AliraHealth

2025 Non-Financial Report

September 2026

MESSAGE FROM LEADERSHIP

Sustainability and Healthcare Transformation, Moving Together

At Alira Health, sustainability and healthcare transformation move together. Our purpose is to humanize healthcare and life sciences through innovative technologies, expert guidance, and partnership with patients. That purpose shapes how we grow, how we serve clients and how we define long-term value.

This 2025 non-financial report presents our progress in a format inspired by integrated reporting and informed by the European Sustainability Reporting Standards (ESRS). It brings together our strategy, governance, impacts and performance across the areas that matter most to our stakeholders: patients and end-users, our own workforce, our clients and partners, and the broader healthcare ecosystem.

The report also reflects a maturing internal discipline. Over the past year, Alira Health continued its double materiality journey, strengthened governance ownership of ESG issues, and improved data collection across people, risk, and sustainability topics. Where our data systems are still developing, we have prioritized transparency over overstatement and explanation over assumption.

> "Our sustainability ambition is not separate from our business ambition. The more responsibly we operate, the more credibly we can help clients accelerate innovation and improve outcomes for patients."
>
> **Gabriele Brambilla and Benjamin Chambon, Co-CEOs**

We thank our employees, patient partners, clients, suppliers, and advisors for challenging us to keep improving. We view this report not as the end of a process, but as a practical management tool and a public expression of accountability.

THE YEAR IN BRIEF

2025 at a Glance

Selected indicators and milestones drawn from the 2025 reporting pack and the 2025 double materiality process.

439
Employees at December 31, 2025

9
Countries with employees

27
ESG topics assessed

109
Impacts, risks and opportunities identified

11
Material topics

153
Administrative and management body population

0
Work-related fatalities

100%
Employees entitled to family-related leave

14.1%
Employee turnover (FY2025)

Silver Medal

EcoVadis recognition places Alira Health among the top 15% of companies assessed globally.

Most of our workforce is based in Italy, Spain, and the United States. Our 2025 materiality assessment identified climate change, workforce issues, patient and end-user impact, ethics, and cybersecurity as the topics most relevant to company decision-making.

CONTENTS

What This Report Covers

01 About Alira Health 05

02 Basis for Preparation and Governance 10

03 Double Materiality 13

04 Environmental Information 16

05 Social Information 21

06 Governance Information 26

07 Roadmap and Appendices 30

This report has been prepared on a voluntary, CSRD-aligned basis and is informed by the European Sustainability Reporting Standards. It is a consolidated non-financial report for external stakeholder communication, not an assured statutory filing.

01

About Alira Health

Purpose, mission and values, the four-pillar ESG strategy, and where the business sits in its value chain.

Who We Are

Alira Health is a global healthcare and life sciences advisory platform whose stated mission is to humanize healthcare and life sciences, in partnership with patients, through innovative technologies and expert guidance. The company's identity combines consulting, clinical, and technology-enabled capabilities, with patient centricity positioned as both a strategic differentiator and a sustainability principle.

Alira Health is a business built to support the biopharma and medtech value chain through integrated services across regulatory support, clinical development, market access, pricing and reimbursement, management consulting, transaction advisory, real-world solutions, and patient engagement. Rather than treating ESG as a parallel workstream, Alira Health positions responsible business conduct as part of how it creates value for clients, patients, and society.

> "The model of employee shareholding put in place from the beginning has helped create a common sense of responsibility toward the mission of putting patients at the center of healthcare transformation and innovation."
>
> **Gabriele Brambilla, CEO**

Consulting

Strategy, market access, pricing, and transactions

Clinical

Regulatory, clinical development, and real-world evidence

Technology

Digital platforms and patient engagement solutions

Mission, Vision, and Values

VISION

To have a positive impact on the life of every patient.

MISSION

To humanize healthcare and life sciences, in partnership with patients, through innovative technologies and expert guidance.

VALUES

- Be inclusive
- Be courageous
- Be honest
- Be accountable
- Elevate others

These principles matter for sustainability because they connect commercial execution with societal relevance. In practical terms, the same behaviors that support high-quality client delivery — accountability, transparency, collaboration, and evidence-based problem-solving — also underpin ethical governance, patient trust, and responsible workforce management.

A Business Model Built Around Integrated Healthcare Capabilities

Alira Health operates as a service-based organization with a relatively light direct environmental footprint but a significant indirect influence through the healthcare solutions, advice, and digital tools it helps to design, test, launch, and scale. Our business model depends on specialized talent, data, digital platforms, external expert networks, and trusted stakeholder relationships. The outcomes we seek include faster and more informed product development, more effective market access, stronger patient engagement, and ultimately, better patient experiences and outcomes.

Alira Health has progressed through the years from investment banking and management consulting capabilities to expanded research, clinical development, technology, and real-world solutions. This trajectory explains why topics such as patient involvement, cybersecurity, responsible data use, and talent development are now central to the company's non-financial profile.

Our ESG Architecture: The Four Pillars

We manage sustainability through four mutually reinforcing pillars that work together to guide decisions, operations, and long-term impact: we keep patient outcomes at the center while sustaining the teams, systems, and governance that make impact possible.

Patients

Improve patients' lives through a systematic, patient-centric approach to healthcare solutions.

People

Empower people through inclusion, development, wellbeing, civic engagement, and responsible leadership.

Planet

Reduce environmental impact across travel, facilities, digital tools, and purchasing decisions.

Governance

Maintain high ethical standards through governance, compliance, cybersecurity, and transparent decision-making.

Alira Health's ESG strategy is structured around these four pillars. In this report we refer to them as Patients, People, Planet, and Governance, with the last pillar covering ethics and policy frameworks. Together they connect the company's purpose to its operating model and help translate broad commitments into management priorities.

This structure is especially useful for a healthcare services business. It keeps patient outcomes and access at the center, without losing sight of the fact that the company's ability to deliver impact depends on healthy teams, trusted digital and data systems, disciplined governance, and a practical plan to reduce its environmental footprint over time.

Value Chain and Ecosystem Positioning

Alira Health's sustainability impacts, risks, and opportunities span direct operations and selected upstream and downstream relationships.

Selected upstream and downstream relationships surrounding the core business activities.

Upstream	Direct Operations	Downstream
Investors	Regulatory, clinical, and CMC support	Pharmaceutical, biotech, and medtech clients
Universities and research centers	Clinical development consulting	Healthcare providers and research institutions
Patient organizations and partnerships	Real-world solutions and data strategy	Patient communities affected indirectly
Technology and IT suppliers	Market access, pricing, and reimbursement	Public authorities and ecosystem stakeholders
Professional services (auditors, lawyers)	Management consulting and transactions	
Utilities and facilities providers	Patient engagement and digital solutions	

The value chain used for the 2025 double materiality process covers both upstream and downstream relationships. Upstream, Alira Health depends on investors, universities and research centers, technology vendors, professional service providers, utilities, and patient organizations. In direct operations, its key resources are people, digital systems, specialized advisory, and clinical capabilities. Downstream, the company serves pharmaceutical, biotech and medtech clients, healthcare providers, and research institutions, while patients are often affected indirectly through the design and implementation of products, services, and protocols supported by Alira Health.

Because Alira Health is not a manufacturer, many of its most important sustainability issues arise not from physical production but from the quality and consequences of advice, the governance of data and technology, and the way the organization manages its own workforce and stakeholder relationships.

02

Basis for Preparation and Governance

How the report was prepared, its boundary and time horizons, and the governance model that owns ESG.

Basis for Preparation

This report has been prepared on a voluntary, CSRD-aligned basis. Following changes to the European timetable, Alira Health is not required to publish a statutory sustainability report on 2025 data at this stage. Even so, we have chosen to continue the process in order to improve transparency, strengthen internal management, and respond to growing expectations from clients, investors, and other stakeholders.

The report draws on the 2025 sustainability drafting pack, prior ESG materials, the 2025 double materiality assessment carried out with Baker Tilly, and internal HR and risk-management data made available during the project. It is written as a consolidated non-financial report for web publication and external stakeholder communication, rather than as an assured statutory filing.

Reporting Boundary and Time Horizons

Unless otherwise stated, workforce data relates to January 1-December 31, 2025 and covers employees only, excluding contingent workers. For ESRS preparation purposes, the report also considers relevant upstream and downstream value-chain relationships, especially where patient, data, supplier, or travel-related effects are significant.

SHORT TERM	MEDIUM TERM	LONG TERM
0-1 year	**1-5 years**	**5-10 years**

These horizons align sustainability risk assessment with the company's strategy and operating cycles.

In several areas, particularly value-chain metrics and environmental data, the company is still strengthening its evidence base. Where direct primary data was not sufficiently mature, the drafting pack favored narrative disclosure, explanation of methodology, and transparent acknowledgment of limitations over unsupported extrapolation.

Governance Model and ESG Oversight

Alira Health's governance model is a foundational element of sustainable success, intended to align strategy, accountability, and resource allocation. The board meets at least four times a year and, although much interaction is remote, also meets in person at least once annually. The broader governance ecosystem includes executive leadership, finance, and legal functions, investor representation, and operational expertise.

153
ESRS governance population

13
Executives

140
Managerial-level employees

GENDER COMPOSITION OF THE GOVERNANCE POPULATION

0.7% not declared. The largest represented nationalities are Italy, the United States, France, and Spain.

At the top executive level alone, however, men still represented the majority of the 13-person population, which shows that diversity progress is uneven across leadership layers and remains a live management question. Baker Tilly provided CSRD training for top management throughout 2025, and the process has increased cross-functional ownership across finance, HR, legal, operations, patient engagement, and commercial leadership.

Internal Control and Data Maturity

As in many first-cycle sustainability reporting projects, Alira Health's main challenge is not lack of intent but uneven system maturity. The company reports solid workforce and governance information for 2025, while certain remuneration disclosures still rely on partially fragmented datasets, estimated inputs, or proxy methodologies. The report therefore discloses what is currently substantiated, flags limitations, and identifies the actions needed to improve future reporting quality.

- Value-chain data capture
- Harmonized learning and remuneration definitions
- Refined climate inventory boundaries
- Formalized policy architecture

03

Double Materiality

The 2025 assessment with Baker Tilly: how 27 topics and 109 impacts, risks, and opportunities resolved into 11 material topics.

Double Materiality Approach

In 2025, Alira Health carried out a structured double materiality assessment with support from Baker Tilly. The process followed ESRS and EFRAG guidance and combined internal workshops, document review, stakeholder mapping, IRO identification, scoring, and validation. The objective was not only to determine what the company should disclose, but also to clarify which sustainability matters are most strategically relevant to manage.

27	109	11
ESG topics covered	Impacts, risks, and opportunities	Material topics

Impact perspective

A topic is material if the company has a significant actual or potential positive or negative effect on people or the environment.

Financial perspective

A topic is material if it can reasonably create or influence financial effects on the company's development, performance, access to finance, or resilience.

Process Steps

1. Scope analysis and assessment of the reporting perimeter and value chain.
2. Identification and validation of ESG topics relevant to Alira Health's business model.
3. Identification and scoring of impacts, risks, and opportunities (IROs).
4. Stakeholder consultation and challenge of scorings and rationales.
5. Consolidation of results, materiality matrix production, and datapoint gap analysis.

The consultation combined internal experts and selected external stakeholders — finance, operations, HR, patients' representatives, commercial leaders, clients, and suppliers — grounding the results in operational reality rather than a purely mechanical scoring exercise.

03 - DOUBLE MATERIALITY

Material Topics Identified in 2025

Alira Health's sustainability impacts, risks, and opportunities span direct operations and selected upstream and downstream relationships.

Environmental — 1

- Climate change mitigation

Social — 7

- Working conditions including adequate wages
- Health, safety and wellbeing of employees
- Equal treatment and equal opportunities
- Employee training and talent development
- Information, inclusion, and access for clients and patients
- Health and safety of patients
- Patient involvement

Governance — 3

- Business ethics
- Protection of whistleblowers
- Stakeholder data protection and cybersecurity

ASSESSED BUT NOT MATERIAL AT CURRENT SCALE

Pollution | Water and marine resources | Biodiversity | Circularity | Workers in the value chain | Local communities | Animal welfare | Political engagement

Alira Health still monitors these issues and addresses some through policies and operating practices, but they are not decision-driving to the same degree as the material topics above.

04

Environmental Information

Climate change as our only material environmental topic, our 2025 emissions profile, and environmental responsibility across our offices.

Climate Change in the Material Environmental Topic

For a service-based healthcare advisory platform such as Alira Health, the most material environmental topic is climate change mitigation. The 2025 double materiality assessment concluded that climate change is the only environmental topic that currently reaches materiality, reflecting the company's travel footprint, office-based energy use, digital infrastructure, and procurement-related indirect emissions.

By contrast, pollution, water, marine resources, biodiversity, and circular economy topics were assessed as non-material at this stage. This does not mean they are irrelevant — given Alira Health's business model, they do not currently create sufficiently large or likely impacts or financial effects to rank among the company's most decision-useful sustainability topics. Even so, the company still addresses several of them through environmental policies, office practices, device management, and supplier expectations.

Climate Strategy and Main Levers

Alira Health's environmental direction is pragmatic rather than rhetoric-driven, built around a low-carbon travel policy, greener facilities and procurement, and employee awareness.

> Reduce business-travel intensity and avoid unnecessary air travel where lower-carbon alternatives are feasible.

> Promote green commuting through support for transport alternatives and more sustainable parking and charging arrangements.

> Reduce the lifecycle impact of electronic devices by extending useful life and favoring more sustainable sourcing.

> Improve office resource efficiency through greener electricity, waste-conscious catering, and sustainable facilities management.

> Strengthen environmental awareness through training and engagement initiatives such as Climate Fresk and internal campaigns.

Latest Consolidated Environmental Data Available in the Source Pack

The environmental data presented in this report reflects the outcome of a structured and rigorous data collection process carried out during the 2025 reporting cycle. Climate-related metrics for the year were consolidated using a protocol-aligned carbon emissions calculator, designed to support greenhouse gas accounting in accordance with widely recognized reporting frameworks. The methodology is aligned with widely accepted greenhouse gas accounting principles and supports ESG reporting and assessment processes.

The process combined internally collected primary data, including business travel activity, workforce distribution, facilities information, and procurement categories, with standardized emission factors embedded in the estimation tool. Data inputs were subject to internal consistency checks, and assumptions were explicitly documented where direct measurement was not yet available, in line with good practice for organizations with complex value chains.

The table below presents 2025 greenhouse gas emissions data consolidated at group level using a consistent methodological framework. While certain Scope 3 categories continue to rely partly on estimates and proxy data, the 2025 dataset represents the most comprehensive environmental dataset currently available for internal decision-making purposes, while recognizing that further improvements in primary data collection remain necessary.

TOTAL LOCATION-BASED

2,452.909

tCO_2e - reference year 2025

TOTAL MARKET-BASED

2,415.592

tCO_2e - reference year 2025

Indicator	Latest Value (tCO_2e)	Reference Year
Gross Scope 1 emissions	2.355	2025
Gross location-based Scope 2 emissions	50.260	2025
Gross market-based Scope 2 emissions	12.943	2025
Gross Scope 3 emissions	2,400.294	2025
Total GHG emissions – location-based	**2,452.909**	**2025**
Total GHG emissions – market-based	**2,415.592**	**2025**

From an analytical perspective, the 2025 emissions profile reflects the nature of Alira Health's service-based business model. The majority of greenhouse gas emissions arise from Scope 3 categories, reflecting indirect activities across the value chain, including purchased goods and services, capital goods, business travel, and other upstream activities. By contrast, Scope 1 and Scope 2 emissions remain comparatively limited, as expected for an organization without manufacturing operations.

This distribution highlights that the company's most significant decarbonization levers are not related to direct operations, but to behavioral, operational, and value-chain factors, particularly travel patterns, supplier engagement, and data quality improvements across Scope 3 categories. Areas identified for future improvement include reducing travel intensity where feasible, improving data granularity, and strengthening collaboration with suppliers and other value-chain partners.

A comparison with the 2023 carbon footprint highlights a variation in total reported emissions. In 2023, Alira Health reported total greenhouse gas emissions of approximately 2,859 tCO_2e, with the majority arising from Scope 3 activities. By contrast, the consolidated 2025 dataset indicates total location-based emissions of approximately 2,452.909 tCO_2e and total market-based emissions of approximately 2,415.592 tCO_2e.

The variation in reported emissions should be interpreted within the context of normal changes in business activities, operational conditions, and emissions-generating sources across reporting periods. While the overall greenhouse gas accounting approach remains broadly consistent with previous reporting cycles, year-over-year differences may reflect changes in both activity levels and underlying emissions drivers. The 2025 inventory provides an updated basis for monitoring environmental performance and informing future decision-making.

The 2023 footprint was developed using a Bilan Carbone®-type methodology, while the 2025 inventory was consolidated using a protocol-aligned carbon emissions calculator. Both inventories were developed using internationally recognized greenhouse gas accounting principles and provide a consistent basis for understanding Alira Health's emissions profile over time. Refinements in data collection and consolidation processes have been implemented where appropriate to support transparency, accuracy, and continuous improvement in environmental reporting.

Alira Health remains committed to continuously strengthening its environmental reporting processes through ongoing improvements in data collection, data granularity, and value-chain engagement. These efforts will support increasingly robust trend analysis over time and provide a stronger foundation for future emissions management, target-setting, and transition planning.

Beyond Climate: Office-Based Environmental Stewardship

Although environmental topics beyond climate change are not currently considered material for Alira Health, the company continues to implement practical measures to reduce environmental impact across its office-based operations.

The 2025 double materiality assessment concluded that pollution, water, and marine resources, biodiversity and circular economy are not currently material from either an impact or a financial perspective. This reflects the company's service-based business model, with no manufacturing activities, limited direct use of natural resources, and a relatively low direct environmental footprint beyond energy consumption and business travel. Climate change mitigation remains the only environmental topic considered material at this stage, primarily due to emissions associated with business travel, electricity use, digital infrastructure, and other value-chain activities.

Alongside its climate-related efforts, Alira Health maintains an approach to environmental stewardship focused on resource efficiency, workplace practices, and day-to-day operational decisions. The measures described below primarily address energy use and associated emissions within this broader approach to office management.

In line with internal guidelines, automated HVAC and lighting systems are configured to follow office occupancy schedules, typically switching on shortly before opening hours and off after closing. Timers or motion sensors are used where available to help reduce unnecessary energy consumption and associated emissions.

2

sites powered by 100% renewable electricity in **2025**

→

3

sites on renewable electricity in **2026**, progressively reducing Scope 2 emissions

Alira Health also sources renewable electricity where available. In 2025, two sites were supplied with 100% renewable electricity, increasing to three sites in 2026. Expanding renewable electricity sourcing forms part of the company's efforts to reduce electricity-related emissions.

These measures are modest in scale and reflect the company's operational profile. They support practical improvements in the environmental management of its offices.

Looking ahead, Alira Health aims to progressively expand access to renewable energy, improve energy data tracking across locations, and embed sustainability considerations more systematically into facilities management and procurement decisions.

05

Social Information

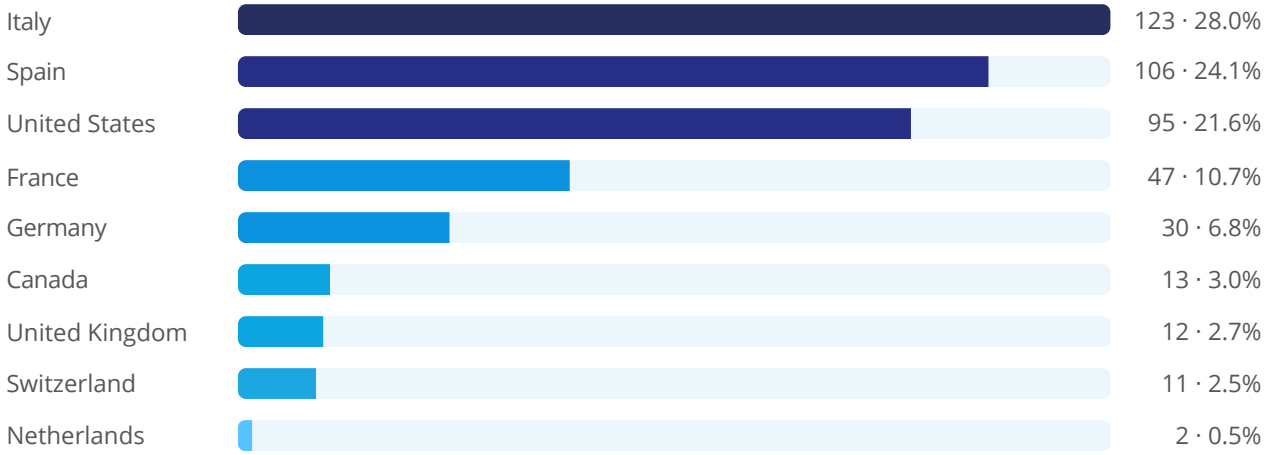
Our workforce, employee wellbeing and social protection, diversity and professional development, and our impact on patients and end users.

Our Workforce at a Glance

As of December 31, 2025, Alira Health had 439 employees, equivalent to 430.6 full-time roles, excluding contingent workers. Average headcount for the year was 461.7, and voluntary employee turnover was 14.1%, with 65 employees leaving voluntarily. At year-end, our workforce included 275 women, 162 men, and 2 employees who had not disclosed their gender.

439	430.6	14.1%	9
Employees	FTE	Turnover (FY2025)	Countries

EMPLOYEES BY COUNTRY AS OF DECEMBER 31, 2025



A relatively compact, internationally distributed organization whose biggest sustainability leverage comes from culture, management quality, development opportunities, and responsible growth rather than heavy industrial controls.

Working Conditions, Wellbeing, and Social Protection

The materiality process identified working conditions, adequate wages, and employee health and wellbeing as core priorities. The challenge for Alira Health is not only to attract and retain specialized talent in a competitive market; it is to do so without letting pace, travel, digital intensity, and commercial expectations undermine long-term wellbeing. A 2025 mid-year satisfaction survey covered job satisfaction, engagement, leadership, communication, learning, inclusion, work environment, and belonging — with results reviewed by HR to inform people-related decisions.

All employees are covered by social protection against loss of income due to sickness, unemployment, employment injury and acquired disability, parental leave, and retirement, through applicable public systems and, where relevant, employer-supported arrangements. No categories of employees are excluded from these protections within the reporting boundary.

People Indicator	2025 Result
Employees entitled to family-related leave	**100%**
Employees who took family-related leave	**23**
Share of entitled employees who took family-related leave	**4.9%**
Work-related fatalities identified in 2025 records	**0**

Mental health support with Unobravo

Launched 2025

unobravo

Mental wellbeing is approached as a preventive, structural management topic rather than a reactive support measure. In 2025, Alira Health launched a dedicated program with Unobravo, giving employees voluntary, confidential access to psychological counseling and wellbeing support from qualified professionals — addressing stress management, emotional intelligence, work-life balance, and psychological safety.

Access to psychological counseling forms part of a coordinated approach to wellbeing, alongside flexible working arrangements, regular employee engagement surveys, management awareness actions, and mental-health education, including webinars and learning sessions. In line with professional ethical standards and data-protection requirements, no individual-level or session-related information is shared with the company, safeguarding confidentiality and the independence of care. Together, these measures support a positive working environment and contribute to the prevention of work-related psychosocial risks.

Diversity, Inclusion, and Employee Development

Diversity and equal opportunity are material not only because of fairness, but because the company's work depends on multi-disciplinary thinking, international collaboration, and credibility across a diverse healthcare ecosystem. At the top executive level, the 13-person population comprised 10 men and 3 women, 23.1% female representation — while female representation across the wider ESRS-defined administrative and management population was stronger. Progress is real across leadership pipelines, with work remaining at the most senior executive layer.

Talent development supports Alira Health's business model and employee value proposition. In 2025, the company's approach combined regular performance and career development reviews, targeted professional training, and digital learning. Reviews form part of the standard people-management cycle and apply to all employees, regardless of contract type.

All employees have access to Udemy Business, offering on-demand training across technical, digital, leadership, and wellbeing-related topics. Curated Learning Paths provide additional structure, bringing together courses informed by a group-wide skills assessment survey to reflect business requirements and employee-identified development needs.

Participation in Learning Paths is voluntary. Employees may complete full paths or select individual courses or modules according to their development objectives and, where applicable, discussions with their line managers. This approach combines a consistent training framework with flexibility for self-directed learning.

Participation in learning activities is monitored at group level.

Learning and development indicator	2025 Result
Employees completing at least one learning item	**87.6%**
Average training hours per employee (learning dataset)	**19.64**
Employees participating in annual performance reviews	**100%**
Non-employees participating in annual performance reviews	**0%**

Disability data remains sensitive and is reported only where voluntarily self-disclosed and legally permitted; figures may understate the true number. Alira Health collaborates with organizations such as Fundación Adecco to improve awareness and facilitate access to information and support.

05 - SOCIAL INFORMATION

Patients, Clients, and End-Users

Beyond the workforce, Alira Health's social profile is shaped by the effects its services can have on patients, end-users, and healthcare access. The double materiality process identified three material topics in this domain, expressing the core social promise of the company: helping healthcare innovation become more human, inclusive, and usable.

Information, inclusion, and access
for clients and patients

Health and safety of patients

Patient involvement

Earlier ESG materials describe a strong patient-engagement capability, digital tools that reduce burden in clinical pathways, attention to diversity criteria in clinical trials, work on ethical pricing and affordability, and a patient-language training program to help employees understand the patient perspective. The same materials refer to the development of a Patient Index (PIIX) to monitor the impact of Alira Health's missions on patient lives and quality of life.

Alira Health's aspiration on access and affordability is especially important. In a sector where access is shaped by pricing, reimbursement, and regulatory architecture, a consulting company does not control final outcomes — but it can influence decisions, frame trade-offs, and advocate for more equitable approaches. This is where the company's market access and pricing capabilities intersect with its social purpose. Data privacy is inseparable from patient and end-user experience: the social license to operate increasingly depends on using sensitive data responsibly.

Communities, Civic Engagement, and Employee-Led Initiatives

Affected communities were not a material ESRS topic in 2025, yet the company's history shows a positive orientation toward civic engagement — four paid service days, financial donations, pro bono work, mentorship, and school partnerships. The employee-led Green & Growing initiative celebrates personal milestones by supporting tree planting in Europe and Australia through The Gifted Tree — a symbolic, engagement-driven action that reinforces a people-centered culture rather than forming part of the climate transition strategy.

GREEN & GROWING

1,016 Trees planted for employee milestones

Europe and Australia · via The Gifted Tree

06

Governance Information

Our approach to business ethics, whistleblower protection, cybersecurity and data protection, and the external assessments that evaluate these practices.

Business Ethics and a Speak-Up Culture

Governance topics are particularly consequential because Alira Health operates in a highly regulated, trust-dependent healthcare environment. The 2025 assessment identified three governance topics as material — business ethics, protection of whistleblowers, and stakeholder data protection and cybersecurity. These affect the credibility of the organization, the resilience of its operating model, and the confidence of clients, patient partners, and employees alike.

Business Ethics and Conduct

Ethical conduct is formalized through a global code of conduct, an ethics charter, and regular training. In a sector where professional standards, data sensitivity, and conflict-of-interest questions are acute, this is a core governance requirement rather than an optional enhancement. Instances of non-compliance, sanctions or infractions are formalized and reported to the board where relevant. The 2025 draft notes the need to continue formalizing group-wide anti-corruption and anti-bribery policies and to clarify the architecture around business-conduct reporting channels — a typical governance maturity issue, where operational controls may exist in practice before the policy set is fully harmonized.

Whistleblowing and a Speak-Up Culture

Protection of whistleblowers emerged as material because a healthcare advisory firm needs trusted routes for surfacing concerns about unlawful, unethical, or inappropriate behavior. Alira Health is subject to applicable legal requirements and is strengthening its policy framework so the group-wide architecture is equally clear and consistently documented.

- Leadership tone and a visible non-retaliation commitment
- Accessible, well-understood reporting channels
- Timely, independent investigation of concerns
- Visible follow-through that builds trust over time

Whistleblowing effectiveness depends on more than a policy document — for an organization combining entrepreneurial agility with disciplined governance, it is a vital trust mechanism.

06 - GOVERNANCE INFORMATION

Data Protection, Cybersecurity, and Resilience

Cybersecurity and data protection are among the most financially and operationally significant governance topics in the 2025 matrix. The business relies extensively on digital tools, specialist platforms, client information, and healthcare-related data. The risks of breach, leakage, or misuse extend well beyond the IT function — they can compromise patient and client trust, disrupt operations, generate regulatory exposure, and undermine the credibility of advisory work.

Alira Health mitigates data-related risks through a dedicated risk-management policy, regular employee training, and a quality-assurance framework governing IT and data-protection practices. A key objective is to further improve the speed and effectiveness of detection, escalation, and management of incidents — resilience in a data-intensive business depends not only on preventive controls but on the ability to identify, contain, and learn from incidents rapidly.

Workday · mandatory training

IT Handbook, Information Security Policy, and Computer Systems Acceptable Use Policy — defining secure use of systems and responsible employee behavior.

SoSafe · awareness e-learning

Role-based, adaptive modules on phishing and social engineering, email, and password security, remote-working risks, and emerging threats including deepfakes.

Supplier Management and Sustainable Procurement

Supplier relationship management did not rank as material in 2025, but it remains an enabling governance issue and a practical route to better environmental and social performance. Work is under way to refine purchasing policies, map suppliers, and integrate ESG considerations into selection and audit, supported by targeted Supply Chain Sustainability training via Workday. The opportunity is to move from ad hoc practice to systematic expectation — clearer supplier clauses, stronger due diligence, and defined ownership across procurement, operations, and sustainability.

Regulatory Management and Business-Model Resilience

Alira Health operates in markets shaped by regulation, data governance, scientific change, and evolving expectations around access and patient centricity. It therefore needs governance systems capable not only of compliance, but of anticipation. This report should be read as part of that anticipation effort.

06 - GOVERNANCE INFORMATION

External Validation and Accountability

Alira Health complements internal ESG management and reporting with recognized external benchmarks. These frameworks do not replace company-specific governance, policies, or controls, but they support greater discipline, comparability, and transparency, and help align internal practices with evolving stakeholder expectations.

EcoVadis Silver Medal

Among the top 15% of companies assessed globally — independent, third-party validation of environmental, social, and ethical practices.

Sustainability Benchmarking

We are exploring B Corp, CDP, and SBTi as potential pathways to strengthen our ESG practices, improve transparency, and advance our climate-related commitments.

The EcoVadis recognition demonstrates that the company has already reached a level of ESG maturity that is externally visible. The B Corp pathway is potentially even more significant, because it forces a whole-business assessment of governance, workers, community, environment, and customer-related impact.

In that sense, the combination of CSRD-aligned reporting and certification-oriented improvement can become a reinforcing loop rather than two separate exercises — each raising the bar for the other over successive reporting cycles.

Looking ahead, Alira Health intends to build on its commitment to the Carbon Disclosure Project (CDP) by progressing toward the disclosure of climate-related targets and, over time, exploring alignment with the Science Based Targets initiative (SBTi) to support the development of science-based greenhouse gas emissions reduction targets.

07

Roadmap and Appendices

Our management priorities through 2030, actions for upcoming reporting cycles, and supporting workforce data and methodology.

Roadmap to 2030

The most useful outcome of this report is the management agenda it clarifies. The groundwork is done — a purpose-led strategy, a robust double materiality assessment, stronger governance ownership. The next phase is about consistency, scalability, and sharper target-setting.

2022
First carbon footprint assessment · carbon reduction plan established (−47% by 2030)

2023
First EcoVadis assessment · EcoVadis Bronze Medal · B Corp BIA (55 points)

2024
Second carbon footprint assessment · ESG report published

2025 · this report
EcoVadis Silver Medal (Q4)

2026
EcoVadis carbon assessment (Q4) · CSRD voluntary report (Q3) · CDP disclosure (Q4) · SBTi target submission, subject to validation (Q4) · UN Global Compact onboarding (Q3)

2029
CSRD mandatory applicability

PRIORITIES FOR THE NEXT CYCLES

- Validate a refreshed GHG inventory with clearer boundaries and stronger supplier inputs.
- Formalize group-wide policy architecture for whistleblowing, anti-corruption, and supplier ESG expectations.
- Harmonize learning, wellbeing, and remuneration metrics, reducing reliance on proxy methodologies.
- Continue strengthening diversity and leadership-pipeline management, especially at the top executive level.
- Deepen patient involvement and evidence of end-user impact.
- Embed ESG into commercial decisions, procurement, partner due diligence, and digital-product governance.

Credibility comes from sequencing: identify the issues that matter, build the management system that can improve them, then publish comparable performance over time.

APPENDIX A

Key Workforce Data

HEADCOUNT BY COUNTRY AS OF DECEMBER 31, 2025

Country	Headcount	% of Total
Italy	123	28.0%
Spain	106	24.1%
United States of America	95	21.6%
France	47	10.7%
Germany	30	6.8%
Canada	13	3.0%
United Kingdom	12	2.7%
Switzerland	11	2.5%
Netherlands	2	0.5%
Total	**439**	**100.0%**

WORKFORCE BY CONTRACT TYPE AND GENDER AS OF DECEMBER 31, 2025

Contract type	Female	Male	Not Declared	Not Specified	Total
Regular	264	156	1	1	**422**
Fixed term	3	1	0	0	**4**
Intern	5	3	0	0	**8**
Hourly	1	1	0	0	**2**
External	1	1	0	0	**2**
Apprentice	1	0	0	0	**1**
Total	**275**	**162**	**1**	**1**	**439**

APPENDIX B

Material Topics and Report Coverage

Material Topic	Primary Chapter
Climate change mitigation	Environmental information
Working conditions including adequate wages	Social information
Health, safety, and wellbeing of employees	Social information
Equal treatment and equal opportunities for employees	Social information
Employee training and talent development	Social information
Information, social inclusion, and access for clients and patients	Social information
Health and safety of patients	Social information
Patient involvement	Social information
Business ethics	Governance information
Protection of whistleblowers	Governance information
Stakeholder data protection and cybersecurity	Governance information

APPENDIX C

Methodological Notes and Limitations

This report is intentionally transparent about data maturity. The strongest 2025 evidence relates to workforce composition, social protection, family-related leave, training participation, top-management gender representation, and selected governance indicators. Environmental data, including climate-related metrics, is also complete for 2025; while methodologies and consolidation processes are still evolving, the dataset provides a sufficiently comprehensive and consistent basis for group-level reporting.

Remuneration metrics are reported on a base-salary, multi-currency basis. Because the data does not yet support a single validated group reporting currency or a fully verified definition of total remuneration, a consolidated ESRS-style annual remuneration ratio is not evidenced in the current pack. Future improvements should cover remuneration definitions, FX methodology, and benefits/variable-pay capture.

Disability metrics are constrained by the voluntary and legally sensitive nature of disability-status disclosure; awareness, support, and inclusion actions are more reliable indicators of progress than any low headline prevalence figure. This document should be read as a CSRD-aligned management report, not an audited statutory sustainability statement.

CLOSING REFLECTION

From Intention to Structure

In healthcare, trust is built through evidence, integrity, and empathy. The same principles apply to sustainability. For Alira Health, responsible business conduct is not an abstract commitment, but a practical condition for delivering high-quality, patient-centered advisory services in a highly regulated and impact-sensitive environment.

The 2025 reporting cycle marks a shift from intention to structure. Through a robust double materiality assessment, strengthened governance ownership, and more disciplined workforce data, the company has clarified which sustainability topics matter most and how they connect to day-today operations and client delivery — prioritizing transparency over completeness, and management relevance over formality.

Looking ahead, the company's sustainability journey will continue to focus on building resilient teams, strengthening learning and wellbeing systems, deepening patient-centric practices, and embedding ESG considerations more consistently into decision-making. These priorities are not pursued for reporting purposes alone, but because they underpin long-term credibility with clients, partners, and patients.

At Alira Health, sustainability is part of how we earn trust, support innovation, and contribute responsibly to the healthcare ecosystem we serve. This report provides a foundation for strengthening governance, improving data quality, and making more informed sustainability decisions over time.