

# Human Rights Policy

2026

---

15/01/2026

ESG Area

# Table of Contents

---

<b>1. Introductory Statement.....</b>	<b>3</b>
<b>2. Scope of Application .....</b>	<b>3</b>
<b>3. Human Rights Priority Areas .....</b>	<b>3</b>
<b>3.1. Our CNS Community .....</b>	<b>4</b>
-Right to Health	
-Right of Patients to Non-Discrimination and Dignity	
<b>3.2. Our Team.....</b>	<b>5</b>
-Labour Rights	
-Non-discrimination, Inclusion and Diversity	
-Workplace Harassment	
-Freedom of Expression	
-Health and Safety at Work	
-Living Wage	
-Working Time and Right to Rest	
-Freedom of Association	
<b>3.3. Our Patients .....</b>	<b>7</b>
-Access to Medicines	
-Clinical Trials	
-Product Quality and Falsified Medicines	
<b>3.4. Our Planet .....</b>	<b>8</b>
-Human Rights and Environmental Responsibility	
<b>3.5. Our Method   Governance .....</b>	<b>8</b>
-Right to Privacy and Data Protection	
-Artificial Intelligence	
-Respect for Free Competition	
-Child Labour	
-Modern Slavery including Forced Labour and Human Trafficking	
<b>4. Strengthening Due Diligence Framework .....</b>	<b>10</b>
<b>5. Reporting Mechanisms.....</b>	<b>11</b>
<b>6. Implementation, Communication and Update .....</b>	<b>11</b>
<b>7. References for drafting this Human Rights Policy .....</b>	<b>11</b>

## 1. Introductory Statement

At Neuraxpharm we believe in respect for fundamental human rights and that every individual deserves to be treated fairly and with dignity. We are committed to supporting internationally recognised fundamental human rights. In every country where Neuraxpharm operates, we act in line with the laws and regulations of each jurisdiction and respect the international conventions related to human rights, including the principles of the Universal Declaration of Human Rights by the United Nations (UDHR), the Fundamental Conventions of the International Labour Organization (ILO), and the United Nations Guiding Principles on Business and Human Rights (UNGSSs).

Respect for human rights is embedded in our Code of Conduct, which is the internal corporate regulation that establishes the principles, ethical values and guidelines of conduct that must be upheld to the highest level in any activities in which a company of the Group participates or which affect a company of the Group. This level of respect also informs our Third Party Code of Ethics, which governs our relationships with suppliers, customers, contractors, external collaborators and partners.

As a company dedicated to improving the lives of people with Central Nervous System (CNS) disorders, our commitment to human rights is synonymous with our mission to deliver innovative treatments that enhance patient well-being.

## 2. Scope of Application

Neuraxpharm is committed to ensuring that all employees act ethically and responsibly, with full respect for human rights in every aspect of their work. This commitment applies to all Neuraxpharm affiliates and their respective collaborators. We expect our teams to uphold these principles consistently, fostering a culture of integrity and respect.

Beyond our internal operations, Neuraxpharm relies on a broad and diverse supply chain of suppliers, manufacturers, contractors, and other business partners. They must operate ethically and responsibly and, as a prerequisite for collaboration, accept our Code of Ethics for Third Parties, which sets clear standards for ethical conduct, labour practices, environmental responsibility, and human rights.

## 3. Human Rights Priority Areas

At Neuraxpharm, we have identified a number of areas where the most significant actual or potential human rights risks may arise. These priority areas guide our efforts to prevent, address, and mitigate human rights impacts across our operations and partnerships.

Our approach is closely aligned with Neuraxpharm's ESG strategy, which is structured around five core pillars that define our purpose and guide our actions. These pillars

encompass the areas where we can make the greatest difference and where our activities may have the most significant human rights impact:

- **Our CNS Community** – Promoting awareness, education and support for those affected by CNS conditions.
- **Our Team** – Promoting diversity, inclusion, and well-being across our organisation.
- **Our Patients** – Delivering safe, effective, and innovative solutions with the aim of improving the quality of life for CNS patients.
- **Our Planet** – Committed to minimising our environmental footprint and advancing sustainable practices.
- **Our Method | Governance** – Operating with integrity, transparency, and continuous improvement.

Together, these pillars form the foundation of our human rights priorities and reflect our responsibility to respect and protect human rights in every aspect of our business.

We place great importance on continuously refining this process, which may involve revising or expanding the list as circumstances evolve.

### 3.1. Our CNS Community

#### Right to Health

Everyone has the right to health, encompassing the highest attainable standard of physical and mental well-being, as recognised in Article 25 of the Universal Declaration of Human Rights (UDHR) and Article 12 of the International Covenant on Economic, Social and Cultural Rights (ICESCR).

As a pharmaceutical company focused on CNS disorders, Neuraxpharm contributes to Sustainable Development Goal (SDG) 3: *Ensure healthy lives and promote well-being for all at all ages* through research, product development, and partnerships. This reflects our purpose to make a positive impact by improving the health, quality of life, and well-being of patients with neurological and psychiatric conditions. We strive to make our medicines and innovative therapies widely accessible in collaboration with all states and regulatory bodies, recognising that the right to health can only be achieved through joint efforts by governments, healthcare professionals, and the private sector.

#### Right of Patients to Non-Discrimination and Dignity

Everyone has the right to be treated with dignity and respect, with full regard for their human rights and privacy, and to be free from discrimination for having a disease or disorder.

Neuraxpharm is committed to challenging stigma and misinformation surrounding CNS disorders. We actively confront myths and stereotypes, promote accurate information, and emphasise that mental and physical health are equally essential to overall well-being.

### 3.2. Our Team

#### **Labour Rights**

Neuraxpharm is committed to respecting and promoting international labour rights across all operations and partnerships. We foster a corporate culture built on ethical conduct, legal compliance, and zero tolerance for breaches of labour standards. Our approach is guided by key international frameworks, including the Universal Declaration of Human Rights (UDHR) and the ILO Core Labour Conventions, and is embedded in our internal practices.

We firmly reject and actively prevent any form of discrimination in the workplace and ensure strict compliance with applicable regulations governing employment contracts and social security matters.

#### **Non-discrimination, Inclusion and Diversity**

All people have the right to have their dignity respected, as well as the obligation to treat the people with whom they interact for work purposes with the utmost respect.

One of Neuraxpharm's core business objectives is to ensure an inclusive, diverse, equal, safe and respectful work environment for everyone in its organisation. Diversity in Neuraxpharm is understood in terms of respect and non-discrimination regarding race, ethnic or national origin, gender, sex, sexual orientation, gender reassignment, disability, protected beliefs, religion, marital or civil partner status, age and social origin.

Embracing diversity enriches our culture and drives innovation, enabling us to better serve our employees, patients, customers, and partners. These principles guide our efforts to foster an inclusive, respectful, and empowering work environment.

#### **Workplace Harassment**

All employees have the right to be treated with dignity, consideration, and respect. Harassment, whether physical or psychological, in the workplace or in any work-related situation or communication (including verbal or non-verbal conduct, or digital harassment) is unacceptable and strictly prohibited.

Neuraxpharm rejects any form of violence, including physical, sexual, psychological, or moral harassment, as well as any abuse of authority or conduct that intimidates, humiliates, or violates individual rights. Such behaviour will not be tolerated under any circumstances.

### **Freedom of Expression**

Neuraxpharm respects and upholds the right to freedom of expression as a fundamental human right. We are committed to fostering an environment where employees can share ideas, opinions, and concerns openly and constructively, without fear of retaliation or discrimination. This principle applies across all levels of the organisation and extends to all Neuraxpharm affiliates.

We encourage dialogue that promotes mutual respect and inclusivity, recognising that diverse perspectives drive innovation and strengthen our culture. While we support open communication, we expect all expressions to align with our values of integrity, professionalism, and respect for others, ensuring that freedom of expression does not compromise dignity, safety, or compliance with applicable laws and regulations.

### **Health and Safety at Work**

Every individual has the right to work in conditions that safeguard health, safety, and well-being. At Neuraxpharm, we consider the protection of our employees' health and safety an essential requirement in the design, manufacturing, operation and maintenance of work equipment, processes, and activities.

Preventing occupational risks is a priority, and we ensure that all employees and third parties who access our facilities receive the necessary information and training to carry out their work safely and responsibly.

Compliance with applicable laws and internal standards and operating procedures is mandatory for all, with the aim of minimising risks and safeguarding individual safety.

### **Living Wage**

Neuraxpharm is committed to providing fair and adequate compensation in full alignment with the regulatory frameworks of each country in which we operate. We ensure that all compensation meets or exceeds the minimum requirements established by the relevant authorities and regularly review wage levels to remain compliant with evolving legal standards. Through our compensation, benefits, and working conditions, we strive to support an adequate standard of living for all employees.

Furthermore, we uphold the principle of no discrimination in compensation, ensuring that compensation practices are free from any form of discrimination based on gender, ethnicity, or other protected characteristics.

### **Working Time and Right to Rest**

We are committed to fostering a culture that safeguards employees' right to adequate rest, recognising it as fundamental to their well-being, performance, and long-term growth.

In line with applicable laws and best practices, our internal policies promote a healthy work-life integration through clear guidelines on working time, annual leave, and flexible arrangements where possible at all levels within the organisation.

### **Freedom of Association**

Neuraxpharm recognises and respects the right of all employees to freedom of association. Employees have the right to form, join, or participate in trade unions or other representative organisations of their choice.

We are committed to maintaining an open and constructive dialogue with employees and their representatives, including works councils and trade unions, in full compliance with local laws and regulations. Employee representatives will not be disadvantaged or granted preferential treatment for carrying out their duties.

## **3.3. Our Patients**

### **Access to Medicines**

Our company recognises that access to medicines, particularly those addressing CNS disorders, is a fundamental component of the right to health and a cornerstone of our purpose. We are committed to ensuring that our products are available and affordable for patients across all markets, while maintaining responsible pricing strategies that balance business sustainability with improved accessibility.

We work closely with governments, regulatory authorities, strategic partners and international organisations to remove barriers and expand access to essential treatments. These efforts include innovative approaches and every new development is guided by a clear purpose: to deliver tangible benefits to patients, healthcare professionals and health systems, aligning innovation with public health priorities.

### **Clinical Trials**

At Neuraxpharm, clinical research is conducted by implementing the highest level of scientific rigour and ethical responsibility. Clinical trials are carefully designed, closely monitored, and initiated only after prior approval by the relevant national regulatory authorities and independent ethics committees. Our research activities are grounded in socially responsible R&D practices, with a strong commitment to respecting human rights, patient protection, data privacy, and full regulatory compliance.

All clinical trials conducted internally or through subcontracted Clinical Research Organisations (CROs) are performed in accordance with internationally recognised standards of Good Clinical Practice. We fully respect the rights, safety, dignity, and well-being of research participants, in line with the principles of the Declaration of Helsinki, ICH Good Clinical Practice, the EU General Data Protection Regulation (GDPR) as a baseline standard applied across global clinical activities, and all

applicable national and international laws. Informed consent is systematically obtained, personal data are strictly protected, and robust safety oversight is maintained throughout the duration of each study. All research partners are required to adhere to the same ethical, legal, and human rights standards.

### **Product Quality and Falsified Medicines**

At Neuraxpharm, we recognise that ensuring the quality, safety and authenticity of our medicines is fundamental to protecting the right to health and maintaining trust in our products. We manufacture all medicines to the highest quality standards, in full compliance with Good Manufacturing Practices and certified regulatory requirements. Our commitment goes beyond production, incorporating robust systems that safeguard patients against falsified or tampered medicines through advanced serialisation technology. This end-to-end tracking across the supply chain mitigates the risk of counterfeiting and ensures compliance with European health regulations.

Our Pharmacovigilance department plays a critical role in monitoring product safety and integrity. It oversees systems that detect, evaluate and report adverse reactions and potential cases of falsified medicines, working closely with national and international authorities to protect patients and uphold public health standards.

## **3.4. Our Planet**

### **Human Rights and Environmental Responsibility**

Environmental protection and respect for human rights are deeply interconnected. Environmental harm not only affects ecosystems but also impacts human health, access to resources and the well-being of communities. We are committed to conducting our operations responsibly, promoting sustainable practices and reducing our environmental footprint across the entire value chain, while complying with all applicable environmental laws and continuously seeking ways to minimise our ecological impact.

By embedding environmental responsibility into our human rights framework, we strive to protect health, preserve natural resources and contribute to a more sustainable future for all stakeholders.

## **3.5. Our Method | Governance**

### **Right to Privacy and Data Protection**

Respecting the right to privacy is a fundamental human right and an essential part of our responsibility as a healthcare company. At Neuraxpharm, we are committed to protecting the privacy rights of employees, patients, their caregivers, healthcare professionals and other stakeholders, ensuring that personal data is processed lawfully, fairly, and transparently. This commitment aligns with applicable data protection laws, including the General Data Protection Regulation (GDPR), as well as other recognised information security standards and industry best practices that

reinforce the protection, integrity, and resilience of organisational information systems.

We provide clear information about how personal data is collected and processed, enabling individuals to make informed decisions and exercise their rights. Data is collected and processed solely for specific, legitimate business purposes and is safeguarded against unauthorised access, misuse or disclosure.

We maintain strong governance structures to protect personal information. Our Privacy Office oversees Data Protection Officer (DPO) functions and works with trusted partners to ensure continuous GDPR compliance. These measures include implementing robust technical and organisational safeguards, maintaining Records of Processing Activities and conducting Data Protection Impact Assessments when required.

### **Artificial Intelligence**

Artificial Intelligence (AI) is a transformative technology that enhances productivity, automation, and innovation. However, its unregulated use may pose risks to data security, compliance, intellectual property, and corporate reputation.

To balance innovation with the protection of corporate values and regulatory compliance, Neuraxpharm has an AI Policy that provides a clear framework for responsible AI usage in alignment with current standards and recognised best practices. This policy applies to all employees, contractors, and external parties who access Neuraxpharm's technological resources, including corporate devices, networks, collaboration platforms, and information, for any AI-related activities.

To ensure the ethical, secure, and compliant use of AI across Neuraxpharm, an AI Governance Committee has been established to safeguard adherence to the AI Policy, evaluate risks associated with the deployment and use of AI technologies, and provide guidance to ensure compliance with evolving standards.

### **Respect for Free Competition**

Our company is firmly committed to fair and transparent competition as an essential principle of ethical business conduct. We compete in the marketplace in full compliance with applicable antitrust and competition laws, ensuring that all actions are lawful and based on integrity. We categorically reject any practice that could restrict free competition, including but not limited to abuse of a dominant position, price-fixing, market share or production capacity agreements, and customer allocation.

We obtain market and competitor information only through legitimate means and we refrain from using misleading or disparaging advertising and from spreading false or uncertain statements about competitors or third parties, products or market conditions.

By upholding these standards, we foster a level playing field that promotes innovation, quality and trust, ensuring that our business practices respect both the law and the fundamental rights of all stakeholders.

### **Child Labour**

Children have the right to grow and develop free from harm, exploitation or any form of hindrance. Neuraxpharm strictly prohibits child labour in all its operations, in accordance with the International Labour Organization (ILO) Conventions No. 138 (Minimum Age Convention) and No. 182 (Worst Forms of Child Labour).

As outlined in our Code of Ethics for Third Parties (Article 4.1.III), our suppliers, customers, contractors and business partners must reject child labour, respect the legal minimum age for employment and implement effective measures to ensure compliance.

### **Modern Slavery including Forced Labour and Human Trafficking**

Forced, compulsory or bonded labour violates fundamental human rights, undermines human dignity and perpetuates poverty and inequality. In accordance with the International Labour Organization (ILO) Conventions No. 29 (Forced Labour Convention) and No. 105 (Abolition of Forced Labour Convention), Neuraxpharm strictly prohibits all forms of modern slavery, including any type of forced labour and human trafficking, within its operations.

Our Code of Ethics for Third Parties (Article 4.1.I and II) requires suppliers, contractors and business partners to adhere to the same standards and implement robust measures to prevent such practices throughout the value chain.

## **4. Strengthening Due Diligence Framework**

Neuraxpharm recognises that respecting human rights requires continuous attention and accountability across all operations and business relationships.

To enforce our policy, Neuraxpharm's specific human rights expectations for third parties are defined in the Code of Ethics for Third Parties, which sets clear standards on ethical conduct, labour practices, environmental responsibility, and human rights.

Additionally, we are committed to the development and strengthening of a due diligence process to identify, prevent, and address potential human rights risks in our value chain. This process supports responsible practices and continuous improvement and reflects our commitment to ensuring that suppliers and third parties respect internationally recognised human rights and promote these standards within their own supply chains.

Neuraxpharm explicitly rejects any form of child labour, forced or compulsory labour, human trafficking, or modern slavery, and requires all suppliers and business partners to adopt measures that prevent such practices across their operations and business activities.

## 5. Reporting Mechanisms

Neuraxpharm provides accessible and secure channels for raising concerns related to human rights or ethical conduct. To reinforce our commitment to transparency and trust, we have established a dedicated Compliance Committee and a secure Ethics and Compliance Channel (Whistleblowing channel).

Our Ethics and Compliance Channel is available to all internal and external stakeholders to report issues such as human rights violations, harassment, corruption, discrimination, anticompetitive practices, breaches of environmental regulations, or any behaviour that does not conform to our Code of Ethics or our Code of Ethics for Third Parties, as well as any dubious activities in their environment. The channel operates under principles of fairness, presumption of innocence, proportionality, and protection of the informant. Our Ethics and Compliance Channel is available [here](#).

All information received is handled with the utmost confidentiality. Reports can be submitted confidentially and anonymously, and we enforce a strict non-reprisal policy. Every notification is reviewed diligently and addressed in line with our zero-tolerance approach to unethical practices.

## 6. Implementation, Communication and Update

By formalising this Human Rights Policy, Neuraxpharm builds on established practices and strengthens our approach to respecting and promoting human rights as an integral part of our culture and as part of our broader sustainability and corporate responsibility strategy. This policy reflects our dedication to maintaining high standards of integrity and responsibility while fostering an environment of fairness and respect for all stakeholders.

Our Human Rights Policy is for immediate implementation. It will be communicated to employees and all relevant stakeholders and published on our website for public access, ensuring transparency and accountability throughout our operations and stakeholder relationships.

We recognise this as a continuous journey and will regularly review and improve our practices and policies to ensure they remain effective and relevant.

## 7. References for drafting this Human Rights Policy

- For further information, please refer to the following key international frameworks and guidelines:

- [Universal Declaration of Human Rights](#) (UDHR)
- [International Labour Organization](#) (ILO)
- [United Nations Guiding Principles on Business and Human Rights](#) (UNGSSs)

-International Covenant on Economic, Social and Cultural Rights (ICESCR)  
-United Nations Sustainable Development Goals (SDGs)

- For further information, please refer to the following Neuraxpharm policies and additional resources:
  - ESG Policy
  - Code of Ethics
  - Diversity & Inclusion Policy
  - HSE Policy
  - Sustainability Report
  - Privacy Policy
  - Information Security Policy
  - AI Policy
  - Code of Ethics for Third Parties
  - Procurement Policy
  - Ethics and Compliance Channel (Whistleblowing channel)
  - Whistleblowing Channel Policy

**health is ESG** 

For more information, please visit our website at  
<https://www.neuraxpharm.com/our-responsibility/> and explore our annual  
Sustainability Report.