

Lobbying Policy.

1. Purpose and scope.

Opella views the active contribution of the healthcare industry to the policy-making process through lobbying as a fundamental aspect of the democratic debate, essential for fostering the legitimate and diverse representation of interests.

Through its lobbying activities, Opella seeks to provide policymakers with relevant perspectives to support informed decision-making on matters affecting the healthcare community, with the aim of improving health outcomes, well-being, and quality of life for patients and consumers, and contributing to a positive impact on society and the environment.

The purpose of this Policy is to set forth the principles for responsible lobbying at the local, national, regional, and international levels, either directly or through third parties.

It applies to

- All Opella products (prescription-only, OTC, supplements, cosmetics, medical devices, etc.).
- All interactions with policymakers aimed at lobbying, around the world.
- All Opella employees and third parties hired by Opella to lobby on its behalf (i.e., lobbying consultants).

2. Principles.

Positive Impact. Opella conducts its lobbying activities to serve the public interest and the needs of the healthcare community, and, ultimately, to contribute to a positive impact on society and the environment fully aligned with Opella's social and environmental commitments and objectives, including its commitment to the Paris Agreement on climate change and the U.N. Sustainable Development Goals.

Respect of Independence. Opella respects the independence of the policymakers and other external stakeholders with which it engages and is committed to making all efforts not to place external stakeholders in a position of conflict with their duties.

Ethics & Integrity. Opella is committed to conducting lobbying in full compliance with applicable laws - including anti-corruption and anti-bribery laws - as well as all relevant regulations, codes, and institutional standards, always applying the highest ethical standards. Lobbying is not conducted with any intention to improperly influence public decisions or to create obligations in expectation of a direct or immediate return for Opella or any individual. Opella does not use any transfer of value (e.g., hospitality, services, grants, donations, contributions, partnerships, sponsorships, gifts, etc.) directly or indirectly, to induce or reward policymakers for an undue business advantage or for adopting a view favorable to Opella's interests. Opella does not provide any funding to political parties, candidates and campaigns unless explicitly regulated under the applicable laws, regulations and codes of the relevant country.

Transparency. Opella engages with policymakers transparently, whether directly or through third parties, and only on the merits of the issues concerned. Opella complies with applicable disclosure and transparency requirements governing interactions with policymakers in the countries where it operates, including registration and reporting through official databases.

Lobbying consultants. Opella may engage lobbying consultants to lobby on its behalf, but never as a means of doing indirectly what it could not do directly. These third parties are selected by Public Affairs, following anti-bribery due diligence (Anti-bribery Due Diligence SOP), engaged under formal agreements with fair and activity-based remuneration, and required to comply fully with applicable laws, this Policy and the Opella Lobbying Standard. Any payment to lobbying consultants is subject to the submission of a detailed report of activities actually performed. Opella remains accountable for the conduct of lobbying consultants. Any breach of applicable laws, this Policy, or the Opella Lobbying Standard by lobbying consultants will constitute a breach of their contractual obligations and may result in the termination of the relationship.

Other organizations. In addition to lobbying consultants, Opella may interact with policymakers in cooperation with other organizations (e.g., patient groups, consumer associations, charities, think tanks, foundations, NGOs, and trade associations) whose values are compatible with Opella's and which share similar perspectives on the issues being discussed with policymakers. Such interactions must take place on the basis of a shared agenda, while preserving each party's independence and ability to express its own views. Opella must respect the independence of these organizations and transparently and respectfully work at reaching common positions as needed. Opella must not use transfers of value (e.g., hospitality, services, grants, donations, sponsorships, or gifts), or biased or inaccurate information, to persuade them to participate in interactions with policymakers or to influence their position on the matters being discussed. Opella must not express views or opinions to policymakers on behalf of such organizations or create the impression that it represents their interests. All such interactions must be conducted in compliance with applicable antitrust and competition laws. Opella's memberships to trade associations are reviewed annually to ensure that such associations continue to represent interests and share principles and values aligned with those of Opella.

High standards in communication. Opella provides policymakers with non-promotional, truthful, fair, balanced, accurate, complete, up-to-date, and substantiated information that rejects any form of manipulation and can always withstand public scrutiny. This may include data which is evidence-based and replicable, insights from independent market research, and scientific data based on research by scientists which has been published in reputable peer-reviewed journals. Opella clearly distinguishes factual data from Opella's own opinions and interpretations. Opella does not use lobbying as an opportunity to promote its products.

Authorized interactions. Opella Public Affairs, General Managers/Heads of Countries or employees formally appointed by such functions/roles for this purpose can interact with and respond to policymakers, including trade associations, on behalf of Opella. Any other function must contact Opella authorized employees and forward any questions received from policymakers to them. Other Opella employees are not allowed to interact on Opella's behalf on lobbying with policymakers. Public Affairs maintains a list of Opella authorized employees and ensures they receive appropriate training.

3. Enforcement.

This Policy is owned by Public Affairs, which is accountable for its implementation and enforcement. It is approved by the Chief Executive Officer. It will be reviewed every three years in consultation with Ethics & Business Integrity.

A more detailed internal Standard on lobbying exists (Opella Lobbying Standard), accompanied by a tailored training effort, and fully mirrors the principles set out in this Policy, providing additional operational and implementation guidance to ensure these principles are fully embedded in Opella's everyday strategic decision-making and operational activities.

Ethics and compliance risks related to lobbying activities are identified and assessed through risk assessment and monitoring performed by Ethics and Business Integrity, the outcomes of which are presented to the Executive Compliance Committee (ECC) and addressed as needed.

Employees, lobbying consultants and other third parties are expected to promptly report any concerns of violation of the applicable laws, this Policy and the Opella Lobbying Standard. In accordance with the Opella Whistleblowing Standard, they can raise concerns with their managers, Ethics and Business Integrity, People & Culture or via any other local channels available under applicable laws. Concerns can also be reported via the [Speak Up Helpline](#). It operates 24 hours a day, every day of the year.

Revision history.

Version.	Document ID.	Date.	Summary of changes.
1.0	PA-CO-POL-0000004-Lobbying Policy.	19 th of August 2026.	Initial issue.