

Sustainability Statement

of the annual year 2025



Sustainability Statement

GENERAL INFORMATION (ESRS 2)

Basis of this sustainability statement (BP-1)

This sustainability statement was prepared for the same scope of consolidation on which the annual financial statements are based (see **Notes to the Consolidated Financial Statements**). The scope of the Group expanded significantly in 2024 following the acquisition of the Ceban Group. The scope of consolidation changed further during the reporting year; as of December 31, 2025, the Group consisted of 56 companies (previous year: 66).

In the following, “we,” Medios, Medios AG, the Medios Group, or “the company” refer to the entire scope of consolidation. If individual statements apply only to a subset of the scope of consolidation, this is indicated accordingly. We also transparently disclose when individual key figures are based on estimates and explain the methodology used. The reporting period for all qualitative statements and quantitative data, including key figures, is defined in accordance with financial reporting (January 1, 2025 – December 31, 2025). “Ceban” refers to Medios International B.V., including its affiliated companies.

This sustainability statement constitutes a nonfinancial consolidated statement in accordance with the legal requirements for a nonfinancial statement pursuant to Section 289b of the German Commercial Code (HGB). The CSR Directive Implementation Act (CSR-RUG) permits reporting companies to utilize additional European frameworks. Accordingly, Medios AG has voluntarily prepared the report's content in accordance with the European requirements of the “Corporate Sustainability Reporting Directive” (CSRD) and the “European Sustainability Reporting Standards” (ESRS). However, neither the content of the report nor the correct application of the reporting standards has been subject to a limited assurance engagement by the auditor. The report also includes the Disclosure requirements of the EU Taxonomy (pursuant to Article 8 of Regulation (EU) 2020/852) and constitutes a progress report in accordance with the COP Policy of the United Nations Global Compact (UNGC) for the year 2025.

To provide a transparent insight into Medios' sustainability-related topics, as little information as possible has been omitted below for reasons of confidentiality or to protect intellectual property. However, due to the nature of Medios' business activities and the industry environment, certain disclosures cannot be made for reasons of confidentiality and data protection. These are, specifically:

- Intellectual property and technological exclusivity: Medios operates in personalized medicine and compounding of patient-specific therapies, which involve innovative solutions and proprietary formulations. To protect competitive advantages and the results of research and development, certain technical details and formulations are treated as confidential, and specific operational procedures and technical details are not fully disclosed.
- Industry-specific standards and confidentiality agreements: Medios adheres to international production standards (e.g., GMP) and participates in clinical trials, whereby certain information and data are protected by strict confidentiality agreements to ensure compliance and safeguard patient data.

The upstream and downstream value chains were examined as part of the materiality assessment. The extent to which the respective policies, actions, targets, and metrics also apply to the value chain is explained in more detail in the relevant thematic chapters below. Similarly, sector average data or other approximate values used for estimates regarding the value chain, as well as key performance indicators associated with measurement uncertainties and estimates, are explained in the respective thematic chapters with reference to the relevant sources. Estimates and measurement uncertainties were particularly present in the following areas, as primary data was not available, at least in part:

- Data on GHG emissions (GHG emissions) from the upstream and downstream value chain (Scope 3 emissions)
- Data on incinerated or landfilled non-hazardous and non-recycled waste
- Quantitative data on resource inflows

In this sustainability statement, no information required by the ESRS was omitted by invoking exemptions regarding confidentiality (ESRS 2 BP-1 5d) or matters currently under negotiation (ESRS 2 BP-1 5e). Disclosures regarding the integration of sustainability-related performance into incentive schemes were included by reference to the remuneration report.

Role of administrative, management and supervisory bodies and information and sustainability matters they deal with (GOV-1, GOV-2)

Medios takes the importance of corporate social responsibility seriously and is actively committed to sustainable and ethical business practices. Promoting environmental protection, social justice, and ethical conduct is an integral part of our corporate philosophy, and we are continuously working to maximize our positive impact on the environment and society.

To meet this commitment, the administrative, management and supervisory bodies of Medios AG are responsible for all matters related to sustainability.

The Sustainability Committee, established in 2021, ensures that sustainability is firmly embedded within the company's organizational structure. The Chairman of the Executive Board (Matthias Gärtner until December 31, 2025) chairs the committee. In addition, the committee consists of the two members of the Supervisory Board's ESG Committee, the members of the Executive Board of Medios AG, and representatives from all functional departments and operational areas. Depending on the topic and necessity, additional contacts are available. The Sustainability Committee meets four times a year, defines the priorities of the sustainability strategy, and monitors the implementation of the corresponding Actions.

As Chair of the Sustainability Committee, the CEO is responsible for the overall sustainability strategy, sustainability reporting, and compliance with sustainability-related legislation. The achievement and monitoring of the set sustainability goals also ultimately fall within his area of responsibility. The double materiality assessment and the material impacts, risks, and opportunities (IROs) identified in this process are reviewed and validated by the full Executive Board. The CEO is also actively involved in the assessment of the IROs. To ensure the management of individual impacts, opportunities, or risks, corresponding areas of responsibility and contact persons for actions and goals, as well as communication channels, are defined.

Table 1: Composition of the Executive Board of Medios AG as of December 31, 2025

	Total	Male	Female
Members of the Executive Board	4	4 (100%)	0 (0%)¹

¹ Until June 30, 2025: 5 members on the Executive Board, of whom 4 are male and 1 is female.

Within the Supervisory Board, the ESG Committee, established in 2024, addresses sustainable business conduct as well as the company's business activities in the areas of environmental, social, and governance (ESG) issues. This includes, in particular, the approach to integrating sustainability into the business strategy, the setting of sustainability goals, mandatory ESG and CSRD reporting and, where applicable, its review, the opportunities and risks, as well as the organizational structures and processes in ESG areas, in each case to the extent that such matters do not fall within the purview of the Audit Committee.

Within its area of responsibility, the Supervisory Board's ESG Committee advises and monitors the Executive Board, issues recommendations on these matters, and prepares any necessary Supervisory Board resolutions. The ESG Committee consists of Dr. Yann Samson (Committee Chair and Chairman of the Supervisory Board) and Jens Apermann.

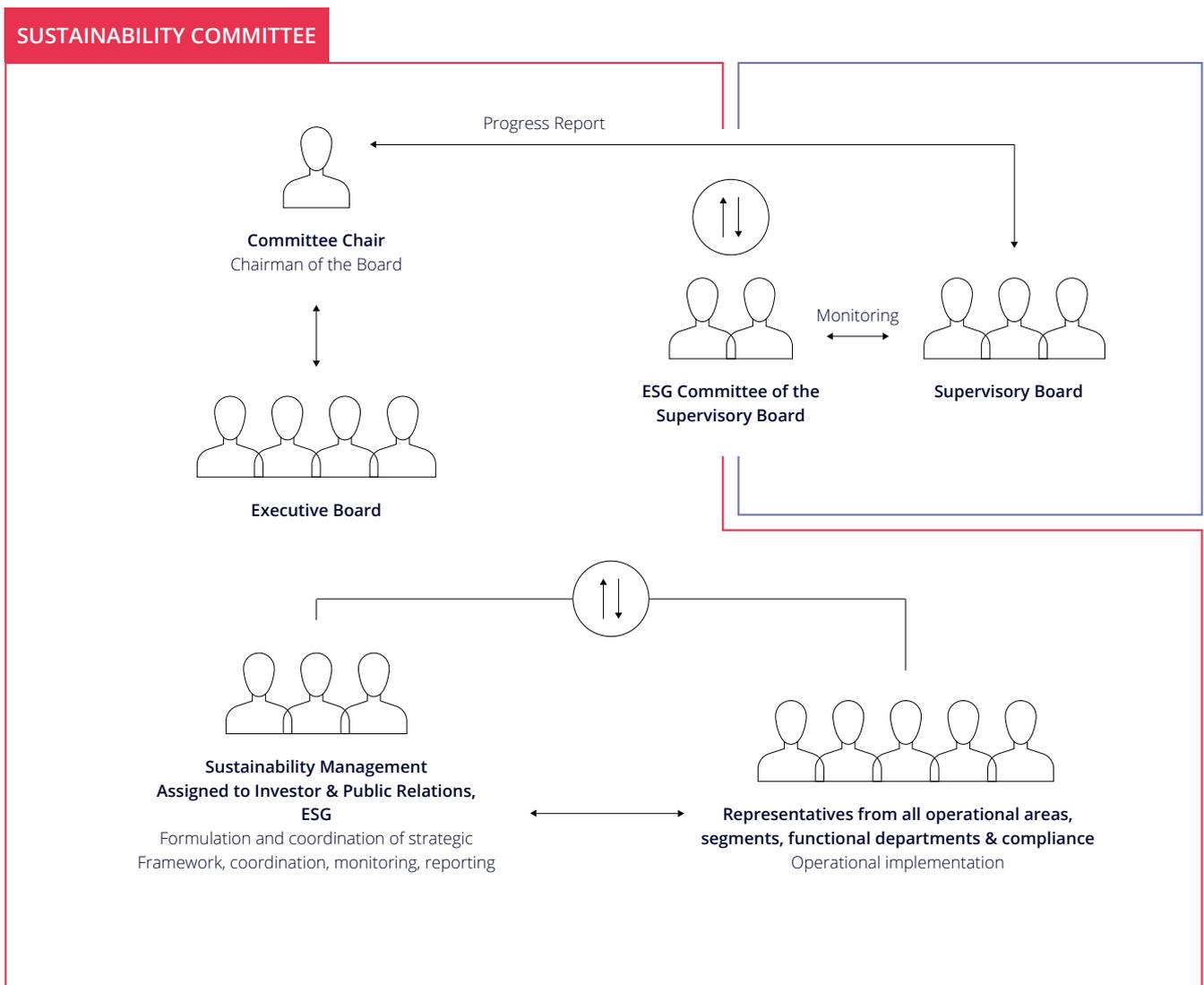
Table 2: Composition of the Supervisory Board of Medios AG

	Total	Male	Female
Members of the Supervisory Board	5 (100%)	4 (80%)	1 (20%)
Of whom are members of the Executive Board	0	0	0
Of which non-Executive Board members	5 (100%)	4 (80%)	1 (20%)
Of which employees	0	0	0
Of which employee representatives (not required by law)	0	0	0
Of which independent members	5	4	1

The ESG Committee ensures that ESG-related issues, as well as actions, objectives, and policies for managing all ESG-related IROs deemed material by Medios, are implemented from management down to every department at all levels. The ESG Committee holds quarterly meetings for this purpose. In his capacity as Chair of the Sustainability Committee, the CEO reports in advance on progress in the management of ESG-related IROs, including results of the

adopted policies, actions, targets, and metrics. Targets are developed and tracked within the Sustainability Committee in collaboration with the CEO and the ESG Committee.

The following chart illustrates the structures, processes, and information flows of ESG Governance within the Medios Group in 2025:



To ensure that the described responsibilities can be fulfilled appropriately, Medios AG ensures that the necessary expertise is available within the administrative, management and supervisory bodies. The Chairman of the Supervisory Board, Dr. Yann Samson, served as the Supervisory Board's Sustainability Officer from early 2022 until the establishment of the ESG Committee within the Supervisory Board and his assumption of its chairmanship. In this role, he was already responsible for monitoring and advising the Executive Board on sustainability issues. As the person responsible for sustainability on the Executive Board of financial.com AG, Dr. Samson has proven expertise in sustainability issues, particularly in ESG strategies, as well as in the collection of ESG data and its further analysis. Among other things, financial.com AG develops its own tools and interfaces for evaluating ESG data. These capabilities in analyzing ESG data enable Dr. Samson to assess and help shape the management of all material impacts, risks and opportunities at Medios AG based on quantitative data.

As an experienced attorney and member of the management boards of various companies, Dr. Samson also possesses years of expertise in legal matters as well as in business conduct and, consequently, in corporate policy. The ESG Committee also has the option of inviting experts on specialized topics to Supervisory Board meetings at any time and has already received targeted ESG training for Supervisory Board members.

Since sustainability is of central importance to Medios AG, sustainability issues are also taken into account by the Executive Board in relation to conventional corporate strategy and risk management. In this way, Medios' business strategy also pursues broader societal goals of sustainable healthcare.

Medios has defined its mission as creating a global platform to bring the most innovative drugs to where they are needed. Against this backdrop, we aim to ensure the best possible, comprehensive access to Specialty Pharma drugs for patients through cooperative collaboration and the exchange of information among various market participants. Our goal is to generate sustainable economic value by integrating good business conduct, social responsibility, and environmental commitment into our core business.

Overall responsibility for implementing the business strategy, including its sustainability-related components, lies with the Executive Board. Consequently, the Executive Board is also responsible for ensuring that the business strategy is taken into account in significant transactions and for the

process of identifying and managing risks associated with the business strategy and business model. The Supervisory Board monitors and controls its implementation as well as the associated reporting.

To obtain sustainability-related expertise, the Supervisory Board, the Executive Board, and the Sustainability Committee collectively draw on a network established by Medios AG with consulting firms and other organizations. These include:

- An external management consultancy for expertise regarding sustainability reporting and the integration of sustainability and corporate strategy.
- The major ESG rating agencies (such as ISS ESG, MSCI, S&P, Sustainalytics) for ESG best practices and feedback on the company's own sustainability performance.
- The United Nations Global Compact (UNGCC) for insights into global sustainability goals and ways to align them with our own corporate goals or to align our own goals with them.

Incorporating sustainability-related performance into incentive schemes (GOV-3)

Since July 2021, the compensation package for all members of the Executive Board of Medios AG has included a sustainability-related component in the form of a performance-based bonus ("ESG"). The ESG bonus is a Short-term variable (performance-based) compensation (known as an STI, "Short-Term Incentive") in the form of a bonus with a one-year performance period. Before the start of each financial year, the Supervisory Board, in consultation with the Executive Board, sets ESG targets across various areas (such as climate and the environment) uniformly for all members of the Executive Board.

When setting the ESG targets, the Supervisory Board also determines the weighting among the established ESG targets for overall target achievement, as well as the criteria and methodologies for assessing the achievement of the respective ESG targets. For the 2025 financial year, sustainability-related performance indicators have also been included as performance benchmarks, accounting for approx. 8–9% of the variable Executive Board compensation. The corresponding targets relate to electricity consumption, water consumption, compliance training, and employee turnover. The more targets are met, the higher the variable compensation. Further information on the ESG bonus in the reporting year, its specific structure, and its share of total compensation can be found in the **Remuneration Report**.

Statement on Due Diligence (GOV-4)

The following table provides information on where we disclose details regarding due diligence in our sustainability statement.

Table 3: Information on due diligence

Core elements of due diligence	Contents of the sustainability statement
Integration of due diligence into governance, strategy, and business model	Information on GOV-2 and GOV-3 as well as SBM-3
Involvement of affected stakeholders in all key steps of due diligence	Information on policies, GOV-2, SBM-2, IRO-1, S1-2, S2-2, and S4-2
Identification and assessment of adverse impacts	Information on IRO-1 and all SBM-3 components in the report
Actions to address these adverse impacts	Information on actions
Monitoring the effectiveness of these efforts and communication	Disclosures regarding metrics and targets

Management of sustainability reporting risks and internal controls for sustainability reporting (GOV-5)

Risks related to sustainability reporting are regularly assessed, and internal controls are reviewed. From a project management perspective, risks regarding the timeline, budget, and scope of consolidation are identified and evaluated for their potential to jeopardize the preparation of reports that are accurate, timely, compliant with requirements, and within budget and prioritized accordingly. Risk management primarily relates to the content reported in the sustainability statement, but also to the raw data and information incorporated into the report. Identified sustainability reporting risks are reported at the quarterly meetings of the ESG Committee. In the event of urgent or material risks, the relevant departments will immediately inform senior management via email or internal communication platforms to ensure that they can quickly take the necessary actions.

The greatest risk arises from the application of a new reporting framework. The ESRS serve as the decisive framework for this reporting year. With regard to some reporting requirements and, in some cases, individual data points, there is still uncertainty regarding their correct interpretation and implementation. These uncertainties arise both for the user during the collection, presentation, and aggregation of information, as well as in the audit process. As a result, some requirements may be interpreted differently and presented as non-comparable reporting elements in various reports.

We address this risk through close collaboration between the Sustainability Committee and external experts in the field of sustainability regulation and reporting, who clarify key issues together with the auditor should this be necessary. We anticipate that confidence in the application of the new standards will increase in the coming years, thereby reducing the significance of this risk.

Another risk arises from incomplete, inconsistent, or erroneous data inputs. Sustainability data covers a broad range of topics, which is why the necessary raw data must be sourced from various systems. As a control process, we use a data tool for quantitative data that clearly describes the data requirements. Individual subject areas or data points are assigned to at least one responsible person and undergo an approval process. The sustainability team validates the data to be reported. If uncertainties regarding data inputs or outputs become apparent during the control process, the first step is to resolve these uncertainties. If this is not possible due to data availability, we transparently disclose the existing uncertainty and the reason for it in the report.

In addition, to mitigate the risk of erroneous data inputs, we have brought together all employees involved in the collection of quantitative information into a task force that receives specialized training from external experts in sustainability regulation and reporting, as well as experts on the data tool. All members of the task force are responsible for collecting and providing the specific data points assigned to them. They can discuss their questions and concerns with the external experts either collectively in quarterly Q&A sessions or individually. An ESG Steering Committee consisting of three members of the Executive Board and employees from the Investor Relations/Public Relations/ESG department oversees the task force. The committee meets every two weeks in the fourth quarter of the year.

Strategy, business model, and value chain (SBM-1)

Medios is one of Europe's leading companies in all aspects of pharmaceutical supply within the multifaceted field of Specialty Pharma. Specialty Pharma plays a pivotal role in the treatment of complex and consultation-intensive diseases such as cancer, HIV, or hemophilia. To optimally tailor therapy to the specific clinical picture, treatments customized to individual patients are increasingly being used. We are experts with many years of experience in pharmaceutical supply and compounding of Patient-Specific Therapies.

With locations in Germany, the Netherlands, Belgium, and Spain, the company supports key partners in the supply chain with innovative solutions and intelligent services. Medios has focused on forward-looking personalized medicine to enable everyone to access the most innovative therapies in collaboration with pharmacies, specialist medical practices, and pharmaceutical companies.

The value chain, with all its stakeholders, is complex and fragmented. To ensure precision in the management of impacts, risks and opportunities, as well as in the information to be reported, we have identified the following key components within the value chain, to which reporting within the scope of the sustainability statement is limited:

— Upstream value chain

- Production of raw materials (including active ingredients). The most important raw materials are:
 - Monoclonal antibodies, produced in the laboratory from immortalized cells that have been genetically modified to produce specific proteins. These proteins are then extracted and purified.
 - Small-molecule drugs, chemically synthesized in laboratories from simple chemical building blocks.

- Natural products, either extracted from natural sources (e.g., from the yew tree or camptothecin) or compounded semi-synthetically.
- Excipients such as sucrose, mannitol, trehalose, and polysorbates, produced synthetically in factories from common plants such as corn, sugarcane, or algae. Polysorbates are derived from sorbitol, a sugar alcohol obtained from plants.
- Production of packaging:
 - Secondary packaging: cardboard, paper.
 - Primary packaging: Tablet blisters (PVC), glass (vials).
 - Shipping materials: Cardboard.
- Production of licensed finished medicinal products (tablets, capsules, injection solutions, ointments, and other dosage forms) in accordance with approval by the Federal Institute for Drugs and Medical Devices (BfArM) and in compliance with international standards of Good Manufacturing Practice (GMP) for drugs for human use.
- Purchasing, storage, sale, and transport to Medios facilities as well as to our partner network of specialized pharmacies.
- **Own business activities**
 - **Compounding Services Business Unit:** The compounding of patient-specific, ready-to-use therapies from approved finished medicinal products, including blistering (dispensing of individually dosed tablets), in the therapeutic areas of oncology, autoimmunology, ophthalmology, neurology, and hemophilia. This primarily includes cytostatic preparations, antibody solutions, and parenteral nutrition solutions. Compounding takes place in Class A to D cleanrooms in accordance with GMP standards.

- **Active Pharmaceutical Ingredients (API) Services Business Unit:** Procurement, storage in accordance with the GDP Framework, and intralogistics for finished medicinal products and other materials used in the compounding of patient-specific therapies (e.g., packaging materials, hygienic protective clothing, sterilization agents).
- **Clinical Trials Business Unit:** Compounding of sterile and non-sterile investigational medicinal products for the conduct of clinical trials by trial sponsors.
- **Pharmacies and Pharmaceutical Services Business Units**
 - Internal transport to various warehouses via transport service providers (vehicles) and subsequent distribution to specialized pharmacies (Specialty Pharma pharmacies) as well as medical specialists, clinics, and pharmaceutical wholesalers. Storage and logistics take place at temperatures ranging from –80 °C to +25 °C between production facilities, pharmaceutical supply centers, and distribution points (Specialty Pharma pharmacies, clinics, medical specialists’ practices, pharmaceutical wholesalers).
 - Provision and operation of a digital ordering and billing platform (“mediosconnect”) for specialist medical practices to order patient-specific therapies and drugs from pharmacies.
 - Operation of 22 pharmacies in the Netherlands.
- **Downstream value chain**
 - Supply of drugs to patients through specialized pharmacies.
 - Administration of drugs to patients by healthcare professionals.
 - Analysis of clinical trials and generation of new medical insights by trial operators (investigators, sponsors, etc.).
 - Disposal of medication packaging and other conventional waste by patients, pharmacies, and medical care facilities, as well as medical waste by pharmacies and leftover medication by pharmacies and patients.

Other components of the value chain, such as cloud computing services provided by suppliers, are also relevant to the end product; however, they have a relatively smaller impact on “people and the environment” and a lesser financial sustainability-related impact on Medios AG’s Business model.

Through the acquisition of the Ceban Group, the Medios Group has added new activities, such as API services and the operation of its own pharmacies in the Netherlands, to its portfolio of offerings. As a result of this acquisition, Medios has also been active in the markets of the Netherlands, Belgium, and Spain since 2024, in addition to Germany. Medios AG’s products and services are subject to strict and, in some cases, differing pharmaceutical regulations in all markets; however, these do not result in any significant differences in the approval of the medical products offered by Medios across the four markets.

By aligning our day-to-day operations in all segments with sustainability, we not only create social value with our products but also reduce our negative impact on the environment and society. We are guided in this by the ten principles of the UN Global Compact. Ultimately, we aim to create sustainable economic value by making good business conduct, social responsibility, and environmental commitment integral parts of our core business. In addition to generally applicable laws, rules, and standards, our corporate values – trust, respect, integrity, and responsibility – also shape the business activity and corporate culture of the entire Medios Group.

The following table outlines our sustainability strategy, including the general sustainability goals that apply to all our product and customer groups, and the markets we serve. Our sustainability strategy is aligned with the topics of our material IROs (“Our Focus”). Each focus topic is assigned a cluster goal.

Table 4: Sustainability strategy of Medios AG

Our ambition	MISSION: We are creating a global platform to bring the most innovative drugs to where they are needed. VISION: To make the most innovative therapies available to everyone.					
Our strategy	By aligning our day-to-day operations with sustainability, our products not only create social value, but also minimize negative impacts on the environment and society.					
Our focus	Climate change	Circular economy	Own Workforce	Workers in the value chain	Consumers and end-users	Corporate policy
Stakeholders primarily affected	Nature	Nature	Employees	Service providers	Customers	Employees
Our Cluster Goals	Establishing effective climate management aligned with the United Nations' 1.5-degree target	Conserving resources throughout the entire value chain	Further developing Medios as an attractive employer + Preventing discrimination and strengthening and promoting diversity and equal opportunity within the company	Upholding human rights in our supply chains	Ensuring the best possible, comprehensive supply of Specialty Pharma drugs to patients	Further establishing a sustainable corporate culture and acting as an active social stakeholder beyond the company's boundaries
Goals	Systematically collect emissions data Building expertise in the area of climate management Develop a climate strategy to reduce CO2e emissions in line with the 1.5-degree target pathway Reduce CO2e emissions through increased energy efficiency and the use of renewable energy Offset unavoidable emissions	Increase the proportion of recycled or reused waste Significantly increase the use of recyclable and reusable packaging	Increase employee satisfaction Effectively support a healthy lifestyle and workplace safety Completely prevent work-related accidents Work-life balance at Medios Long-term employee retention and reduction of precarious employment relationships Identifying and developing our employees' potential through clear strategies Supporting young talent and future leaders – increasing the number of apprenticeship positions Maintaining a high proportion of women in leadership positions Actively promoting equal opportunity Ensuring fair pay for women	Ensuring appropriate working conditions in the upstream value chain	Ensuring quality Further increasing customer satisfaction Reducing customer complaints and resolving them as effectively as possible Expanding cooperation with local pharmacies Improving patient care through digitalization and innovative processes	Formalizing values and aligning business practices with these values Ensuring compliance with established standards in the supply chain Expand social engagement
UN SDGs	Strategic sustainability focus in line with the UN Sustainable Development Goals (SDGs)					

Overarching our sustainability goals is our ambition to create a Europe-wide platform to make personalized therapies accessible to all patients in the future, in collaboration with pharmacies, specialist medical practices, and pharmaceutical companies. The specialized pharmaceutical supply and compounding of patient-specific therapies to improve care models for patients – and thus treatment options for diseases such as cancer, HIV, or hemophilia – in all the markets we serve is therefore our most important output and is accordingly the focus of our sustainability efforts. We aim to shape Specialty Pharma sustainably across Europe. The key to both expanding a European platform for personalized therapies and ensuring its sustainable design lies in close networking and cooperation throughout the entire value chain.

Customers, investors, and all other stakeholders benefit from the effectiveness of our personalized therapies. These successes underscore the growing relevance of patient-specific therapies for ensuring a sustainably functioning healthcare system in Europe.

In addition to the physical inputs from our upstream value chain – such as the active ingredients in the therapies we prepare – our storage and delivery logistics, and especially our human capital in the form of experience, expertise, and competence, are the most significant inputs. Added to this is the exchange of experience and knowledge transfer at the international level to foster synergies, new ideas, customized solutions, and efficient processes – and to identify, develop, and secure human capital as our most important input. The partnership intelligence arising from networking, the exchange of experience, and knowledge transfer among stakeholders along the value chain, as well as between science and practice, is also our central means of capturing, developing, and securing all other physical and non-physical inputs mentioned above. In this way, for example, we learn about novel active ingredients, collaboration opportunities, or epidemiological developments at an early stage and can respond to them with agility.

As of December 31, 2025, a total of 967¹ employees work for Medios in Belgium, Germany, the Netherlands, and Spain, of whom 519 are in Germany, 369 in the Netherlands, 56 in Belgium, and 23 in Spain.

Total revenue 2025: €2,078 million

Revenue² in 2025 by segments defined under IFRS 8:

- Pharmaceutical Supply segment: €1,835 million
- Patient-Specific Therapies segment: €233 million
- International Business segment: €169 million

Stakeholder interests and perspectives (SBM-2)

For Medios, ongoing dialogue with its stakeholders is of central importance. By taking stakeholder perspectives into account, we gain insight into our stakeholders' expectations and can thus act and report in a more targeted manner.

Although we consider every stakeholder along our value chain and beyond to be relevant, we list below the key stakeholders for further reporting, whom we have identified as material stakeholders in relation to our business model and the achievement of our sustainability goals:

- Customers: Pharmacies, hospital pharmacies, and medical care centers (hospitals, specialist medical practices)
- Suppliers: pharmaceutical companies
- Employees
- Service providers
- Interest groups/associations
- Financial stakeholders (investors or shareholders, banks, financial analysts, insurance companies)
- Nature.

As part of the double materiality assessment (DMA), we have categorized our stakeholders into two groups: impact stakeholders and financial stakeholders. The latter also correspond to the primary users of the sustainability disclosures provided in the report. The goal is to present stakeholders with questions that are as precise as possible and that can be answered in a well-informed manner by the respective stakeholder.

We systematically presented suitable representatives of the impact stakeholders with topics – via an online survey – that our business model and value chain may influence. We used the information gathered to highlight the most relevant topics in the subsequent materiality assessment process. There was no engagement through direct dialogue with impact stakeholders. Nature was incorporated as a “silent stakeholder” through consultation of the scientific database ENCORE (encorenature.org).

¹ Headcount as of December 31, 2025, excluding members of the Executive Board and managing directors.

² Presentation prior to consolidation and excluding the Services segment, which generated revenue of €13,825 thousand. Please refer to the segment reporting in the notes to the consolidated financial statements.

In contrast, we engaged representatives of financial stakeholders in dialogue through individual interviews, with at least one Member of the Executive Board participating, to discuss (financial) opportunities and risks related to sustainability as well as impact topics considered based on consultations with impact stakeholders. This not only helped us identify Medios' significant opportunities and risks but also provided us with important input for assessing them. The summary of stakeholder engagement is part of the validation of the materiality assessment by our Executive Board and is discussed at the quarterly meetings of the ESG Committee.

The results of the stakeholder engagement as part of the double materiality assessment have had a decisive influence on the identification of our material impacts, risks and opportunities, as well as on the subsequent management of our material IROs, including objectives and actions. The Executive Board was involved in the stakeholder consultations as part of the materiality assessment and informed the Supervisory Board of the results. In its quarterly meetings, the ESG Committee also continuously discusses the interests and concerns of stakeholders that have been brought to the attention of individual members and incorporates them into its planning.

We also maintain close communication with our stakeholders outside the scope of the materiality assessment. We continuously adapt our products and services in light of new developments in research, regulation, and epidemiology. We hold a status meeting with our suppliers at least once a year. We maintain dialogue with our partner pharmacies primarily at networking events and through regular conference calls. In March 2025, the "Medios Specialty Pharma Day" took place once again in Berlin with 55 participants. This annual event provides pharmacies with an opportunity to exchange ideas and helps us better understand the needs of our pharmacy customers.

As a publicly traded company, we place great importance on engaging with our investors. In addition to mandatory disclosures, we also issue press releases and are always available to answer questions in person, ensuring that we communicate our business performance and activities in a continuous and transparent manner. Furthermore, we participate in numerous national and international investor conferences throughout the year.

To stay informed about the latest industry and policy developments, we are members of various advocacy groups and attend their networking events. Here is a list of the associations and institutions of which we are members:

- BVDK e. V. – Federal Association of German Pharmacy Cooperatives
- Federal Association of Compounding Production Facilities e. V.
- DIRK – German Investor Relations Circle
- Berlin Chamber of Industry and Commerce
- UN Global Compact.

The interests and rights of our own workforce are taken into account in our corporate strategy and business model through regular surveys. In addition, we offer stock options to employees.

We are considering further refining our sustainability strategy in 2026 with targets and action plans for the period up to 2030. Based on the stakeholder consultations conducted as part of the double materiality assessment, we see no need to fundamentally change our business strategy or business model in light of the views of the consulted stakeholders. Over the next five years at a minimum, we will continue to advocate for ever-closer collaboration among all partners along the value chain and drive the provision of Patient-Specific Therapies in Europe.

Impacts, risks and opportunities and their interplay with strategy and business model (SBM-3)

As part of its materiality assessment, Medios AG has identified the impacts, risks, and opportunities (IROs) relevant to the company that are related to the topic of sustainability. All IROs relevant to us along the entire value chain under consideration, as well as their location along our value chain and their timing, are described in the respective topical chapters.

The focus of our material sustainability-related risks, opportunities, and impacts lies in our own business activities. We have focused on forward-looking personalized medicine to enable everyone to access the most innovative therapies in collaboration with pharmacies, specialist medical practices, and pharmaceutical companies. We outline details regarding the positioning of the material IROs along the value chain, their relationship to strategy, business model, or business relationships, as well as expected financial effects in the individual topical chapters.

Our core business – the specialized pharmaceutical supply and compounding of patient-specific therapies – requires continuous development and adaptation in light of new research findings, new epidemiological developments, and new regulatory developments in the pharmaceutical sector. This necessitates innovation across the entire value chain, which in turn can only be achieved through intensive exchange of experience and knowledge transfer throughout the entire supply chain. We will also take this into account when addressing and leveraging our material sustainability-related IROs.

Since we have a steadily growing network of partners – including medical specialists, pharmacies, and pharmaceutical companies – as part of our own business activities and cooperate closely with all involved partners, we can, through our own actions, partially manage significant impacts and risks and capitalize on significant opportunities located in the upstream or downstream value chain. Our material sustainability-related IROs therefore do not fundamentally call our business model and business strategy into question. We will continue to address the necessary adjustments in the wake of environmental and societal developments in a spirit of partnership within an already dynamic and promising business sector.

Identification of material IROs and topics (IRO-1)

The IROs material to the company are the core findings of our materiality assessment. We examined and assessed topics in the areas of environment, social issues, and governance in a multidimensional manner, following the principle of double materiality.

We considered IROs arising from the most important activities, business relationships, and processes in Medios AG's business model or value chain – without limiting ourselves to those with an increased risk of adverse impacts – as well as external influences related to sustainability issues. Excluded from the analysis are all consequences that could result from intentional and harmful actions, as valid assessments are not possible in such cases. Impact materiality and financial materiality were analyzed in two separate steps.

IMPACT MATERIALITY

Starting with a long list based on the ESRS, we gathered information in various steps to identify the thematic areas where impacts on people and the environment could arise. In doing so, we conducted both an industry analysis and a screening of empirical findings. Through a stakeholder survey, we gathered information on which topics customers, suppliers, employees, service providers, and stakeholders consider important. This enabled us to identify, early in the process, the impacts that might arise in the upstream and downstream value chain. Using the insights gathered internally, in collaboration with experts, through the stakeholder survey, and by considering empirical findings, we were able to identify the most important issue areas and assess the associated impacts.

To assess the impacts, all impacts were sorted into the following categories:

- potentially positive
- potentially negative
- actually positive
- actually negative.

For actual impacts, the following dimensions were evaluated:

- actual positive impacts: Assessment based on scale and scope
- actual negative impacts: Assessment based on scale, scope, and irremediability
- potential positive impacts: Assessment based on scale, scope, and probability of occurrence
- potential negative impacts: scale, scope, irremediability, and probability of occurrence.

We generally weighted these assessment factors equally; however, in cases of potential negative impacts related to human rights issues, we placed greater weight on the extent of the negative effects on the affected people. Based on the categorization, the relevant dimensions for the impacts were assessed on the impact list. All dimensions were assessed on a Likert scale from 1 to 5 (5 = highest, 1 = lowest).

The assessment was conducted by a selected group of expert staff and decision-makers and supported by external experts. Where possible, the assessment was based on the gross principle, i.e., considering actions already taken or planned prior to their impact. We deviated from this principle only when the magnitude, scope, or likelihood of occurrence had already been significantly reduced (negative impacts) or amplified (positive impacts) over the long term by actions to such an extent that it was no longer possible to draw conclusions about the original state. After applying a threshold, we defined the impacts of material importance to Medios AG.

FINANCIAL MATERIALITY

We considered the sustainability-related risks and opportunities in a downstream process step. In a first step, we collected risks and opportunities that can be derived from the material impacts and are directly related to them. Furthermore, we identified risks and opportunities that could arise along our entire value chain within short-, medium-, or long-term timeframes, even if they are not directly linked to an impact.

We conducted interviews with various stakeholders whom we consider particularly well-suited to assess the financial dimension of double materiality. These include investors, lenders, insurance companies, and business partners. We also included the requirements arising from the ESG rating assessment processes during the year as information in the analysis. The risks and opportunities were then assessed by our risk management team based on the criteria of probability of occurrence and financial impact. In the evaluation, we established a materiality threshold to define material risks and opportunities, analogous to the approach used in the impact analysis. The materiality threshold was based on that used in financial reporting. Multiplying the probability of occurrence by the potential impact yields an expected value for financial reporting. Similarly, a potential total risk or potential total opportunity was determined by multiplying the probability of occurrence by the extent of loss or benefit (each on a scale of 1–6 points), and a materiality Threshold of 8 was set. This Threshold was used to apply a relatively low extent of loss in order to prioritize sustainability-related risks over other risks.

The results of the two process steps (Impact and Financial) were validated by the Executive Board and the Supervisory Board. Throughout the entire process, decisions were never made by individuals alone. The Executive Board was involved in the decision-making process as well as in the internal control procedures regarding the materiality assessment from the very beginning.

The identified material IROs will now also be incorporated into general risk management as well as into our corporate strategy and general management. Similar to other risk categories, sustainability-related risks and impacts are regularly communicated to the responsible decision-makers who oversee risk management. The process for identifying, assessing, and managing impacts and (sustainability) risks is intended to be an annual standard process of Medios' general risk management, beyond the initial implementation of the double materiality assessment. Medios uses this process to review the materiality assessment and the corresponding ESG Strategy annually and adjust them as necessary. This also involves reassessing and refining the overall risk profile and the risk management process accordingly.

In 2024, we conducted a materiality assessment for the first time using the procedure described in the ESRS. The results of the materiality assessment – and thus the identified material IROs – are reviewed annually, and the results of this review are presented to the Supervisory Board. A complete repeat of the assessment is not currently planned, but may result from the annual review should new developments and circumstances lead to significant changes in the IROs. In preparation for the current reporting cycle, the Sustainability Committee reviewed the results of the materiality assessment for relevance. To account for new perspectives arising from the further integration of Ceban during the reporting year, the following changes were made:

- Instead of the actual and positive impact “Improved health and healthy lifestyles among our own workforce,” Medios now assesses the potential and negative impact “Health impairments among our own workforce” as material.
- Medios no longer considers the positive and actual impacts “Prosperity among workers in the value chain” and “Improved health and healthy lifestyles among workers in the value chain” to be material.

The next review of the materiality assessment is scheduled for September 2026.

For the materiality assessment, ENCORE, a database of scientific findings regarding typical impacts of companies in various industries, was utilized. Otherwise, company-specific data and assessments by the company and external experts were used as input parameters.

The process described above outlines our materiality assessment, which we used to distinguish our material IROs and topics from the non-material ones. In the following section, we also describe what information we included in the standards regarding the topics of Environment and Governance.

E1 – CLIMATE AND ENERGY

To assess whether our business activities have a material impact on climate change, we analyzed and recorded our greenhouse gas emissions. Based on scientific findings, we were able to confirm that we have a material impact on climate change.

In addition, we analyzed our climate-related physical risks within our own operations and across the upstream and downstream value chain. In doing so, we considered a high-emission climate scenario (4 °C) and one aligned with the 1.5-degree target. Our assets and business activities may be affected in Scenario 1, as extreme weather events in this scenario could significantly disrupt our supply chains and operational processes. In Scenario 2, our Business activities are less affected. Further details on this can be found below in the corresponding section **E1 Climate risk analysis**.

E2 – SOIL POLLUTION; POLLUTION OF LIVING ORGANISMS AND FOOD RESOURCES

An analysis of the Medios Group's Business activities and the value chain revealed no significant points of contact (interfaces) with the aforementioned forms of pollution. Production processes within the Group's own business activity³ and throughout the value chain are subject to national and international pharmaceutical regulations that largely preclude actual and potential contamination of soil, living organisms, and food resources. The only issue identified as a potential source of soil contamination was oil leaks resulting from accidents during truck transport within the value chain; however, due to the low probability and limited potential scope, this was not considered further.

E3 – WATER AND MARINE RESOURCES

We have not identified this issue as material beyond potential water pollution (considered under E2 – Water Pollution), as the water supply at Medios sites and throughout the value chain is ensured by public utilities. Medios primarily uses water for sanitation or as drinking water (low consumption). Only in the upstream supply chain, in the area of active ingredient and drug production, can higher water consumption occur, which is managed through local utilities in accordance with strict pharmaceutical regulations.

E4 – BIODIVERSITY

We have not identified any known impacts of Medios' Business activities on biodiversity beyond potential adverse effects on freshwater Ecosystems due to water pollution (addressed under E2 – Water Pollution). A review of all nine Medios facilities regarding their location in or near biodiversity-sensitive areas, as well as the potential impacts of the facilities and Specialty Pharma pharmacies on biodiversity-sensitive areas, revealed no interfaces with biodiversity or Ecosystems. This is due, on the one hand, to the origin and degradability of the specific active and excipient substances in the drugs that are compounded, processed, ingested, and disposed of or degraded within the value chain. Furthermore, this is due to the minimal impact of Medios' Business activities on the local environment, which results from pharmaceutical safety and hygiene regulations as well as GMP.

Similarly, an examination of Medios' own Business activities and the value chain revealed no known significant Dependencies on biodiversity and/or Ecosystems. Only in the context of active ingredient production in the upstream supply chain is there a dependency on genetic material (such as a cell line known as CHO cells, which was isolated in 1957 from ovarian cells of a hamster species) for the formulation of antibody molecules. However, these are immortalized cell lines, which therefore do not have any direct dependencies on the survival of the corresponding species.

³ For Medios, limited to the compounding of patient-specific, ready-to-administer therapies from approved finished medicinal products, including Blistering.

E5 – RESOURCES AND CIRCULAR ECONOMY

To assess E5, we reviewed our facilities and Business activities and examined our value chain for relevant touchpoints (interfaces). As a result, we identified key IROs. The detailed analyses we conducted in accordance with the requirements specific to this topic standard are described in more detail in the corresponding chapter on **Resources and Circular economy**.

G1 – CORPORATE POLICY

We assessed risks of corruption and bribery through a geographic mapping of our own companies and facilities as well as our key suppliers. Locations or Business relationships in countries with an elevated risk of corruption, based on the Corruption Perception Index, are highlighted and examined. The same applies to countries with an elevated risk of human rights violations.

After consulting our key stakeholders in the areas of impacts and finance, we gained a valuable and comprehensive overview of which sustainability issues are particularly closely linked to our business model. Following the quantitative assessment of the IROs, we were therefore able to sort them in descending order, thereby establishing the basis for prioritization. To ensure that the sustainability statement discloses only the information that is of particular significance to Medios AG, our stakeholders, and the report's audience, we established a materiality threshold and excluded all IROs below this threshold from the reporting. This has the advantage that the selection of IROs – and thus the information to be reported – is as free as possible from subjective views on the subject areas, since we do not allow any deviations from this materiality threshold in the materiality assessment process. The materiality threshold was determined in collaboration with external experts and set so that the information most important to our stakeholders and the report's audience – and which forms the basis for informed decisions – will be included in the report.

For all identified material IROs, we report on the relevant policies, actions, and targets of the associated topics in the respective chapters. If no policies, actions, or targets exist for a topic, we disclose this transparently. Quantitative data points from the reporting requirements of the metrics derived from the ESRS that are not directly related to the material IROs we have identified are not included in the report, so that only pertinent and relevant information is included. To this end, we derived report-relevant data points based on the material IROs. After each material IRO was assigned to a sub-sub-topic, all data points of the topic standard were reviewed for their relevance to the respective IRO within the respective sub-sub-topic area. In assessing which data points are related to our IROs, we also consulted external experts. In addition to technical expertise, the assessment was based on an analysis of the extent to which interest in these data points had been evident to date (e.g., through inquiries from stakeholders such as rating agencies), as well as a rough estimate of the figures, including their classification.

EU TAXONOMY

Operating in an environmentally sustainable manner is one of the central issues of our time. As part of the European Green Deal, the European Union has placed issues such as climate and environmental protection at the center of the political agenda. An important building block for directing continental capital flows toward investments that support sustainable development is the EU Taxonomy (Regulation (EU) 2020/852 and associated delegated acts). This is an instrument designed to support not only investors and project developers but also companies in the transition to a low-carbon, resource-efficient, and resilient future.

Background and goals

The EU Taxonomy uses a uniform classification system to define which economic activities can be declared environmentally sustainable, distinguishing between taxonomy eligibility and taxonomy compliance. An economic activity is considered taxonomy-eligible if it has the potential to contribute to achieving at least one of the following six environmental objectives:

- Climate change mitigation
- Climate change adaptation
- Sustainable use and protection of water and marine resources
- Transition to a Circular economy
- Prevention and reduction of pollution
- Protection and restoration of biodiversity and Ecosystems.

However, according to the EU Taxonomy Regulation, an economic activity is only considered environmentally sustainable and taxonomy-compliant (“aligned”) if the following three conditions are met:

- Making a material contribution to one of the six environmental objectives
- Compliance with the “Do No Significant Harm” (DNSH) criteria, which are intended to prevent significant harm to one or more other environmental objectives
- Compliance with the minimum safeguards set out in Article 18 of Regulation (EU) 2020/852.

Reportable key figures

As a company falling within the scope of the EU Taxonomy, Medios AG must disclose the defined metrics of revenue and CapEx (capital expenditures) for its share of taxonomy-eligible or taxonomy-compliant economic activities. Operating expenses as defined by the EU Taxonomy (Section 1.1.3) amount to €1.9 million at Medios (OpEx denominator). Due to the low relevance of these expenses relative to the Business model’s total operating expenses, the OpEx metric is immaterial for Medios’ business model. Consequently, the taxonomy-eligible portion is reported as zero.

The taxonomy-eligible or taxonomy-compliant revenue metric compares two revenue figures: The numerator represents the portion of net revenue from goods or services (including intangible assets) associated with taxonomy-eligible or taxonomy-compliant economic activities. The denominator is net revenue, which comprises all revenue reported in accordance with International Accounting Standard IAS 1.82(a).

For CapEx, additions to property, plant and equipment and intangible assets during the financial year, before depreciation, amortization, and any revaluations, are to be considered, which

- a) relate to assets or processes associated with taxonomy-compliant economic activities,
- b) are part of a plan to expand taxonomy-compliant economic activities or to convert taxonomy-eligible economic activities into taxonomy-compliant economic activities, or
- c) relate to the procurement of products from taxonomy-compliant economic activities and individual actions through which target activities are carried out in a low-carbon manner or greenhouse gas emissions are reduced.

With regard to taxonomy-eligible or taxonomy-compliant capital expenditures, we report for the 2025 financial year the proportion of expenditures and expenses incurred in connection with the operation and expansion of our facilities to produce taxonomy-eligible or taxonomy-compliant products. All economic activities we have reviewed fall under Category a) – that is, assets or processes associated with taxonomy-compliant economic activities.

Methodology

For the 2025 financial year, Medios AG has opted not to apply Delegated Regulation (EU) 2026/73 and continues to use the reporting requirements of the EU Taxonomy Regulation and associated legal acts applicable until December 31, 2025.

The identification of economic activities that are fundamentally taxonomy-eligible and taxonomy-compliant was carried out in four steps:

- In the first step, a cross-departmental workshop was held to review all activities within the six defined environmental objectives against the descriptions in Delegated Regulation (EU) 2021/2139 to assess their alignment with our business activities and their taxonomy eligibility.
- Subsequently, the amount of revenue and CapEx was determined for the activities identified as eligible for the taxonomy using account and investment plans. The amounts used to calculate the key figures are based on the figures reported in the consolidated financial statements. In principle, all fully consolidated Group companies were included in this analysis. If a particular key figure encompassed multiple economic activities, an appropriate allocation was made, typically based on the direct costs incurred by the economic activity.
- The materiality threshold was set at 2% in accordance with standard practice. It can be assumed that economic activities that together account for no more than 2% of revenue and CapEx have no material impact on the reporting and therefore do not result in a lack of information if omitted. Accordingly, only information on material activities is provided below.
- All taxonomy-eligible activities identified as material were subjected to a compliance review. To this end, an initial assessment was conducted by surveying the respective Group companies, central functions within the company, and service providers to verify whether the relevant technical evaluation criteria had been met. If it was not possible to determine compliance with the technical assessment criteria due to a lack of data or evidence, a further in-depth analysis was not conducted, and the economic activity was assessed as non-taxonomy-compliant. The results of the assessment are described in the following sections on revenue, Investments, and operating expenses.
- Since none of the economic activities identified as having materiality could be classified as taxonomy-compliant following a review of the technical assessment standards, a further review of the minimum protection criteria was not required.

Performance indicators in accordance with the EU Taxonomy Regulation

In connection with the environmental objectives defined in the EU Taxonomy, we were able to identify the following economic activities of Medios as taxonomy-eligible:

REVENUE

The analyses revealed that, in accordance with the EU Taxonomy Regulation, no revenue-generating activity can be attributed to the environmental objectives (1) Climate change mitigation, (2) Climate change adaptation, (3) sustainable use and protection of water and marine resources, (4) transition to a Circular economy, or (6) protection and restoration of biodiversity and Ecosystems, and falls within the scope of the EU Taxonomy.

The proportion of taxonomy-eligible revenue⁴, calculated as the portion of taxonomy-eligible net revenue (numerator) divided by Medios AG's total net revenue (denominator), thus amounts to 0% for the reporting year (see Table 5 below). The taxonomy-compliant portion of taxonomy-eligible revenue is accordingly 0%.

Compared to the previous year, activities 6.5 "Transportation by motorcycles, passenger cars, and light commercial vehicles," 7.6 "Installation, maintenance, and repair of renewable energy technologies," and 7.7 "Acquisition and ownership of buildings" are no longer reported in Table 5, as, as in the previous year, no taxonomy-eligible or taxonomy-compliant revenue was generated in these areas.

⁴ Revenue was determined in accordance with the taxonomy definition and applicable accounting principles and corresponds to the amounts in the annual financial statements (see [Financial Information](#)).

Table 5: Revenue taxonomy metrics

2025 financial year	Year		Criteria for a material contribution							DNSH criteria ("no significant adverse impact")							Share of taxonomy-compliant (A.1) or taxonomy-eligible (A.2) revenue, 2024 (18)	Enabling activity category (19)	Transitional activity category (20)
	Economic activities (1)	Code (2)	Revenue (3)	Revenue share, 2025 (4)	Climate change mitigation (5)	Climate change adaptation (6)	Water (7)	Pollution (8)	Circular economy (9)	Biodiversity (10)	Climate change mitigation (11)	Climate change adaptation (12)	Water (13)	Pollution (14)	Circular economy (15)	Biodiversity (16)			
		In € thousand	in %	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	in %	E	T
A. TAXONOMY-ELIGIBLE ACTIVITIES																			
A.1. Ecologically sustainable activities (taxonomy-compliant)																			
Revenue from environmentally sustainable activities (taxonomy-compliant) (A.1)		0	0	0	0	0	0	0	0								0		
Of which enabling activities		0	0	0	0	0	0	0	0								0		
Of which transitional activities		0	0	0	0	0	0	0	0								0		
A.2. Taxonomically eligible but not ecologically sustainable activities (not taxonomy-compliant)																			
Revenue from activities that are taxonomically eligible but not ecologically sustainable activities (non-taxonomy-compliant activities) (A.2)		0	0	0	0	0	0	0	0								0		
A. Revenue from taxonomy-eligible activities (A.1 + A.2)		0	0	0	0	0	0	0	0								0		
B. ACTIVITIES NOT SUBJECT TO TAXONOMY																			
Revenue from activities not classified in the taxonomy		2,078,652	100																
Total		2,078,652	100																

Codes:
J - yes, taxonomy-eligible and taxonomy-compliant with the relevant environmental objective
N - no, taxonomy-eligible but not taxonomy-compliant with the relevant environmental objective
N/EL - "not eligible," activity not eligible for the respective environmental objective
EL - activity eligible for the respective objective

Table 6: Taxonomy capability and compliance by environmental objective

	Revenue share/total revenue	
	Taxonomy-compliant per objective	Taxonomy-eligible per objective
CCM	0%	0%
CCA	0%	0%
WTR	0%	0%
CE	0%	0%
PPC	0%	0%
BIO	0%	0%

CAPEX

The basis for identifying taxonomy-eligible capital expenditures (CapEx)⁵ is the additions to property, plant and equipment and intangible assets during the financial year under review, before depreciation and any amortization for that financial year. In addition, CapEx includes additions to property, plant and equipment and intangible assets resulting from business combinations (application of IFRS [IAS 16, 38, 40, 41, IFRS 16] as well as national accounting standards).

Within our CapEx, we have included both “new construction” (see Category 7.1, Annex I of Delegated Regulation 2021/2139 of June 4, 2021) and “renovation of existing buildings” (see Category 7.2, Annex I of Delegated Regulation 2021/2139 of June 4, 2021) as taxonomy-eligible economic activities under the environmental objective “Climate change mitigation” for the 2025 financial year. Activities 6.5 “Transportation by motorcycles, passenger cars, and light commercial vehicles,” 7.6 “Installation, maintenance, and repair of Renewable energy technologies,” and 7.7 “Acquisition and ownership of buildings” are reported in **Table 7** solely based on their prior-year figures.

Table 7 thus shows that in the 2025 financial year, a total of 14% of our capital expenditures can be classified as taxonomy-eligible. None of the economic activities identified as taxonomy-eligible in the CapEx category could also be classified as taxonomy-compliant.

⁵ Capital expenditures were determined in accordance with the taxonomy definition and applicable accounting principles and correspond to the amounts in the consolidated financial statements (see **Financial Information**).

Table 7: CapEx Taxonomy Key Figures

2025 financial year	Year		Criteria for a material contribution							DNSH criteria ("no significant adverse impact")							Proportion of taxonomy-compliant (A.1) or taxonomy-eligible (A.2) CapEx, 2024 (18)	Enabling activity category (19)	Transitional activity category (20)
	Economic activities (1)	Code (2)	CapEx (3)	CapEx share, 2025 (4)	Climate change mitigation (5)	Climate change adaptation (6)	Water (7)	Pollution (8)	Circular economy (9)	Biodiversity (10)	Climate change mitigation (11)	Climate change adaptation (12)	Water (13)	Pollution (14)	Circular economy (15)	Biodiversity (16)			
		In € thousand	in %	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	in %	E	T
A. TAXONOMY-ELIGIBLE ACTIVITIES																			
A.1. Ecologically sustainable activities (taxonomy-compliant)																			
6.5. Transportation by motorcycles, passenger cars, and light commercial vehicles	CCM	0	0	N	N/EL	N/EL	N/EL	N/EL	N/EL	N	N	N	N	N	N	N	0		T
7.1 New Construction	CCM	0	0	N	N/EL	N/EL	N/EL	N/EL	N/EL	N	N	N	N	N	N	N	0		T
7.2 Renovation of Existing Buildings	CCM	0	0	N	N/EL	N/EL	N/EL	N/EL	N/EL	N	N	N	N	N	N	N	0	E	
7.6 Installation, maintenance, and repair of renewable energy technologies	CCM	0	0	N	N/EL	N/EL	N/EL	N/EL	N/EL	N	N	N	N	N	N	N	0	E	
7.7 Acquisition and Ownership of Buildings	CCM	0	0	N	N/EL	N/EL	N/EL	N/EL	N/EL	N	N	N	N	N	N	N	0		T
CapEx for environmentally sustainable activities (taxonomy-compliant) (A.1)		0	0	0	0	0	0	0	0								0		
Of which enabling activities		0	0	0	0	0	0	0	0								0		
Of which transitional activities		0	0	0	0	0	0	0	0								0		
A.2. Taxonomically eligible but not ecologically sustainable activities (not taxonomy-compliant)																			
				EL; N/EL	EL; N/EL	EL; N/EL	EL; N/EL	EL; N/EL	EL; N/EL										
6.5. Transport by Motorcycles, Passenger Cars, and Light Commercial Vehicles	CCM	0	0	EL	N/EL	N/EL	N/EL	N/EL	N/EL								0.1		T
7.1 New construction	CCM	925	11	EL	N/EL	N/EL	N/EL	N/EL	N/EL								0		T
7.2 Renovation of Existing Buildings	CCM	262	3	EL	N/EL	N/EL	N/EL	N/EL	N/EL								0	E	
7.6 Installation, maintenance, and repair of renewable energy technologies	CCM	0	0	EL	N/EL	N/EL	N/EL	N/EL	N/EL								0	E	
7.7 Acquisition and Ownership of Buildings	CCM	0	0	EL	N/EL	N/EL	N/EL	N/EL	N/EL								1.5		T
CapEx eligible for taxonomy, but not environmentally sustainable activities (non-taxonomy-compliant activities) (A.2)		1,187	14	100	0	0	0	0	0								1.6		
A. CapEx for taxonomy-eligible activities (A.1 + A.2)		1,187	14	100	0	0	0	0	0								1.6		
B. ACTIVITIES NOT ELIGIBLE FOR TAXONOMY																			
CapEx for activities not eligible for the taxonomy		7,222	86																
Total		8,409	100																

Codes:
J – yes, taxonomy-eligible and taxonomy-compliant with the relevant environmental objective
N – no, taxonomy-eligible but not taxonomy-compliant with the relevant environmental objective
N/EL – “not eligible,” activity not eligible for the respective environmental objective
EL – activity eligible for the respective objective

Table 8: Taxonomy capability and compliance by environmental objective

	CapEx share/total CapEx	
	Taxonomy-compliant per objective	Taxonomy-eligible per objective
CCM	0%	100%
CCA	0%	0%
WTR	0%	0%
CE	0%	0%
PPC	0%	5%
BIO	0%	0%

OPEX

The basis for determining taxonomy-eligible operating expenses⁶ (OpEx) consists of direct, non-capitalized costs for research and development, building renovation measures, Short-term leases, maintenance and repairs, as well as all other direct expenditures for the ongoing maintenance of property, plant and equipment by the company or by third parties that are necessary to ensure the continuous and effective functionality of these assets.

Due to the low relevance of operating expenses relative to the total operating expenses of the business model, the OpEx metric is immaterial for Medios' business model. Consequently, the taxonomy suitability of the OpEx metric is reported as 0% (Table 9).

The activities listed in Table 9, 6.5 "Transportation by motorcycles, passenger cars, and light commercial vehicles" and 7.7 "Acquisition and ownership of buildings," are reported in Table 9 solely on the basis of the taxonomy-eligible prior-year figures.

⁶ Operating expenses were calculated in accordance with the taxonomy definition and therefore differ from the amounts in the annual financial statements (see Financial Information).

Table 9: OpEx Taxonomy Key Figures

2025 financial year	Year		Criteria for a material contribution							DNSH criteria ("no significant adverse impact")							Proportion of taxonomy-compliant (A.1) or taxonomy-eligible (A.2) OpEx, 2024 (18)	Enabling activity category (19)	Transitional activity category (20)
	Code (2)	OpEx (3)	OpEx Share, 2025 (4)	Climate change mitigation (5)	Climate change adaptation (6)	Water (7)	Pollution (8)	Circular economy (9)	Biodiversity (10)	Climate change mitigation (11)	Climate change adaptation (12)	Water (13)	Pollution (14)	Circular economy (15)	Biodiversity (16)	Minimum protection (17)			
Economic activities (1)		In € thousand	in %	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	in %	E	T
A. TAXONOMY-ELIGIBLE ACTIVITIES																			
A.1. Ecologically sustainable activities (taxonomy-compliant)																			
OpEx of environmentally sustainable activities (taxonomy-compliant) (A.1)		0	0	0	0	0	0	0	0								0		
Of which enabling activities		0	0	0	0	0	0	0	0								0		
Of which transitional activities		0	0	0	0	0	0	0	0								0		
A.2. Taxonomically eligible but not ecologically sustainable activities (not taxonomy-compliant)																			
				EL; N/EL	EL; N/EL	EL; N/EL	EL; N/EL	EL; N/EL	EL; N/EL										
Transportation by motorcycle, passenger cars and light commercial vehicles		6.5	0	0	EL	N/EL	N/EL	N/EL	N/EL	N/EL	N/EL	N/EL	N/EL	N/EL	N/EL	N/EL	7		T
Acquisition and ownership of buildings		7.7	0	0	EL	N/EL	N/EL	N/EL	N/EL	N/EL	N/EL	N/EL	N/EL	N/EL	N/EL	N/EL	1.9		T
OpEx eligible for taxonomy, but not ecologically sustainable activities (non-taxonomy-compliant activities) (A.2)		0	0	0	0	0	0	0	0								8.9		
A. OpEx of taxonomically eligible activities (A.1 + A.2)		0	0	0	0	0	0	0	0								8.9		
B. ACTIVITIES NOT ELIGIBLE FOR TAXONOMY																			
OpEx for activities not eligible for classification		2,523	100																
Total		2,523	100																

Codes:
J - yes, taxonomy-eligible and taxonomy-compliant with the relevant environmental objective
N - no, taxonomy-eligible but not taxonomy-compliant with the relevant environmental objective
N/EL - "not eligible," activity not eligible for the respective environmental objective
EL - activity eligible for the respective objective

Table 10: Taxonomy capability and compliance by environmental objective

	OpEx share/total OpEx	
	Taxonomy-compliant per objective	Taxonomy-eligible per objective
CCM	0%	0%
CCA	0%	0%
WTR	0%	0%
CE	0%	0%
PPC	0%	0%
BIO	0%	0%

CLIMATE CHANGE (E1)

We feel responsible for the efficient use of energy and the reduction of Emissions. Accordingly, climate-related criteria – specifically the increasing share of electricity from renewable sources in total electricity consumption and the reduction of Scope 3 Emissions – are included in the compensation of the Executive Board. ESRS-compliant climate targets, which in addition to being measurable should also have a time limit and be results-oriented, do not yet exist. Medios is currently considering formulating these in FY 2026.

Impacts, risks, and opportunities (E1 SBM-2, SBM-3)

Table 11: E1 Climate change

	Value chain			Time horizon		
	Upstream	Own activities	Down-stream	<1 year	1-5 years	> 5 years
Impact 1: Contribution to climate change through the company's own greenhouse gas emissions in Scope 1-3 (at its own sites and throughout the entire value chain) (actually negative)	●	●	●	●	●	●
Impact 2: (Climate-impacting) Energy consumption from the company's own production processes and throughout the entire value chain (actually negative)	●	●	●	●	●	●
Risk 1: Risk of damage to the organization's physical assets caused by extreme weather events such as floods, storms, and heat waves, or by longer-term trends such as temperature changes, rising sea levels, reduced water availability, or loss of biodiversity		●		●	●	●
Risk 2: Serious disruption of critical business processes or services, including those provided by third parties, resulting from extreme weather events (e.g., disrupted supply chains)	●		●	●	●	●

IMPACT 1: CONTRIBUTION TO CLIMATE CHANGE THROUGH THE COMPANY'S OWN GREENHOUSE GAS EMISSIONS IN SCOPES 1-3 (AT ITS OWN SITES AND THROUGHOUT THE ENTIRE VALUE CHAIN) (ESRS 2.48)

Throughout the entire value chain – both in the company's own operations and in the upstream and downstream supply chain – incineration of fossil fuels releases greenhouse gas emissions that have a negative impact on global climate change.

Emissions arise in connection with Medios AG's business activities, both in the compounding, transportation, and disposal of our products, as well as from the additional energy requirements of our company locations and in the area of employee mobility.

IMPACT 2: (CLIMATE-RELEVANT) ENERGY CONSUMPTION THROUGH OWN PRODUCTION PROCESSES AND ALONG THE ENTIRE VALUE CHAIN

The energy mix for general electricity and heat generation contains significant proportions of fossil fuels such as oil, gas, hard coal, and/or lignite, not only in Germany but also in all other countries where Medios AG operates directly or indirectly. Incineration of fossil fuels for energy generation not only contributes to Climate change through greenhouse gas emissions but also contributes to rising energy costs due to the scarcity of finite natural resources. This impact arises both from the company's own production processes and throughout the entire value chain, from raw material extraction to distribution.

RISK 1: RISK OF DAMAGE TO THE ORGANIZATION'S PHYSICAL ASSETS CAUSED BY EXTREME WEATHER EVENTS SUCH AS FLOODS, STORMS, AND HEAT WAVES, OR BY LONGER-TERM TRENDS SUCH AS TEMPERATURE CHANGES, RISING SEA LEVELS, REDUCED WATER AVAILABILITY OR LOSS OF BIODIVERSITY

Rapidly changing climatic conditions, such as global warming, are now also having an impact in Germany and Europe in the form of an increase in extreme weather events such as heavy rainfall with flooding, storms, droughts, and heat waves. This development poses a physical risk of damage to a company's tangible assets – such as buildings, production facilities, and data centers – and can result in business interruptions and high repair costs. Furthermore, if Climate change is not mitigated, long-term phenomena such as rising sea levels, water shortages, or the loss of biodiversity and irreversible damage to Ecosystems pose a threat. These long-term climatic impacts can also influence Medios in terms of a physical climate risk regarding the selection of company locations and rising operating costs.

RISK 2: SERIOUS DISRUPTION OF CRITICAL BUSINESS PROCESSES OR SERVICES, INCLUDING THOSE PROVIDED BY THIRD PARTIES, DUE TO EXTREME WEATHER EVENTS (E.G., DISRUPTED SUPPLY CHAINS)

Another physical climate risk relates to the danger of severe disruptions in key business processes or services caused by extreme weather events such as heavy rain with flooding, storms, droughts, and heat waves. Such events can impair the availability and functionality of supply chains and services, particularly when these have dependencies on external providers. Disruptions to transportation routes or to the infrastructure of the upstream and downstream value chain can lead to production losses, delays, and increased costs, which significantly jeopardize business continuity.

Climate risk analysis (E1 IRO-1)

To identify its climate-related opportunities and risks, Medios analyzed two scenarios from the Intergovernmental Panel on Climate Change (IPCC) as part of a climate scenario analysis within the materiality assessment, examining their implications for Medios and its value chain over short-term (<1 year), medium-term (1–5 years), and Long-term (>5 years) time horizons:

- Global warming of up to 2 °C by 2050 – with noticeable consequences (or IPCC concentration pathway RCP2.6)
- Global warming of up to 4 °C by 2050 – with drastic consequences (i.e., IPCC concentration pathway RCP8.5).

Based on these two scenarios, a discourse-based assessment was conducted as part of the materiality assessment to determine which physical and transitional risks and opportunities the company and its value chain are or will be exposed to across the various time horizons. The identification of physical risks to the company's business activities, assets, and value chain is based on the assumptions of the 4°C scenario: Specifically for Medios AG, this means that persistently high global Emissions will lead to climate hazards such as more frequent and intense heat waves, longer droughts, and increases in heavy rainfall and other extreme weather events by 2050. The identification of transitional risks and opportunities was based on the assumption of the 2°C scenario that comprehensive political and regulatory climate protection measures – such as rising CO₂ costs and market developments – as well as technical innovations will lead to a drastic reduction in greenhouse gas emissions by 2050.

As a result, the following physical risks were initially identified as potentially material and subsequently assessed as material in the context of financial materiality with regard to probability of occurrence and extent of damage:

- Damage to the organization's physical assets caused by extreme weather events such as floods, storms, and heat waves, or by longer-term trends such as temperature changes, rising sea levels, reduced water availability, or the loss of biodiversity
- Serious disruption of critical business processes or services, including those provided by third parties, resulting from extreme weather events (e.g., disrupted supply chains)

In addition to physical risks, the following potentially material transitional risks have also been identified:

- Legal costs and fines resulting from non-compliance with politically mandated national and international Reduction targets
- Worsening credit terms due to high greenhouse gas emissions or a lack of reduction targets
- Financial risk due to politically established and rising CO₂ taxes
- Public disclosure of increased greenhouse gas emissions associated with Medios' business activities could lead to reputational damage and a loss of trust among customers and investors, as well as a loss of attractiveness for potential new employees
- Rising energy costs due to growing demand and geopolitical conflicts.

In addition, the following potentially material transitional opportunity has been identified:

- Opportunity for cost-effective energy generation and self-sufficiency in electricity.

Neither the five transition risks nor the potential transition opportunity were deemed material in the context of assessing probability of occurrence and financial impact. In the course of identifying climate-related transition risks, no assets or business activities were identified that would be incompatible with the transition to a climate-neutral economy or that would require significant efforts to become compatible with the transition to a climate-neutral economy.

Resilience Assessment (E1 SBM-3)

In the context of an ESRS-compliant resilience analysis, the resilience of the business model and corporate strategy must be assessed and described, particularly with regard to material climate risks. An initial resilience assessment found that Medios' business model and business strategy are resilient to the climate risks identified as non-material. In connection with the risks identified as material, however, concrete adjustments must be made to remain resilient to the impacts of climate change in the medium and long-term. The necessary actions include, for example, adequate insurance coverage of assets against extreme weather events and other climate impacts, as well as a sufficiently diversified supply chain through closer cooperation along the value chain. As part of a comprehensive climate strategy, which Medios plans to develop by 2026, appropriate actions to strengthen the resilience of the business model will be developed.

Medios has not conducted a structured, ESRS-compliant climate scenario analysis that includes criteria such as probability, magnitude, and duration, as well as geographic coordinates, to identify climate risks to business activities and assets. This, along with a similarly structured Resilience analysis to assess the adaptability of the business model and corporate strategy, is being considered for financial year 2026.

Transition plan for climate change mitigation (E1-1)

Currently, Medios does not yet have a concrete Transition plan for climate change mitigation. For the coming financial year, however, we are considering developing a company-specific climate strategy as part of our new Sustainability Strategy 2030. This will involve setting reduction targets and developing and implementing corresponding actions that are consistent with the 1.5-degree target of the Paris Climate Agreement.

Currently, there are already various policies, actions, and general ambitions that we have formulated in connection with the current "Sustainability Strategy 2025" and that relate to the three identified Decarbonisation levers: energy-saving measures and efficiency, sustainable mobility, and competence development in the area of energy and climate management.

Our Policy (E1-2)

STANDARDIZED WORK INSTRUCTIONS FOR ENERGY AND RESOURCE CONSERVATION

Medios' general code of conduct and Standard Operating Procedures (SOPs) explicitly require the responsible use of energy and resources such as paper and packaging materials in accordance with the principles of the Circular economy. The respective management teams of the Medios companies are responsible for compliance with and implementation of this framework. In addition, we rely on the individual sense of responsibility of all employees, who are encouraged to act in their daily work in a manner that conserves energy and resources as much as possible, also in the interest of Climate change mitigation.

ENERGY-EFFICIENT PURCHASING POLICY

As part of our sustainable procurement policy, we have made energy efficiency a key criterion in the procurement of new hardware and electronic devices, as well as in the contracting of data centers. The first prerequisite for this is the definition of specific procurement criteria regarding the energy efficiency classes of the respective equipment. The central procurement department of Medios AG is responsible for implementing this policy.

CLIMATE-FRIENDLY (BUSINESS) TRAVEL POLICY

In addition, we have published a (business) travel policy that explicitly recommends that all employees use sustainable modes of transportation such as rail (for long distances) and public transit (for short distances). When selecting company vehicles, which are used exclusively by field staff and executives, sustainable vehicle alternatives such as electric vehicles must also be explicitly prioritized.

Actions (E1-3)

Medios aims to set science-based, far-reaching yet realistic climate and environmental goals that are in line with the 1.5-degree target of the Paris Climate Agreement. These will be incorporated into the company's first climate strategy (Transition Plan) in 2026 as part of the development of our 2030 Sustainability Strategy. Guided by effective decarbonization levers, a concrete action plan will be developed to ensure the achievement of these objectives. The entire Medios AG will be covered by our sustainability strategy. The following actions were launched or continued during the reporting year:

ENERGY AUDITS AND INSTALLATION OF PHOTOVOLTAIC SYSTEMS

In the reporting year, Medios AG further expanded its processes and systems for ESG data collection. This particularly concerns the group-wide implementation of the ESG software Cority. In addition, in 2024 and 2025 – also in accordance with legal requirements – energy audits were conducted in collaboration with specialized external partners for the subsidiaries in Germany and for those in Belgium, the Netherlands, and Spain, respectively. The opportunities identified through this process for reducing our greenhouse gas emissions will be specifically incorporated into the catalog of actions in the climate strategy. Medios has already implemented individual actions resulting from this in 2025. For example, Medios has identified the use of renewable energy as a key Decarbonisation lever and has commissioned its own photovoltaic (PV) systems at its Dutch sites in Almere and Breda. The further implementation of these actions will depend on Medios making the necessary – primarily financial – resources available and allocating them.

Medios is considering determining the achieved and expected reductions in greenhouse gas emissions resulting from these actions in 2026 as part of the development of a climate strategy. This would also involve identifying the CapEx and OpEx required to implement and maintain the actions that have been taken and are planned.

SUPPORT FOR OFFSET PROJECTS

In 2025, Medios offset 1,208 t CO₂e – and thus all Scope 1 and Scope 2 emissions generated in 2024 that stem from activities in Germany – by purchasing CO₂ reduction certificates from certified or quality-assured reforestation projects for resilient mixed forests in Germany – outside the value chain. When selecting the offset provider and the project, we focused on factors such as transparency, regional projects, and certifications. The reforestation areas are FSC, Naturland, or PEFC certified and are maintained by foresters. Furthermore, these areas may not be cleared and must be reforested in the event of a fire. Medios has not developed its own projects for removals and storage of greenhouse gas emissions.

RISK MONITORING AS CLIMATE CHANGE ADAPTATION

As part of our internal risk monitoring, we have identified the physical climate risks mentioned above and developed strategies to address them. In particular, with regard to the risk to the company's own tangible assets, such as buildings and equipment, as well as the IT infrastructure, we have taken out a comprehensive insurance package and developed backup plans with alternative data centers.

Goals (E1-4)

Our primary ambition in the area of climate management is the general avoidance and reduction of greenhouse gas emissions. Measurable and time-bound targets for reducing greenhouse gas emissions compared to the Base year 2025 do not yet exist. However, with the implementation of the ESG software Cority, we have laid the foundation for a group-wide, standardized ESG data management system. Based on this data, we are currently developing our first climate strategy and formulating concrete reduction targets for all three scopes. These are to be established in the coming year, and their effectiveness will be measured via ESG data management.

Key figures (E1-5 to E1-9)

Medios does not generate the electricity for its own business activity. However, how and what energy we procure and use determines the level of greenhouse gas emissions for which we are responsible. We generally procure heat from the landlords of our locations in the form of district heating, Natural gas, and/or heating oil.

Our energy consumption in the reporting year was as follows:

Table 12: Medios Group Energy Consumption

in MWh unless otherwise stated	2025
Total energy consumption related to our own operations	11,750.68
Total energy consumption from fossil sources	9,597.63
Fuel consumption from coal and coal products	0
Fuel consumption from Crude oil and petroleum products	1,990.14
Fuel consumption from natural gas	2,798.53
Fuel consumption from other fossil sources	0
Consumption of purchased or acquired electricity, heat, steam, or cooling from Fossil sources	4,808.96
Share of fossil sources in total energy consumption	81.7%
Total energy consumption from Nuclear sources	0
Share of nuclear sources in total energy consumption	0%
Total energy consumption from Renewable sources	2,153.05
Fuel consumption from Renewable sources	0
Consumption of purchased or acquired electricity, heat, steam, or cooling from Renewable sources	1,922.51
Consumption of self-generated non-fuel renewable energy	230.54
Share of renewable sources in total energy consumption	18.3%
Share of electricity from Renewable sources (self-generated and purchased) in total electricity consumption	42.5%
Non-renewable energy generation	0
Generation of energy from renewable sources	230.54
Energy intensity (total energy consumption per net revenue) related to activities in High climate impact sectors	0.0064 MWh/million
Net revenue from activities in high climate impact sectors	€1,835,561 thousand
Net revenue from activities not taking place in high climate impact sectors	€242,663 thousand

Due to the detailed reporting requirements of the ESRS, we have restructured our carbon footprint for the 2025 reporting year and designated the 2025 financial year as the new Base year. In accordance with the international Greenhouse Gas Protocol standard, the carbon footprint includes direct emissions from stationary and mobile incineration (Scope 1) as well as indirect emissions from purchased energy such as electricity and heat (Scope 2).

To determine material Scope 3 categories, industry-specific average values were used as a science-based approximation in the context of Medios AG (NACE Code: 21.20 – Compounding of pharmaceutical specialities and other pharmaceutical products & 46.4 – Wholesale of consumer goods⁷). These estimates are based on emissions data from more than 30 companies per sector (according to NACE code) from the ICE database. Taking into account the percentage shares of all 15 Scope 3 categories described in the GHG Protocol within the sector (materiality threshold: 2%) as well as an internal plausibility check of the categories' relevance to Medios AG's business model, four categories were initially declared material. In addition to Scope 3.1 Purchased goods and services, 3.2 Capital Goods, 3.3 Energy-Related Emissions, and 3.9 Downstream Transportation, certain stakeholders have expressed particular interest in 3.5 Operational Waste and 3.6 Business traveling; we have therefore also captured and capitalized these, even though the category falls below the set materiality threshold on an industry-wide basis.

To calculate Scope 1 and Scope 2 emissions as well as Scope 3 emissions in categories 3.3, 3.5, and 3.6, Medios used emission factors from Ecoinvent, the UK Department for Environment, Food and Rural Affairs (DEFRA), and the German Federal Environment Agency, as well as, where available, Market-based emission factors from energy suppliers. To calculate Scope 3 emissions for categories 3.1, 3.2, and 3.9, Medios relied on emission factors from the freely accessible Open CEDA database for expenditure-based Scope 3 emissions.

7 NACE Code 21.20 – Compounding of pharmaceutical specialities and other pharmaceutical products: This NACE code is also relevant because Medios AG is active, through subsidiaries, in the patient-specific compounding of drugs, particularly in the compounding of sterile infusion solutions and oncological therapies. These customized drug preparations fall under pharmaceutical production and justify the classification within the compounding sector.
NACE Code 46.4 – Wholesale of consumer goods: This NACE code is relevant to Medios AG because its business model is primarily based on the sale and distribution of specialty and customized pharmaceuticals. The company acts as a link between manufacturers, pharmacies, and medical facilities, making the classification as a wholesale company in the pharmaceutical products sector appropriate. The inclusion of this code accurately reflects the company's positioning in the pharmaceutical distribution market and ensures regulatory and statistical comparability with other market players.

In addition to the reference gas carbon dioxide (CO₂), methane (CH₄), nitrous oxide (N₂O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), sulfur hexafluoride (SF₆), and nitrogen trifluoride (NF₃) were also included in the calculation as CO₂ equivalents (CO₂ e) in the calculation.

Medios does not use an internal carbon pricing system. The expected financial impacts of significant physical and transitional risks as well as climate-related opportunities were not calculated in the reporting year.

Table 13: Medios Group Emissions

in t CO ₂ e	2025
Scope 1 gross GHG emissions	1,283.78
Location-based Scope 2 gross GHG emissions	1,552.48
Market-based Scope 2 gross GHG emissions	1,180.53
Total indirect (Scope 3) gross GHG emissions	350,142.65
Scope 3 Category 1: Purchased goods and services	345,281.68
Scope 3 Category 2: Capital goods	1,835.52
Scope 3 Category 3: Activities related to fuels and energy (not included in Scope 1 or Scope 2)	515.00
Scope 3 Category 5: Waste generated in operations	327.00
Scope 3 Category 6: Business traveling	31.71
Scope 3 Category 9: Downstream transportation	2,151.70
Total GHG emissions (location-based)	352,978.90
Total GHG emissions (Market-based)	352,606.95
Biogenic CO₂ emissions from incineration or biological degradation of Biomass (Scopes 1-3)	0
Share of contractual instruments, Scope 2 GHG emissions	0%
Proportion of Scope 3 GHG emissions calculated using primary data	0%
GHG intensity, location-based (total GHG emissions per net revenue)	0.17 tCO₂e/million €
GHG intensity, market-based (total GHG emissions per net revenue)	0.17 tCO₂e/million €

RESOURCE USE AND CIRCULAR ECONOMY (E5)

Description of impacts, risks, and opportunities (ESRS 2 SBM-3)

Table 14: E5 Resource use and circular economy

	Value chain			Time horizon		
	Upstream	Own activities	Down-stream	<1 year	1-5 years	> 5 years
Impact 1: Resource consumption, particularly in the area of drug production (entire value chain) ¹ as well as in infrastructure measures such as the expansion and construction of company sites (actually negative)	●	●	●	●	●	●
Impact 2: Waste generation from our own products as well as along the entire value chain (actually negative)	●	●	●	●	●	●

¹ Medios defines "production" as the compounding of patient-specific, ready-to-use therapies from approved finished medicinal products, including Blistering.

IMPACT 1 – RESOURCE CONSUMPTION

Medios AG requires various resources throughout the entire value chain. These are needed in particular for pharmaceutical raw materials and packaging, but also for its own construction projects, among other things. The extraction of these resources has negative impacts on the environment and certain local communities. A large portion of these resources is required in the upstream value chain to compound the finished medicinal products that Medios further processes or repackages as part of its compounding operations, or trades as part of its pharmaceutical supply business. Resource consumption thus arises not only from the company's own activities but also from its business relationships – that is, throughout the entire value chain.

IMPACT 2 – WASTE GENERATION

Waste is generated both during production processes in the upstream value chain and through Medios' own compounding and office activities, hygiene measures, and the disposal of packaging, as well as from residual drug stocks resulting from the consumption of medical products. This waste thus arises in the upstream and downstream value chains as well as through Medios' own business activities. Improper disposal of waste could result in waste entering the environment or harmful substances being released into nature. The generation of waste is an intrinsic part of Medios AG's business model as a pharmaceutical company and must be identified throughout the entire value chain.

No significant opportunities or risks related to resource use and the circular economy were identified that could be expected to have financial implications.

Identification of material impacts, risks, and opportunities related to resource inflows, resource outflows, and Waste (E5.IRO-1, E5-11 a, b)

Medios did not deviate from the generally applied methodology described in Chapter ESRS 2 – General disclosures when determining the material impacts, risks, and opportunities related to resource use and the circular economy. All stakeholders mentioned in the chapter were consulted, including nature as the primary stakeholder affected in this area, in the form of scientific literature compiled in the ENCORE database. Furthermore, the entire value chain was included in the analysis. No separate review of assets or business activities took place, and no affected communities were consulted.

As a result, the two impacts mentioned above were defined as having materiality. In doing so, Medios took into account that safety in terms of quality and hygiene in accordance with GMP and GDP is the top priority throughout the entire value chain. To date, this has been accompanied by high consumption of single-use materials such as plastics or cardboard.

Policies/concepts related to Resource use and circular economy (ESRS 2 MDR-P; ESRS E5-1)

We aim to promote the responsible use of resources throughout the entire value chain. To this end, we intend to significantly increase the proportion of recycled or reused Waste as well as the use of recyclable and reusable packaging. This includes the increased use of Virgin resources, including a relative increase in the use of secondary (recycled) resources, as well as the sustainable procurement and use of renewable resources. To this end, actions are discussed, reviewed, and, where appropriate, adopted at the quarterly meetings of the Sustainability Committee to counteract the negative impacts of our resource consumption and waste generation without compromising the quality of our pharmaceutical products.

GENERAL TERMS AND CONDITIONS OF CONTRACT OF THE MEDIOS GROUP FOR CONSTRUCTION AND CRAFT SERVICES (AAB)

The General Terms and Conditions of Medios AG for Construction and Trades Services (AAB) govern the legal relationships between Medios AG and its contractual partners for the procurement of services in the construction and trades sector. This covers not only the direct contractual partners but also their suppliers and subcontractors. These stakeholders were not involved in the drafting of the Policy. The AAB specify which construction products the contractor is to use. These must comply with the relevant legal requirements, including building authority approvals and CE or Ü marking. If an approval is missing, the client's written consent is required. To date, this Policy does not apply to Ceban, which was acquired during the financial year. This is planned for 2026.

Furthermore, it is stipulated that only materials that do not pose a health or environmental hazard may be used. Materials containing hazardous substances are permitted only if the occupational exposure limit is complied with. In the event of potential pollutant emissions, the type, concentration, and protective measures must be communicated to the client. Waste management is also part of the AAB. The contractor is responsible for the proper disposal of waste generated by their work. If disposal is carried out by the client, the client's guidelines for waste separation must be followed.

The policy is publicly available on the Medios AG website at⁸. The relevant stakeholders are informed of our AAB, including the web link, in the first paragraph of the standardized external purchase order. The senior manager responsible for this policy is the Head of Procurement & Contract Management (PCM).

The policy does not address the shift away from the use of Virgin resources, including a relative increase in the use of secondary (recycled) resources, nor does it address the sustainable procurement and use of renewable resources.

RECYCLING AND CIRCULAR ECONOMY

There is no group-wide policy governing the Waste hierarchy, the prioritization of waste prevention or minimization over Waste treatment, or the concepts of eco-design, Waste as a resource, or consumer waste (at the end of the life cycle of consumer products). However, Medios AG has Standard Operating Procedures (SOPs) in place at all locations to ensure compliance with national waste management laws.

In addition, the ESG Committee of Medios AG addresses the potential for waste reduction, increasing recycling rates, more efficient use of resources, and the development of Circular economy concepts during its quarterly meetings. The resulting actions are outlined below.

Actions and means related to Resource use and the circular economy (ESRS 2 MDR-A; ESRS E5-2)

During our ESG Committee meetings, we discussed several actions regarding resource use and the circular economy, which were either newly implemented or continued to be implemented during the reporting year with the provision of all necessary resources.

Since 2021, Medios AG has been using washable protective suits in the cleanrooms of its production facilities, with the exception of those at Ceban. This switch from disposable to reusable suits reduces resource consumption and waste generation. Similarly, the production facilities – excluding those at Ceban – have switched from shoe covers to sterile shoes in the laboratory areas with the lowest hygiene requirements.

⁸ General Terms and Conditions of the Medios Group for Construction and Trades Services (AAB) of Medios AG, <https://medios.group/en/gpc>.

Medios plans to switch to fully plastic-free insulated boxes for passive cooling during the transport of thermolabile products in Germany starting in 2026. The new boxes consist of a corrugated cardboard outer box and two foldable cardboard inserts made of cellulose. They can be disposed of as paper waste and recycled. To date, Medios has used insulated packaging made of extruded polystyrene with aluminum foil in Germany. By 2025, Medios will have shipped approximately 50,000 of these insulated boxes with a total weight of approx. 17.5 tons.

For the procurement and disposal of hardware, we collaborate with a non-profit IT company that specializes in extending the lifespan of used IT and mobile devices through professional data destruction, refurbishment, and remarketing. This partnership applies to all German subsidiaries. We provide unused IT hardware to the company, which either resells it or recovers valuable raw materials through recycling. The devices are offered on the open market and can be purchased by both Medios AG and private consumers. In this way, resold hardware is put back into use by us.

Medios 2025 has taken an action to broaden and deepen scientific understanding of the ecological benefits of Blistering by having Medios Blister GmbH (formerly Blisterzentrum Baden-Württemberg GmbH) support a bachelor's thesis in the Industrial Engineering and Media program at Stuttgart Media University. The title of the thesis is "Sustainability Analysis of Patient-Specific Blistering of Drugs in Blister Centers for Nursing Homes with a Scalable Model Calculation and the Effects on Medication Therapy Safety." The thesis demonstrates that in Germany, there is potential to reduce avoidable medication waste in nursing homes through external Blistering by 11% to 22% per year. Research and development opportunities exist in promoting standardization and digitalization, strengthening interdisciplinary collaboration, and driving regulatory adjustments.

Goals related to resource use and circular economy (ESRS 2 MDR-T; ESRS E5-3)

To manage our material impacts in the area of resources and Circular economy, we have the overarching ambition to conserve resources throughout the entire value chain.

Medios is considering translating this ambition into concrete goals and discussing further potential goals, particularly with regard to ESRS paragraphs E5-3 24 and E5-3 26, by 2026 as part of the revision of our sustainability strategy.

We track the effectiveness of our initiatives in the area of resource consumption and Circular economy by monitoring relevant resource- and waste-related metrics in our ESG data management system. Our ambitions, policies, and actions in the area of resource use and circular economy are based on relevant legal requirements regarding the circular economy and the management of waste, including hazardous waste, in Belgium, Germany, the Netherlands, and Spain.

Resource inflows and outflows, and waste (ESRS E5-4, E5-5)

At Medios AG, the following resource inflows occur within the scope of the company's own business activities and within the company's upstream value chain (see also Chapter ESRS 2 – General Disclosures):

- **Active pharmaceutical ingredients and accompanying substances:**
 - Monoclonal antibodies (pembrolizumab, vedolizumab, nivolumab, daratumumab, avelumab, pertuzumab, bevacizumab)
 - Small-molecule drugs such as azacitidine
 - Natural products such as paclitaxel (from the yew tree) or SN-38 (from camptothecin), some of which are compounded semi-synthetically.
 - Excipients such as sucrose, mannitol, trehalose, and polysorbates derived from common plants like corn, sugarcane, and algae, or synthetically compounded in factories.
- **Packaging:**
 - Secondary packaging made of cardboard, paper
 - Primary packaging such as tablet blisters (PVC), glass (vials)
 - Shipping materials: Cardboard.
- **Hygiene equipment:**
 - Protective suits (textiles, plastics)
 - Sterilization agents (alcohols and other chemicals).
- **Ongoing operation:**
 - Water
 - Fossil fuels and renewable energy sources for power generation
 - Metals and plastics for machinery, laboratory instruments, and vehicles
 - Building materials such as concrete and metal for buildings.

The processes for compounding Patient-Specific Therapies primarily result in individually dosed tablets, vials, or infusion bags containing cytostatic preparations – primarily antibody solutions and parenteral nutrition solutions – as well as excipients. Cytostatic waste generated during the production process or after administration by specialized pharmacies and healthcare professionals is properly disposed of in designated containers in accordance with specific legal regulations.

In the course of our production processes related to compounding and the use of our products, waste also arises from hygiene products and packaging, which primarily consists of plastic, glass, cellulose, and textiles. These are disposed of in the conventional manner. Since our products are medical products, their durability is governed by pharmaceutical regulations and does not deviate from the Industry Average. Likewise, our products are not designed according to circular economy principles, but solely according to pharmaceutical principles.

Medios estimates the total weight of products and technical and biological materials used in 2025 for the manufacture of products (compounding) and within the scope of Medios' services (pharmaceutical supply and API services) at 4,455 t. The estimate is based on waste volumes. No procurement of biological materials took place in 2025 within the framework of a certification system. Furthermore, Medios did not use any reused or recycled secondary components, products or materials in 2025.

Packaging placed on the market by Medios is generally recyclable, but in some cases cannot be recycled for medical or data protection reasons. For example, the film used by Medios in Germany for Blistering, which consists of approx. 40% cellulose hydrate (renewable raw material) and approx. 60% polyethylene- e (fossil raw material), can only be disposed of as residual waste for data protection reasons.

WASTE-RELATED KEY FIGURES

Table 15: Waste diverted from disposal

Type of waste	Type of utilization	Quantity (in tons)
Hazardous waste	Preparation for recycling	0
	Recycling	0
	Other types of recovery	0
	Total	0
Non-hazardous waste	Preparation for recycling	0
	Recycling	454.40
	Other types of recovery	0
	Total	454.40

Table 16: Waste Directed to Disposal

Type of waste	Type of waste treatment	Quantity (in tons)
Hazardous waste	Incineration	136.88
	Landfill	0
	Other disposal methods	0
	Total	136.88
Non-hazardous waste	Incineration	399.48
	Landfill	0
	Other disposal methods	0
	Total	399.48

Total waste generation (in tons): 990.76
 Total amount of non-recycled waste (in tons): 536.36
 Percentage of non-recycled waste: 54.14%
 Total amount of hazardous waste (in tons): 136.88

Where Medios was unable to collect waste-related data, the values were estimated. This is the case, for example, with office spaces for which no consumption-based waste data was reported. In these cases, waste was calculated based on the proportion of leased space relative to the total area. In addition, in some cases, no data was available on the respective proportion of waste directed to disposal that was landfilled or subjected to incineration. In these cases, national average values from the Confederation of European Waste-to-Energy Plants (CEWEP) were used.

Double counting is avoided by collecting data for sites shared by multiple subsidiaries not on a per-subsidiary basis (), but for the site as a whole.

Table 17: Other resource-related metrics

	2025
Share of recycled paper in total paper consumption	15.48%
Consumers' recycled paper consumption	570,000 sheets
Total paper consumption	3,681,200 sheets
Water consumption	7,817.27 m³

OWN STAFF (S1)

Table 18: S1 Own workforce

	Value chain			Time horizon		
	Upstream	Own activities	Down-stream	<1 year	1-5 years	> 5 years
Impact 1: Opportunity for long-term life planning on the part of the company's own workforce (actually positive)		●		●	●	●
Impact 2: Sustainable prosperity for the company's own workforce (actually positive)		●		●	●	●
Impact 3: Participation of the company's own workforce in family and social life (actually positive)		●		●	●	●
Impact 4: Health risks for the company's own workforce (potentially negative)		●		●	●	●
Impact 5: Sustainable professional development of skilled workers among the company's own employees (potentially positive)		●			●	●
Impact 6: Valuing and integrating people, regardless of gender, nationality, religion, sexual orientation, or physical/mental disabilities (actually positive)		●		●	●	●
Risk 1: Reputational damage and increased recruitment costs due to an unbalanced work-life balance		●			●	●
Risk 2: Loss of talent/high turnover of employees in key roles due to negatively perceived working conditions (e.g., an inadequate work-life balance)		●			●	●
Opportunity 1: Recruiting specialists through good working conditions (e.g., an appropriate work-life balance)		●		●	●	●

Highly qualified and committed employees are fundamental to the Medios Group's business success (see the [General Information chapter](#)). Therefore, in its materiality assessment, Medios assessed whether there are impacts on its own business activities as well as on the value chain that affect all employees within its own business division. The identified risks and opportunities affect all employee groups. The procedure for identifying material impacts, risks, and opportunities related to the company's own workforce is described in more detail in the [chapter ESRS 2 – General disclosures](#).

The company influences the lives of its employees by offering them opportunities to plan for the long term under reliable conditions through long-term employment. Adequate wages ensure sustainable prosperity. Medios creates an appreciative environment for its employees and ensures that people are equally integrated regardless of gender, nationality, religion, sexual orientation, or physical/mental disabilities. Furthermore, work-life balance enables employees to participate in family and social life.

For this reason, the materiality assessment identified high turnover and the loss of talent due to negatively perceived working conditions as a risk to the Medios Group's business model with regard to its own workforce. This also includes a potential loss of reputation as an employer, which can lead to increased recruitment costs for the company.

Conversely, however, this also presents an opportunity for Medios: a good reputation as an employer, built on good working conditions, can become an advantage for the company in achieving its business goals.

As the company whose processes are aligned with the quality standards GDP (Good Distribution Practice) and GMP (Good Manufacturing Practice), we have come to understand that certain individuals, such as employees working in cleanrooms, are fundamentally exposed to a higher risk of health hazards. The dry, circulating air can increase susceptibility to colds over time. Additionally, accidents involving medications can endanger employees' health. For example, the unintentional release of cytostatics can lead to skin and eye injuries.

Human Resources Policy (S1-1)

The Group's human resources policy is centrally managed by the Human Resources department, which is represented directly on the Executive Board by the Chief Financial Officer. A description of the management system for the prevention of workplace accidents is provided in [Section S1-4](#).

Cooperation at Medios is based on the company's values and shared vision. Building on this, several policies have been implemented to ensure good working conditions for our employees.

CODE OF CONDUCT FOR EMPLOYEES

Medios' Code of Conduct (CoC) is made available to all employees in Germany via the internal HR management system and a training platform and is binding for them. Employees of Medios AG – with the exception of Ceban – must confirm the CoC via an online survey. For Ceban, there is currently a separate set of rules consisting of "Operating Rules" and a staff handbook that addresses key topics such as bribery, discrimination, and collegial behavior. These regulations are to be aligned with the group-wide CoC in a Medium-term; in doing so, Medios will assess the extent to which adjustments to local legal requirements are necessary.

Furthermore, Medios expressly commits in the CoC to respecting human rights as set forth in the United Nations Universal Declaration of Human Rights. Further information is provided in Chapter G1.

POLICY ON DIVERSITY, EQUALITY, AND INCLUSION

The Policy on Diversity, Equality, and Inclusion is also mandatory for all employees in Germany. The goal of the policy is to create a work environment characterized by mutual respect and free from prejudice for all employees. All employees are to be protected from discrimination based on race, ethnic origin, gender, religion and belief, disability, age, or sexual identity. This applies to job postings, applications, selection processes, training and professional development, promotion, and termination. Otherwise, Medios has not made any specific commitments regarding particularly vulnerable groups within its own workforce.

Both guidelines – the Code of Conduct and the Diversity, Equality, and Inclusion Policy – are supplemented by specialized anti-discrimination training. If employees have concerns regarding the conduct of Medios employees or third parties, or if they suspect Breaches of this policy, they may contact their supervisors, the Executive Board, or the external compliance officer. In addition, employees may use the whistleblowing system provided. Incoming reports are reviewed by an external ombudsperson in accordance with our Whistleblowing Policy, and follow-up measures are initiated (for more information, see [Chapter G1](#)).

CURRENT PRACTICE REGARDING EMPLOYMENT CONTRACTS

Medios strives to retain as many permanent employees as possible and to provide corresponding social security. Even though temporary contracts are legally permissible for specific reasons, we issue them only in rare cases. These include, for example, internships where a fixed term is planned from the outset.

OCCUPATIONAL SAFETY STRATEGY

Since the end of 2022, the Medios Executive Board has had a dedicated board portfolio for occupational safety. The responsible board member bears overall responsibility and has appointed a central occupational safety officer as well as safety officers in all subsidiaries, who serve as primary points of contact both internally and externally. The managing directors of the respective companies are responsible for on-site implementation through delegation of duties. The structure is supplemented by an external occupational safety specialist and location-based company physicians.

Medios identifies and addresses occupational safety issues in the occupational safety committees (ASA) of its subsidiaries in Germany and ensures their implementation. Each ASA consists of a representative of management, an internal safety officer, an external occupational physician, and an external occupational safety specialist. The ASAs met quarterly in 2025. No ASA has yet been established at the Ceban subsidiaries.

In all subsidiaries, first aid responders and fire safety assistants are trained in accordance with the law, including consideration of shift work. In addition, risk assessments, annual and event-specific mandatory training sessions, fire drills, and occupational health examinations are conducted in accordance with the preventive care concept. Accidents – including commuting, work-related, near-miss, and spill accidents – are documented according to a uniform policy.

Annual safety training sessions are conducted by a certified occupational safety specialist. New employees receive training immediately, and missed sessions are rescheduled. After the training notification is sent, two reminders follow; the manager is informed with the final reminder. If all scheduled sessions remain unattended, this is noted.

At Medios subsidiaries in Germany, there is a working group that analyzes and discusses all occupational safety topics on a monthly basis and generates new ideas.

INTERNATIONAL STANDARDS

As a company with locations in Germany, the Netherlands, Belgium, and Spain, Medios AG operates in accordance with the legal requirements applicable in the respective countries as well as in the European Union. Furthermore, it recognizes the ILO standards as binding, which have been ratified in the respective countries and are therefore also applicable. The International Labour Organization (ILO) is the oldest specialized agency of the United Nations (UN). We are therefore also committed to the prohibition of human

trafficking, child labour, and forced labour. Medios does not have a separate mechanism for monitoring and ensuring compliance with the UN Guiding Principles on Business and Human Rights, the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work, and the OECD Guidelines for Multinational Enterprises. Since Medios operates exclusively within the EU, Medios does not consider its employees to be at risk of forced or Child labour.

Procedures for employee engagement, mitigation of negative impacts, and communication channels (S1-2, S1-3)

To give our employees the opportunity to report actual or potential negative impacts of our business activities, the company conducts an annual employee survey. In the reporting year, we once again conducted a survey on mental stress in the workplace in Germany. The survey covers the following topics: professional development, employee retention, social responsibility, communication, customer focus, Medios Group management, "My Job," sustainable engagement, quality and operational efficiency, training, teamwork, and compensation and benefits. The content of the questionnaire was adapted for Ceban.

We take our employees' criticism and suggestions seriously and incorporate them – to the extent compatible with our business model – into the planning of our activities. The employee survey is managed by the Human Resources department; in addition, the annual performance reviews provide important insights, for example regarding professional development, training initiatives, or opportunities for optimization within the business unit. The participation rate serves as an important indicator of how effective the process is and to what extent our employees take advantage of the opportunity. Upon request, employees can also obtain 360-degree feedback to gain different perspectives, particularly with regard to potential discrimination. The CFO is the highest-ranking official responsible for this process.

Furthermore, all employees have access to a whistleblower system operated by an external entity for reporting misconduct, including discrimination and other negative impacts. More information on this can be found in [Chapter G1](#).

An employee representative is not currently involved, as there is no employee representation at Medios in Germany; such representation currently exists only for Ceban employees in the Netherlands. Under the Works Constitution Act, Medios employees in Germany have the right to establish a works council. However, this right has not yet been exercised.

Actions in connection with own workforce (S1-4)

Qualified and motivated employees are central to Medios AG's business model. Working conditions present both risks and opportunities: By consistently minimizing negative impacts, reputational damage, recruitment costs, talent loss, and turnover can be reduced. At the same time, attractive working conditions increase the chances of attracting and retaining skilled workers over a long-term period.

Through regular employee surveys as well as supplementary feedback and dialogue formats, Medios ensures that potential negative impacts of its own business practices are identified early, assessed, and mitigated as needed.

We address this interplay of impacts, risks and opportunities in a targeted manner with a package of actions. It is based on an internal analysis with executives as well as feedback from employee surveys and development discussions. The IROs and the resulting actions were discussed and planned in the ESG Committee. Management provides all necessary financial and human resources for this purpose. The actions are grouped into the following areas:

— **Reducing precarious employment /secure and adequate employment**

We provide our employees with economic security, the opportunity for long-term life planning, and a share in prosperity. Our opportunities lie in attracting and retaining qualified workers through good working conditions.

— **Work-life balance**

Our employees have the opportunity to participate in professional, family, and social life. They should not have to choose between their career (and thus their income) and their family. Our opportunities lie in employee satisfaction and, as a result, in better recruitment and the long-term retention of qualified workers.

— **Completely preventing workplace accidents/ Health and safety**

We minimize health risks for our employees in the workplace. Furthermore, we counteract potential health risks by promoting a healthy lifestyle and thereby improving the health of our employees.

— **Promoting equal opportunity and equal treatment**

Medios pursues a zero-tolerance policy toward discrimination: No one may be discriminated against on the basis of race, ethnic origin, gender, religion or belief, disability, age, or sexual identity. All employees should experience appreciation, inclusion, and equal opportunity. Our opportunity lies in the motivation and long-term retention of qualified employees.

— **Continuous training and professional development**

We provide our employees with "lifelong" training, thereby promoting their employability. This fosters self-esteem, social security, and career advancement. Our opportunities lie in the long-term retention and increasing qualifications of our workforce.

The actions outlined in these packages apply to all employees of the Medios Group. Through annual employee satisfaction surveys and annual performance reviews, we assess whether the set goals are being achieved through the implemented actions and identify areas for improvement where necessary.

Below, we describe the individual actions included in the packages.

ELIMINATING PRECARIOUS EMPLOYMENT RELATIONSHIPS/SECURE AND ADEQUATE EMPLOYMENT

We provide our employees with economic security, the opportunity for long-term life planning, and a share in prosperity. Our opportunity lies in the long-term retention of qualified employees.

— **Long-term employee retention**

To offer employees security and long-term prospects, but also to ensure that employees remain with the company for as long as possible, Medios AG strives to conclude only permanent contracts. In fact, the rate of permanent contracts is around 90%. Specific objective reasons must be provided for fixed-term contracts. Fixed-term employment relationships include, among others, those with members of the Executive Board, trainees, working students, interns, and parental leave replacements. The use of temporary agency workers is kept to a minimum.

— **Fair Compensation**

Medios AG guarantees its employees fair compensation in line with applicable national standards, as well as permanent employment contracts, to avoid social insecurity. At the same time, this is a key strategy for remaining competitive in the talent market for qualified professionals and thereby securing our economic goals, as salary plays a central role in this context.

Compensation is based on the requirements of the respective position as well as employee performance. To determine salaries, we use the Korn Ferry/Hay job evaluation system and use the annual Korn Ferry compensation data for the overall German market as a benchmark. This approach is intended to eliminate any discrimination based on gender, race, ethnic origin, religion and belief, disability, age, or sexual identity. This approach does not currently apply to Ceban.

In addition, we offer our employees targeted benefits designed to provide financial support for health-promoting Actions (see **"Health and Safety"**).

WORK-LIFE BALANCE

Our employees have the opportunity to balance their professional, family, and social lives. They should not have to choose between their career (and thus their income) and their family. Our advantage lies in the satisfaction – and consequently the long-term retention – of our qualified workforce.

— **Flexible and Mobile Work Models**

Medios AG offers its employees flexible and mobile work models. In recent years, flex-time models and mobile work models, among others, have been further developed or introduced – particularly for employees in administrative roles – to promote our employees' work-life balance. However, we must keep in mind that this offering has significant dependencies on operational requirements and local conditions.

— **Employee surveys as well as feedback and development meetings**

In addition, the annual employee reviews provide a framework for identifying additional needs for flexible and mobile work arrangements and exploring possible solutions.

COMPLETELY PREVENT WORKPLACE ACCIDENTS/ PROMOTE HEALTH AND SAFETY

We mitigate health risks and promote a healthy lifestyle and improved health. Our opportunities lie in the sustainable reduction of absences and illnesses.

As an employer, we have a duty to protect the health and safety of our employees. At Medios, there are various sensitive work areas where our employees could be exposed to hazards and potential health risks. We are aware of this fact and take precautions to prevent harm and injury.

— **Documentation of workplace accidents**

Medios AG documents workplace accidents in accordance with group-wide guidelines. This documentation allows us to identify potential hazards to employee safety and adapt safety measures to neutralize them.

— **Regular review of current standards and safety instructions**

In its quarterly meetings, the Occupational Safety Committee (ASA) regularly reviews existing occupational safety instructions. Where adjustments are needed, they are revised accordingly. In addition, the ASA discusses necessary organizational actions and technical aids that can be used to further strengthen safety in the workplace.

— **Regular mandatory medical examinations**

At all locations in Germany, the site safety officers or site management organize regular workplace-specific health screenings and mandatory medical examinations for all employees.

— **Regular occupational safety training**

The subsidiaries of Medios AG conduct annual safety briefings and fire drills at all locations. This includes training fire safety assistants and first responders. Currently, every Medios location has designated first responders. The occupational safety and fire protection specialist at each company organizes the training. The respective managing director is responsible for its implementation.

— **Promoting and tracking mental health**

In accordance with legal requirements, since 2023 we have also been collecting data on psychological pressure caused by stress and overload as part of our employee survey. Consequently, in April 2024, a project group for workplace health management (BGM) was established under the supervision of the occupational safety working group. As of 2025, BGM has been transferred to the responsibility of Senior Manager of Privacy, Health, and Safety Marcus Paulick. Starting in 2026, an additional person will provide operational support by organizing events, managing members, and answering questions regarding BGM.

Since its inception, Medios' BGM has been based on three pillars: body, soul, and mind. Within the framework of these components, services from external providers for onsite and offsite corporate health, including Urbans Sports Club and Wellnow, were introduced in Germany. Additionally, in collaboration with an external occupational health service provider, we offer our employees in Germany a free, anonymous initial consultation on mental health. In the future, these actions will be aligned even more closely with the needs identified in the employee survey and measured and evaluated as part of a continuous improvement process using KPIs and evaluations. The insights gained will then be systematically addressed within the Plan-Do-Check-Act (PDCA) cycle and integrated into the package of actions.

— **Hamburg model**

When reintegrating employees following a long-term illness, we follow the Hamburg Model. This model provides for the gradual reintegration of employees according to a plan developed jointly by the physician and the patient.

— **Offer of preventive medical check-ups and vaccinations by the company doctor**

At all locations, our employees can access standard preventive health screenings and vaccination services – such as the annual flu shot and other vaccinations covered by health insurance – through the company physicians. Simply communicating about these services raises awareness of preventive care and vaccination protection, and the offerings enable employees to take active steps to improve their own health.

— **Support and benefits for medical services**

Medios AG provides a financial subsidy to all permanent employees in Germany who require prescription eyeglasses for work. This support is documented in a Group-wide Standard Operating Procedure (SOP). Furthermore, the application and approval process is described in this SOP, which came into effect in 2023. This does not yet apply to Ceban.

Permanent employees of Medios AG also receive purchasing benefits for over-the-counter and self-selection products at the Medios Pharmacy. The policy is set forth in a Policy and is implemented by the Human Resources department.

PROMOTING EQUAL OPPORTUNITY AND EQUAL TREATMENT

Medios pursues a zero-tolerance policy toward discrimination: No one may be discriminated against on the basis of race, ethnic origin, gender, religion or belief, disability, age, or sexual identity. All employees should experience appreciation, inclusion, and equal opportunity. Our material opportunity lies in the motivation and long-term retention of qualified employees.

— **Whistleblower System**

All employees of the Medios Group who personally experience discrimination or become aware that discrimination is occurring can and should report it anonymously through our whistleblower system. Further information can be found at in Chapter **G1 – Corporate Policy**.

— **Anti-discrimination Training**

To ensure that Medios AG remains a discrimination-free workplace in the future, we began conducting anti-discrimination training for the entire workforce in 2023.

— **Gender-Balanced Leadership Positions**

The proportion of women in leadership positions at Medios AG stood at 43% in the 2025 reporting year. This figure is to be increased, if possible, or at least maintained in the coming years. Furthermore, the proportion of female executives in the top quartile is to be increased in the Medium-term. To ensure that the filling of leadership positions remains (nearly) balanced and even more equitable in the future, we are actively pursuing internal succession planning. This includes a mentoring program initiated in 2023, through which we ensure that suitable male and female candidates are prepared early on for leadership roles, which can then be filled in a gender-balanced manner.

CONTINUOUS TRAINING AND DEVELOPMENT

Qualified professionals are central to our success, but their skills must be continuously adapted to technological developments through lifelong learning. Through continuous professional development, employees ensure their employability and social participation. At the same time, we strengthen the long-term retention of qualified professionals and reduce the risk of rising recruitment costs.

— **Identifying and developing the potential of our skilled workers**

At Medios AG, all employees are entitled to an annual feedback and development meeting. These meetings are documented so that it is clear how many meetings have actually taken place. In addition to workplace satisfaction, these feedback and development meetings also address employees' development opportunities and aspirations. Furthermore, we assess how potential can be further developed and specifically nurtured through training or continuing education. The annual feedback and development meetings help us identify and resolve dissatisfaction early on, which reduces the risks of turnover and talent loss.

— **Support for Leaders and High-Potential Employees**

Medios AG supports employees across the entire Medios Group in their personal and professional development through various personnel development initiatives.

As a training company, we offer the following apprenticeships:

- Wholesale and Foreign Trade Management,
- Office Management Clerk
- Warehouse logistics specialist.

In 2022, Medios introduced new programs for employee and leadership development. These are based on our leadership guidelines and competencies. They include management diagnostics as well as various development initiatives. We systematize employee and leadership development through a training catalog aligned with our leadership guidelines, which includes off-the-job, along-the-job, and on-the-job actions.

Supporting leaders and high-potential employees conveys to our staff that they are valued and gives them the assurance that professional and personal growth – and thus a degree of Long-term life planning – are possible within the company. As an employer, this helps us mitigate potential reputational damage and reduce turnover caused by workplace dissatisfaction.

Goals related to own workforce (S1-5)

The goals related to reducing negative and promoting positive impacts on our own workforce, as well as managing the material risks and opportunities related to our own workforce, are listed in Table 4 "Medios AG Sustainability Strategy" in **Chapter ESRS 2 General disclosures**. The targets are not yet formulated in all cases in a time-bound or outcome-oriented manner. The targets were established by the Executive Board without the direct involvement of the company's own workforce or a works council, but in consultation with the entire ESG Committee, and are equally monitored by the ESG Committee. The goals listed in Table 4 are derived from at least one of the overarching S1 cluster goals – "Further developing Medios as an attractive employer" and "Preventing discrimination, and strengthening and promoting diversity and equal opportunity within the company" – and are intended to track Medios AG's performance over a long-term period through the realization of these goals. Part of this monitoring also involves being able to identify insights or opportunities for improvement arising from the company's performance.

General Key Figures (S1-6, S1-9)

Table 19: Personnel Key Figures

Key figure (number of employees per capita or %)	Value as of 12/31/2025
Total number of employees ¹	967
Of which Mrs.	629
Of whom men	338
Of whom with a fixed-term contract	99
Of whom Mrs. with fixed-term employment contracts	62
Of whom men with fixed-term employment contracts	37
Of whom have permanent employment contracts	868
Of which Mrs. with permanent employment contracts	567
Of which men with permanent employment contracts	301
Of whom are trainees	22
Of whom under 30 years of age	148
Of which between 30 and 50 years old	542
Of which over 50 years old	277
Of which with a contract without guaranteed work	0
Of which departures in the reporting year	201
Turnover rate	20.8%
Employees in management positions (department heads and above)	89
Women in management positions (department heads and above)	38
Men in management positions (department head and above)	51

¹ Number of employees per capita as of December 31, 2025, excluding members of the Executive Board and managing directors

Key figures on workplace accidents (S1-14)

In the 2025 reporting year, there were 13 workplace accidents with serious consequences across the Group, i.e., the affected employee was on sick leave for at least three days following the accident. This corresponds to 15 accidents per 1 million hours worked. There were no work-related fatalities.

Compensation metrics (S1-16)

Medios AG is committed to ensuring gender-equitable compensation across the entire group. The principles set forth in the Code of Conduct and the Anti-Discrimination Policy lay the foundation for pursuing this goal within the company and achieving it. In the 2025 financial year, women at Medios earned on average 17.2%⁹ less than men. The unadjusted gender pay gap was calculated, which includes the gross hourly wage of all employees. Structural factors such as level of education and qualifications, occupation, scope of employment, or work experience are not taken into

account in this analysis due to a lack of data. The ratio of the highest to the median compensation was 4.4 in 2025.

Human Rights Metrics (S1-17)

No incidents of discrimination or serious human rights violations were reported during the reporting year. A total of three reports were received via the whistleblower portals of Medios and Ceban, as well as through compliance officers.

⁹ Calculated based on the number of employees per capita as of the reporting date December 31, 2025, excluding members of the Executive Board and managing directors.

WORKFORCE IN THE VALUE CHAIN (S2)

Impacts, risks, and opportunities (ESRS 2-17a)

Table 20: S2 Workforce in the value chain

	Value chain			Time horizon		
	Upstream	Own activities	Down-stream	<1 year	1-5 years	> 5 years
Impact 1: Exploitation of workers in the value chain (potentially negative)	●		●	●	●	●

Medios AG operates in a highly specialized pharmaceutical segment focused on treating complex or chronic diseases through personalized therapies. In compounding these therapies, Medios relies on raw materials that meet high-quality standards. Highly qualified professionals are also involved in the application of Medios products.

Our top priority is quality, followed by cost savings. In procurement, in addition to quality and price, we also consider criteria such as the intended use and delivery capability, as well as, in some cases, feedback from our customers (e.g., regarding special requirements for the packaging of shipments).

Particularly in the area of logistics, we are sometimes reliant on rapid delivery outside normal working hours for product safety reasons. There is a risk that these workers may be subject to exploitation (see Impact 1 in Table 20). Otherwise, however, the workers in our upstream and downstream value chains are well protected from exploitation within the value chain of our business model and the associated requirements, and can participate in Europe's economic prosperity. We rely on long-term partnerships with our suppliers¹⁰ to ensure both their economic stability and the protection of their employees.

Policies and Actions (ESRS 2-17b,d)

As a sustainability-conscious group, we are committed to balancing economic, social, and environmental aspects. This is reflected in all our business relationships and employment arrangements. A trusting collaboration strengthens us for future projects. That is why we engage in dialogue with our suppliers to clearly define expectations, mutual support, and the protection of all employees in the value chain.

Since signing the UN Global Compact in 2021, Medios has supported the world's largest corporate values alliance. We are committed to the principles of the UN Global Compact in the areas of human rights, labor, the environment, and anti-corruption.

Furthermore, we are committed to the core labor standards of the International Labour Organization (ILO) as well as the UN Guiding Principles on Business and Human Rights. We also expect this commitment from our business partners in the value chain. No serious issues or incidents related to human rights within our upstream and downstream value chain were reported during the reporting year.

The basis for Medios AG's collaboration with business partners is the company's values as well as its corporate and compliance culture. Another foundation for our collaboration with business partners is the legal requirements and EU

¹⁰ We consider all Companies that participate in our upstream and downstream value chain and with which we have a direct customer or client relationship to be suppliers.

Framework for Good Manufacturing Practice (GMP) and Good Distribution Practice (GDP) of human medicines. These also apply in part to particularly affected employees of our suppliers, such as cleaning staff and drivers.

We regularly verify whether our suppliers are qualified in accordance with these legal requirements. When necessary, we train the workers in the value chain ourselves on the GMP and GDP requirements relevant to them and audit their compliance. In this way, we shape our collaboration with our partners in a cooperative and dialog-based manner. This enables us to influence their adherence to these high standards.

For suppliers of pharmaceutical goods and services, we have also formulated a Code of Conduct that provides guidance for collaboration with Medios in Germany. This is publicly available on our website in German and English. The Code of Conduct defines, among other things, environmental responsibility and regulatory compliance (in particular respect for human rights, fair working conditions, diversity, and ethical standards) as material principles for collaboration.

Authorized representatives of suppliers in our upstream and downstream value chain can confirm the Code of Conduct online on a dedicated website for suppliers. Suppliers who already have their own Code of Conduct that covers the requirements and content of our Code do not need to additionally sign the Medios Supplier Code of Conduct.

For all new contracts, suppliers are required to agree to the Supplier Code via the website or to submit a comparable Code of Conduct. The Supplier Code then becomes an integral part of the business relationship. Contracts concluded with Ceban, which was acquired in 2024, are an exception.

Medios AG is committed to the United Nations Universal Declaration of Human Rights and the fundamental conventions of the ILO. We explicitly reject child labour, forced labour, and labor based on human trafficking. These standards and principles serve as criteria for the selection of suppliers and business partners. Through our whistleblower system ([see Chapter G1 – Governance](#)), employees in the value chain can report potential or actual misconduct anonymously and without fear of reprisal.

Metrics and Targets (ESRS 2-17b,e)

Most recently, in 2024, we recorded the number of suppliers who confirmed the Supplier Code of Conduct for the first time or renewed their confirmation, both in absolute terms and as a percentage of the total number of suppliers. 12% of our suppliers confirmed the Supplier Code of Conduct. For an additional 9%, responses to references to the supplier's own code were reviewed. Medios strives to increase this proportion of confirmations or valid references to a comparable code, but has not yet formulated a Time-bound target for this.

CONSUMERS AND END-USERS (S4)

Description of impacts, risks, and opportunities (ESRS 2-17a)

Table 21: S4 Consumers and end-users

	Value chain			Time horizon		
	Upstream	Own activities	Down-stream	<1 year	1-5 years	> 5 years
Impact 1: Healing or prevention of diseases among consumers and end-users of our products (actually positive)			●	●	●	●
Opportunity 1: Reputational and market gains through high-quality specialty medication (Opportunities)		●		●	●	●

IMPACT 1 – CURE OR PREVENTION OF DISEASES

Medios AG is the leading provider of specialized pharmaceutical supply and compounding of Patient-Specific Therapies. In doing so, we connect stakeholders to ensure supply security and benefit patients and the system. We have focused on forward-looking personalized medicine to enable everyone across Europe to access the most innovative therapies in collaboration with pharmacies, specialist medical practices, and pharmaceutical companies. Every disease progresses differently, and every patient responds differently to the therapy administered. Drugs specifically tailored to individual needs often lead to better treatment outcomes and thus enhance people’s well-being. The benefits of such Specialty Pharma drugs are particularly evident in the treatment of rare, complex, or chronic diseases such as cancer, multiple sclerosis, or hemophilia. Patient-specific drugs are more expensive to develop and compound, but are often significantly more effective and better tolerated.

OPPORTUNITY 1 – REPUTATION AND MARKET GAINS

Medios AG was founded to make the specialized pharmaceutical supply for complex diseases more cost-effective and simpler. In doing so, we aim to improve care models by creating a platform to make personalized therapies accessible to all patients across Europe. Specialized pharmacies, as well as specialists and clinics, can be supplied with the necessary preparations as quickly as possible through the platform. In our state-of-the-art cleanrooms, the preparations are manufactured strictly in accordance with international Good Manufacturing Practice (GMP) standards, transforming approved finished medicinal products into ready-to-use, Patient-Specific Therapies.

Objectives (ESRS 2-17b)

We recognize the urgency of providing patients with Specialty Pharma drugs produced strictly in accordance with GMP and Good Distribution Practice (GDP), and we are making our unique contribution to shaping the future of personalized medicine for all of us. In doing so, we aim to improve healthcare models by creating a platform to make personalized therapies accessible to all patients across Europe in the future. Medios was founded to make the specialized pharmaceutical supply for complex diseases more cost-effective and simpler across all indications. Our overarching goal is to provide pharmacies, specialists, and clinics with specialized drugs and individualized therapies for patients as quickly, safely, and cost-effectively as possible. This is made possible by our highly functional regional supply network, optimal knowledge transfer with all partners, and state-of-the-art technical equipment.

As part of the annual self-inspection of the GMP-regulated companies within the Medios Group, Medios AG performs a reconciliation of its operations with the principles of the quality management system and GMP regulations. The annual goal is to identify virtually no violations at the companies. In this context, the maximum complaint rate of 0.4% must not be exceeded at the GMP-regulated companies in the supply chain that comply with the guidelines¹¹.

¹¹ Excluded are influences due to force majeure.

Policies (ESRS 2-17c)

The entire company is obliged to meticulously implement the GMP framework¹² and the GDP framework¹³ in the form of a quality assurance system with risk management for the respective production and commercial divisions. Compliance with the process guidelines is verified through self-inspections and continuously optimized. For Medios AG (with the exception of Ceban), this is enshrined in its Code of Conduct¹⁴, which falls under the responsibility of the CEO. It is equally binding for all employees across the Group and is made available to them via the HR management system and the digital training platform Coursepath. All employees of Medios AG have read and signed the Code of Conduct. At Ceban, compliance with GMP and GDP frameworks is equally mandatory and regulated in process guidelines. As a result, production processes at Medios AG are designed to ensure that our products are developed to the highest quality standards, thereby providing our patients with only the best individualized therapies.

As a further relevant policy, the Supplier Code of Conduct¹⁵ requires suppliers to maintain regulatory compliance. For us, this also means that compliance with GMP and GDP is a prerequisite, particularly for pharmaceutical suppliers.

Overall quality management is the responsibility of Christoph Prusseit (CBO Germany) for the Patient-Specific Therapies business and Constantijn van Rietschoten (CBO International) for the International Business.

Quality Assurance Actions (ESRS 2-17d)

Through extensive audits, both within the group and along the value chain, we assess the effectiveness of our quality management. In accordance with the EU Framework for GMP and GDP, suppliers are reviewed for their positive reputation, competence, creditworthiness, and reliability for every new contract and annually for all compounding and trading operations (upstream and downstream value chain). In addition, Medios reviews the portfolio of pharmaceutical products and monitors the supply chain for the likelihood of counterfeits and product availability. Furthermore, quality

assurance in accordance with GMP and GDP includes a comprehensive deviation and CAPA system (CAPA = Corrective and Preventive Action) to address any errors that have occurred. Within the framework of the CAPA system, specific actions are defined with the goal of error prevention and process improvement. This may involve modifying standard operating procedures or training and instructing employees.

The goal of GMP and GDP is to document all information seamlessly from drug manufacturing to the customer. A key aspect of seamless documentation is that products are partially (video) documented during incoming and outgoing goods to verify the quality of the raw materials. Furthermore, verification of the Secupharma number prevents counterfeits from entering the inventory. All raw materials and their batches are fully traceable via QR codes. In this way, Medios AG contributes significantly to the safety of our patients.

Our annual training plan specifies job-specific training, general training on topics such as GMP and GDP, workplace hygiene, and compliance, as well as annual briefings for all employees. These are prerequisites for employees to be permitted to begin their work and serve to verify their qualifications.

To guarantee the quality of our suppliers, we conduct internal audits in addition to the annual routine inspections required by law. In this way, we verify, among other things, appropriate working and production conditions, compliance with environmental standards, and respect for human rights in the supply chain.

Actions for Incorporating Customer Feedback (ESRS 2-17d)

Medios maintains constant communication with its customers. In the Patient-Specific Therapies segment, medically trained and qualified staff consult with the prescriber upon receipt of an order to ensure that the order best meets the patient's medical needs. We also maintain contact with wholesale customers through regular phone calls and meetings. These customers include physicians such as neurologists, oncologists, and ophthalmologists. They are contacted monthly or semi-annually, depending on the customer group.

¹² Commission Policy (EU) 2017/1572 of September 15, 2017, supplementing Directive 2001/83/EC of the European Parliament and of the Council as regards the principles and Framework of Good Manufacturing Practice for medicinal products for human use, <https://eur-lex.europa.eu/eli/dir/2017/1572/oj>.

¹³ Framework of November 5, 2013, on Good Distribution Practice of Medicinal Products for Human Use (2013/C 343/01), https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=oj:JOC_2013_343_R_0001_01.

¹⁴ Medios AG Code of Conduct, p. 16, https://medios.group/fileadmin/IR_Download/Verhaltenskodex/MED_Code-of-Conduct_1220_final_clean.pdf.

¹⁵ Medios AG Supplier Code of Conduct, https://investors.medios.group/fileadmin/IR_Download/Lieferantenkodex/Supplier_Code_of_Conduct.pdf.

In addition, we systematically survey customers regarding their satisfaction with the respective products and services they have purchased. Medios Pharma last conducted a survey in 2023, and Ceban conducted one in February 2025.

Customer meetings via patient proxies with Medios AG are also part of the process through which we involve Consumers and end-users in our business operations. Roundtables with pharmacies are held at least three times a year, and a Specialty Pharma Day is held once a year.

Direct communication with patients is intentionally avoided. This is reserved for pharmacists, physicians, and other medical professionals. An exception is made for pharmacies operated by subsidiaries of Ceban itself. These pharmacies are located exclusively in the Netherlands. There, prescribing practices are regulated by law such that physicians prescribe directly to patients, specifying the compounding process.

Action to Prevent Drug Shortages (ESRS 2-17d)

In the reporting year, Medios developed artificial intelligence-based software in the Netherlands (Ceban) that can predict drug supply shortages early on. This helps Medios prevent market shortages early on and thereby ensure continuity in the supply of life-saving drugs to consumers and end-users. To this end, Medios also shares its data on impending shortages with generic drug manufacturers in the upstream value chain.

Key Metrics (ESRS 2-17e)

The number of customer complaints plays a role in the decision-making process regarding the product range. Customers may express complaints or requests for improvement, which our employees record in non-conformance reports and forward to the responsible persons. Complaints regarding products are handled and documented by the “Qualified Person” or the respective stage plan representative as the responsible person for the wholesale business in accordance with GMP regulations. The complaint rate (percentage of returns relative to shipments) was 0.01% in 2025.

BUSINESS CONDUCT (G1)

Impacts, Risks, and Opportunities (G1 SBM-3)

Table 22: G1 Business conduct

	Value chain			Time horizon		
	Upstream	Own activities	Down-stream	<1 year	1-5 years	> 5 years
Impact 1: fulfilling employment for our own workforce, for example through appreciation and participation in decisions and processes related to ESG (potentially positive, corporate culture)		●		●	●	●
Impact 2: Promotion of ESG goals throughout the entire value chain through collaboration with suppliers and other business partners (potentially positive, corporate culture)	●	●	●	●	●	●
Impact 3: Achieving ESG goals through the establishment partnerships (potentially positive, corporate culture)	●	●	●	●	●	●
Impact 4: Protection of whistleblowers and increased probability of reporting and uncovering misconduct (potentially positive, whistleblowers)		●		●	●	●
Impact 5: Improved access to drugs through corporate political engagement (actually positive, lobbying)		●		●	●	●

As a responsible employer, we are committed to upholding the highest standards of compliance, fairness, integrity, and transparency. Our internal Governance structures are designed to ensure that all legal requirements and our ethical principles are consistently followed by all employees and stakeholders. Our goal is to ensure sustainable and Long-term value creation and to continuously develop our corporate culture in line with our economic, environmental, and social responsibilities. As part of our double materiality assessment (see IRO-1), we have identified a total of five impacts related to the Governance topic area.

IMPACT 1 (G1-1)

In the spirit of a sustainable corporate culture, our company's Code of Conduct emphasizes various Sustainability matters, such as valuing diversity in the workforce. The implementation of sustainability projects at all levels is ensured through the ESG Committee within the Supervisory Board and the ESG Committee. In the future, we intend to increasingly incorporate relevant input from the workforce and actively involve our employees in the implementation of ESG initiatives. This is intended to enable greater participation and increase job satisfaction. The incentives for such participation lie in the importance of the topic, which will be emphasized through internal communication and relevant training programs.

IMPACT 2 (G1-1)

We view the achievement of ESG goals as an important task that we aim to fulfill in cooperation with our business partners and stakeholders to create sustainable value. A particular focus in promoting ESG goals lies on collaboration with our suppliers, who have a direct impact on the sustainability of our products. Accordingly, as part of our Supplier Code of Conduct, we require that our suppliers fulfill their social and environmental responsibilities and protect human rights and the environment. In the future, we will specifically consider social and environmental criteria when selecting our suppliers, thereby laying the groundwork within our direct sphere of influence to contribute to sustainable development.

IMPACT 3 (G1-1)

We view the achievement of ESG goals as an important task that we aim to fulfill in cooperation with our business partners and stakeholders in the spirit of sustainable value creation. Through targeted partnerships with organizations outside our own value chain, we can leverage additional synergies to strengthen our efforts to achieve ESG goals. In this way, we aim to make a positive contribution to sustainable development even beyond Medios' immediate sphere of influence.

IMPACT 4 (G1-1)

Within the framework of our EU-compliant whistleblower system and the corresponding whistleblower policy, which is based on the Whistleblower Protection Act, all reported irregularities and misconduct within the company and in the supply chain are treated with strict confidentiality and, upon request, anonymized. Protecting whistleblowers from potential retaliation is fundamental to building trust and increases the likelihood that relevant incidents will be detected early and appropriate countermeasures implemented. This potentially improves process quality and enhances the company's reputation in the long term.

IMPACT 5 (G1-5)

Unimpeded access to the necessary drugs and personalized therapies is of paramount importance to patients. Accordingly, we intend to actively work to remove barriers to access in the future. To this end, we will increasingly engage with professional associations to influence the development of relevant regulations and further strengthen the healthcare infrastructure through stable supply chains and the promotion of specialized pharmacies.

Code of Conduct and Corporate Culture (G1-1)

Trust, respect, integrity, and responsibility are upheld as core values of Medios' corporate culture both internally and externally, serving as a guide for business conduct and employees, a standard of conduct, and a basis for decision-making. The Executive Board and Supervisory Board are firmly convinced that unrestricted compliance and excellent business conduct are further indispensable foundations of sustainable economic success. The Supervisory Board complies with laws and regulations as well as applicable internal compliance rules that go beyond these requirements and ensures that members of the Executive Board also remain compliant.

CODE OF CONDUCT FOR EMPLOYEES OF MEDIOS AG

In addition to generally applicable laws, rules, and standards, the values of trust, respect, integrity, and responsibility also shape our business activities and corporate culture. Respecting these values is a matter of course for us and is enshrined in the Code of Conduct for Employees of Medios AG. The Code of Conduct is the written Code of Conduct for implementing the Group-wide guiding principles. It is equally binding for all employees in Germany and is made available to them via an HR management system. In addition, key elements of the Code of Conduct (CoC) in the Supplier Code of Conduct also apply to companies along the value chain (upstream and Downstream) and serve as a contractual criterion for suppliers and business partners. The Code of Conduct is discussed four times a year during a compliance meeting.

Since 2022, we have appointed a primary external Compliance Officer and an internal deputy who, under the leadership of the CEO, are responsible for coordinating and managing compliance matters and the Compliance Management System (CMS). The key pillars of Medios AG's CMS include a group-wide internal set of rules, regular employee training, and targeted compliance risk analyses. The Compliance Officer reports directly to the CEO on a quarterly basis, who in turn regularly informs the Supervisory Board about current developments and issues. Additional reporting takes place only on an ad hoc basis.

The CoC and the Supplier Code of Conduct are publicly available as policies on the Medios website¹⁶. Suppliers were not involved in the development of the policies.

¹⁶ Medios AG Code of Conduct, https://medios.group/fileadmin/IR_Download/Verhaltenskodex/MED_Code-of-Conduct_1220_final_clean.pdf.

OPERATING RULES OF CEBAN PHARMACEUTICALS

The Ceban Pharmaceuticals Group, acquired in 2024, had not yet been fully integrated into Medios' existing regulations by the 2025 financial year. To date, Ceban has "Operating Rules" as well as an employee handbook. Together, these two sets of regulations cover topics similar to those in the Code of Conduct. These include issues such as bribery, discrimination, and conduct among employees. Furthermore, the "Operating Rules" also govern compliance with GMP and GDP. However, the "Operating Rules" and the employee handbook are not as comprehensive as the Code of Conduct. Topics that overlap with the Code of Conduct will be covered by it in the future. Prior to the expansion, Medios will review the Code of Conduct to ensure it is adapted to local conditions and legislation.

ANTI-CORRUPTION POLICY

Part of the general guidelines for conduct (Code of Conduct and Operating Rules) and Standard Operating Procedures (SOPs) at Medios is the Anti-Corruption Policy applicable to all employees, in accordance with the United Nations Convention Against Corruption¹⁷, along with associated training. In this way, we aim to contribute to the implementation of the provisions of the United Nations Convention Against Corruption that have been incorporated into German law.

Actions

TRAINING

We train our employees annually on the implementation of our values and established procedural principles. During the reporting period, the compliance regulations and associated training sessions were consolidated into an internal training and administration platform. In addition to onboarding training, all employees are informed about, among other things, the anti-corruption and antitrust guidelines, corruption prevention, and conflicts of interest. This also includes information about our whistleblower system. In the training sessions, care is taken to ensure that the information includes generally understandable explanations of the legal situation and practical application examples. Upon completion of the training, a certificate of participation is issued. In addition, we have established a software platform for documentation.

WHISTLEBLOWER SYSTEM

The whistleblower system, which includes an external ombudsman office, supports our employees and suppliers in anonymously reporting suspected cases and violations to Medios AG. To prevent and investigate potential compliance breaches, we established an EU-compliant whistleblower system in 2022, complete with an external ombudsman's office for the anonymous reporting of breaches and suspected cases. Ceban has an equivalent whistleblower system. Our employees are required to report potential compliance breaches immediately. Suppliers can also use the whistleblower system to report violations and suspected cases. In addition, offenses such as discrimination and harassment in the workplace that violate our internal Code of Conduct can be reported there. In the 2025 reporting year, we began conducting targeted risk analyses and obtaining compliance confirmations from both suppliers and internal employees.

Like all forms of compliance violations, we strictly reject any form of corruption and bribery. Every suspicion is taken seriously and investigated in accordance with standardized procedures. If a suspected case is confirmed, the Executive Board of Medios AG immediately initiates disciplinary actions. The drugs and Specialty Pharma industries are strictly regulated, meaning that even the sales divisions generally considered most at risk – as is the case at Medios – are exposed to a manageable risk of corruption and bribery. No cases of corruption or suspected corruption were reported in the 2025 financial year. We are also not aware of any pending legal proceedings regarding anti-competitive conduct, nor of any fines or non-monetary sanctions imposed for non-compliance with laws and regulations. All cases recorded by our whistleblower system are reviewed by the external ombudsperson. The results are then forwarded to the external compliance officer and from there to the management bodies and the Supervisory Board. Outside of the whistleblower system, suspected incidents of misconduct or concerns regarding illegal conduct can be reported directly to the Executive Board.

¹⁷ United Nations Convention against Corruption
https://www.unodc.org/documents/treaties/UNCAC/Publications/Convention/08-50026_E.pdf.

Political influence and Lobbying activities (G1-5)

Information regarding the prevention and combating of corruption and bribery is central to the company's integrity. Accordingly, the issue of transparency in Political influence and Lobbying activities is also of great importance to us. Responsibility for all matters related to public affairs, including Political influence and Lobbying activities, lies with our Chief Business Officer, Germany (CBO Germany). This individual is also responsible for maintaining the lobbying register and the transparency register (<https://www.transparenzregister.de>). Medios AG is registered in the German Transparency Register. The total value of the 2025 contributions and in-kind contributions made indirectly or directly amounts to 51,000 euros. None of the members of Medios' administrative, management and supervisory bodies held a comparable position in public administration in the two years prior to their appointment.

We are active in various areas to strengthen the security of supply in the healthcare sector and to support pharmacies and patients. The three central focuses of our lobbying efforts are the promotion of specialized pharmacies, the management of supply bottlenecks, and the expansion of manufacturing capabilities.

The promotion of specialized pharmacies in Germany is a particular focus, as any restriction on their activities could jeopardize patient care. Medios AG is therefore specifically committed to strengthening these pharmacies legally and economically to ensure a secure and specialized supply of medications over the long term. Specialized pharmacies differ from regular pharmacies in that they focus on supplying complex, rare, and often high-cost drugs. They play a central role in the safe provision of these drugs to patient groups requiring specific and high-quality care.

Supply shortages of key active ingredients are a growing problem in the healthcare sector. Medios is actively involved in reducing supply issues and bridging shortages. For example, the company compounds parenteral nutritional infusions for premature infants and children, thereby helping to stabilize the supply situation. Through the targeted use of its services, Medios AG creates solutions for critical supply gaps and supports pharmacies in caring for seriously ill patients even during difficult times.

The third focus is on expanding Medios AG's production capabilities in the area of compounding on behalf of pharmacies. Medios AG is currently active in Germany in the manufacture of infusions produced specifically for pharmacies. A regulatory change allowing pharmacies to also commission non-sterile compounded and extemporaneous preparations would enable Medios to further expand its production capacities and guarantee additional support to pharmacies. This expansion could significantly improve supply security in Germany and substantially alleviate the burden on pharmacies.

Objectives (ESRS 2 MDR-T)

IMPROVEMENT OF THE WHISTLEBLOWER SYSTEM

We have set ourselves the goal of assessing our employees' satisfaction with and trust in our whistleblower system through annual surveys and increasing the corresponding metrics. The active involvement of our employees in problem-solving processes begins with the identification of grievances and undesirable developments. Therefore, we strive to convince our employees of the constructive potential of the whistleblower system and motivate them to participate.

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