 - Consumers and End-Users, which are also subject to the phase-in scheme. For these areas, Techdow reports the information currently available in order to describe the company's positioning and interactions with stakeholders. The company is committed to progressively strengthening its management and measurement capacity on these fronts as well, in line with its adopted sustainability approach.

ENVIRONMENTAL INFORMATION

[ESRS E1]

[ESRS E4]

[ESRS E5]

[ESRS E1] Climate change

[GOV-3] Integration of sustainability-related performance in incentive schemes

In 2025, there are no climate considerations in the remuneration of the members of the administrative, management and supervisory bodies.

[SBM-3] Material impacts, risks and opportunities and their interaction with strategy and business model

Among the issues that emerged from the double materiality process, the sub-topic of climate change mitigation was found to be material due to greenhouse gas emissions generated by own activities (Scope 1 and 2) and the value chain (Scope 3).

Techdow has begun to calculate its climate footprint according to UNI EN ISO 14064:2019, updating the data to 2025, with the aim of having a solid information basis for evaluating reduction and offsetting actions.

The topic of energy is also material, with actual impacts related to energy consumption and the use of non-renewable sources in own operations and upstream activities.

In addition, a physical risk was identified related to the possible disruption of production due to extreme weather events, particularly in the upstream stages of the supply chain.

Techdow Pharma Italy recognises that, with respect to physical climate-related risks, there is limited scope of action within its direct operating perimeter. The most exposed activities, such as livestock rearing and the processing of biological raw materials, are in fact upstream in the value chain and are managed by parties outside the operational control of the company’s Italian head office.

The company has initiated an internal reflection on the resilience of the business model with respect to climate change, conducting a qualitative analysis of potential vulnerabilities. Aspects such as dependence on non-renewable energy sources, location of external production activities and business continuity in case of extreme weather events have been considered; however, to date, no structured analysis of resilience with an applied climate scenario approach has been carried out. The company is aware of the need to progressively strengthen its assessment and response capacity and plans to integrate more advanced methodological tools in the coming years, in line with regulatory developments and the adopted sustainability approach.

[IRO-1] Description of the processes to identify and assess climate-related material impacts, risks and opportunities

For a description of the process for identifying and assessing material climate-related impacts, risks and opportunities, see chapter "[IRO-1] Description of the processes to identify and assess material impacts, risks and opportunities" in the "General Information" section.

[E1-1] Transition plan for climate change mitigation

Currently, Techdow has not adopted a formalised transition plan for climate change mitigation. However, the company recognises the materiality of the issue and has therefore initiated measurement activities with a view to progressive alignment with the Paris Agreement targets.

As far as the direct operating perimeter is concerned, the company only has one administrative and sales office which is located within a multi-tenant complex. This context does not allow for autonomous structural interventions, such as the installation of photovoltaic systems or the direct management of energy carriers, limiting the possibilities for direct action.

[E1-2] Policies related to climate change mitigation and adaptation

There are no specific policies dedicated to climate change mitigation or adaptation that define the organisation's strategic and operational approach to climate risks.

[E1-3] Actions and resources in relation to climate change policies

Aware of the strategic nature and materiality of the issue, Techdow has undertaken a number of voluntary actions aimed at mitigating greenhouse gas emissions: for example, HVO (Hydrotreated Vegetable Oil) is used as an alternative fuel for the company fleet, with lower emissions than traditional fossil fuels. The HVO used is tracked and complies with the sustainability requirements of industry standards. The company also systematically measures its organisational carbon footprint, which is updated annually with the support of a consulting and auditing company in accordance with UNI EN ISO 14064-3:2019, for the collection and reporting of emission data along the entire value chain, including Scope 1, 2 and 3, with comprehensive coverage and using a methodology compliant with international standards.

Currently, financial resources for climate mitigation are allocated to measuring and monitoring emissions.

[E1-4] Targets related to climate change mitigation and adaptation

No quantitative emission reduction targets have been set for 2025. The improvement strategies and action plans to reduce greenhouse gas emissions within the company's supply chain identified by the Organisational Carbon Footprint study are listed below by emission category according to UNI EN ISO 14064-1:2019.

Category 1 - Direct emissions (diesel, petrol, HVO):

- Reduce the use of fuels through the use of electric and/or bio-fuelled systems with certified compliance with the sustainability requirements of industry standards, and promoting energy efficiency in both stationary (methane combustion) and mobile (company vehicles) sources.

Category 2 - Indirect emissions from imported energy:

- Use electricity produced from renewable sources by purchasing electricity through Power Purchase Agreements (PPAs) or supported by Guarantee of Origin (GO) certificates.

Category 3 - Indirect transport-related emissions:

- Where possible, push for the increased use of rail and ship transportation opposed to road haulage (this applies both to suppliers and to the transport of the finished product).

Category 4 - Indirect emissions from products used by the organisation:

- Select suppliers with a Product Carbon Footprint (PCF) or Environmental Product Declaration (EPD). In the absence of such certifications, we recommend prioritising the use of products with certified recycled content, and suppliers whose production processes use renewable energy sources.

In the coming years, the company will evaluate which mitigation actions are realistically feasible.

[E1-5] Energy consumption and mix

In 2025, fuel consumption included 1,691.93 litres of petrol, 16,094.96 litres of diesel and 381.70 litres of HVO to power the company fleet. The amount of electricity purchased from the grid for office use was 17,815 kWh; 24,612.76 scm of natural gas was used for heating via the building’s central boiler.

The data, obtained from invoices, were converted to MWh using the latest conversion factors (EU ETS 2025), as shown in the table below.

Energy consumption and mix (2025)	Values
(1) Fuel consumption from coal and coal products (MWh)	0
(2) Fuel consumption from crude oil and petroleum products (MWh)	177.94
(3) Fuel consumption from natural gas (MWh)	243.30
(4) Fuel consumption from other fossil sources (MWh)	0
(5) Consumption of purchased or acquired electricity, heat, steam, and cooling from fossil sources (MWh)	17.82
(6) **Total energy consumption from fossil sources** (MWh) (sum of rows 1 to 5)	439.06
Share of fossil sources in total energy consumption (%)	99.23%
(7) **Consumption from nuclear sources** (MWh)	0
Share of consumption from nuclear sources in total energy consumption (%)	0
(8) Fuel consumption for renewable sources, including biomass (also comprising industrial and municipal waste of biologic origin, biogas, renewable hydrogen, etc.) (MWh)	3.86
(9) Consumption of purchased or acquired electricity, heat, steam, and cooling from renewable sources (MWh)	0
(10) The consumption of self-generated non-fuel renewable energy (MWh)	0
(11) **Total energy consumption from renewable sources** (MWh) (sum of rows 8 to 10)	3.86
Share of renewable sources in total energy consumption (%)	0.87%
Total energy consumption (MWh) (sum of rows 6 and 11)	442.92

The company falls under section G “Wholesale and Retail Trade” of the NACE classification, as set out in Commission Delegated Regulation (EU) 2022/1288, and has an energy intensity of 5.04 MWh per million euro of net revenue[5].

[E1-6] Gross Scopes 1, 2, 3 GHG emission and total emissions

In 2025, Techdow calculated its greenhouse gas (GHG) emissions according to the “scope” classification system and the categories set out in UNI EN ISO 14064-1:2019.

GHG emissions by scope (2025)	Values
Gross Scope 1 GHG emissions (tCO_{2eq})	44.89
Gross location-based Scope 2 GHG emissions (tCO_{2eq})	56.89
Gross market-based Scope 2 GHG emissions (tCO_{2eq})	59.00
Gross Scope 3 GHG emissions (tCO_{2eq})	3,606.39
Total GHG emissions (location-based) (tCO_{2eq})	3,708.18
Total GHG emissions (market-based) (tCO_{2eq})	3,710.28

Scope 1 (Category 1) emissions result from the consumption of diesel (41.38 tCO_{2eq}), petrol (3.50 tCO_{2eq}) and HVO (0.01 tCO_{2eq}) by the company fleet, and account for 1.21% of total emissions. The

[5] The item used for net revenue corresponds to “A) Production value 1) revenue from sales and services” in the Statement of Profit and Loss of the 2025 Financial Statements, and is equal to EUR 87,885,572.34.

percentage of Scope 1 emissions subject to regulated emissions trading schemes is 0%, as the organisation is not covered by any ETS mechanism.

Scope 2 (Category 2) emissions are associated with low-voltage electricity consumption and the use of natural gas by the central boiler and account for 1.53% of the total.

Almost all of the emissions (97.26%) can be attributed to Scope 3, in particular the supply chain and purchased goods, which represent the main emission driver for Techdow and include emissions of Category 3 (415.22 tCO_{2eq}, or 11.51% of Scope 3: transport, commuting, travel) and Category 4 (3,191.17 tCO_{2eq}, 88.49% of Scope 3: purchased goods, energy upstream, waste).

The most significant items in the total of location-based GHG emissions are:

- raw materials purchased (2,306.41 tCO_{2eq}, 62.20%);
- packaging purchased (850.69 tCO_{2eq}, 22.94%);
- transport of supplies by ship (240.70 tCO_{2eq}, 6.49%);
- transport of finished products by truck (121.39 tCO_{2eq}, 3.27%).

Together, these four items account for over 94.9% of the total location-based GHG emissions (3,519.19 tCO_{2eq}).

Compared with 2024, there was a significant increase in Category 2 emissions due to the inclusion of the figures of energy consumption from the building's central heating system, which were not included in the 2024 figures. Consequently, there has also been an increase in category 4.1.1, which relates to the upstream natural gas sector. Category 4.3 also saw an increase, due to the inclusion of discharged water, which was not included in the previous year's figures.

Biogenic CO_2 emissions were calculated separately, as required by ISO 14064:2019, using the IPCC 2021 GWP100 method (incl. CO_2 uptake) using a location-based approach, and came to 3.87 t of biogenic CO_2 (3.40 t for Category 1; 0.44 for Category 2 and 0.03 for Category 4).

The main sources for the emission factors used in this report are DEFRA 2025 for fuels, transport, waste, travel, commuting, part of packaging; Ecoinvent 3.11 for electricity, purchased goods, energy upstream; ADEME 2025 for capital goods; ARERA for grid losses. For market-based scope 2 emissions, the AIB residual mix emission factor for Italy was used.

The intensity of GHG emissions in relation to the organisation's net revenue is 42.19 t CO_2eq per million euro of net revenue.

Inventory data was collected directly from the organisation and covered energy and fuel consumption, recorded through invoices; raw material purchases and business trips, tracked through the company's management system; refrigerant/insulating gas leaks, documented in intervention reports; commuting between home and work, recorded through questionnaires; and waste production, estimated. Data on natural gas consumption by the boiler and water consumption were obtained from the building's utility bills, calculating the company's share of actual consumption. The reporting boundaries for indirect emissions were defined according to a significance analysis.

[E1-7] GHG removals and GHG mitigation projects financed through carbon credits

There is no absorption or storage of GHGs resulting from projects developed in own operations or along the value chain.

[E1-8] Internal carbon pricing

There is no internal carbon pricing scheme.

[E1-9] Anticipated financial effects from material physical and transition risks and potential climate-related opportunities

Information omitted as subject to phase-in.

[ESRS E4] Biodiversity and ecosystems

During the current financial year, with reference to the ESRS E4 standard, which is subject to gradual phase-in, Techdow Pharma Italy has chosen to voluntarily align itself with the terms of application foreseen for obligated companies, conforming to the transitional deadlines and methods allowed by the regulations.

Although the company is not required to report its performance according to the full disclosure requirements set out by the standard, it has chosen to transparently highlight the relevant impacts and risks related to biodiversity along its value chain.

These impacts are exclusively upstream and concern the production activities run by the parent company, on which Techdow Pharma Italy depends for the supply of heparin. The production of this life-saving active ingredient necessarily requires the use of livestock, for which there are currently no technological or biological alternatives. This dependence results in potential pressures on ecosystems and the status of species.

Reputational and regulatory risks were also identified, linked to changing social expectations and environmental regulations on livestock rearing. Although it does not have direct operational control over such activities, Techdow Pharma Italy makes reasonable efforts to ensure information transparency on the issue, acknowledging its ethical and environmental relevance and highlighting the issue as significant in its reporting, and undertakes to progressively strengthen the level of information detail on this issue, in line with regulatory developments and stakeholders' expectations.

[ESRS E5] Resource use and circular economy

[IRO-1] Description of the processes to identify and assess material resource use and circular economy-related impacts, risks and opportunities

For a description of the process for identifying and assessing material impacts, risks and opportunities related to the use of resources and the circular economy, please refer to chapter "[IRO-1] Description of processes to identify and assess relevant impacts, risks and opportunities" in the "General Information" section.

[E5-1] Policies related to resource use and circular economy

Techdow Pharma Italy has not adopted a policy related to resource use or circular economy, in line with the operational perimeter of the organisation: the material topics identified (such as the use of natural resources for the production of heparin, the use of single-dose materials and non-recycled plastic, the potential negative impacts associated with pharmaceutical residues and the risks related to the availability and costs of raw materials) are outside the operations directly managed by Techdow Pharma Italy and are located both upstream and downstream of the value chain. Consequently, material environmental issues are not currently the subject of an internal policy, but have been considered within the scope of the double materiality assessment.

[E5-2] Actions and resources related to resource use and circular economy

The double materiality assessment did not reveal any relevant aspects attributable to resources that can be managed directly by the organisation. According to the flow analysis, the resources associated with materials and equipment under operational control are insignificant, and include, for example, apartment air conditioning, consumables, water and waste. The end of life of products also does not fall under the direct responsibility of the company. In light of these findings, no specific actions on resource use and circular economy have been implemented.

[E5-3] Targets related to resource use and circular economy

The company has not defined any formal, quantitative or time-based targets relating to resource use and circular economy, given the non-materiality of the specific issue in terms of its own operations.

[E5-4] Resource inflows

Techdow Pharma Italy is an importer and wholesaler of preventive and therapeutic solutions for thromboembolic events, with operational headquarters in Assago, Italy. The administrative offices are equipped with district systems heating in winter (natural gas) and air-conditioning in summer (electric), as well as a dedicated air-conditioning system for the server room. The company also has ten company cars. In addition to consumables, it has durable goods for its administrative and logistical activities, including furniture, computer equipment and electronic devices.

The main activity is the marketing of pharmaceuticals, in particular pre-filled syringes and safety systems, produced by the parent company. Materials used for production include plastic, rubber, glass, metal, paper and cardboard, which are used for functional components, primary and secondary packaging and leaflets, and heparin, the biological substance of animal origin used as an active ingredient in marketed products. Recycled or reused materials are not used, as they are not compatible with the safety requirements of medical devices. The storage and packaging of the products are entrusted to the supplier Euromed Pharma, which receives the goods from China, unpacks them and then repacks them for distribution on the Italian market.

[E5-5] Resource outflows

As Techdow Pharma Italy does not directly design the marketed products, reporting on circular economy for products and materials are not relevant. Even if the assessment is extended to the value chain, a circularity strategy after first use is not feasible for medical devices, nor is a design with durability, reparability or recyclable content criteria.

The waste produced by Techdow Pharma Italy in the year amounted to 7.7 tonnes. The figure has been estimated through modelling based on ISPRA data for the municipality of Assago, considering the average annual presence of personnel. The composition is typical for an office building: paper, cardboard, plastic and undifferentiated waste, all of which is classified as non-hazardous. Sorted waste, estimated according to the same source, represented 53% of the total.

Euromed Pharma directly handles packaging waste (paper, cardboard and plastic) from storage and packaging activities. These flows do not fall within the direct operating perimeter of Techdow Pharma Italy.

As for the end-of-life of the marketed products, the organisation has no control over the disposal stages after sale. The management of such waste is delegated to companies authorised to treat special waste, in accordance with the regulations in force.

[E5-6] Anticipated financial effects from resource use and circular economy-related impacts, risks and opportunities

Information omitted as subject to phase-in.

SOCIAL INFORMATION

[ESRS S1]

[ESRS S3]

[ESRS S4]

Techdow
A Hepalink Company

[ESRS S1] Own workforce

[SBM-3] Material impacts, risks and opportunities and their interaction with strategy and business model

Among the issues that emerged from the double materiality process, the management of the company's own workforce was found to be material due to its direct impact on employee welfare and its strategic role in ensuring the quality, continuity and resilience of the business model. The actual impacts relate in particular to the protection of health and safety, workers' satisfaction and well-being, training and skills development, and equal treatment and opportunities.

In 2025, Techdow confirmed its commitment to gender equality through the successful renewal of the UNI/PdR 125:2022 certification on gender equality, underscoring its efforts to ensure equal opportunities for growth, career development and pay for all people.

These factors provided the opportunity to strengthen the corporate culture and promote diversity and the inclusion and enhancement of human capital as a lever for growth. In confirmation of this commitment, Techdow Pharma Italy was awarded the Great Place To Work certification and the Best Work Place award for five consecutive years, from 2021 to 2025, based on employee evaluations and the HR practices adopted by the company.

However, risks were identified related to the difficulty of attracting and retaining resources with specialised skills, which could affect operational efficiency and innovation.

Further potential negative impacts concern the possible violation of data protection and employee privacy.

No risks of forced or child labour were detected in the company's operations or among the personnel provided by third parties.

[S1-1] Policies related to own workforce

For Techdow, people are the main driver of business success. The company pays the utmost attention to the protection, enhancement and growth of human capital, promoting a working environment based on mutual respect, cooperation and skills development.

Work is structured to enhance individual potential and offer real opportunities for personal and professional growth. Human resources management is based on meritocratic, objective and transparent criteria, excluding any form of discrimination based on gender, ethnicity, orientation, personal opinions or other factors not related to professional conduct or capacity.

Techdow guarantees safe, healthy working conditions that respect people's dignity and promote the physical and psychological well-being of its staff, employees and consultants. Offensive, discriminatory or harassing behaviour is prohibited, as is any form of propaganda or incitement to hatred, including the denial of historical events such as the Holocaust or other crimes against humanity.

In the field of Occupational Health and Safety, the company operates in compliance with Legislative Decree 81/2008, promoting a widespread safety culture and a risk prevention and management system aimed at ensuring the protection and well-being of personnel.

By confirming the Gender Equality Certification in 2025, Techdow consolidated its commitment to a personnel management model based on equity, inclusion and resource development. Through the Gender Equality Management System, the company promotes good practices to:

- ensure equal opportunities in career, training and pay, as well as full respect for parental rights;
- create a fair and welcoming environment, free of bias and merit-oriented;
- implement welfare policies to support a positive work-life balance.

Techdow's Gender Equality Strategic Plan is divided into six areas of intervention:

1. Selection and recruitment: transparent and impartial procedures to prevent gender inequalities;
2. Career and training: equal representation in leadership roles and equal access to development opportunities;
3. Pay equity: reduction of any pay gaps, ensuring parity at the same job and level;
4. Parenting and caring: concrete support for sharing family and caring burdens;
5. Work-life balance: flexibility measures and accessible policies to support organisational well-being;
6. Harassment prevention: zero tolerance policy against all forms of physical, verbal or digital violence.

Techdow's Code of Ethics incorporates the general principles of labour protection, respect for human dignity and condemnation of all forms of discrimination or incitement to hatred, in line with the company's founding values and international standards of social responsibility.

[S1-2] Processes for engaging with own workforce and workers' representatives about impacts

The company is committed to creating an environment where every person feels heard and valued. To this end, internal communication tools have been made available that allow any problems or critical situations to be reported confidentially (the whistleblowing procedure) with the aim of finding quick and effective solutions.

Social dialogue is regulated by the CCNL (collective labour agreement) for the pharmaceutical chemicals sector, which sets out how employees' rights are to be consulted and protected.

[S1-3] Processes to remediate negative impacts and channels for own workers to raise concerns

Techdow respects the privacy of its staff and has adopted a Privacy Policy in accordance with the GDPR Regulation, ensuring the correct and transparent processing of personal data. This procedure is integrated into the 231 Model and the whistleblowing procedure, with the aim of enabling the reporting of any data protection breaches or other irregularities.

[S1-4] Taking action on material impacts on own workforce, and approaches to managing material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions

Techdow's approach to worker health and safety management is outlined in the Risk Assessment Document, which establishes roles, responsibilities and operating procedures for the identification, assessment and mitigation of risks. These are periodically monitored through task-specific assessments, considering factors such as access to offices, use of mains-connected equipment, computer screen activities, office activities, use of ladders for document/load retrieval from shelves/furniture, flexible working, travel to third party sites and third party access to offices.

Inspections, internal audits and periodic meetings are carried out between the supervisors, the Prevention and Protection Service Manager (*Responsabile del Servizio di Prevenzione e Protezione*/RSPP), the Workers' Safety Representative (*Rappresentante dei Lavoratori per la Sicurezza*/RLS) and the staff. These engagement opportunities make it possible to assess the suitability of the measures taken and to identify any critical points at an early stage.

In order to generate positive welfare impacts, Techdow promotes work-life balance policies based on flexible hours and remote working, thus fostering satisfaction and motivation among employees.

The organisation actively supports diversity, inclusion and gender equality, ensuring equal career and training opportunities and equal pay for work of equal value. These actions have had a positive impact on staff engagement and the strengthening of the company's reputation.

One of the main risks monitored is the risk of failing to attract resources with the necessary skills in a context of increasing competition for qualified human capital. To this end, Techdow has strengthened its employer branding and internal development policies, with the aim of maintaining its attractiveness as an employer.

In this regard, in 2025 Techdow launched the “Best People First” project to establish growth paths for all personnel and define individual performance appraisals in a structured manner. The project is structured into three phases:

The Best People First programme consists of three integrated stages:

- initial strategic analysis with the management team;
- audits using proprietary software;
- definition of the operational project;

with the aim of enhancing the performance of managers and staff and guiding the organisation towards a people-centric model, in line with ESG principles.

By directly engaging staff, data is collected and analysed to identify strategic priorities and areas for improvement, thereby establishing an objective basis for planning initiatives. The project aims to streamline risk management processes in order to enhance the ability to anticipate risks and opportunities, and to implement change management strategies to support organisational development. The measures also include strategic consultancy, process optimisation based on lean principles, and the development of the sales system, with the aim of strengthening competitiveness and supporting balanced and sustainable growth.

Techdow also organised two team-building events involving all staff on 26–30 May and 28 November 2025.

[S1-5] Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities

As far as working conditions are concerned, Techdow has defined specific objectives to consolidate the growth and well-being of its staff:

- maintain the quality of the working environment over time, by listening to staff needs through anonymous surveys or meetings;
- maintain positive work-life balance practices, including the remote working and flexible working hours policies already offered by the company to all employees;
- monitor incidents of discrimination and harassment and implement measures to maintain a high level of trust amongst all staff, while encouraging them to report any incidents of discrimination and ensuring their protection;
- continue to promote professional development paths through the “Best People First” project, launched in 2025, with the aim of enhancing talent and promoting career progression;
- strengthen the sense of belonging and internal cohesion by continuing team-building initiatives aimed at promoting collaboration, trust and integration among teams.

In relation to equal treatment and equal opportunities, Techdow is committed to monitoring and improving KPIs related to the Gender Equality Certification, promoting further targeted training courses and enhancing anonymous reporting channels, with the inclusion of a box in the office to securely and transparently collect any critical issues or proposals for improvement from staff.

[S1-6] Characteristics of the undertaking's employees

In 2025, Techdow Pharma Italy's workforce consisted of 14 people, of which 79% are women and 21% are men. 86% of staff are employed on permanent contracts.

Employees by gender and contract type (2025)	Number of people	Open-ended	Fixed-term
Women	11	9	2
Men	3	3	-
Other	-	-	-

Not disclosed (ND)	-	-	-
Total	14	12	2

The overall turnover rate of Techdow staff recorded is 7%, with one person leaving the company during the year.

[S1-7] Characteristics of non-employee workers in the undertaking's own workforce

There is one non-employee worker in the company's own workforce.

[S1-8] Collective bargaining coverage and social dialogue

The entire workforce of Techdow Pharma Italy is covered by the National Collective Labour Agreement (CCNL) for the pharmaceutical chemicals sector. As a principle of its Code of Ethics, in the event of joining a trade association, Techdow undertakes to participate in the association's planned activities and to abide by its rules. Actions include a commitment to ensure a trusting working relationship with staff. Staff are represented in trade union discussions by the Workers' Safety Representative (RLS).

[S1-9] Diversity metrics

The following table shows the age distribution of Techdow's staff.

Company workforce by age group (2025)	Values
Under 30 years	2
Percentage of employees under 30 years of age	14%
Between 30-50	7
Percentage of employees aged between 30 and 50	50%
Over 50 years of age	5
Percentage of employees over 50 years of age	36%

In 2025, there are no managers.

[S1-10] Adequate wages

Techdow guarantees its employees an adequate level of remuneration, higher than the minimum guaranteed by the application of the CCNL and supported by remuneration policies aimed at maintaining competitiveness in the market, in line with the company's objectives of growth and staff loyalty. Moreover, in recent years, it has been investing in reducing the gender pay gap, a commitment that is evidenced by the fact that it has been awarded the UNI/PdR 125:2022 certification.

[S1-11] Social protection

All staff benefit from the health cover provided by the relevant CCNL. Staff can register on a voluntary basis with the Faschim supplementary health fund, provided for by the CCNL. In addition, Techdow has an insurance policy that covers staff and their family members in the event of accidents and illness.

[S1-12] Persons with disabilities

The current own workforce does not include any employees with disabilities.

[S1-13] Training and skills development metrics

The training programmes offered to employees include both compulsory training on Health and Safety, as required by Legislative Decree 81/08, as well as courses oriented towards the development of technical and transversal skills, which are considered essential to deal with the changes currently taking place in the company's production and organisational contexts. As part of this commitment, the company annually promotes the participation of employees in training courses on ethical principles and best practices relating to issues of inclusiveness, gender equality, sustainability and work-life balance.

In 2025, all staff participated in training courses, with an average of 10 hours of training per employee. Training courses on pharmacovigilance were provided for the two new staff members recruited in 2025, while a specific course on occupational health and safety was provided to the new HR Support role. All Techdow employees have completed the "Introduction to Gender Equality" course and have been involved in the "Best People First" project.

[S1-14] Health and safety metrics

Although there is no certified Health and Safety Management System in place, Techdow is committed to complying with the relevant regulations in order to ensure safe and healthy working environments for all employees.

Techdow ensures continuous training for its personnel, both voluntary and mandatory, so that each worker acquires the necessary skills and is aware of their role and the implications of their actions on health and safety.

Each new employee attends a structured training course, which introduces the company's regulations and procedures.

In 2025, there were no accidents or deaths due to work-related injuries or ill-health.

[S1-15] Work-life balance metrics

The Gender Equality Management System ensures that parenting is encouraged, supported and valued at all stages and that there is work-life balance by adopting rules and procedures accessible to staff. Although not formalised within company documentation, Techdow grants the possibility of remote working and offers hourly flexibility to everyone.

The company guarantees access to the leave provisions outlined in the collective labour agreement to the entire workforce. During 2025, no one took parental leave.

[S1-16] Remuneration metrics (pay gap and total compensation)

In 2025, Techdow monitored the ratio of the average basic pay of women to men, broken down by professional category, calculated as the percentage difference between the average pay of female and male workers according to their job level and the same skills.

Techdow's workforce comprises roles that are not always filled by both genders; for this reason, the only roles for which a salary comparison can be made are:

- A1, where the pay gap between the two genders for the same level and equivalent skills stands at -6.9%, with female staff earning a higher average salary;
- C1, with a pay gap of 0%.

The annual remuneration of the highest-paid person in Techdow is 1.9 times the median annual total remuneration of the rest of the staff.

[S1-17] Incidents, complaints and severe human rights impacts

In 2025 there were no recorded incidents, complaints or severe impacts on human rights. Internal reporting channels and preventive measures, including training and monitoring activities, remain in place to ensure respect for fundamental rights at work.

[ESRS S3] Affected communities

During the current financial year, with reference to the ESRS S3 standard, which is subject to gradual phase-in, Techdow Pharma Italy has chosen to voluntarily align itself with the terms of application foreseen for obligated companies, conforming to the transitional deadlines and methods allowed by the regulations. Although the company is not required to report according to the full scheme of disclosure requirements set out in the standard, it deemed it appropriate to enhance the management of material topics that emerged from the double materiality analysis, with the aim of guaranteeing transparency and consistency with respect to European sustainability references.

Although Techdow does not have a formalised policy for managing impacts, risks and opportunities related to local communities, in line with the principles expressed in its Code of Ethics, it is committed to contributing to improving the quality of life through the development of innovative technologies and targeted therapies that can increase life expectancy.

The company promotes constant dialogue with the main local stakeholders, with the aim of responding concretely to the needs of the communities and ensuring that its actions respect the environment and the social context in which it operates.

For years, Techdow has been investing in initiatives that support the most vulnerable groups, backing associations operating in the health and well-being sectors, as well as in sports, environmental, and cultural projects. The company places strong emphasis on community health education, providing donations to universities and non-profit organisations, promoting initiatives for the most vulnerable groups, and supporting associations dedicated to health and well-being. These activities offer the opportunity to attract and recruit new qualified resources while also providing the parallel possibility of forging strategic partnerships with research institutions. In addition, community development initiatives on a social level increase employee loyalty and motivation.

In order to contribute to scientific and health development, Techdow supports three major Italian universities with regular donations:

- University of Catania;
- University of Bologna;
- State University of Milan.

In addition, the company makes an ongoing financial contribution to the School of Medical Education (*Scuola Superiore di Formazione in Medicina*/SSFM), a non-profit organisation committed to promoting health education in various fields.

Techdow is the official sponsor of the water polo team Training Academy Olympic Roma. Together with the team, it also supports the “Filippide” project, an initiative aimed at promoting sports inclusion for people with autism and related rare syndromes.

In 2025, Techdow took part in a number of initiatives and supported the following activities:

- The “Maratona del Cuore” initiative in aid of the G. and D. Marchi ETS Foundation, which supports scientific research and cares for children with cancer and serious illnesses;
- Run For Autism 2025, an event organised by Olympic Roma;

- A blood donation day in aid of the Bambin Gesù Children's Hospital in Rome and Olympic Roma project;
- I bambini delle fate, an organisation that provides financial support for social inclusion projects aimed at helping families with children with autism and other disabilities;
- Sponsorship of an orphanage through the charity WeWorld Onlus.

.

[ESRS S4] Consumers and end-users

During the current financial year, with reference to the ESRS S4 standard, which is subject to gradual phase-in, Techdow Pharma Italy has chosen to voluntarily align itself with the terms of application foreseen for obligated companies, conforming to the transitional deadlines and methods allowed by the regulations. Although the company is not required to report according to the full scheme of disclosure requirements set out in the standard, it deemed it appropriate to enhance the management of material topics that emerged from the double materiality analysis, with the aim of guaranteeing transparency and consistency with respect to European sustainability references.

Techdow adopts an ethical and transparent approach towards customers and end users, as defined in its Code of Ethics and ISO 9001 Quality Management System. In particular, the company believes that being attentive to the needs and suggestions of those who use the company's products and services is fundamental to its business.

Customer relations are guided by the following principles:

- customer-centric approach;
- quality and excellence as key elements of the brand identity;
- transparency and honesty in communications, including advertising;
- obligation for all recipients of the Code of Ethics to provide professional assistance and accurate information.

Company policy expressly forbids any form of misleading communication and requires scrupulous control to ensure that any promises made in terms of quality are always reflected in the actual products sold.

Techdow promotes continuous customer involvement, collecting feedback and observations to help improve its products and services through internal procedures and monitoring systems, including:

- verification that customers' requirements are met;
- customer complaints;
- corrective actions;
- product and process non-conformities;
- drafting of the quality policy;
- assessment and assurance of adequate dedicated resources;
- communications to all personnel about the importance of complying with customer requirements.

At least once a year, the management team reviews the points listed above to ensure that customer requirements and expectations are identified and analysed in order to achieve and increase complete customer satisfaction.

Techdow has implemented structured channels for collecting complaints and reports, allowing customers to express any concerns they may have about products, services or company conduct.

Complaints are handled through:

- a traceability system;
- analysis of the underlying causes of non-compliance;
- the definition and implementation of corrective and preventive measures.

Periodically, a questionnaire is sent out in which information and suggestions are collected and subsequently taken into account by the management team to inform possible reviews of the Quality Management System (QMS). In the event of repeated malfunctions, the Quality System Manager may initiate corrective actions even outside the QMS review.

In the event of complaints, corrective action aimed at removing the causes of detected or potential non-conformities can be activated, according to the dedicated procedure. Corrective action is initiated in the following cases:

- repeated cases of non-compliances for which the action taken thus far has not solved the problem;
- non-compliance identified by audits;
- particularly serious or frequently recurring customer complaints.

The tools described are aimed at reducing negative impacts and restoring trust in the organisation, in line with the commitment to ensure a transparent and trusting relationship with customers.

In the course of the double materiality analysis process, a number of material risks and impacts related to the relationship with customers and end users were identified. Potential downstream risks include:

- the risk of legal and financial disputes arising from incorrect or incomplete product information, which in highly sensitive contexts (e.g. health or regulatory) can lead to serious consequences;
- the risk of compromise of customers' personal data (such as integrity, confidentiality, accessibility), especially in cases where external systems or suppliers are used for information management.

To avoid such risks, as per ISO 9001, the company ensures that any customer data, when under the organisation's control, is used, identified, verified, protected and safeguarded.

From the point of view of actual positive impacts, the company recognises the value of promoting the social inclusion of consumers; in this regard, making its products accessible, while maintaining a fair and transparent price, is a firm goal for the company to ensure that a wide audience can benefit from its solutions.

GOVERNANCE INFORMATION

[ESRS G1]

[ESRS G1] - Business conduct

[GOV-1] The role of the administrative, management and supervisory bodies

Techdow has adopted an Organisational, Management and Control Model pursuant to Legislative Decree 231/01 (the so-called 231 Model), which formalises the management team's commitment to oversee the internal control system. The Model is aimed at ensuring:

- Effectiveness and efficiency of operational activities;
- Reliability of information and economic/financial reporting;
- Compliance with laws and regulations;
- Safeguarding corporate assets.

These principles are reflected in the company’s corporate culture and operational conduct, through the dissemination of the Code of Ethics and conduct guidelines, continuous training for personnel on the contents of the Model, the documented traceability of significant operations, and the assignment of responsibilities so as to avoid critical overlaps.

Compliance with the Code of Ethics and operational control procedures is required at all organisational levels, from the Board of Directors to department managers, employees and collaborators.

The Board of Directors approves and supports the implementation of the 231 Model and related documents, and promotes the dissemination of the Code of Ethics and the implementation of control activities.

The company's Supervisory Board is composed of professionals with requirements of independence and integrity and supervises the effectiveness and updating of the model.

All corporate functions work together to keep the control system active and effective, operating in compliance with the defined organisational policies and ethical principles.

[IRO-1] Description of the processes to identify and assess material impacts, risks and opportunities

For a description of the process for identifying and assessing relevant impacts, risks and opportunities related to business conduct, please refer to chapter "[IRO-1] Description of the processes to identify and assess material impacts, risks and opportunities” in the “General Information” section.

[G1-1] Corporate culture and business conduct policies

Since 2020 Techdow has had a Code of Ethics to formalise its corporate philosophy. The document allows the rules of conduct and activities within the company to be shared with all stakeholders.

The ultimate goal is to ensure high ethical standards and compliance with applicable regulations, while promoting a positive and respectful working environment.

The Code of Ethics is an integral part of the 231 Model, and through these instruments, Techdow promotes a culture based on:

- lawfulness;
- professionalism;
- impartiality;
- fairness;
- privacy;
- prohibition of unfair competition;
- transparency and fairness in the management of social activities and information;
- prevention of money laundering and self money laundering;
- transparency in accounting and internal controls;
- prevention of tax offences;
- diligence and good faith in the negotiation and performance of contracts;
- protection of share capital, creditors and the market;
- correct use of company assets;
- value of human resources and respect for the individual;
- compliance with privacy regulations;
- environmental protection;
- research;
- security of access and information stored in computer systems.

The acronym “AORI” encapsulates Techdow's values:

- *Armonia* - harmony;
- *Onestà* - honesty;
- *Responsabilità* - responsibility;
- *Integrità* - integrity.

The company ethos is expressed in the harmony of teamwork, constant collaboration to achieve goals; honesty towards customers, partners and patients; responsibility towards the effective development and maintenance of a world-class quality system; and, finally, the integrity of all processes and procedures, together with the technical and scientific approach.

In order to prevent the risk of commission of offences which may result in liability for the company, the 231 Model provides for:

- the identification of activities within the scope of which offences may be committed;
- specific protocols aimed at planning the formation and implementation of the organisation's decisions in relation to the specific offences to be prevented;

- the identification of methods for managing financial resources that can prevent the commission of offences;
- obligations to provide information to the body responsible for supervising the operation of and compliance with the model;
- the introduction of an appropriate disciplinary system to sanction non-compliance with the measures indicated in the model.

The 231 Model is subject to periodic review and is amended if significant breaches of the requirements are discovered or if there are changes in the organisation or its activities or in the reference standards.

A whistleblowing procedure has been adopted, in accordance with Legislative Decree 24 of 10 March 2023, with the aim of guaranteeing the protection of persons who report violations of national or European legislation detrimental to the public interest, the integrity of the public administration or the private entity, when such violations are detected within the organisation.

In line with the principles of good faith and fairness, any interested party may report actual or alleged violations to the Supervisory Board through the following internal channels:

- direct communication to the Supervisory Board, either orally or in writing, by sending an email to odv@it.techdow.com or requesting an appointment;
- filling in the paper form available on the notice board and posting it in the appropriate box;
- use of the electronic channel in the Whistleblowing section of the company website, which is conveyed directly to the Supervisory Board.

Reports are treated with the utmost confidentiality, guaranteeing the anonymity of the reporter and their protection from any form of retaliation or discrimination. There are no consequences for reports made in good faith, even if unfounded. However, sending deliberately false or instrumental reports constitutes a serious violation. Techdow expressly forbids any retaliatory behaviour and considers reports a tool for improving internal control and strengthening the company's ethical and organisational values.

The dissemination and training on the contents of the Code of Ethics and the 231 Model is ensured both inside and outside the organisation, involving staff, corporate bodies, collaborators and third parties bound by contractual relations. The Reference Principles of the Code of Ethics and the main related documents are made available to all on the “Agency” section of the website.

[G1-2] Management of relationships with suppliers

Techdow manages relations with its suppliers according to principles of fairness, transparency and respect for rules. Relations with business partners are developed in line with the Code of Ethics, in compliance with the 231 Model and the Procurement and Supplier Management Procedure, formalised in 2020. The aim is to prevent unlawful conduct, such as money laundering, corruption or corporate offences, and to promote a corporate culture based on legality and integrity.

Suppliers are selected according to clear and objective criteria, with a commitment to guarantee equal opportunities and to avoid any form of discrimination. All those who meet the requirements are equally eligible to enter into business with the company. The company adopts a careful and responsible approach to supply chain management, giving priority to suppliers who offer high standards in terms of quality, reliability and safety. Contractual terms, including payment terms, are shared transparently and in advance to reduce the risk of delays and ensure continuity of supply.

Relationships with suppliers do not end with the signing of the contract: constant dialogue is maintained in order to address any critical issues in a timely and constructive manner, in accordance with good business practice. In the event of significant problems, the management team is informed in order to assess the most appropriate action.

In line with the company's values, it is forbidden to accept or offer gifts or non-symbolic advantages, even if they are in the interest of the company, if they could improperly influence purchasing decisions.

[G1-3] Prevention and detection of corruption and bribery

The Code of Ethics prohibits and condemns all forms of corruption, fraud and conflict of interest through a governance approach based on transparency and integrity.

The implementation of the 231 Model aims to structure and define the critical processes of the company’s business that could be linked to corruption. This business management model guarantees an internal control system that prevents the commission of offences and unlawful conduct, in accordance with the provisions of the decree.

Staff training to ensure the dissemination, knowledge and implementation of the decree and the 231 Model is managed by the Operation Manager in close cooperation with the Supervisory Board, and is structured across the following levels:

- employees: initial training for all new hires and people entering into new roles, and annual training for all employees;
- other personnel: adequate dissemination of information. Special clause on all contracts for new hires;
- consultants: provisions of initial information. Special clause on all new contracts to be signed separately.

The percentage of at-risk functions covered by training programmes to prevent corruption and bribery is 10% and is represented by the management team.

[G1-4] Incidents of corruption or bribery

During the reporting period, the company recorded no incidents of corruption or bribery.

[G1-5] Political influence and lobbying activities

There are no activities and commitments related to political influence and lobbying.

[G1-6] Payment practices

Techdow adopts defined payment practices based on the contractual terms agreed with customers and suppliers. Payment terms can generally vary between 30, 60 and 90 days, depending on the type of business relationship.

Due to the non-uniformity of contracts, it is not possible to determine an average payment time representative of the entire business activity. However, the company guarantees the punctual adherence to agreed deadlines and maintains relations characterised by fairness and transparency towards its business partners.

There are no legal proceedings related to late payments.

APPENDICES

[I]

[II]

[III]

Techdow
— A Hepalink Company —

APPENDIX I – ESRS Content Index

APPENDIX II – GRI Content Index

GRI Standard	Disclosure	Page
GRI 2: General Information 2022	2-1 Organizational details	10-13
	2-2 Entities included in the organization's sustainability reporting	9
	2-3 Reporting period, frequency and contact point	9
	2-4 Restatements of information	9
	2-6 Activities, value chain and other business relationships	16-19
	2-7 Employees	45
	2-8 Workers who are not employees	45
	2-9 Governance structure and composition	10-12
	2-10 Nomination and selection of the highest governance body	10-12
	2-11 Chair of the highest governance body	10-12
	2-12 Role of the highest governance body in overseeing the management of impacts	10-12
	2-14 Role of the highest governance body in sustainability reporting	14
	2-17 Collective knowledge of the highest governance body	10-12
	2-18 Evaluation of the performance of the highest governance body	14
	2-19 Remuneration policies	14; 31
	2-21 Annual total compensation ratio	47
	2-22 Statement on sustainable development strategy	16-19
	2-23 Policy commitments	14-15; 41-42; 55-56
	2-24 Embedding policy commitments	14-15; 42; 55-56
	2-25 Processes to remediate negative impacts	41-43
	2-26 Mechanisms for seeking advice and raising concerns	42; 55-57
	2-27 Compliance with laws and regulations	47; 57
	2-29 Approach to stakeholder engagement	21-22
	2-30 Collective bargaining agreements	45
GRI 3: Disclosures on material topics 2022	3-1 Process to determine material topics	27
	3-2 List of material topics	23-26
	3-3 Management of material topics	31-32; 37-38; 41-44; 47-52; 55-58
GRI 205: Anticorruption 2016	205-1 Operations assessed for risks related to corruption	57
	205-2 Communication and training about anti-corruption policies and procedures	57
	205-3 Confirmed incidents of corruption and actions taken	57
GRI 302: Energy 2016	302-1 Energy consumption within the organization	33-34
	302-2 Energy consumption outside of the organization	33-34
	302-3 Energy intensity	34
GRI 305: Emissions 2016	305-1 Direct (Scope 1) GHG emissions	34-35
	305-2 Indirect GHG emissions from energy consumption (Scope 2)	34-35
	305-3 Other indirect (Scope 3) GHG emissions	34-35
GRI 306: Waste 2020	306-3 Waste generated	39
	306-4 Waste diverted from disposal	39
	306-5 Waste directed to disposal	39
GRI 401: Employment 2016	401-1 New employee hires and employee turnover	45
	401-2 Benefits provided to full-time employees that are not provided to temporary or part-time employees	46
	401-3 Parental leave	47

GRI 403: Occupational health and safety 2018	403-1 Occupational health and safety management system	41-42
	403-2 Hazard identification, risk assessment, and incident investigation	42
	403-3 Occupational health services	41-42
	403-4 Worker participation, consultation, and communication on occupational health and safety	42
	403-5 Worker training on occupational health and safety	47
	403-6 Promotion of worker health	46
	403-8 Workers covered by an occupational health and safety management system	47
	403-9 Work-related injuries	47
	403-10 Work-related ill health	47
GRI 404: Training and Education 2016	404-1 Average hours of training per year per employee	46
GRI 405: Diversity and Equal Opportunity 2016	405-1 Diversity of governance bodies and employees	10-11; 45
	405-2 Ratio of basic salary and remuneration of women to men	47
GRI 406: Non-discrimination 2016	406-1 Incidents of discrimination and corrective actions taken	48
GRI 413: Local communities 2016	413-1 Operations with local community engagement, impact assessments, and development programs	49-50
	413-2 Operations with significant actual and potential negative impacts on local communities	49-50
GRI 416: Customer Health and Safety 2016	416-2 Incidents of non-compliance concerning the health and safety impacts of products and services	51-52
GRI 418: Customer privacy 2016	418-1 Substantiated complaints concerning breaches of customer privacy and losses of customer data	51-52

APPENDIX III - Datapoints in ESRS 2 and topical ESRS that derive from other EU legislation

Disclosure Requirement and related datapoint	SFDR reference	Pillar 3 reference	Benchmark regulation reference	EU climate law reference	Page
ESRS 2 GOV-1 Board's gender diversity, paragraph 21 (d)	Indicator number 13 Table #1 Annex I		Delegated Regulation (EU) 2020/1816, Annex II		10-12
ESRS 2 GOV-1 Percentage of board members who are independent, paragraph 21 (e)			Delegated Regulation (EU) 2020/1816, Annex II		10-12
ESRS 2 GOV-4 Statement on due diligence, paragraph 30	Indicator number 10 Table #3 Annex I				14-15
ESRS 2 SBM-1 Involvement in activities related to fossil fuel activities, paragraph 40 (d) (i)	Indicator number 4 Table #1 Annex I	Article 449-bis of Regulation (EU) 575/2013; Commission Implementing Regulation (EU) 2022/2453, Table 1 – Qualitative information on Environmental risk and Table 2 – Qualitative information on Social risk	Delegated Regulation (EU) 2020/1816, Annex II		Not material
ESRS 2 SBM-1 Involvement in activities related to chemical production, paragraph 40 (d) (ii)	Indicator number 9 Table #2 Annex I		Delegated Regulation (EU) 2020/1816, Annex II		Not material
ESRS 2 SBM-1 Involvement in activities related to controversial weapons, paragraph 40 (d) (iii)	Indicator number 14 Table #1 Annex I		Delegated Regulation (EU) 2020/181829, Article 12(1) Delegated Regulation (EU) 2020/1816, Annex II		Not material
ESRS 2 SBM-1 Involvement in activities related to cultivation and production of tobacco, paragraph 40 (d) (iv)			Delegated Regulation (EU) 2020/1818, Article 12(1) Delegated Regulation (EU) 2020/1816, Annex II		Not material
ESRS E1-1 Transition plan to reach climate neutrality by 2050, paragraph 14				Regulation (EU) 2021/1119, Article 2(1)	Not adopted
ESRS E1-1 Undertakings excluded from Paris-aligned Benchmarks, paragraph 16 (g)		Article 449-bis of Regulation (EU) 575/2013; Commission Implementing Regulation (EU) 2022/2453, Template 1: Banking book- Indicators of potential climate	Delegated Regulation (EU) 2020/1818, Article12.1 (d) to (g), and Article 12.2		Not material

		change transition risk: Credit quality of exposures by sector, emissions and residual maturity			
ESRS E1-4 GHG emission reduction targets, paragraph 34	Annex I, Table 2, Indicator 4	Article 449-bis of Regulation (EU) 575/2013; Commission Implementing Regulation (EU) 2022/2453, Template 3: Banking book - Indicators of potential climate change transition risk: Alignment metrics	Article 6 of Delegated Regulation (EU) 2020/1818		Not quantified. Qualitative information on page 33
ESRS E1-5 Energy consumption from fossil sources disaggregated by sources (only high climate impact sectors), paragraph 38	Indicator number 5 Table #1 and Indicator number 5 Table #2 Annex I				33-34
ESRS E1-5 Energy consumption and mix, paragraph 37	Indicator number 5 Table #1 Annex I				33-34
ESRS E1-5 Energy intensity associated with activities in high climate impact sectors, paragraphs 40 to 43	Indicator number 6 Table #1 Annex I				33-34
ESRS E1-6 Gross Scope 1, 2, 3 and Total GHG emissions, paragraph 44	Indicators numbers 1 and 2 Table #1 Annex I	Article 449-bis of Regulation (EU) 575/2013; Commission Implementing Regulation (EU) 2022/2453, Template 1: Banking book – Indicators of potential transition risk linked to climate change: Credit quality of exposures by sector, emissions and residual maturity	Delegated Regulation (EU) 2020/1818, Article 5(1), 6 and 8(1)		34-35
ESRS E1-6 Gross GHG emissions intensity, paragraphs 53 to 55	Indicator number 3 Table #1 Annex I	Article 449-bis of Regulation (EU) 575/2013; Commission Implementing Regulation (EU) 2022/2453, Template 3: Banking book - Indicators of potential climate change transition risk: Alignment metrics	Delegated Regulation (EU) 2020/1818, Article 8(1)		34-35
ESRS E1-7 GHG removals and carbon credits, paragraph 56				Regulation (EU) 2021/1119, Article 2(1)	36
ESRS E1-9 Exposure of the benchmark portfolio to climate change physical risks, paragraph 66			Delegated Regulation (EU) 2020/1818, Annex II Delegated Regulation (EU) 2020/1816, Annex II		*Phase-in*
ESRS E1-9 Disaggregation of monetary amounts by acute and chronic physical risk, paragraph 66 (a) ESRS E1-9 Location of significant physical risk assets, paragraph 66 (c)		Article 449-bis of Regulation (EU) 575/2013; paragraphs 46 and 47 of Commission Implementing Regulation (EU) 2022/2453; Template 5: Banking book - Indicators of potential climate change physical risk: Exposures subject to physical risk			*Phase-in*

ESRS E1-9 Breakdown of the carrying value of its real estate assets by energy-efficiency classes, paragraph 67 (c)		Article 449-bis of Regulation (EU) No 575/2013; paragraph 34 of Commission Implementing Regulation (EU) 2022/2453; Template 2: Banking book - Indicators of potential climate change transition risk: Loans collateralised by immovable property - Energy efficiency of the collateral			*Phase-in*
ESRS E1-9 Degree of exposure of the portfolio to climate-related opportunities, paragraph 69			Delegated Regulation (EU) 2020/1818, Annex II		*Phase-in*
ESRS E2-4 Amount of each pollutant listed in Annex II of the E-PRTR Regulation (European Pollutant Release and Transfer Register) emitted to air, water and soil, paragraph 28	Indicator number 8 Table #1 Annex I Indicator number 2 Table #2 Annex I Indicator number 1 Table #2 Annex I Indicator number 3 Table #2 Annex I				Not material
ESRS E3-1 Water and marine resources, paragraph 9	Indicator number 8 Table #2 Annex I				Not material
ESRS E3-1 Sustainable oceans and seas, paragraph 14	Indicator number 12 Table #2 Annex I				Not material
ESRS E3-4 Total water recycled and reused, paragraph 28 (c)	Indicator number 6.2 Table #2 Annex I				Not material
ESRS E3-4 Total water consumption in m^3 per net revenue on own operations, paragraph 29	Indicator number 6.1 Table #2 Annex I				Not material
ESRS 2- IRO-1 - E4 paragraph 16 (c) (i)	Indicator number 7 Table #1 Annex I				*Phase-in*
ESRS 2 IRO-1 – E4 paragraph 16 (b)	Indicator number 10 Table #2 Annex I				*Phase-in*
ESRS 2 IRO-1 – E4 paragraph 16 (c)	Indicator number 14 Table #2 Annex I				*Phase-in*
ESRS E4-2 Sustainable land / agriculture practices or policies, paragraph 24 (c)	Indicator number 11 Table #2 Annex I				*Phase-in*
ESRS E4-2 Sustainable oceans / seas practices or policies, paragraph 24 (c)	Indicator number 12 Table #2 Annex I				*Phase-in*
ESRS E4-2 Policies to address deforestation, paragraph 24 (d)	Indicator number 15 Table #2 Annex I				*Phase-in*
ESRS E5-5 Non-recycled waste, paragraph 37 (d)	Indicator number 13 Table #2 Annex I				39

ESRS E5-5 Hazardous waste and radioactive waste, paragraph 39	Indicator number 9 Table #1 Annex I		39
ESRS 2 - SBM3 - S1 Risk of incidents of forced labour, paragraph 14 (f)	Indicator number 13 Table #3 Annex I		41
ESRS 2 - SBM3 - S1 Risk of incidents of child labour, paragraph 14 (g)	Indicator number 12 Table #3 Annex I		41
ESRS S1-1 Human rights policy commitments, paragraph 20	Indicator number 9 Table #3 and Indicator number 11 Table #1 Annex I		41-42
ESRS S1-1 Due diligence policies on issues addressed by the fundamental International Labor Organisation Conventions 1 to 8, paragraph 21		Delegated Regulation (EU) 2020/1816, Annex II	41-42
ESRS S1-1 Processes and measures for preventing trafficking in human beings, paragraph 22	Indicator number 11 Table #3 Annex I		41-42
ESRS S1-1 Workplace accident prevention policy or management system, paragraph 23	Indicator number 1 Table #3 Annex I		41-42
ESRS S1-3 Grievance/complaints handling mechanisms, paragraph 32 (c)	Indicator number 5 Table #3 Annex I		42
ESRS S1-14 Number of fatalities and number and rate of work-related accidents, paragraph 88 (b) and (c)	Indicator number 2 Table #3 Annex I	Delegated Regulation (EU) 2020/1816, Annex II	47
ESRS S1-14 Number of days lost to injuries, accidents, fatalities or illness, paragraph 88 (e)	Indicator number 3 Table #3 Annex I		47
ESRS S1-16 Unadjusted gender pay gap, paragraph 97 (a)	Indicator number 12 Table #1 Annex I	Delegated Regulation (EU) 2020/1816, Annex II	47
ESRS S1-16 Excessive CEO pay ratio, paragraph 97 (b)	Indicator number 8 Table #3 Annex I		47
ESRS S1-17 Incidents of discrimination, paragraph 103 (a)	Indicator number 7 Table #3 Annex I		48
ESR S1-17 Non-respect of UNGPs on Business and Human Rights and OECD guidelines paragraph 104 (a)	Indicator number 10 Table #1 and Indicator number 14 Table #3 Annex I	Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818 Art 12 (1)	48
ESRS 2 SBM-3 – S2 Significant risk of child labour or forced labour in the value chain, paragraph 11 (b)	Indicators numbers 12 and 13 Table #3 Annex I		*Phase-in*

ESRS S2-1 Human rights policy commitments, paragraph 17	Indicator number 9 Table #3 and Indicator number 11 Table #1 Annex I		*Phase-in*
ESRS S2-1 Policies related to workers in the value chain, paragraph 18	Indicators numbers 11 and 4 Table #3 Annex I		*Phase-in*
ESRS S2-1 Non-respect of UNGPs on Business and Human Rights principles and OECD guidelines, paragraph 19	Indicator number 10 Table #1 Annex I	Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818 Art 12 (1)	*Phase-in*
ESRS S2-1 Due diligence policies on issues addressed by the fundamental International Labor Organisation Conventions 1 to 8, paragraph 19		Delegated Regulation (EU) 2020/1816, Annex II	*Phase-in*
ESRS S2-4 Human rights issues and incidents connected to its upstream and downstream value chain, paragraph 36	Indicator number 14 Table #3 Annex I		*Phase-in*
ESRS S3-1 Human rights policy commitments, paragraph 16	Indicator number 9 Table #3 and Indicator number 11 Table #1 Annex I		*Phase-in*
ESRS S3-1 non-respect of UNGPs on Business and Human Rights, ILO principles or and OECD guidelines, paragraph 17	Indicator number 10 Table #1 Annex I	Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818 Art 12 (1)	*Phase-in*
ESRS S3-4 Human rights issues and incidents, paragraph 36	Indicator number 14 Table #3 Annex I		*Phase-in*
ESRS S4-1 Policies related to consumers and end-users, paragraph 16	Indicator number 9 Table #3 and Indicator number 11 Table #1 Annex I		*Phase-in*
ESRS S4-1 Non-respect of UNGPs on Business and Human Rights principles and OECD guidelines, paragraph 17	Indicator number 10 Table #1 Annex I	Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818 Art 12 (1)	*Phase-in*
ESRS S4-4 Human rights issues and incidents, paragraph 35	Indicator number 14 Table #3 Annex I		*Phase-in*

ESRS G1-1 United Nations Convention against Corruption, paragraph 10 (b)	Indicator number 15 Table #3 Annex I			55-56
ESRS G1-1 Protection of whistleblowers, paragraph 10 (d)	Indicator number 6 Table #3 Annex I			55-56
ESRS G1-4 Fines for violation of anti-corruption and anti-bribery laws, paragraph 24 (a)	Indicator number 17 Table #3 Annex I		Delegated Regulation (EU) 2020/1816, Annex II	57
ESRS G1-4 Standards of anti-corruption and anti-bribery, paragraph 24 (b)	Indicator number 16 Table #3 Annex I			57