

November 2025

Chiesi Group - Business Operations in Russia & Belarus

In response to Russia's invasion of Ukraine, B Lab has implemented additional requirements for companies with business operations in Russia and/or Belarus. As the Chiesi Group has business operations in Russia or Belarus, the company is required to meet such requirements outlined below to move forward with certification.

B Lab is implementing a phase-in approach composed of (1) requirements applicable immediately and (2) requirements to be met by recertification.

1. Respond to questionnaire (Annex I)

B Lab will require companies with operations (including subsidiaries and business partners) in Russia or Belarus to respond to the questionnaire in Annex I. The questions assess a company's ability to implement heightened human rights due diligence in line with UNGP and UNDP's guide on conflict-affected areas. The questions are designed to assess companies' ability to analyze changes in this context and to act accordingly, their willingness to ensure their own human rights commitments are respected, and their ability to identify tipping points or stages of the conflict that would trigger specific decision-making by the company.

2. Implement heightened due diligence

B Lab will require companies to publicly commit to having implemented heightened due diligence by the date of their next recertification, or within 36 months, whichever is later. Heightened due diligence is an **internationally recognized best practice**, and B Lab recognizes that implementing it meaningfully takes time. Within corporate contexts, the level of maturity on heightened human rights due diligence remains low, and requesting companies to implement adequate processes in a short time would invariably lead to inadequate application, be irresponsible, and/or result in claims of green/cause-washing.

With the publication of this disclosure, B Lab confirms that the company is currently meeting the above requirements. The company's responses to the Questionnaire can be reviewed below. If you or someone you know is aware of any specific practices of this company related to their Business Operations in Russia or Belarus that have had a negative impact and that may constitute a violation of the B Corp standards, please contact us via our <u>public complaints</u> <u>procedure</u>.

Company Responses to Questionnaire

Company Reaction to Russian Invasion of Ukraine

Chiesi employs around 130 people, with field-based team members outnumbering office-based staff, operating across 25 cities in Russia. The therapeutic focus of Chiesi in Russia spans Pulmonology, Neurology, Neonatology, and Rare Diseases, including life-saving products.

Chiesi has consistently honored its mission to improve the quality of life of its patients, and this mission has continued to guide its presence in the Russian Federation. The company's decision was further informed by its Global Human Rights Policy, which reaffirms Chiesi's commitment to the UN Guiding Principles on Business and Human Rights, the International Bill of Human Rights, and the principles of the International Labour Organisation (ILO).

The Chiesi Group's continued presence in the Russian Federation has been aligned with the broader approach of the European pharmaceutical industry, as represented by EFPIA (European Federation of Pharmaceutical Industries and Associations). EFPIA and its members have stood in solidarity with the people of Ukraine, condemned the invasion, and emphasized the critical priority of ensuring that medicines continue to reach patients across all affected areas.

To ensure the company's activities remained consistent with its human rights commitments and did not infringe on the rights of employees or other stakeholders, Chiesi's operations in Russia, beyond supplying its products for patient treatment, have been limited to providing medical information and raising disease awareness. After February 2022, the company also paused the recruitment of new patients for all ongoing clinical trials. However, the company continued providing treatment to patients already enrolled in these trials to ensure that no one was left without the care they needed.

Before February 2022, Chiesi Russia's main responsibilities included conducting disease awareness campaigns, supporting promotional and scientific events and congresses, fostering relationships with the medical and scientific community, engaging with government stakeholders to ensure patient access to Chiesi treatments, supporting local distributors and warehouses, and pursuing business development initiatives, including business deals and licensing activities.

Around the beginning of the Russian invasion of Ukraine in February 2022, Chiesi established an internal task force comprising its Regional Head for China & International (which includes Russia), the Russian General Manager, and representatives from the Legal & Compliance and Supply Chain functions. The primary objective of this task force was to ensure uninterrupted access to its medicines for patients in need and, consequently, to maintain business continuity at that essential level.

In parallel, a separate task force was created to address the urgent needs of patients first and communities in Ukraine. This team focused on guaranteeing and enabling access to the company's medicines, facilitating drug donations, and responding to compassionate use requests from Ukrainian patients. The task force worked closely with the company's local partners in Ukraine to ensure these initiatives could be implemented effectively, while exploring additional ways Chiesi could provide broader support to the Ukrainian people during the crisis through support to local associations.

Following the introduction of the EU and US sanction packages against Russia, Chiesi undertook a comprehensive review of its third-party due diligence process to ensure full compliance with the newly established regulatory standards. As part of this strengthened framework, all providers identified as highly critical are now subject to a specific due diligence procedure. Furthermore, in accordance with the XII EU Sanction Package, all interactions between Chiesi and its Russian affiliates are conducted under the scope of a specific license, formally issued by the Italian competent authority (UAMA) on June 4, 2024. This approach reflects Chiesi's commitment to operating with transparency, responsibility, and adherence to international regulations while safeguarding the continuity of its mission.

Chiesi's ability to respond swiftly to crises has been reinforced by governance mechanisms introduced during the COVID-19 pandemic, which aim to better prepare for geopolitical and environmental uncertainties. A dedicated budget for emergency support and donations was established as part of these measures, ensuring rapid allocation of resources to support communities in emergency situations, when needed. This approach was applied to the Ukraine response, with all related decisions made by the Committee for Social Activities and Community Development (CASSC) to ensure coordinated and responsible action.

Starting from 2022, all the donations and solidarity initiatives promoted in support of the Ukrainian community were overseen and approved by the CASSC. Indeed, the CASSC, in alignment with Chiesi's Benefit Corporation common benefit purpose of "contributing to the development of the local communities in which the company operates,", stated in the company bylaws, plays a central role in the company's efforts for social purposes, including local community support and interventions during emergency situations.

In 2022, Chiesi allocated an initial sum of €1.5 million to support the Ukrainian community, part of which was directed to major international humanitarian organisations such as UNHCR (the UN Refugee Agency), the Red Cross, and UNICEF, as well as other long-standing NGOs in Ukraine working with specific beneficiary groups. Chiesi also supported initiatives for the reception of refugees in host countries (e.g., Poland) and matched employees' donations to selected partners assisting both local and international organisations.

In addition to financial contributions, Chiesi actively monitored drug donation requests from various channels worldwide and responded whenever possible by providing Chiesi medicines free of charge. Among these donations were life-saving treatments for neonates and transplant patients in Ukraine, supplied at no cost through Chiesi's local partner, as well as an enzyme replacement therapy (ERT) for the rare genetic disorder alpha-mannosidosis. Chiesi also continued its collaboration with International Health Partners (IHP), a trusted partner since 2016, supporting its mission to provide essential medicines and health supplies and to strengthen health systems under strain from natural or man-made crises.

As of 2025, Chiesi's commercial activities in Ukraine continue in partnership with the company's local partner, which has been instrumental in ensuring the availability of the products for patients despite the challenging circumstances. In the country, Chiesi markets both Air products and Care products..

Chiesi has strengthened awareness across all areas of the organisation and reinforced the urgency with which Chiesi responds in potential times of global conflict or emergency. Chiesi's purpose remains constant: ensuring uninterrupted, timely, and access to treatment for the patients.

Human Rights Due Diligence

Chiesi's primary consideration is ensuring uninterrupted access to its therapeutic solutions for patients who depend on them. Terminating all activities in regions of the world would deprive vulnerable populations, in some cases, of lifesaving medicines, which would contradict Chiesi's mission to improve patients' quality of life and its ethical obligations as a healthcare company. By applying the learnings outlined above, Chiesi is positioned to safeguard access to medicines while reducing the risk of human rights violations.

Chiesi has established robust governance systems to manage stakeholder relationships across its value chain, ensuring collaboration with partners who meet defined standards, including the respect for human rights. These systems incorporate specialized tools for partner qualification and evaluation, such as sustainability assessments and reputational due diligence. Control of these mechanisms is entrusted to the relevant members of the Group Executive Leadership Team, who ensure alignment with Chiesi's strategic and sustainability objectives.

Regarding communities' support and help during emergencies due to conflicts or other situations (e.g., natural disasters), the main governance body for Chiesi is the previously mentioned CASSC. Established in 2014, the CASSC coordinates, evaluates, and approves social responsibility initiatives. The CASSC's mandatory members are the Chair and Vice-Chair, CEO, and Head of Shared Value and Sustainability (SV&S). In total, five members of the CASSC also serve on Chiesi's Board of Directors.

For the selection of local non-governmental organizations or scientific associations to support, Chiesi follows a dedicated process that is activated in any crisis or emergency to ensure assistance reaches the correct targets in the affected region.