

Modern Slavery and Human Trafficking Statement

This annual Modern Slavery and Human Trafficking Statement describes Orion Corporation's and its group companies' approach to preventing modern slavery, in accordance with the United Kingdom's Modern Slavery Act 2015.

Committed to Human Rights

Orion Corporation and its group companies (collectively, 'Orion' or 'Orion Group') are committed to responsible and sustainable business conduct and to the promotion of ethically approved practices.

We are committed to respecting internationally recognised human rights in all Orion Group's activities and promoting them in practice. We are committed to the principles of the Universal Declaration of Human Rights, the International Bill of Human Rights, the core conventions of the International Labour Organization (ILO), and the United Nations Guiding Principles on Business and Human Rights and expect the same from our business partners.

We do not accept or encourage activities violating human rights or participate in any such activities. We emphasise social, economic, and environmental responsibility as well as fairness and transparency in our relationships with employees, partners, customers, suppliers, authorities, and other interest groups. Modern slavery is a crime and a gross violation of human rights. We have zero tolerance for modern slavery and are committed to preventing modern slavery and human trafficking in our corporate activities. We are also committed to ensuring that our supply chain partners do not engage in or support any form of slavery or human trafficking.

Orion's business and supply chain

Orion Corporation is a globally operating Nordic pharmaceutical company – a builder of well-being for over a hundred years. We develop, manufacture, and market human and veterinary pharmaceuticals and active pharmaceutical ingredients. Orion has an extensive portfolio of proprietary and generic medicines and consumer health products. The core therapy areas of Orion's pharmaceutical R&D are oncology and pain. Proprietary products developed by Orion are used to treat cancer, neurological diseases and respiratory diseases, among others. In 2025, Orion's net sales amounted to EUR 1,889.5 million and the company employed about 4,000 professionals worldwide, dedicated to building well-being. Orion's A and B shares are listed on Nasdaq Helsinki.

Orion Corporation

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Orion is headquartered in Espoo, Finland and has a total of eight production sites, six in Finland, one in France and one in Belgium.

Orion's products are sold globally in over one hundred countries through Orion's own sales network and by partners. Orion has its own sales network in Europe and in six countries in the Asia-Pacific region. Elsewhere in the world, Orion's human pharmaceuticals are sold mainly by the company's partners. Orion is engaged in the sale of veterinary drugs through its own sales network in the Nordic countries, Belgium, France, some Eastern European countries, and Vietnam. Elsewhere, these products are sold by partners. Orion is also engaged in the sale of active pharmaceutical ingredients and contract manufacturing products and services globally. In addition, Orion markets and sells drugs and products manufactured by several other companies.

Orion has a vast network of suppliers in over 50 countries supplying packaging materials, raw materials and bulk and finished products. In addition, we rely on outside partners for the supply of services and materials to support our core businesses.

[Policies and training on modern slavery and human trafficking](#)

To ensure awareness of our values and policies, we provide training to our employees, and our policies are available on our corporate website. Our Code of Conduct defines the Orion Group's ethical practices and commitment to complying with laws, ethically approved practices, and respect for human rights and the environment.

Orion expects all Group personnel to be familiar and comply with the Code of Conduct. We provide a mandatory Code of Conduct training to Orion Group employees, currently available in 18 languages, to ensure accessibility to all employees. During 2025, 98% Orionees completed the Code of Conduct e-learning course. Orion ensures that the training is completed by all new employees.

The Orion Third Party Code of Conduct defines the minimum requirements concerning ethical business practices, human rights and labour, health and safety, environment, and management systems to which the Orion Group expect its suppliers and all other partners to be committed. Both the Code of Conduct and the Third Party Code of Conduct reflect our commitment to operating with integrity and high ethical standards in all our business relationships and to implementing systems and controls to ensure that modern slavery and human trafficking do not take place in our supply chain. In 2025, 96% (by spend) and 63% (by number of suppliers) of Orion's active suppliers Third Party materials, raw materials, and products confirmed their adherence to the Third Party Code of Conduct.

Orion contributes to industry-wide cooperation to strengthen responsible practices across the pharmaceutical supply chain. Orion Corporation is a full member of the Pharmaceutical Supply Chain Initiative (PSCI) and endorses the PSCI principles and standards for suppliers on ethics, human rights and labour, health and safety, environment, and management systems throughout the Orion Group. We also offer PSCI's trainings to our suppliers to support practicing the PSCI's principles of responsible supply chain management.

Due diligence processes

Orion analyses the risks pertaining to people across its value chain. The main risks for human rights issues, including modern slavery, arise from the supply chain. As a global pharmaceutical business, we maintain strong oversight and control of our tier one suppliers. However, with complex and extended supply chains, we recognise that our visibility diminishes beyond our tier one suppliers. As supply chains continue to grow in length and complexity, the risk of modern slavery occurring at some point within the value chain increases.

We systematically manage risks in our global supply chain through a structured sustainability due diligence process. In 2025, Orion continued to further refine and strengthen its risk-based supplier assessment process. According to the renewed process, Orion continues to conduct human rights due diligence for all new suppliers and manufacturing sites prior to contracting, with clearer and more systematic requirements. Our process includes identifying relevant manufacturing sites, classifying suppliers, and evaluating site-level risks using independent tools such as EcoVadis IQ. We assess country-level and product-related risk factors, including operations in high-risk regions and high-risk manufacturing processes. Based on this analysis, each supplier is assigned a risk rating, which informs our next steps, ongoing monitoring and required follow-up actions. All active suppliers are systematically reassessed.

When assessments or audits reveal gaps, Orion works with suppliers to agree on necessary corrective actions and monitors their implementation to ensure timely and effective closure. Our audits cover a broad range of sustainability topics, including human rights and labour practices, environmental performance, occupational health and safety, ethics, and management systems. In 2025, Orion conducted 38 PSCI-aligned audits assessing sustainability-related issues at supplier sites.

Access to remedy and grievance mechanisms

We encourage employees and other stakeholders to report any concerns regarding modern slavery and human trafficking, as well as any other suspected misconduct or violation of our policies, to

Orion's grievance channel, Compliance Line. We take any such reports seriously, investigate, and take appropriate, case-specific measures to stop behaviour and activity violating our policies.

Orion is committed to remedying situations where its activities have caused or contributed to adverse human rights impacts. Remediation approaches are adapted to the specific case and the relevant local context. Breaches of Orion's policies lead to actions, including corrective measures with business partners, which may include termination of the contractual relationship, where remediation is not possible or appropriate. Orion seeks to address adverse human rights impacts through proportionate and responsible actions.

During the reporting period, no substantiated severe human rights issues were identified in Orion's own operations through the Compliance Line.

We annually report on our human rights-related policies, risk management practices, indicators, and results. These are a part of Orion Corporation's sustainability statement included in Orion Corporation's Financial Statement documents 2025.

[On this statement](#)

This Modern Slavery and Human Trafficking statement constitutes the Orion Group's modern slavery and human trafficking statement for the financial year ending 31 December 2025 for the purposes of section 54(1) of the UK Modern Slavery Act 2015.

This statement has been approved by Orion Corporation's Board of Directors on 24 March 2026.

In Espoo, Finland, on 24 March 2026.

Liisa Hurme
President and CEO, Orion Corporation