

1. INTRODUCTION

While Alvotech is a Company incorporated in Luxembourg, its headquarters and main development and manufacturing facility are in Iceland. This policy is written under the terms of the Icelandic Gender Equality Act No. 150/2020 and Act on Equal Treatment in the Labor Market 86/2018 but is also intended to create the ground rules for other Alvotech sites as appropriate.

Alvotech pledges as an employer to create a workplace of equality and mutual respect among its employees that are to be treated fairly and enjoy equal opportunities. The company and its management emphasize creating a work environment where modes of communication and workplace behavior are characterized by respect, integrity, fairness, and equality.

2. THE PURPOSE OF THE POLICY

The purpose of this Equality Policy (or “Policy”) is to ensure equal conditions and opportunities for all employees, irrespective of gender, race, sexual orientation, age, religion, nationality, or other irrelevant factors, and to prevent discrimination or harassment based on these factors. The Policy is designed to help make sure that all employees are respected and valued on their own terms and that talent and human resources are used as effectively as possible. The program is also aimed at counteracting any stereotypes concerning gender. Furthermore, the program is meant to contribute to as much gender balance as possible in comparable positions and committee representation.

The aim is to ensure that Alvotech employees act without prejudice towards other employees and without discrimination, whether directly or indirectly, while reinforcing that any form of harassment, violence or bullying will not be tolerated within Alvotech.

According to provisions in the Icelandic Act on Equal Status and Equal Rights of all genders, Alvotech is obligated to establish an Equality Policy which states how the aims of the Act will be achieved to guarantee that employees will enjoy the rights set forth in law.

3. RESPONSIBILITY

Responsibility for implementation of the Equality Policy and advancing equal rights within the organization lies with the CEO, and VP of People & Culture and, as well as all directors and managers which are involved in managing human resources or impacting Alvotech’s culture in other ways.

The Vice President of People & Culture is responsible for coordinating Alvotech’s equality strategy and integrating it with the company’s human resource policy overall, as well as publishing periodic status and progress reports.

4. SCOPE

This policy applies to all Alvotech’s employees.

5. STATUS ANALYSIS

An Equality Report shall be prepared annually and made available no later than by the end of April (with information about the previous calendar year). The table of contents for this report is covered in the Appendix.

6. POLICY REVIEW

The Equality Policy was last approved in January 2024 and will be reviewed and updated no later than 3 years from this date.

7. SALARIES AND TERMS OF EMPLOYMENT

In determining salaries, care shall be taken to ensure that genders are not discriminated against, and wages shall be determined in the same way for all employees, irrespective of gender. All employees shall enjoy equal wages if they have comparable work experience, education, skills and other relevant qualifications for equally valuable and comparable jobs.

AIM

That no gender-based differences in wages or terms of employment can be identified among staff members in comparable positions.

INDICATORS

Equal pay analysis shall be conducted annually with the aim of detecting gender-based differences. Results shall be presented to the Corporate Leadership Team (“CLT”). The CLT is responsible for taking action to eliminate any gender-based differences which may be detected.

ACTIONS

If the above-mentioned analysis reveals differences that can only be explained by gender or other unexplained factors, the differences shall be corrected so far as possible and as quickly as possible.

Aim	Responsibility	Action	Time frame	Follow-up
Maintain a Equal pay certification.	VP of People & Culture	Equal pay Certification.	January 2020.	Certification shall be maintained according to provisions in law.
Minimize gender-based difference in wages.	VP of People & Culture	Conduct equal pay analysis and present to the leadership team. If unexplained gender pay gap appears in equal pay analysis, investigate, and correct as needed.	Annually.	Results of equal pay analysis are used to support merit review in March each year.

8.EMPLOYEES AND RECRUITMENT

Alvotech's recruitment process ensures that all recruitment is handled professionally irrespective of gender, race, sexual orientation, age, religion, nationality, or other irrelevant factors.

AIM

Positions at Alvotech are open to all individuals regardless of gender, and the employee group reflects diversity in gender, nationality, age, and other characteristics. Gender-equality considerations are consistently applied throughout the hiring process, with the aim of achieving balanced representation in comparable roles and fostering diverse teams and departments. When allocating projects, care is taken to ensure that no employee is disadvantaged on the basis of irrelevant factors such as gender, and that all individuals have equal opportunities to assume responsibility.

INDICATORS

Each year, statistics on gender balance, nationality and age distribution of employees shall be compiled and published. The content of the report is covered in more detail in the Appendix.

ACTIONS

Advertisements for vacant positions shall be designed to appeal to individuals of all genders and to a wide age group.

If there is a significant imbalance between genders and more than one equally qualified individual is suitable for the position in question, efforts shall be made to hire a person of the gender that is in the minority in the respective area of work.

Aim	Responsibility	Action	Time frame	Follow-up
Composition of staff is diverse in terms of gender nationality, age etc.	Vice President of People & Culture	Report issued on statistics.	Annually.	If one group is underrepresented, then an effort shall be made to take this into consideration in recruitment.

9. PROMOTIONS

Opportunities for advancement and promotions shall be open to employees of all genders and employees shall be on an equal footing irrespective of nationality, gender etc.

Aim	Responsibility	Action	Time frame	Follow-up
Equal opportunities for career development and promotions.	Vice President of People & Culture	Annual summary of promotions	Annually	VP of People & Culture will be able to request reasoning if only persons of one gender have been considered for promotions.

10. PROFESSIONAL TRAINING AND DEVELOPMENT

Alvotech employees shall enjoy equal opportunities as regards access to professional training and development.

Aim	Responsibility	Action	Time frame	Follow-up
Ensure that all employees, irrespective of gender and professional duties, enjoy the same possibilities for training and professional development.	Immediate supervisor.	Alvotech leaders encourage employees to pursue appropriate training and professional development. Professional development, training and education is to be discussed at least annually in a performance review.	Annually	VP of People & Culture will ensure that performance reviews are conducted. Progress on professional development is monitored in an annual employee survey.

11. WORK LIFE BALANCE

An important part of creating a good workplace and a joyful atmosphere Alvotech emphasizes that employees feel they can balance work and family responsibilities.

Aim	Responsibility	Action	Time frame	Follow-up
That all employees can balance their professional obligations and family responsibilities, where applicable.	CEO, VP of P&C, immediate supervisor.	The organization of work should be structured in a way that supports work life balance.	Annually	Measured in employee survey & results presented.

12.GENDER-BASED VIOLENCE, GENDER-BASED HARASSMENT AND SEXUAL HARASSMENT

An important part of creating a good workplace is to prevent bullying, gender-based and sexual harassment and violence. In connection with this, employees must be educated on what is considered bullying, gender-based and sexual harassment and violence.

Definitions:

- *Bullying: A repeated behaviour which often causes distress to those affected, i.e. by belittling, insulting, hurting, threatening, intimidating or causing someone fear. Opposing opinions or disputes between stakeholders is not considered bullying.*
- *Gender-based harassment: Behavior linked to the affected person's gender, having the purpose or effect of offending the dignity of the person involved and creating circumstances that are threatening, hostile, degrading, humiliating or insulting for the person in question.*
- *Sexual harassment: Any kind of sexual behavior having the purpose or effect of offending the dignity of the person affected by it, especially when this behavior creates circumstances that are threatening, hostile, degrading, humiliating or insulting for the person in question. The behavior can be verbal, symbolic and/or physical.*
- *Violence: Any type of behavior which results in, or could result in, physical or psychological injury or suffering on the part of the victim; also, the threat of such and coercion or arbitrary deprivation of freedom.*

Aim	Responsibility	Action	Time frame	Follow-up
That clear procedural rules are in place if cases relating to the above-mentioned matters arise and that these procedural rules are published on Alvotech Intranet.	VP of People & Culture	Procedural rules periodically reviewed.	Annually.	Human Resources monitors the number of cases that are notified. Workplace analysis.

Assistance for victims among employees.	VP of P&C	Victims will be offered appropriate assistance, for example, psychological assistance.	As needed.	Victims will be offered a follow-up interview after six months have passed.
Perpetrators among employees.	VP of P&C.	Procedural rules will be established based on the severity of the offence and number of offences.	As needed.	Appropriate measures taken with reference to procedural rules.
To prevent gender-based violence.	CEO, COO, VP of P&C & CLT but all employees hold responsibility.		Annually.	Courses/education will be offered for all Alvotech employees.
To prevent gender-based harassment.	CEO, COO, VP of P&C and CLT responsibility but all employees hold responsibility.	Purposeful training for employees.	Annually.	Courses/education will be offered for all Alvotech employees.

13. APPENDIX I. TABLE OF CONTENTS OF EQUALITY REPORT

Each year, statistics on gender balance, nationality and age distribution of employees shall be compiled and made available. Results shall be published for Alvotech as a whole, each department and location/site.

Equality Report Suggested Table of Contents

1. Introduction
2. Equal Pay Certification
 - a. Overview
 - b. Unexplained Gender Pay Gap
 - c. Salary Distribution
 - d. Unadjusted Pay Gap
3. Global Career Framework
4. Gender Ratio
 - a. Leadership Team
 - b. General Staff
5. By Function
6. By Location
7. Overall
8. In Iceland
9. Diversity
 - a. Nationalities in Employee Group
10. Promotion and Progression
11. Age Distribution and Turnover
12. Recruitment Process and Selection of New Hires
13. Main Results of Employee Engagement Survey
 - a. Work-Life Balance
 - b. Equality
14. Bullying and Harassment
15. Next Steps