

Modern Slavery and Human Trafficking Statement

Orion Corporation (“Orion”) and its group companies (Orion and its group companies collectively, the “Orion Group”) are committed to responsible business conduct and strive to promote ethically approved practices. We are committed to respecting internationally recognised human rights in all our activities and promoting them in practice. We are committed to the principles of the Universal Declaration of Human Rights and the core conventions of the International Labour Organization (ILO) 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 emphasize social, economic and environmental responsibility as well as fairness and transparency in our relationships with employees, partners, customers, 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.

Our business and supply chain

Orion is a globally operating Finnish pharmaceutical company - a builder of well-being. The Orion Group develops, manufactures and markets human and veterinary pharmaceuticals and active pharmaceutical ingredients. Orion has an extensive portfolio of proprietary and generic medicines and self-care products. The core therapy areas of Orion's pharmaceutical R&D are oncology and pain. Orion's A and B shares are listed on Nasdaq Helsinki.

The Orion Group's net sales in 2022 were EUR 1,341 million. At the end of December 2022 the Orion Group had a total of 3,527 employees. The Orion Group's headquarter is located in Finland and it has six production sites in Finland, one in France and one in Belgium. Orion's products are sold globally in over one hundred countries through the Orion Group's own sales network and by partners. Orion Group has its own sales network for human pharmaceuticals in Europe and in five countries in the Asia-Pacific region. Elsewhere in the world, Orion's human pharmaceuticals are sold mainly by partners. Orion is engaged in the sale of veterinary drugs through its own sales network in the Nordic countries, Belgium, France, certain Eastern European countries and Vietnam. Elsewhere, these products are sold by partners. The Orion Group is also engaged in the sale of active pharmaceutical ingredients and contract manufacturing products and services globally.

The Orion Group 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 in relation to 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. The Orion Group expects all its personnel to be

familiar and comply with the Code of Conduct. We provide a mandatory Code of Conduct training to the Orion Group employees, currently available in 15 languages. During 2022, 682 Orionees completed the CoC e-learning course. The majority of the Orion Group employees completed the mandatory Code of Conduct e-learning in 2020, when the training was published.

In June 2022, Orion acquired a Belgian animal health company V.M.D. NV, including its subsidiaries (collectively, “VMD”), and the process of integrating VMD into the Orion Group’s sustainability (incl. modern slavery and human trafficking) and risk management practices is ongoing and will continue during 2023. In 2022, Orion rolled out the Code of Conduct to the VMD employees and published an additional language version of the policy and related e-learning to ensure accessibility to all employees.

The Orion Third Party Code of Conduct defines the minimum requirements to which the Orion Group expect its partners to be committed. In addition, Orion Supplier Sustainability Requirements forms a minimum set of requirements that the Orion Group expects from its suppliers to ensure that the suppliers conform to the Orion Third Party Code of Conduct and additional requirements for management systems, ethical business practices, labour, health and safety and environment. 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.

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. We offer PSCI’s trainings to our suppliers to support practicing the PSCI’s principles of responsible supply chain management.

Due diligence processes

We are committed to sustainability in all our operations. As part of managing our supply chain, we monitor modern slavery and human trafficking risks based upon the industry in which we operate, and the geographic locations in which we conduct business and/or obtain materials necessary to provide products to our customers. We systematically manage risks in our global supply chain through our due diligence practices. Suppliers’ compliance with regulations and requirements are monitored through assessment questionnaires, undertaking risk-based sustainability audits (involving matters such as human rights and labour, the environment, occupational health and safety, ethics and management systems) of their operations and facilities, ensuring that necessary corrective actions are agreed with the supplier and monitoring implementation of actions.

In 2022, Orion continued to apply its human rights due diligence practices with risk-based approach.

Access to remedy and grievance mechanisms

We encourage employees and other stakeholders to report in good faith any concerns regarding modern slavery and human trafficking, as well as any other suspected misconduct or violation of our company's policies. We take any such reports seriously, investigate and take appropriate, case-specific measures to stop behaviour and activity violating our policies. Non-compliance with our policies may lead to employment dismissal or termination of our relationship with third parties. Orion was not made aware of any human rights violations in its own operations through the Orion Group's whistleblowing channel in 2022. We annually report on our human rights related policies, risk management practices, indicators and results as a part of Orion's non-financial reporting included in Orion Corporation Financial Statement Documents.

This statement constitutes the Orion Group's modern slavery and human trafficking statement for the financial year ending 31 December 2022 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 27 April 2023.

In Espoo, Finland, on 27 April 2023

Liisa Hurme
President and CEO, Orion Corporation