

ESG Policy

Version control and approval

IMPLEMENTATION AND REVIEW

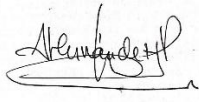

(Alphabetical order)

Made	Position	Date
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Revised	Position	Date
Ascensión Hernández	Chief Strategy Officer (CSO)	20/12/2024

APPROVAL

(Alphabetical order)

Approved	Position	Date	Signature
Ascensión Hernández	Chief Strategy Officer (CSO)	20/12/2024	
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1. Introduction

This ESG (Environment, Social, Governance) Policy defines HTBA's commitments to the community and the environment in which it operates and establishes a framework for generating value and ensuring responsible behavior towards our key stakeholders.

The document outlines our commitments to ethics, the environment, good governance, transparency, compliance with laws and the improvement of the community on which our business activity has an impact. By acting responsibly, we aim to manage the challenges of sustainability in our area of impact.

These commitments are aligned with the mission *"To provide innovative solutions from natural raw materials, challenging paradigms in the health and nutrition industries to improve consumer well-being"* and the company's vision *"To be recognized as an integrated and sustainable partner, leader in the natural ingredients sector, with minimal impact on our environment"*, which must be shared and upheld by all professionals who are part of HTBA.

In addition, this policy is aligned with the company's overall objectives and strategies, and establishes standards, roles and responsibilities in sustainability management.

2. Target

Through the ESG policy, HTBA aims to contribute to the following objectives:

- To provide a global reference framework setting out the general principles of action for the incorporation of ESG criteria in the business.
- Develop the activity in a responsible manner, considering the impact on people.
- To create sustainable and shared value for shareholders and other stakeholders, including the society in which the company operates.
- Integrate ESG impacts into strategic decision making.
- Prevent and mitigate possible negative impacts derived from business activities.
- Promote transparency both internally and externally.

3. Scope and Application

This policy applies to all HTBA companies, activities and professionals worldwide:

- Healthtech HTBA Holding S.L.
- HealthTech Bio Actives, S.L.U.
- HealthTech Bio Actives US, Inc.
- Any other company that in the future may join the HTBA group of companies.

All HTBA employees must contribute to sustainability objectives, integrate ESG aspects into their work and adopt responsible behavior.

The management team will promote, and lead commitments established in this policy, encouraging their integration into the corporate culture.

The policy will be a frame of reference when establishing and developing policies and governance systems within the company, which will have to be coherent and consistent with it. HTBA will also ensure that its commitments are extended to its value chain, to promote sustainability among its stakeholders.

4. General Principles

The company's own activity is aimed at offering healthy and safe solutions that improve the well-being of consumers. At HTBA we assume this responsibility not only through our products but also in the way we manage and do business.

This principle of Corporate Social Responsibility (CSR) of the company is understood as the responsibility for the impact of our activity on society, which requires integrating into our daily business the social, environmental, ethical and human rights concerns of the different stakeholders with whom we interact.

This commitment has a direct impact on our strategy, policies and procedures, making us responsible for the consequences of our actions and establishing guidelines and standards to improve our impact on society. This is why HTBA has defined an ESG strategy with specific objectives and actions to advance in this area.

Our ESG strategy contributes to the Sustainable Development Goals (SDGs), which have been identified and prioritized by the company to focus efforts on those goals where the company can generate a more relevant impact, being aware of the fundamental role that companies play in achieving the 2030 Agenda.

In addition, HTBA's values and principles are included in the Code of Ethics, which is known and available to all employees. It highlights the importance of complying with these commitments and all those policies established by the company.

5. Commitments and Principles of Action

HTBA establishes the following commitments and responsible practices in Sustainability and ESG:

Commitment to the environment (E)

- Respect and enforce compliance with applicable environmental regulations.
- Promote actions to mitigate climate change and progressively reduce the company's carbon footprint, with the goal of achieving carbon neutrality by 2050, in line with the Paris Agreement and the European Green Deal.
- Promote energy efficiency and the transition to renewable energy consumption.
- Make responsible and rational use of natural resources, including water, soil, biodiversity and raw materials, developing circular economy initiatives in the business.
- Properly manage waste, promoting its reuse and recycling.
- Ensure the safety and proper management of chemicals with a life cycle orientation, and along the entire supply chain.
- Maintain a preventive approach and integrate the environmental variable in the identification and management of the company's risks, ensuring that prevention and mitigation mechanisms are in place.
- Encourage the development and diffusion of environmentally friendly technologies, contributing to the broader goal of sustainable development.
- Promote a culture of respect and protection of the environment among employees.

Commitment to the HTBA Team and Society (S)

- Comply with current legislation on working conditions and respect fundamental labor rights established by the International Labor Organization.
- Support freedom of association and the effective recognition of the right to collective bargaining.
- Respect diversity and promote equal opportunities, eliminating workplace harassment and discrimination practices based on gender, age, sexual orientation, ethnic origin, religion, disability, or any other circumstance, implementing protocols and action measures to ensure the functioning of complaint channels and corrective measures.
- Maintain a safe and healthy workplace, implementing preventive actions and avoiding accidents and occupational diseases.
- Promote work-life balance practices.
- Promote professional development by fostering the improvement of skills and competencies.

- Respect and protect human rights in our own operations and in the supply chain, especially those of vulnerable groups that may be at greater risk of abuse or discrimination.
- Invest in socially responsible actions that respond to the needs of the community with which the company interacts.
- Maintain a commitment of responsibility towards customers and end consumers, offering safe products that meet the required quality standards.

Commitment to good governance, ethics and best practices in the value chain (G)

- To carry out our activities in accordance with the legislation in force in the different territories or countries in which we operate and in compliance with our code of ethics.
- Ensure compliance with the expected behaviors in terms of good governance, ethics, integrity and accountability. Ensure that these are integrated into the corporate culture and transmitted to the rest of the organization.
- Work against corruption in all its forms, including bribery and other forms of extortion, by implementing codes, regulations and initiatives integrated into planning and decision-making elements.
- Promote transparency and dialogue with all stakeholders of the organization, integrating their needs in decision making and carrying out responsible communication and marketing.
- To offer information in a continuous and timely manner to our shareholders to facilitate their knowledge on those issues that may be of interest to them and allow them to make the right investment decisions.
- To nurture relationships with customers with the goal of establishing long-lasting, trust-based, and value-driven connections. To provide high-quality products and services, ensure data protection and confidentiality, and properly manage their claims.
- Maintain a fair relationship with suppliers, ensure that they comply with applicable regulatory frameworks, and drive sustainability in our supply chain by encouraging suppliers to adopt the best policies and practices in sustainable management.
- Comply with the requirements of the certifications and standards to which we adhere, with a focus on continuous improvement.
- To find synergies and alliances that contribute to sustainable development.

6. Governance model and responsibilities

ESG functions must be integrated at all hierarchical levels, from operational departments to senior executives to ensure effective execution and monitoring of ESG strategy and projects. Therefore, two ESG governance bodies have been established: the ESG SteerCo and the ESG Task Force, each with different members and functions:

- The **ESG SteerCo** will be composed primarily of the CEO and CSO, with the ESG Manager acting as an advisor, providing a unified ESG vision, promoting strong corporate governance standards, and integrating ESG factors into decision-making. However, the CFO, COO, CCO, CRD, and CPO will participate in decisions related to their respective areas. This body will report to the Executive Management Committee.
- **ESG Task Force**: On the other hand, the ESG Task Force is composed of experts from different areas of the company, which ensures transversality and integration of ESG issues at the operational level. There are clear assignments of responsibilities for each of the lines and projects, and each member is responsible for implementing the actions and achieving the objectives of his or her area of responsibility.

7. Review, update and approval

This policy should be reviewed periodically to adapt it to changes both internally and in the national and international context and should be made available within and outside the organization to all interested parties so that its contents are known.

The ESG Manager is responsible for the maintenance of this document. All changes to this document must be approved by Management to take effect.

8. Definition and terms

Terminology related to the policy:

ESG: These refer to environmental, social and governance (ESG) factors, which are taken into account when investing in a company and which measure the impact and sustainability of investments. Companies are increasingly incorporating these three acronyms into their language, as the weight that these criteria have for investors when choosing one investment or another is key. As a result, these factors are integrated into the strategies, operations and governance of organizations.

CSR (Corporate Social Responsibility): Voluntary commitment acquired by the company in its strategy, policies and procedures, on environmental, social, ethical, good governance, trust and transparency aspects, responding at all times of the consequences of their actions.

Sustainability: In the business context, sustainability means that companies should not only focus on financial performance, but also take into account the risks and opportunities associated with the social and environmental impacts that companies may have, in their own operations and along the entire value chain.

SDGs: The Sustainable Development Goals (SDGs) are a universal initiative promoted in 2015 by the United Nations General Assembly, which is part of the 2030 Agenda for Sustainable Development. They are 17 interrelated goals designed to be a blueprint for peace and prosperity for people and the planet, which are intended to be achieved by 2030.

Paris Agreement: An international treaty on climate change. It was adopted by 196 Parties in Paris at the 2015 United Nations Climate Change Conference and entered into force on November 4, 2016. It aims to limit global warming to well below 2, preferably 1.5 degrees Celsius, compared to pre-industrial era levels.

European Green Deal: The European Green Deal, adopted in 2020, is a set of policy initiatives of the European Commission with the overall objective of making the European Union climate neutral by 2050.