
Orion Group



Sustainability Report 2010

This PDF contains the content of the Report for 2010.
The master report has been published as a web publication
at www.orion.fi/sustainability-report-2010/

5 May 2011

Orion Group
Sustainability Report 2010

5 May 2011

Orion Group
Sustainability Report 2010

Foreword to Orion's Sustainability Report 2010

The first ever Corporate Sustainability Report by Orion Corporation was published in June 2010. The Report covered the years 2007–2009. The report now at hand is for 2010, largely continuing to discuss the development of those issues we have dealt with in the first report. The comparative year is primarily 2009 although historical data in the tables and graphics on the indicators is presented as of 2007. In the long run we plan to extend the history over a retrospective time span of 5 years.

In its reporting, Orion monitors and explains its sustainability affairs largely based on the globally adopted GRI (Global Reporting Initiative) guidelines and framework, using indicators relevant and applicable to the company's businesses.

The primary publication platform for this report is the Sustainability section of the corporate internet website at www.orion.fi/sustainability. The Report is regrettably not available as a printed publication, but the manuscript of the full Report is provided in a PDF document. The language versions available of the Report are English and Finnish.

We have received delightful acknowledgements for the report for 2009: In August 2010, Kempen Capital Management announced having granted Orion a Pass status in their socially responsible universe, allowing Kempen's ethical funds to invest in Orion. In autumn, the central organization of Finnish auditors, KHT-yhdistys, rewarded our report as the best first-timer. In March 2011, Nasdaq OMX informed that Orion Corporation was qualified to its new OMX GES Sustainability Finland Index which comprises the 40 leading Nasdaq OMX Helsinki listed companies in terms of sustainability. The index criteria are based upon international guidelines for environmental, social and governance issues.



Building well-being in a trustful manner

Without the primary attitude of all-encompassing responsibility, Orion would not have the qualifications for its business, i.e., to develop, manufacture and market medicines. As a basic characteristic, Orion is and wants to be a very responsible and quality-oriented company. Ignorance of the impacts of our doings and operations is not in harmony with the spirit of our values and ethical principles, which underline caring and concern.

Orion wants to show exemplary practices as a corporate citizen. We are by far the largest player in Finland in our field, with an almost 100-year-long history. We want to demonstrate that Orion can meet without compromise its key stakeholders' anticipations of good company behavior. With a caring mind, and by acting in compliance with the regulations we are promoting our mission to build well-being in a credible manner. By keeping to this road we can ensure strong confidence in us and a basis for a good future for our company.

Anne Allo
Corporate Responsibility Officer

Orion Group Sustainability Report 2010 (according to GRI)

CONTENT OF THE REPORT

3.12. GRI content index

A comparison with the GRI guidelines and location of the disclosures in the Report is provided in the table below.

Extent of reporting

- 1 Reported
- 2 Partly reported
- 3 Not reported

AR = Annual Report 2010

orion.fi = Orion's corporate website
www.orion.fi

GRI code	GRI content	Scope of reporting	Page number in Report	Note
	Standard Disclosures part I: Profile Disclosures			
1.	Strategy and analysis	1	13	
1,1	Statement from the most senior decision-maker of the organization.	1	15	
1,2	Description of key impacts, risks, and opportunities.	1	16	
2.	Organizational profile		16-19	
2,1	Name of the organization.	1	16	
2,2	Primary brands, products, and/or services.	1	16	
2,3	Operational structure of the organization, including main divisions, operating companies, subsidiaries, and joint ventures.	1	17	
2,4	Location of organization's headquarters.	1	16	
2,5	Number of countries where the organization operates, and names of countries with either major operations or that are specifically relevant to the sustainability issues covered in the report.	1	17	
2,6	Nature of ownership and legal form.	1	17	
2,7	Markets served (including geographic breakdown, sectors served, and types of customers/beneficiaries).	1	17	
2,8	Scale of the reporting organization.	1	18	
2,9	Significant changes during the reporting period regarding size,	1	19	

5 May 2011

Orion Group
Sustainability Report 2010

	structure, or ownership.		
2,10	Awards received in the reporting period.	1	19
3.	Report Parameters		20-23
3,1	Reporting period (e.g., fiscal/calendar year) for information provided.	1	20
3,2	Date of most recent previous report (if any).	1	20
3,3	Reporting cycle (annual, biennial, etc.)	1	20
3,4	Contact point for questions regarding the report or its contents.	1	20
3,5	Process for defining report content.	1	20
3,6	Boundary of the report.	1	21
3,7	Specific limitations on the scope or boundary of the report.	1	22
3,8	Basis for reporting on joint ventures, subsidiaries, leased facilities, outsourced operations, and other entities that can significantly affect comparability from period to period and/or between organizations.	1	22
3,9	Data measurement techniques and the bases of calculations, including assumptions and techniques underlying estimations applied to the compilation of the Indicators and other information in the report.	1	22
3,10	Explanation of the effect of any re-statements of information provided in earlier reports, and the reasons for such re-statement.	1	22
3,11	Significant changes from previous reporting periods in the scope, boundary, or measurement methods applied in the report.	1	23
3,12	GRI content Index. Table identifying the location of the Standard Disclosures in the report.	1	4-12
3,13	Policy and current practice with regard to seeking external assurance for the report.	3	23
4.	Governance, commitments and engagement		23-28
4,1	Governance structure of the organization, including committees under the highest governance body responsible for specific tasks, such as setting strategy or organizational oversight.	1	23
4,2	Indicate whether the Chair of the highest governance body is also an executive officer.	1	23
4,3	For organizations that have a unitary board structure, state the number of members of the highest governance body that are independent and/or non-executive members.	1	23
4,4	Mechanisms for shareholders and employees to provide recommendations or direction to the highest governance body.	1	23
4,5	Linkage between compensation for members of the highest governance body, senior managers, and executives and the organization's performance.	1	24
4,6	Processes in place for the highest governance body to ensure conflicts of interest are avoided.	1	24
4,7	Process for determining the qualifications and expertise of the members of the highest governance body for guiding the organization's strategy on economic, environmental, and social topics.	1	24
4,8	Internally developed statements of mission or values, codes of conduct, and principles relevant to economic, environmental, and social performance and the status of their implementation.	1	25
4,9	Procedures of the highest governance body for overseeing the organization's identification and management of economic,	1	25

	environmental, and social performance, including relevant risks and opportunities, and adherence or compliance with internationally agreed standards, codes of conduct, and principles.			
4,10	Processes for evaluating the highest governance body's own performance, particularly with respect to economic, environmental, and social performance.	1	25	
4,11	Explanation of whether and how the precautionary approach or principle is addressed by the organization.	1	25	
4,12	Externally developed economic, environmental, and social charters, principles, or other initiatives to which the organization subscribes or endorses.	1	25	
4,13	Memberships in associations (such as industry associations) and/or national/international advocacy organizations in which the organization: * Has positions in governance bodies; * Participates in projects or committees; * Provides substantive funding beyond routine membership dues; or * Views membership as strategic.	1	26	
4,14	List of stakeholder groups engaged by the organization.	1	26	
4,15	Basis for identification and selection of stakeholders with whom to engage.	1	26	
4,16	Approaches to stakeholder engagement, including frequency of engagement by type and by stakeholder group.	1	28	
4,17	Key topics and concerns that have been raised through stakeholder engagement, and how the organization has responded to those key topics and concerns, including through its reporting.	3		
Standard disclosures Part II: Disclosures of Management Approach (DMAs)				
5.	G3 DMA			
DMA EC	DISCLOSURE ON MANAGEMENT APPROACH EC – ECONOMIC		29	
Aspects	Economic performance			
	Market presence			
	Indirect economic impacts			
DMA EN	DISCLOSURE ON MANAGEMENT APPROACH EN – ENVIRONMENT		33	
Aspects	Materials			
	Energy			
	Water			
	Biodiversity			
	Emissions, effluents and waste			
	Products and services			
	Compliance			
	Transport			
	Overall			
DMA LA	DISCLOSURE ON MANAGEMENT APPROACH LA – LABOR		50	
Aspects	Employment			
	Labor/management relations			

5 May 2011

Orion Group
Sustainability Report 2010

	Occupational health and safety			
	Training and education			
	Diversity and equal opportunity			
DMA HR	DISCLOSURE ON MANAGEMENT APPROACH HR – HUMAN RIGHTS		69	
As- pects	Investment and procurement practices			
	Non-discrimination			
	Freedom of association and collective bargaining			
	Child labor			
	Forced and compulsory labor			
	Security practices			
	Indigenous rights			
DMA SO	DISCLOSURE ON MANAGEMENT APPROACH SO – SOCIETY		72	
As- pects	Community			
	Corruption			
	Public policy			
	Anti-competitive behavior			
	Compliance			
DMA PR	DISCLOSURE ON MANAGEMENT APPROACH PR – PRODUCT RESPONSIBILITY		75	
As- pects	Customer health and safety			
	Product and service labelling			
	Marketing communications			
	Customer privacy			
	Compliance			
	Standard Disclosure Part III: Performance Indicators			
EC	Economic		30-32	
	Economic performance			
EC1	Direct economic value generated and distributed, including revenues, operating costs, employee compensation, donations and other community investments, retained earnings, and payments to capital providers and governments.	1	30	
EC2	Financial implications and other risks and opportunities for the organization's activities due to climate change.	3		
EC3	Coverage of the organization's defined benefit plan obligations.	1	31	
EC4	Significant financial assistance received from government.	1	42	
EC	Donations	1	32	Own
	Market presence			
EC5	Range of ratios of standard entry level wage compared to local minimum wage at significant locations of operation.	3		
EC6	Policy, practices, and proportion of spending on locally-based suppliers at significant locations of operation.	3		

5 May 2011

Orion Group
Sustainability Report 2010

EC7	Procedures for local hiring and proportion of senior management hired from the local community at significant locations of operation.	3		
	Indirect economic impacts			
EC8	Development and impact of infrastructure investments and services provided primarily for public benefit through commercial, in-kind, or pro bono engagement.	3		
EC9	Understanding and describing significant indirect economic impacts, including the extent of impacts.	3		
EN	Environmental		36-49	
	Materials			
EN1	Materials used by weight or volume.	1	36	
EN2	Percentage of materials used that are recycled input materials.	1	36	
	Energy			
EN3	Direct energy consumption by primary energy source.	1	38	
EN4	Indirect energy consumption by primary source.	1	38	
EN5	Energy saved due to conservation and efficiency improvements.	3		
EN6	Initiatives to provide energy-efficient or renewable energy based products and services, and reductions in energy requirements as a result of these initiatives.	3		
EN7	Initiatives to reduce indirect energy consumption and reductions achieved.	2	40	
	Water			
EN8	Total water withdrawal by source.	1	40	
EN	Water consumption	1	40	Own
EN9	Water sources significantly affected by withdrawal of water.	3		
EN10	Percentage and total volume of water recycled and reused.	3		
	Biodiversity			
EN11	Location and size of land owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas.	1	41	
EN12	Description of significant impacts of activities, products, and services on biodiversity in protected areas and areas of high biodiversity value outside protected areas.	3		
EN13	Habitats protected or restored.	3		
EN14	Strategies, current actions, and future plans for managing impacts on biodiversity.	3		
EN15	Number of IUCN Red List species and national conservation list species with habitats in areas affected by operations, by level of extinction risk.	3		
	Emissions, effluents and waste			
EN16	Total direct and indirect greenhouse gas emissions by weight.	1	41	
EN17	Other relevant indirect greenhouse gas emissions by weight.	3		
EN18	Initiatives to reduce greenhouse gas emissions and reductions achieved.	3		
EN19	Emissions of ozone-depleting substances by weight.	3		
EN20	NOx, SOx, and other significant air emissions by type and weight.	1	43	
EN21	Total water discharge by quality and destination.	1	44	

5 May 2011

Orion Group
Sustainability Report 2010

EN22	Total weight of waste by type and disposal method.	1	45	
EN23	Total number and volume of significant spills.	3		
EN24	Weight of transported, imported, exported, or treated waste deemed hazardous under the terms of the Basel Convention Annex I, II, III, and VIII, and percentage of transported waste shipped internationally.	1	45	
EN25	Identity, size, protected status, and biodiversity value of water bodies and related habitats significantly affected by the reporting organization's discharges of water and runoff.	3		
	Products and services			
EN	Production volumes by type of product	1	47	Own
EN26	Initiatives to mitigate environmental impacts of products and services, and extent of impact mitigation.	2	47	
EN27	Percentage of products sold and their packaging materials that are reclaimed by category.	3		
	Compliance			
EN28	Monetary value of significant fines and total number of non-monetary sanctions for non-compliance with environmental laws and regulations.	1	48	
	Transportation			
EN29	Significant environmental impacts of transporting products and other goods and materials used for the organization's operations, and transporting members of the workforce.	2	48	
	Overall			
EN30	Total environmental protection expenditures and investments by type.	1	49	
SO	Social			
LA	Social: Labor Practices and Decent Work		53-68	
	Employment			
LA1	Total workforce by employment type, employment contract, and region.	1	53	
LA2	Total number and rate of employee turnover by age group, gender, and region.	1	54	
LA3	Benefits provided to full-time employees that are not provided to temporary or part-time employees, by major operations.	1	56	
	Labor/management relations			
LA4	Percentage of employees covered by collective bargaining agreements.	1	57	
LA5	Minimum notice period(s) regarding significant operational changes, including whether it is specified in collective agreements.	1	57	
	Occupational health and safety			
LA6	Percentage of total workforce represented in formal joint management-worker health and safety committees that help monitor and advise on occupational health and safety programs.	1	58	
LA7	Rates of injury, occupational diseases, lost days, and absenteeism, and number of work-related fatalities by region.	1	59	
LA8	Education, training, counseling, prevention, and risk-control programs in place to assist workforce members, their families, or community members regarding serious diseases.	3		

5 May 2011

Orion Group
Sustainability Report 2010

LA9	Health and safety topics covered in formal agreements with trade unions.	1	60	
	Training and education			
LA10	Average hours of training per year per employee by employee category.	1	62	
LA11	Programs for skills management and lifelong learning that support the continued employability of employees and assist them in managing career endings.	1	62	
LA12	Percentage of employees receiving regular performance and career development reviews.	1	63	
	Diversity and equal opportunity			
LA13	Composition of governance bodies and breakdown of employees per category according to gender, age group, minority group membership, and other indicators of diversity.	2	64	
LA14	Ratio of basic salary of men to women by employee category.	1	66	
LA	Job satisfaction	1	66	Own
HR	Social: Human Rights		70-71	
	Diversity and equal opportunity			
HR1	Percentage and total number of significant investment agreements that include human rights clauses or that have undergone human rights screening.	3		
HR2	Percentage of significant suppliers and contractors that have undergone screening on human rights and actions taken.	3		
HR3	Total hours of employee training on policies and procedures concerning aspects of human rights that are relevant to operations, including the percentage of employees trained.	3		
	Non-discrimination			
HR4	Total number of incidents of discrimination and actions taken.	1	70	
	Freedom of association and collective bargaining			
HR5	Operations identified in which the right to exercise freedom of association and collective bargaining may be at significant risk, and actions taken to support these rights.	1	70	
	Child labor			
HR6	Operations identified as having significant risk for incidents of child labor, and measures taken to contribute to the elimination of child labor.	1	70	
	Forced and compulsory labor			
HR7	Operations identified as having significant risk for incidents of forced or compulsory labor, and measures to contribute to the elimination of forced or compulsory labor.	1	71	
	Security practices			
HR8	Percentage of security personnel trained in the organization's policies or procedures concerning aspects of human rights that are relevant to operations.	3		
	Indigenous rights			
HR9	Total number of incidents of violations involving rights of indigenous people and actions taken.	1	71	
SO	Social: Society			

5 May 2011

Orion Group
Sustainability Report 2010

	Community			
SO1	Nature, scope, and effectiveness of any programs and practices that assess and manage the impacts of operations on communities, including entering, operating, and exiting.	3		
	Corruption			
SO2	Percentage and total number of business units analyzed for risks related to corruption.	3		
SO3	Percentage of employees trained in organization's anti-corruption policies and procedures.	3		
SO4	Actions taken in response to incidents of corruption.	1	74	
	Public policy			
SO5	Public policy positions and participation in public policy development and lobbying.	1	74	
SO6	Total value of financial and in-kind contributions to political parties, politicians, and related institutions by country.	1	74	
	Anti-competitive behaviour			
SO7	Total number of legal actions for anti-competitive behavior, anti-trust, and monopoly practices and their outcomes.	1	74	
	Compliance			
SO8	Monetary value of significant fines and total number of non-monetary sanctions for non-compliance with laws and regulations.	1	74	
PR	Social: Product Responsibility		77-84	
	Customer health and safety			
PR1	Life cycle stages in which health and safety impacts of products and services are assessed for improvement, and percentage of significant products and services categories subject to such procedures.	1	77	
PR2	Total number of incidents of non-compliance with regulations and voluntary codes concerning health and safety impacts of products and services during their life cycle, by type of outcomes.	1	77	
PR	Product traceability and product recall procedures.	1	77	Own
PR	Product recalls and product defects.	1	78	Own
PR	Inspections of Orion's operations and sites conducted by third parties.	1	78	Own
PR	Inspections of material and service suppliers' and contract manufacturers' operations and sites conducted by Orion.	1	79	Own
	Product and service labelling			
PR3	Type of product and service information required by procedures, and percentage of significant products and services subject to such information requirements.	1	81	
PR4	Total number of incidents of non-compliance with regulations and voluntary codes concerning product and service information and labeling, by type of outcomes.	1	82	
PR5	Practices related to customer satisfaction, including results of surveys measuring customer satisfaction.	2	82	
	Marketing communications			
PR6	Programs for adherence to laws, standards, and voluntary codes related to marketing communications, including advertising, promotion, and sponsorship.	1	82	
PR7	Total number of incidents of non-compliance with regulations and	1	84	

5 May 2011

Orion Group
Sustainability Report 2010

	voluntary codes concerning marketing communications, including advertising, promotion, and sponsorship by type of outcomes.			
	Customer privacy			
PR8	Total number of substantiated complaints regarding breaches of customer privacy and losses of customer data.	1	84	
	Compliance			
PR9	Monetary value of significant fines for non-compliance with laws and regulations concerning the provision and use of products and services.	1		

1. Orion Group's vision and strategy

The Executive Management Board has confirmed Orion's commitment to responsible operation and continuous development in the following statement:

The operations and activities in the Orion Group are based on compliance with laws and regulations, as well as with ethically acceptable operating practices. These principles together with Orion's values and our dedication to 'Building well-being' are the key drivers for us in our approach to corporate responsibility in our daily work, in what ever we do.

With strong devotion to promoting health we want to enhance trust in Orion as a company caring for and contributing to the welfare of mankind. We are committed to sustainable development and constantly improving performance, aiming at highest of industry standards in respect to Environment, Health and Safety.

We want to be a trustworthy partner in terms of economical, social and environmental criteria. We also want to be an attractive and solid workplace, respecting the human rights and equality.

Our commitment to responsibility allows us to expect the same also from our business partners.

Strategy and management approach

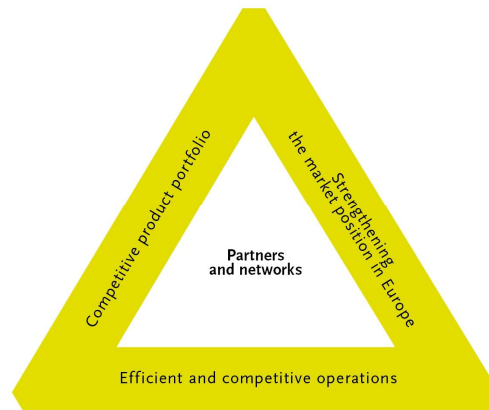
Orion's mission is to build well-being. To this end, Orion provides pharmaceuticals and diagnostic tests that help patients to effectively treat their diseases. Effective drugs also provide added value for patients by improving quality of life. Responsibility and caring about the consequences of the operations and their impacts on people, environment and society are key parameters the smart and viable operating practices applied by Orion in order to reach its strategic objectives.

Orion wants to be an innovative European R&D-based pharmaceutical and diagnostic company with a special emphasis on developing medicinal treatments and diagnostic tests for the global markets. Innovation is at the centre of Orion's vision, because the development of innovative products alone is not enough in the current competitive environment: the company's overall approach should be based on innovation. Orion aims at innovative, effective practices and business models throughout its operations.

The corporate values – Mutual trust and respect / Customer focus / Innovation / Achievement / Quality, reliability and safety – are the basic elements behind the implementation of the strategy.

Orion's strategic aims are profitable growth and increased shareholder value, whilst keeping business risks under control. Orion's strategy focuses on three key themes:

- Growth of business operations through a competitive product portfolio
- Strengthening the market position in Europe
- development of operational flexibility and efficiency
- development of partnerships and networking



All of Orion’s business divisions have a major role in achieving the financial objectives of the Group. The two largest divisions, Proprietary Products and Specialty Products, are most crucial, however. Orion strives to enhance synergy benefits between patent-protected proprietary drugs, off-patent (i.e. generic) prescription drugs and self-care products. The Animal Health, Fermion and Orion Diagnostica divisions are actively seeking new growth opportunities.

A description of the strategy of the Orion Group is available on the corporate website at <http://www.orion.fi/en/Orion/Strategy/>.

Orion’s strategic themes

Achieved in 2010		
Competitive product portfolio	<ul style="list-style-type: none"> • Active in-licensing • Constant flow of product launches • Building self-care product portfolio in Nordic countries • Progress in R&D projects 	<ul style="list-style-type: none"> • In-licensing of value-added products for selected therapy areas • Nearly 150 launches of human pharmaceuticals • Continuously renewed generic and self-care portfolio in Finland, Nordic countries and Eastern Europe • Marketing authorisation application for dexmedetomidine submitted to the European Medicines Agency • Progress on target in research projects to develop Easyhaler combined formulation, and Stalevo for Japanese markets • Marketing authorisation process for Vantas implemented • Many new research projects with partners
Strengthening market position in Europe	<ul style="list-style-type: none"> • Europe-wide presence • Strengthening market position • Target customer groups 	<ul style="list-style-type: none"> • Strengthened position as market leader in Finland • Expansion of sales network coverage in Europe through new subsidiaries • Strengthened market position in Scandinavia through expansion of generic and self-care product portfolio • Different target customer groups in different areas
Efficient and competitive operations	<ul style="list-style-type: none"> • Improving efficiency of operations • Cost control 	<ul style="list-style-type: none"> • Improved efficiency throughout the value chain • Improved cost control • New R&D operating model with increased flexibility • More efficient supply chain • Creation of flexible sales organisation
Partnerships and networks		<ul style="list-style-type: none"> • New R&D partnerships in early-phase research • Continued active building of partnerships and networking throughout the value chain

1.1 Statement by the CEO about the relevance of sustainability to Orion and the associated challenges

CEO Timo Lappalainen:

In 2008, Orion's management made a decision to start reporting on sustainability. The basis and infrastructure for the reporting were defined and built during 2009, and in early summer 2010 we published our first report. This initiative has been of major significance to Orion. We engaged ourselves to do the work properly, and along with the progress of our efforts we started seeing a clearer picture of which matters already are in good shape and which need improvement. Our report for 2009 served as a good basis for further development. We appreciate very much the recognition of the *Best first-timer* in the Finnish contest of Corporate Social Responsibility reporting 2010, as well as the qualification of Orion into the Nasdaq OMX GES Sustainability Index.



As a listed company we are inevitably facing the fact that we are subject to increasingly critical and detailed external scrutiny of our affairs and approaches relating to ethics and sustainability. For certain investors and stakeholders, the total impression of sustainability is an important criterion in making choices and decisions. It is a matter of importance also when organizations screen the acceptable ones for their business partners.

When evaluating Orion on the basis of our first report, ESG analysts (environment, social, governance) gave comments and asked for more information, thereby also helping us study Orion with the eyes of an outsider. For the basis of further development of our sustainability reporting we have received constructive critic and valuable reference on what information should be added or characterized in more detail.

In GRI-based reporting, much emphasis is put on environmental affairs. Orion takes all efforts to see to it that the company's facilities and operations do not cause unnecessary environmental burden. Environmentally hazardous materials and substances are handled and treated in safe processes and in adequate facilities. Our emissions are under control and our relationships with both the neighbors and the environmental authorities are in place at every operational location. Our investments in machinery, equipment and buildings can often be characterized as environmental. To us the aspect of the upcoming new Finnish waste legislation, which is based on EU waste strategy, is justified: it is quite fair that the one who generates waste is also liable for it. This requires also us to rethink many things with a far-sighted view and adjust our material flows into an even more efficient mode.

In the common efforts to slow down climate change, Orion's role is mainly in actions to improve energy efficiency. The goals of the Energy Efficiency Program of the Confederation of Finnish Industries, EK, are challenging to reach, but personally I consider them so justified that we should strive towards them in any case. Constant improvement of energy efficiency is a must, simply because it is certain that the cost of energy will only increase.

Recently we started preparations for introducing an environmental system based on the ISO 14001 environmental standard in our pharmaceutical manufacturing operations. The effort is extensive, I admit, but I'm confident that it will help us towards more systematic practices in environmental affairs.

5 May 2011

Orion Group
Sustainability Report 2010

For Orion, the undoubtedly most important focus of attention and assurance is on product quality and the safety of the product to its user, the patient. In our company, the Quality Manual is the ground and the code which determines how functions and operations shall be arranged in order to ensure the quality and safety, as well as how we are improving them. Notably many of our operational practices are based on so-called GxP industry guidelines (Good Practices). The standard methods and practices determined in the Quality Manual and GxP throughout the chain of our operations are so elementary for our existence and business continuity that no separate company policy statements have been issued for the areas they cover.

In our opinion, product responsibility receives comparatively little attention in the GRI framework. This area is absolutely the most important one for Orion among the review aspects of corporate responsibility, with clear and ambitious performance objectives: Not only our own operations but also those of our partners must always be ready to welcome an inspector and, whenever inspected, demonstrate compliance with regulations and requirements so that no critical observations are entered in the audit reports by authorities and partners. Our tolerance of serious product defects is zero. So is the case for minor defects too, although here we must admit that so pure a zero level is very challenging to achieve.

1.2 Description of key impacts, risks, and opportunities

The risks of the Orion Group's operations are characterised in the Corporate Governance statement, accessible at Orion's corporate website at www.orion.fi/risk-management.

2. Organisational profile

Detailed information about the Orion Group's operations and operational scope can be found at Orion's website at www.orion.fi/en/orion.

2.1 Name of the organization and

2.4 Location of headquarters

Orion Corporation
Orionintie 1 A
FI-02200 Espoo, Finland

2.2 Primary brands, products and/or services

Pharmaceuticals
Active pharmaceutical ingredients
Diagnostic tests

5 May 2011

Orion Group
Sustainability Report 2010

2.3 Operational structure of the organisation, including main divisions, operating companies, subsidiaries and joint ventures

Proprietary Products:

Patented prescription drugs for central nervous system diseases, oncology and critical care, Easyhaler pulmonary drugs

Specialty Products:

Generic (off-patent) prescription products and self-care products

Animal Health:

Veterinary medicines and products for pets and production animals

Fermion:

Active pharmaceutical ingredients

Orion Diagnostica:

Diagnostic test systems for healthcare service providers and industry

2.5 Number of countries where the organisation operates, and names of countries with either major operations or that are specifically relevant to the sustainability issues covered in the report

Finland

Headquarters and administration in Espoo

Pharmaceutical manufacturing in Espoo, Turku and Kuopio

Active pharmaceutical ingredient manufacturing in Hanko and Oulu (Fermion)

Diagnostics manufacturing in Espoo and Turku

Pharmaceutical research centres in Espoo and Turku

Marketing: Espoo, Turku, Kuopio, Oulu and Tampere

Outside Finland

Marketing subsidiaries in 22 countries in Europe

Liaison office in India

2.6 Nature of ownership and legal form

Orion Corporation is a public company whose shares are listed on Nasdaq OMX Helsinki. At the end of 2010, the company had approximately 59,000 registered shareholders, of which 56,000 were households. Households held a little over 50% of the entire stock.

Details on the shareholder base are accessible at www.orion.fi/shareholder-base. Most of the data is updated on a monthly basis.

2.7 Markets served

The Orion Group operates in the pharmaceutical and diagnostics markets. Customers in these sectors include healthcare providers and professionals, consumers and other pharmaceutical companies. In healthcare, customers primarily include specialist doctors and general practitioners, vets, pharmacies, hospitals, healthcare centres, clinics and laboratories and their supply organisations.

5 May 2011

Orion Group
Sustainability Report 2010

Orion's products are available in more than a hundred countries. Finland is the main market area, contributing 27% of the net sales for 2010. The share of Scandinavia and rest of Europe of the net sales was about 50 per cent, and North-America and rest of the world about 20 per cent.

Outside Europe, Orion operates by granting marketing licenses to its products to other pharmaceutical companies.

2.8 Scale of the reporting organisation

The Group's net sales in 2010 amounted to EUR 850 million. International operations account to about 73 per cent of net sales.

At the end of 2010, the Group had 3,131 employees, of whom some 2,450 in Finland and 650 in the foreign marketing subsidiaries.

Net sales of the Orion Group by market area 2007–2010

EUR million	2007	2008	2009	2010
Finland	201.0	217.2	223.3	229.2
Scandinavia	97.4	101.2	101.6	114.0
Other Europe	234.8	244.0	274.7	292.2
North America	77.7	73.8	70.9	109.9
Other markets	69.0	74.6	101.0	104.6
Orion Group total	680.0	710.7	771.5	849.9

Key figures for 2007–2010

	2007	2008	2009	2010
Net sales, EUR million	680.0	710.7	771.5	849.9
International operations, EUR million	479.0	493.6	548.2	620.7
% of net sales	70.4%	69.4%	71.1%	73.0%
Operating profit, EUR million	192.0	185.0	207.0	254.2
% of net sales	28.2%	26.0%	26.8%	29.9%
Profit before taxes, EUR million	193.4	184.2	203.7	252.6
% of net sales	28.4%	25.9%	26.4%	29.7%
Income tax expense, EUR million	49.5	47.8	52.3	67.9
R&D expenses, EUR million	85.0	90.0	95.2	85.5
% of net sales	12.5%	12.7%	12.3%	10.1%
Capital expenditure, EUR million	35.3	56.8	60.4	39.2
% of net sales	5.2%	8.0%	7.8%	4.6%
Assets total, EUR million	565.7	695.5	727.1	745.8
Equity ratio, %	76.2%	60.2%	60.6%	62.7%
Gearing, %	-20.0%	-7.1%	-8.9%	-12.2%
Interest-bearing liabilities, EUR million	4.0	146.3	131.5	110.0
Non-interest-bearing liabilities,	130.5	130.6	156.5	168.4

5 May 2011

Orion Group
Sustainability Report 2010

EUR million				
Cash and cash equivalents, EUR million	90.4	176.1	170.5	167.2
ROCE (before taxes), %	44.8%	38.5%	37.4%	45.0%
ROE (after taxes), %	33.5%	32.1%	35.3%	40.7%
Personnel at the end of the period	3 176	3 309	3 147	3 131
Average personnel during the period	3 160	3 270	3 192	3 137
Personnel expenses, EUR million	241.5	260.5	274.8	170.3

2.9 Significant changes during the reporting period regarding size, structure, or ownership

Orion's current operational structure has been in place since the demerger in the summer of 2006, when Orion Corporation started as a new company specialising in pharmaceuticals and diagnostics. Net sales for 2010 were approximately 33 per cent higher compared with the 2006 pro forma net sales. In accordance with its strategy, Orion has expanded the geographical territory covered by its own marketing organization for pharmaceuticals by establishing own subsidiaries in an increasing number of European countries.

The total number of employees has increased by some 130 employees since the demerger in 2006. The most notable changes in the number of employees have taken place in the pharmaceuticals business where the number of Finnish employees has decreased, whereas the number of employees in the foreign marketing organisations has increased.

In the course of the past three years, the number of shareholders has increased by 60%, being close to 58,700 at the end of 2010.

	2007	2008	2009	2010
Number of shareholders	36 500	43 100	54 300	58 700

2.10 Awards received in the reporting period

The surface cleaning test *Orion Clean Card® PRO*, developed by Orion Diagnostica in collaboration with VTT (The Technical Research centre of Finland), was awarded with the innovation prize of Chemical Industry Finland in spring 2010. The test is a new-generation chemical test for assessing and monitoring surface cleanliness. The test card, which is manufactured by roll-to-roll printing, is simple and rapid to use. The surface to be monitored is simply moistened and wiped with the test card. The result is available immediately, as a colour change indicates if protein residues remain on the surface.

The innovation successfully combines chemical expertise with various materials and advanced printing technology. In its reasoning, the Scientific Advisory Board emphasized the innovation's multidisciplinary nature and the productive collaboration between the corporate and research sectors. The product has broad potential in the surface hygiene verification in fields like food industry and hospitals. The Chemical Industry Innovation Award is a biennial award to recognise outstanding achievement with industrial-scale applications. The sum awarded is 20,000 euros.

3. Report parameters

3.1 Reporting period for information provided

The reporting period is one calendar year. This report focuses on 2010. Comparative data is provided for 2007–2009.

3.2 Date of most recent previous report

The previous sustainability report by Orion Corporation was dated and published on 21 June 2010. The report was the first sustainability report of the company.

3.3 Reporting cycle (annual, biennial, etc.)

Orion Corporation plans to publish a sustainability report on an annual basis.

3.4 Contact point for questions regarding the report or its contents

The person responsible for report compilation at Orion Corporation is Anne Allo, Corporate Responsibility Officer, tel. +358 10 426 3735, e-mail: anne.allo@orion.fi. She is also the company's contact person for sustainability-related questions.

3.5 Process for defining report content

The indicators included in Orion's sustainability reporting have been selected, supplemented and specified in working groups for economic, social and environmental responsibility. Members of the groups were selected to well represent all the different expertises areas present in the Group. These groups also specified the calculation methods used in reporting. Materiality was assessed indicator by indicator also when setting up a data management system for GRI-based reporting. The reporting infrastructure was supplied by ToFuture.

The members of the working groups participated in workshops headed by consultants who specialise in sustainability reporting. The working groups determined the relevance and identified key stakeholders expected to use the report. The views formed in the workshops were presented to the sustainability reporting steering group, which made a further assessment and approved the prioritizing, principles and boundaries used in this report as well as the key stakeholder groups. The steering group consists of three members from Orion's Executive Management Board (i.e., Senior Vice President, Corporate Functions, Senior Vice President, Supply Chain, and CFO), Vice President, Quality Assurance, Vice President, Communications, Project Manager responsible for sustainability reporting and the Corporate Responsibility Officer responsible for the report compilation.

In sustainability reporting, Orion follows the GRI guidance, principles, terms, indicators, calculation methods and structure as closely as possible. Since GRI has not yet issued a Sector Supplement for the pharmaceutical industry, Orion has chosen the applicable meters and indicators from GRI standard disclosures and supplemented them with calculated and descriptive indicators derived from Orion's operations. These organisation-specific indicators are primarily related to product quality and product/patient safety.

5 May 2011

Orion Group
Sustainability Report 2010

Emphasis on product responsibility, patient safety and Orion employees

Due to the nature of Orion's products and the industry, Orion considers product responsibility as a primary concern in its corporate responsibility. As a manufacturer of pharmaceutical and diagnostic products, Orion emphasises the responsibility for product safety, even though responsibility and caring are an integral, uncompromised and natural part of everything we do at Orion. The Supply Chain organisation with all its operations is linked to product safety. Orion's basic mission is to build sustained well-being by providing products that promote health and quality of life and by providing guidance on the correct and proper use of Orion's products. Orion's support to patient organisations and the further training and coaching provided for healthcare professionals, in particular to doctors, nurses and pharmacy personnel, also largely falls in the scope of product responsibility.

Orion's social responsibility places emphasis on the company's employees. Orion employs highly educated professionals and wants to ensure that they are satisfied with Orion, their working conditions, work assignments and the way they are rewarded good work. Orion wants its employees to feel that they have opportunities for professional development and that their work is important for the society at large.

Orion's environmental responsibility places emphasis on materials use and energy

The environmental burden caused by Orion's production plants is relatively low. The processes are closed and represent up-to-date technology. In recent years, Orion has made significant investments in process technology and methods to increase the efficiency of use and treatment of chemicals. While these investments have helped Orion reach performance levels significantly better than the minimum levels required by the environmental permits, the company has also attained significant economic value added with more efficient, economic and smart use of materials which also helps minimise adverse environmental impacts.

As regards environmental responsibility, the key themes at Orion include the chemicals and other materials used as raw materials and excipients in pharmaceutical manufacturing as well as cost-efficient and environmentally friendly materials management. Also, a lot of packaging materials are used in the middle and end of Orion's supply chain operations.

Energy efficiency is subject to particular monitoring and development in Orion. Projects and activities are underway all over the Group to achieve savings both in terms of energy costs and consumption.

3.6 Boundary of the report

Orion's sustainability report principally covers Group-wide operations. Measurement data is gathered from each operational location and grouped according to the Group structure. All Orion units involved in manufacturing are located in Finland, which means that the calculation of indicators such as material flows and related responsibilities are based on the processes of Finnish units. The foreign offices of the Group are marketing or liaison offices that market the pharmaceutical or diagnostic products, mainly in the country they are located in, and almost all of their employees are involved in marketing except for a few employees working in support functions.

Orion provides relevant Group-wide information under the GRI indicators used in reporting. The following organizational groupings are used in the calculations:

5 May 2011

Orion Group
Sustainability Report 2010

Orion Group

Orion Corporation

- Pharmaceutical operations Espoo
- Pharmaceutical operations Turku
- Pharmaceutical operations Kuopio
- Subcontractors for Pharmaceutical operations (when applicable)
- Foreign Orion Pharma and Orion Diagnostica marketing subsidiaries

Orion Diagnostica

- Diagnostics operations Espoo
- Diagnostics operations Turku
- Subcontractors for Diagnostics operations (when applicable)

Fermion

- Pilot plant Espoo
- API manufacturing Hanko
- API manufacturing Oulu

3.7 Specific limitations in the scope or boundary of the report

Foreign subsidiaries are not included in environmental performance indicators. Also part of the data showing structural information about the employees is limited due to insufficient data for the subsidiaries. Due to the relatively small size of the offices, their impact on the total performance is, however, minor.

3.8 Basis for reporting on joint ventures, subsidiaries, leased facilities, outsourced operations, and other entities that can significantly affect comparability from period to period and/or between organisations

Certain indicators have been reported with more accurate figures than in 2009. The report does not include such new items as would affect the comparability of the data reported for the previous years.

3.9 Data measurement techniques and the bases of calculations

Orion uses the applicable calculation principles of the GRI guidelines in its sustainability reporting. The measurement techniques and calculation methods are described in more detail for some indicators if the method is not otherwise clear or if it deviates from the GRI guidelines.

Some figures for years 2008 and 2007 may include some uncertainty because they may have been derived in a post-calculation when implementing the data system for sustainability reporting.

3.10 Explanation of the effect of any re-statements of information provided in earlier reports, and the reasons for such re-statement

The first sustainability report was published by Orion in 2010. The report covered the years 2007–2009. Thus, the report for 2010 is the second sustainability report published by Orion.

3.11 Significant changes from previous reporting periods in the scope, boundary or measurement methods applied in the report

No material changes have been made to the scope, boundary or measurement methods.

3.12. GRI content index

A comparison with the GRI guidelines and location of the disclosures in the Report is provided as a list of contents, on pages 4-12.

3.13 Policy and current practice with regard to seeking external assurance for the report

No assurance has been sought for this report from external assurance providers. Orion is further developing the coverage of its reporting as well as its data gathering and reporting systems to meet the requirements of external assurance.

4. Governance, commitments and engagement

4.1 Governance structure

The governance structure of the Orion Group is described in detail in both the annual report and the corporate website, at www.orion.fi/corporate-governance. Orion Corporation follows the Finnish Corporate Governance Code 2010 for companies listed on NASDAQ OMX Helsinki. However, Orion Corporation deviates from the Code's recommendation No. 22 concerning the election of members to the Nomination Committee, which can also include persons other than members of the Board.

The Code is available at www.cgfinland.fi.

4.2 Chairman of the Board of Directors

The Chairman of the Board of Directors of Orion Corporation is not an executive officer.

4.3 Independence of the Board of Directors

All Board members are independent of the Company and its significant shareholders in the manner described in recommendation No. 15 of the Finnish Corporate Governance Code.

4.4 Mechanisms for shareholders and employees to provide recommendations or direction to the highest governance body

The shareholders exercise their decision-making authority at the General Meeting of the Shareholders. According to Chapter 5, Section 5 of the Finnish Companies Act, a shareholder shall have the right to have a matter falling within the competence of the General Meeting dealt with by the General Meeting, if the shareholder so demands in writing from the Board of Directors well in advance of the meeting, so that the matter can be mentioned in the notice.

There is no representative of the employees in the Board of Directors.

A representative of the employees is present at the meetings of the Executive Management Board of the Orion Group. The employees select their representative annually.

Forums for employee interaction with Group management include the mandatory employer-employee procedures, a semi-annual Group-level consultation meeting and the annual meeting of an international European Works Council. The entire personnel of the Group have access to the Orion Group-wide intranet system which was upgraded and re-introduced in 2010, offering not only daily news flows but also versatile possibilities for mutual information sharing, discussion and collegial networking.

4.5 Compensation

The remuneration principles and the remuneration of the Board and Group management are described under the Corporate Governance section of the corporate website, at www.orion.fi/management-remuneration. The influence of the company's social and environmental performance on the management remuneration principles has not been determined specifically.

4.6 Processes in place for the highest governance body to ensure conflicts of interest are avoided

Members of the Board of Directors must adhere to the Section on Disqualification of the Finnish Limited Liability Companies Act. Disqualified members must inform the Board meeting before the matter in question is dealt with and must not participate in the consideration of the matter. Names of disqualified members are always recorded in the Minutes of the meeting.

4.7 Process for determining the qualifications and expertise of the members of the highest governance body

The Board of Directors is elected by the Annual General Meeting for a term of one year. The Nomination Committee's task is to prepare and present a recommendation to the Board of Directors concerning the composition and compensation of the Board to be elected by the Annual General Meeting. The committee's recommendations do, however, not obligate the Board of Directors to present its proposals to the AGM in line with the recommendations. The Nomination Committee prepares its recommendations observing the qualification requirements provided in the Companies Act and recommendation nr. 9 of the Finnish Corporate Governance Code.

According to the Companies Act, the following cannot be Members of the Board of Directors: legal persons, minors, persons under guardianship, persons with restricted legal competency and bankrupts. According to the Finnish Corporate Governance Code, the constitution of the Board must be such that it allows the Board to look after its responsibilities effectively. The constitution must also be considerate of the needs of the company and its current stage of development. The members elected to the Board of Directors must be sufficiently competent and able to assign enough time for taking care of their responsibilities. Both genders must be represented in the Board of Directors.

Members of the Audit Committee must be competent in the responsibility area of the committee, and at least one of the members must have expertise in accounting and bookkeeping or auditing.

4.8 Internally developed statements of mission or values, codes of conduct, and principles relevant to economic, environmental, and social performance and the status of their implementation

Orion builds well-being with its products and operations. The values of the Group (Mutual trust and respect, Customer focus, Innovation, Achievement and Quality, reliability and safety) unite Orion employees who produce products that promote well-being and health.

The values are a corner stone. In addition to them, every Orion employee is committed to follow the ethical standards and business practices determined in the Code of Conduct. They are the basic rules by which the employees play in interaction with each other and the stakeholders of the company, and with society and environment. The Code is available at www.orion.fi/code-of-conduct.

4.9 Procedures of the Board of Directors for overseeing the organisation's identification and management of economic, environmental, and social performance, including relevant risks and opportunities, and adherence or compliance with internationally agreed standards, codes of conduct, and principles

The Board of Directors monitors Orion's economic, social and environmental performance according to the same principles as other performance areas of the Group, which include the Group's risk management policy and insurance policy.

4.10 Processes for evaluating the Board of Directors' own performance, particularly with respect to economic, environmental, and social performance

The Board of Directors self-evaluates its performance and working methods annually.

4.11 Explanation of whether and how the precautionary approach or principle is addressed by the organisation

Risk management constitutes a significant part of Orion's corporate governance. The aim is to identify, measure and manage the risks that might threaten the company's operations and the achievement of the objectives set for the company. Overall risk management processes, practical actions and the definition of responsibilities are developed by means of regular risk identification approaches. Details of Orion's risk management are presented on the internet website at www.orion.fi/risk-management.

4.12 Externally developed economic, environmental, and social charters, principles, or other initiatives to which the organisation subscribes or endorses

Orion is a member of the international Responsible Care programme, which is a voluntary environment, health and safety initiative of the chemical industry. The objective of the programme is to promote operations that are in line with sustainable development, both from the social and environmental point of view. All participating companies are committed to developing their products and operations in a way that increases social well-being. The programme has participants from over 50 countries.

Orion is a member in the Energy Efficiency Programme launched by the Confederation of Finnish Industries, EK. Under the agreement, Orion aims to cut its energy consumption by 9% by

5 May 2011

Orion Group
Sustainability Report 2010

2016, compared with the 2005 level. This includes the consumption of energy, heat and fuels. Energy conservation achievements based on compromised quality of production or working conditions are not acceptable.

4.13 Memberships in associations and/or national/international advocacy organisations

The following industry associations and advocacy organisations are relevant to the Group, and Orion Corporation and/or its subsidiaries are members thereof:

- Chemical Industry Federation of Finland / Confederation of Finnish Industries, EK
- Pharma Industry Finland and its national sister organisations in countries where Orion has a presence
- EFPIA, European Federation of Pharmaceutical Industry Associations
- Helsinki Region Chamber of Commerce
- Turku Chamber of Commerce
- Environmental Register of Packaging PYR Ltd
- Finpro ry
- Association for Finnish Work
- Excellence Finland
- Sailab ry and its national sister organisations in countries where Orion Diagnostica has presence
- EDMA, European Diagnostic Manufacturing Association

4.14 List of stakeholder groups engaged by the organisation and

4.15 Basis for identification and selection of stakeholders with whom to engage

Multiple stakeholder groups being in interaction with Orion and its representatives are both affected by Orion's activities and can affect Orion's performance and operating conditions, directly or indirectly.

5 May 2011

Orion Group
Sustainability Report 2010

The stakeholders relevant in view of Orion's corporate responsibility have been determined in workshops of the specialist persons engaged in the reporting of sustainability at Orion. The list of stakeholders has been confirmed by the steering group for sustainability reporting, consisting of Group-level executives. Assessment criteria included reasonable expectations of stakeholder groups and their importance in relation to Orion's business operations as a whole.

Stakeholder groups which are important to Orion's business and to which Orion's corporate responsibility issues can be supposed to be of particular interest:

- Patients and consumers
- Orion employees
- Healthcare authorities
- Marketing and research partners
- Contract manufacturing principals
- Shareholders
- Customers (doctors, nursing staff, pharmacies, clinics, laboratories, research institutes, decision-makers in procurement organisations)
- Suppliers of goods and services
- Patient organisations, civic organisations
- Media, forums in social media
- Helsinki Stock Exchange and the Financial Supervisory Authority FIN-FSA
- Investors: financial entities, analysts, portfolio managers, investment advisors
- Job applicants, students, educational institutions
- Competition authorities
- Environmental authorities
- Other authorities

5 May 2011

Orion Group
Sustainability Report 2010

- Banks and insurance companies
- Neighbours

4.16 Approaches to stakeholder engagement

Orion engages with its stakeholder groups in various ways. Orion has not established engagement mechanisms focusing specifically on economic, social or environmental sustainability.

Internet and network-based solutions are increasingly important channels alongside traditional engagement methods, enabling quick and active interaction. For example, the public can use the feedback form on the corporate website to send messages in selected categories or to write free-form messages to Orion. We strive to respond to any feedback as quickly as possible. Orion aims to offer more interactive functionalities in its web based media attracting stakeholder groups into discussion.

5. Disclosure on Management Approach, DMA

The management approaches (DMA) are described separately for each indicator category alongside the performance indicators.

6. Performance indicators

EC – Economic Responsibility

Management approach of Economic Responsibility (DMA EC)

Orion's economic responsibility consists of producing economic value added for both shareholders and other stakeholders, such as personnel, customers and suppliers of goods and services. To this end, we develop our operations systematically, utilise our resources efficiently and manage risks. Corporate governance is also part of the economic responsibility of a public company, as well as open and regular communication about the development of our financial performance and the factors affecting it.

A good financial result is necessary to enable the Group to attend to also the other areas of corporate responsibility as a corporate citizen and ensure sustained operational continuity in the future. The better we manage our finances and are able to provide employment, the more the society will benefit of Orion's economic value added.

Most of the key figures related to economic responsibility are presented in Orion's consolidated financial statements, which are prepared in accordance with the International Financial Reporting Standards (IFRS). The corporate responsibility report refers to the statements without repeating the figures. We will present some key figures in accordance to the recommendations of the Global Reporting Initiative (GRI) here. The financial statements also provide information on Orion's current economic objectives and dividend policy.

Management of economic responsibility follows the general guidelines established in Orion's Corporate Governance Manual. They consist of clear definitions of responsibility, setting and monitoring of objectives and appropriately organised internal control. More detailed descriptions of Orion's corporate governance principles, risk management and internal control, are presented in Orion's regular financial statements and under the Orion section of the corporate internet website, at www.orion.fi/en.

Goals and performance

Orion aims for profitable growth whilst keeping business risks under control. Despite the challenging economic situation and the changes that have taken place in our business environment over the recent years, the Group has been able to grow steadily, make a good profit and pay good dividends to the shareholders.

Orion's net sales for 2010 grew by over 10% and operating profit by over 20% from those of 2009. Operating profit for 2010 was EUR 254.2 million (207.0 million for 2009), return on capital employed before taxes was 45.0% (37.4%). Dividends were paid EUR 1.20 per share, representing 91.6% (93.5%) of earnings per share. Of the good and stable financial result, Orion has also paid the taxes due regularly and on time. The Group has also always taken care of its

5 May 2011

Orion Group
Sustainability Report 2010

pension commitments in full. In the comparison of financial performance, Orion has been ranked among the best of the Finnish listed companies year after year.

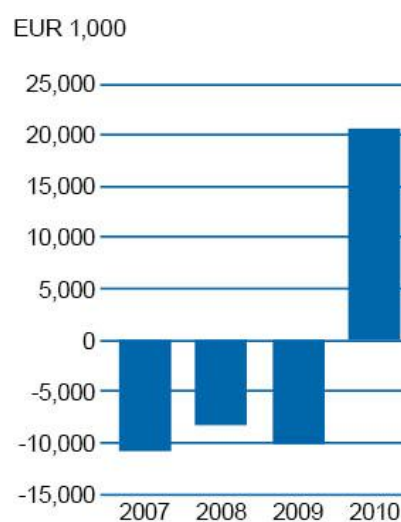
Long-term economic success of the Group requires continuous ability to ensure competitiveness and cost-effectiveness with right strategy decisions and enhancement of procedures, operational structure and product portfolio. Orion's growth is based on a competitive product portfolio, which the Group builds by active development of new drugs and diagnostics products in both Orion's R&D organisation and through wide-ranging cooperation with external parties. In 2009, Orion's R&D expenses totalled EUR 85.5 (95.2) million.

Orion's shareholder base is quite diverse. There have not been any major changes in the ownership structure, and no single shareholder holds a significant portion of the shares. The clearly largest shareholder group comprises of private Finnish individuals. Detailed information on the shareholder base is presented and updated on a monthly basis in the "Investors" section of Orion's website. As a public listed company, Orion fulfils its disclosure obligations diligently. The Group also actively develops its corporate communications, and aims to utilise different communication channels and tools in a versatile yet purposeful manner. Orion focuses on the good quality contents of its financial statements and website to provide capital markets and shareholders with up-to-date information about the Group's operations and performance. Orion also organises regular meetings with investors in various locations in Finland and abroad. A calendar for investors is accessible under the "Investors" section of the corporate website containing both past and up-coming investor events and roadshows, since 2006.

Indicators of Orion's economic performance

EC1 Economic value added generated and distributed to stakeholders

EUR million	2007	2008	2009	2010
Revenues	680.0	710.7	771.5	849.9
Employee wages and benefits	156.3	170.9	171.4	170.3
Operating costs	343.7	357.9	399.1	426.5
Payments to government (gross taxes and royalties)	49.5	47.8	52.3	68.0
Payments to providers of capital	141.3	142.2	158.7	164.2
Community investments	0.1	0.1	0.1	0.2
Economic value retained	-10.9	-8.2	-10.2	+20.7



The above calculation of economic value added generated and distributed to stakeholders uses the calculation method required by GRI and does not represent Orion's view.

5 May 2011

Orion Group
Sustainability Report 2010

Orion takes care of its economic obligations towards personnel, partners, owners and the society. As part of this responsibility, we are proactive and aim to identify and control the risks related to our operations and further development as well as possible.

Orion wants to ensure the economic sustainability of its operations over the coming years. The company has set objectives for profit development and financial position to ensure economic stability, create a solid foundation for long-term profitable growth and enable operations and profitability also in economically challenging times.

Orion is a company whose products are of significant social importance. Orion offers its employees the chance to develop, manufacture and sell products that promote well-being, health and quality of life, and offers a fair compensation and good employee benefits in return. The Orion Group employs 3,100 people of whom 2,450 work in facilities in Finland. Orion is one of the largest private employers in Espoo, Turku and Hanko. More than 650 employees are working in the foreign subsidiaries and representative offices, mostly in marketing and sales operations.

Orion employees pay national and regional taxes based on the salaries they receive from Orion. As a profitable company, Orion is a major tax payer: in 2010, the Group paid over EUR 70 (52) million in income taxes.

Orion partners with goods and service suppliers who share the responsibility values of Orion. Invoices for deliveries that meet the agreed terms, are paid by Orion in the agreed schedule. Correspondingly, Orion aims to minimise its own trade receivables which are overdue.

As a stock exchange listed company, Orion is anticipated to generate added economic value also for its shareholders. According to its dividend policy, Orion takes into account the distributable funds and the capital expenditure and other financial requirements in the medium and long term to achieve the financial objectives. Orion has been a stable dividend payer and has during the past years paid dividends with a payout ratio exceeding 90 per cent of the total annual earnings attributable to the owners.

EC3 Coverage of the Group's pension obligations

The Group has pension plans in accordance with each country's local regulations and practices. The Group has both defined contribution and defined benefit plans. In the defined contribution plans, the Group pays fixed contributions to separate entities, such as pension insurance companies in Finland, who manage the pensions. The Group has no legal or constructive obligations to pay further contributions if the recipient of the contribution is unable to pay the employee benefits. The Group's most important defined benefit pension plans are in Finland, where statutory insurance under the Employees' Pensions Act (TyEL) has been arranged through the Orion Pension Fund for the Group's clerical employees and supplementary pension security for some of the clerical employees. In addition, the Group management has defined benefit pension plans taken out with life insurance companies.

The Group's pension obligations are listed under Note 12 "Pension assets and pension liabilities" of Orion Financial Statements 2010. At the end of 2010, the Group's pension obligations totalled EUR 213.1 (184.5) million. At the end of 2010, the Group had a pension asset of EUR 31.6 (29.8) million from the Pension Fund and the Group has a liability of EUR 0.7 (0.8) million to other units.

Note 12 of the Financial Statements 2010 is accessible at <http://ar2010.orion.fi/en/financial-statements/consolidated-financial-statements-%28ifrs%29/notes-to-the-consolidated-financial-statements/12.-pension-assets-and-pension-liabilities>

EC4 Significant financial assistance received from government

EUR million	2007	2008	2009	2010
In Finland	2.5	3.1	2.0	1.5

Orion has received funding for its development projects from the Finnish Funding Agency for Technology and Innovation (Tekes). Tekes grants funding to Finnish companies and institutions to promote research, development and innovation as well as to share related risks.

The figures reported in EC4 are based on the Annual reviews of Tekes, and they contain both direct cash funding and project-specific loans. The annual reviews are available at www.tekes.fi >About Tekes > Annual review.

Summaries of the projects receiving Tekes funding are available at www.tekes.fi. Funding was received by Orion for prognostic models and technologies for accelerating pharmaceutical R&D processes. In the Tekes project lists, the currently ongoing projects are identified under the names Building up translational medicine framework-tools and workflows, Solubility and Permeability Enhancing Technologies and Uudet ennustavat tautimallit palvelemaan uusien syöpälääkkeiden kehitystä. Tekes funding received by Orion Diagnostica in 2010 relates to a business development program named *Customer loyalty through user interface*.

EC Donations

In 2010, Orion supported purposes of public interest with donations of over EUR 150,000. The main focus areas of the Group's gratuitous support include medical research, patient organisations and other associations promoting healthcare, defence and veterans, children and youth, education and culture. At Group level, UNICEF Finland (United Nations Children's Fund) is a prioritised charitable organisation receiving financial support from Orion. In addition to the direct cash donation, Orion sponsored UNICEF by donating 'Inspired gifts' every day between 1–24 December 2010, in connection with the season's greetings. The recipients of the greetings were also invited to give their own contribution the campaign.

In addition to the above, Orion donated EUR 43,000 to the Pink Ribbon Fund of Finland as one of the main sponsors. More about the sponsorship is explained under indicator PR6.

Information about Orion's collaboration with patient organizations is provided in the Sustainability section of the Group's website, at www.orion.fi/patient-organization-collaboration, as required by the ethical codes concerning marketing of pharmaceuticals.

EN - Environmental Responsibility

Management approach of environmental responsibility (DMA EN)

Goals and performance

Orion takes environmental impacts into consideration at every stage of product development and manufacture. At Orion, environmental matters are an important focus area in the company's safety policy, which emphasises consideration of the environmental impacts in the management, control and development of operations and requires that the environmental impacts of decisions and solutions are identified and that operations are developed to preserve the diversity of nature and that procedures for managing accident situations are established.

Laws, decrees and regulations set the minimum level for the management of environmental responsibility. However, objectives set at these minimum levels are usually not satisfactory for Orion. A higher target level can often prove more meaningful than the minimum level, also financially.

Orion's environmental activities encompass the following areas:

- Air protection
- Waste water
- Soil protection
- Waste management
- Recycling

As a policy, Orion considers the long-term environmental impacts when planning its operations, preparing for investments and at every stage of product development and manufacture. Orion expects good standards of managing environmental affairs also from its contract manufacturers, vendors and other partners.

Reduced production of waste in all forms is an important objective for Orion when minimising environmental impacts. Orion's objectives are aligned with the priority targets specified in the EU-level waste strategy, which are included in the new waste act entering into force in April 2012. These priorities include avoiding the production of waste by all means possible and recycling the produced waste materials. If waste cannot be re-used as material, it must be used in some other way whenever possible, such as an energy source. The amount of landfill waste is to be minimised.

The operations of Orion's manufacturing facilities for pharmaceutical preparations and active pharmaceutical ingredients require environmental permissions as specified in the Environmental Protection Decree of Finland. The environmental regulations and permissions are regional.

The primary objectives of pharmaceutical research for developing both new drugs and generics include not only clinically efficacious and safe drugs, but also quality and reliability. The methods applied in pharmaceutical R&D are mainly directed by the regulations of drug and health authorities. Their main purpose in turn is first and foremost to ensure that the applied research method yields as reliable a result as possible. Whenever possible, the most environmentally friendly option is selected.

Procedures

Focus areas in the management of environmental affairs at Orion include chemicals used in production and laboratories, consumption of energy and water, waste produced by operations and the environmental load caused by the company's products over their life-cycle.

Orion monitors the environmental impacts of its operations by, for example, measuring and calculating the volumes of chemicals, solvents and other substances, water and energy consumed and emissions to water and air as well as keeping track of waste and recording waste statistics.

The manufacturing processes of pharmaceutical products, active pharmaceutical ingredients and diagnostics products differ very much from each other, and accordingly, they also generate emissions and waste differently both in terms of amounts and type. Hazardous waste is produced especially from active pharmaceutical ingredients (API) processes, but also to some extent from the manufacture of pharmaceutical products. Fermion, which produces APIs by means of synthetic methods of organic chemistry, typically uses some 97% of the total solvents used by Orion, and the emissions of their volatile organic compounds (VOC) attribute to some 75% of Orion's total emissions to air. Fermion also produces the relatively largest amount of hazardous waste in the Group. The plants manufacturing pharmaceutical and diagnostics products in Espoo, Turku and Kuopio in turn produce non-hazardous recyclable materials and landfill waste.

Organisational responsibility

The management responsibilities of environmental affairs are allocated according to the operational structure of the Group. This means that the managers of each business division and line function are primarily responsible for the management of their respective environmental affairs. The focus areas and practices are mainly determined by the nature of operation of each division and function, relevant authority regulations and legislation and environmental risks related to the operation in question.

Business divisions and line functions are responsible for identifying the main environmental impacts of their operation and to develop their operations and activities in an environmentally friendly manner. They also draft division and location specific procedures for environmental damage and accidents, document the main tasks and activities that have an impact on environmental safety and issue guidelines for them as well as draft and maintain operating procedures for the collecting, processing and archiving of information related to environmental safety.

Each Orion employee is responsible for operating according to environmental principles in their daily work.

Training and awareness

Orion organises training to maintain and develop the personnel's awareness of environmental affairs and to encourage the personnel's commitment to Orion's environmental objectives. Aspects of environmental protection are included in training programs when appropriate and possible.

Supervisors have a special responsibility of ensuring that the personnel and new employees receive sufficient training on the safety procedures and environmental matters of the department and division.

Responsible Care programme and the Energy Efficiency Programme of the Confederation of Finnish Industries

Orion is a member of the chemical industry's global voluntary initiative Responsible Care, under which companies work together to continuously improve their health, safety and environmental performance.

Orion is also committed to the Energy Efficiency Programme launched by the Confederation of Finnish Industries, EK. Under the agreement, Orion aims to cut its energy consumption by 9% by 2016, compared with the 2005 level. This includes the consumption of energy, heat and fuels. Compromised quality of production or working conditions are not acceptable ways of reaching the goals of the program.

Orion is implementing its company-specific energy efficiency plan in accordance with action plans and goals set for each operational site. In general, the most challenging goals are those relating to electricity consumption, whereas those concerning heating energy are achievable more easily.

Orion's activities to adopt REACH and CLP legislation

Fermion is the part of the Orion Group that was most affected by the REACH Regulation concerning Registration, Evaluation, Authorisation and Restriction of Chemicals which induced new obligations, such as registration of all solvents and intermediate products imported or produced in amounts of at least one tonne per year. Fermion has already registered part of its substances. All chemicals covered by the REACH legislation must be registered by the end of May 2018.

Neither pharmaceutical products or substances used in them, nor diagnostic products are concerned by the requirements of REACH. These product groups are regulated and controlled by healthcare authorities, with special regulatory registration and authorisation procedures.

The renewed classification and labelling of chemicals according to CLP legislation (Classification, Labelling and Packaging of Substances and Mixtures) which entered into force in 2009, concerns the entire supply chain of Orion to a considerable extent. The purpose of CLP is to harmonise the classification and labelling system of chemicals within the EU to the principles recommended in the United Nations' GHS (Globally Harmonised System of Classification and Labelling of Chemicals). The idea of the GHS is to use the same principles in the classification and labeling of chemicals worldwide and to harmonise the rules and regulations on the transport, sale and use of chemicals.

In 2010, the classifications and of all the chemicals manufactured and used by Orion were re-assessed and renewed, and all the more than 1,200 substance-specific safety data sheets (SDS) were updated in accordance with CLP. Also the hazard and precautionary statements were re-written. In all operational units of the Group and throughout the entire supply chain the Group's units, the legislative changes became visible also in the new packaging labels of chemicals, with new hazard warning pictograms replacing the old ones.

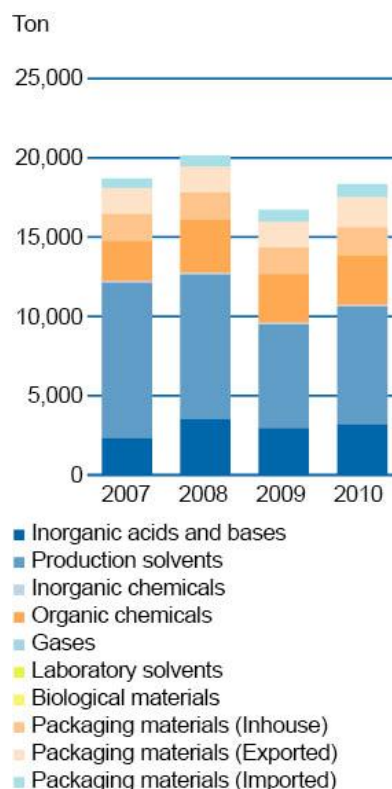
Due to REACH and CLP, the employees handling and dealing with chemicals have participated in a major educational training programme arranged by the EHS organization of the Group.

Indicators of Orion's environmental performance

Materials

EN1 Materials use, total materials

Ton	2007	2008	2009	2010
Inorganic acids and bases	2 322	3 493	2 963	3 204
Production solvents	9 808	9 138	6 528	7 409
Inorganic chemicals	82	110	105	100
Organic chemicals	2 532	3 372	3 072	3 140
Gases	3	5	4	5
Laboratory solvents	19	15	15	14
Biological materials	6	6	5	6
Packaging materials (Inhouse)	1 688	1 677	1 648	1 771
Packaging materials (Exported)	1 631	1 607	1 595	1 827
Packaging materials (Imported)	610	719	785	847
Materials use total	18 700	20 143	16 720	18 323



EN2 Percentage of recycled input materials of total materials used

*)Production solvents include the following amounts of regenerated solvents:

	2007	2008	2009	2010
Regenerated solvents, ton	2 955	2 725	1 931	2 187
Share of total materials use, %	16 %	13 %	12 %	12 %

The above indicators on materials use include the substances and materials used by the supply chains for pharmaceuticals, active pharmaceutical ingredients and diagnostic tests (manufacturing, storage and transport to wholesalers) and R&D.

Almost all of the reported production solvents, inorganic acids and bases and organic chemicals are consumed by Fermion in its manufacturing operations. Close to half of the consumption of organic chemicals is by Fermion. Materials use is primarily dependent on production volumes of finished products but it is also affected by manufacturing process improvements and the amount of semi-finished products and intermediates delivered by external suppliers. Inorganic acids and bases are mainly industrial detergents used for the cleaning of the production lines and equipment.

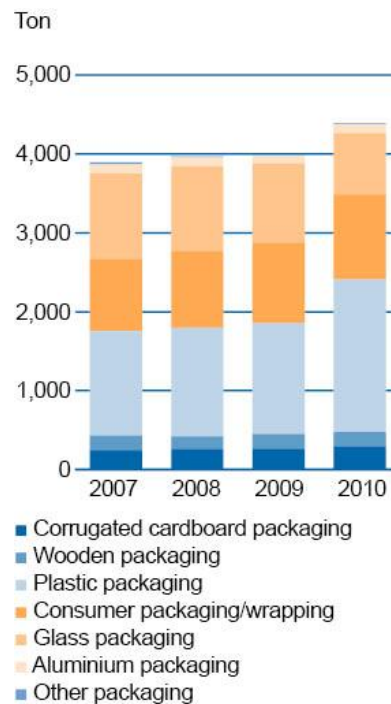
5 May 2011

Orion Group
Sustainability Report 2010

In 2010, about 3% or 211 tonnes of the total volume of solvents consumed were used in tablet coating phases and in the production of tablet masses. Orion has reduced the use of solvents and aims to reduce it even further by developing processes where water can be used instead of solvents when possible. In the materials economy of Fermion, solvents regenerated for re-use play a significant role.

Packaging materials

Ton	2007	2008	2009	2010
Corrugated card-board packaging	245	253	263	293
Wooden packaging	184	167	188	182
Plastic packaging	1 324	1 375	1 403	1 938
Paper fibre-based consumer packaging/wrapping	912	970	1 024	1 081
Glass packaging	1 087	1 076	1 001	775
Aluminium packaging	118	115	103	115
Other packaging materials	23	11	12	12
Packaging materials total	3 891	3 967	3 993	4 395



The materials used for different types of packaging account for approximately 25% of Orion's total material consumption. Most commonly used packaging materials include plastic, glass, board, corrugated cardboard and aluminium. Plastic and glass are most often used as so-called primary packaging materials, i.e., they are materials in direct contact with the medicine. Board and corrugated cardboard are most often used as secondary packaging materials which encase the primary package. Aluminium is used most in blister packages. It is also used in the collars of injection bottles and some cream tubes. A very thin aluminium film layer is contained in the bag protecting the Easyhaler inhalator in its retail package.

A high proportion of the waste generated in the warehousing and packaging stages is uptaken for re-use and recycling. Practically no landfill waste containing packaging materials is generated by the company's internal functions, thanks to the efficient and comprehensive municipal waste collection, handling and recycling infrastructure of Finland. Landfill waste from Orion's blister packaging lines decreased further in 2010, as Ekokem started to take blister packs, which contain plastics and aluminium, for incineration in its power plant. The plastic component is combusted into energy, and part of the very thin aluminium layer is recovered for re-use. Unfortunately, no sorting and recollection system is available yet for the blister pack waste from Finnish households.

Orion's EHS Specialist, Sirpa Pelttari explains more about the blister pack recycling arrangement in an article titled '[Savings through the sorting and recycling of waste](#)', one of

the 'Stories of responsibility' available in the Well-being Lounge website attached to the web version of the Annual Report 2010 of Orion, at <http://well-beinglounge.orion.fi/en>.

Safety and protection are decisive factors in packaging of medicines

Packaging solutions applied to medicines are highly influenced by the requirements of medicinal authorities, and they are primarily determined and dictated by safety aspects concerning the product and the patients. The medicine and the packaging material must be compatible in such a way that the safety of the patient is not endangered. No compounds shall be dissolved from the package into the medicine, and the package must not react harmfully with the medicine. The package must protect the medicine so that, when handled and stored correctly, its physical and chemical stability, consistency and durability remain unchanged and undamaged in the storing and transportation phases throughout the products entire useful life.

In addition to the product itself, the package must carry a substantial amount of regulatory information about the product. Package designers are working in collaboration with medicinal authorities to find an ideal solution for the primary package, observing the characteristics of the product.

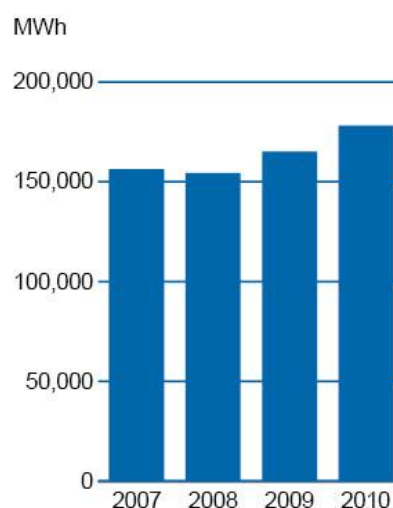
Naturally, also cost factors must be attended to in designing the package. It is neither in the favour of the manufacturer nor the patient if the medicine is sold under an unnecessarily expensive package. Also environmental factors are observed by Orion to the extent possible, although no particular policy has been determined for packaging purposes.

The quality requirements concerning packaging of pharmaceuticals are determined in the European, US and Japanese pharmacopoeias, among others. Guidelines are provided by the European Medicines Agency EMA, the US Food and Drug Administration, FDA, and the International Committee of Harmonisation, ICH.

Energy

EN3 and EN4 Direct and indirect energy consumption by primary energy source, MWh

MWh	2007	2008	2009	2010
Heavy fuel oil	11 800	10 800	12 000	13 000
Light fuel oil	483	465	539	488
Direct				
energy total	12 283	11 265	12 539	13 488
District heat	59 953	56 777	65 863	57 450
District heat + steam	14 919	15 598	15 489	-
Steam	-	-	-	34 930
Electricity	69 150	70 820	71 327	72 240
Indirect				
energy total	144 022	143 195	152 679	164 620
Energy total	156 305	154 460	165 218	178 108



5 May 2011

Orion Group
Sustainability Report 2010

The above table shows amended data for the previously reported years 2007–2009, as they have become more accurate in the course of 2010. The figures have been amended for the consumption of light fuel oil, district heat and electricity. District heat and steam consumption are reported as separate items as of 2010.

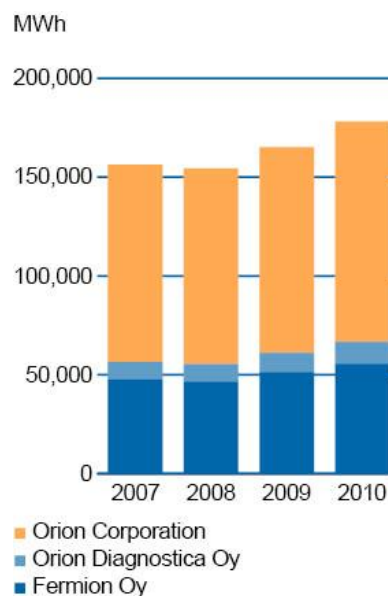
The Group's total consumption of energy in 2010 was 8% higher than in 2009. The share of indirect energy consumed by Orion's facilities was approximately 92% of the total, and the absolute consumption is increasing.

Direct energy is mainly generated by the boiler facility adjacent to Orion's manufacturing facilities in Espoo, which uses heavy fuel oil to produce heat energy which in turn is used to produce steam for the plants. The much smaller pharmaceutical plant in Kuopio has its own steam boiler which uses light fuel oil.

The combined consumption of district heating and steam energy grew by 14%, partly due to higher utility rates of the production facilities, partly also because of the colder and longer winter season than average in Finland. Total electricity consumption showed some further growth from 2009. Fermion used somewhat less electricity than in 2009, whereas consumption by other plants increased.

Total energy consumption by reporting unit

MWh	2007	2008	2009	2010
Fermion Oy	47 700	46 600	51 500	55 580
Orion Diagnostica Oy	8 722	8 794	9 669	11 090
Orion Corporation	99 883	99 065	104 049	111 438
Total	156 305	154 460	165 218	178 108



Total energy consumption of Fermion's chemical manufacturing plants for active pharmaceutical ingredients (API) in Hanko and Oulu came to 55,580 MWh in 2010, accounting for slightly less than one-third of all energy consumed by the Orion Group. Steam energy consumption was 32,000 MWh, or close to 60% of the total energy used by Fermion. The combustion facility built and operated by Ekokem Oy for the Hanko API plant, burns the solvent-containing waste gases of the plant. In 2010, the plant produced some 18,300 MWh of heat energy for Fermion's processes, thus considerably reducing the proportion sourced from Fortum.

EN5 Energy saved due to conservation and efficiency improvements, and

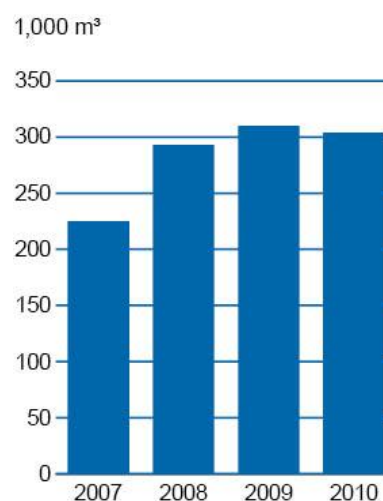
EN7 Initiatives to reduce indirect energy consumption and reductions achieved

Orion is a member of the Energy Efficiency Programme coordinated by the Confederation of Finnish Industries EK the aim of which is to cut proportional energy consumption by 9% by 2016 from the 2005 level. Actions for improving energy efficiency are underway at all operational locations of Orion.

Water

EN8 Total water withdrawal by source

1 000 m ³	2007	2008	2009	2010
Municipal water supply	225	293	310	304
Water withdrawal from other sources	0	0	0	0
Water withdrawal total	225	293	310	304
Water consumption total	225	293	310	304



Water consumption by reporting unit

1 000 m ³	2007	2008	2009	2010
Fermion Oy	69	90	101	104
Orion Diagnostica Oy	10	13	19	16
Orion Corporation	146	190	190	184
Total	225	293	310	304

Orion withdraws all the water it consumes from municipal water supplies. Total consumption of water in 2010 came slightly below the level of 2009. All reporting units have increased water consumption from the clearly lower figures reported for 2007. There are significant differences in the purposes and volumes of water consumption between the units and locations due to the differing characteristics of their facilities and operations.

Fermion's share is approximately one-third of Orion's total water consumption, and its water consumption has increased considerably in the past three years. This is consequence of the process technical changes implemented at Fermion's plants which enable the use of water instead of solvents but have led to increased water consumption. Fermion also uses a lot of water for cooling its processes.

In the production of pharmaceutical preparations, water consumption has increased due to the new gas scrubbers installed for capturing evaporated solvents efficiently. They use high amounts of water but have led to considerably decreased VOC (volatile organic compound)

emissions. Pharmaceuticals are manufactured in batch processes, and the operations must meet very strict purity requirements. The process equipment and lines are carefully cleaned with water after the manufacture of each batch so that no traces of any substances used in the previous batch are left behind. Thus, along with growing production volumes also the consumption of water increases. Water is also used as a substance in the composition of liquid solutions.

Orion Diagnostica has also increased water consumption in the past three years. A lot of water is consumed in the manufacturing phases of the main product, the QuikRead system, and the production and sales volumes of the product have shown strong annual growth.

Biodiversity

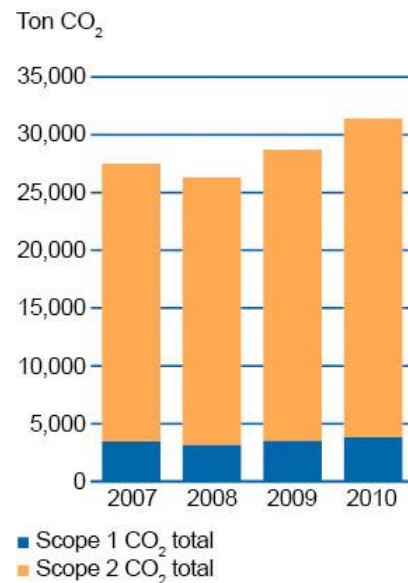
EN11 Location and size of land owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected area

Orion does not own or manage any land or real estate which are used in manufacturing and are of high biodiversity value, nor does Orion operate adjacent to any areas classified as such.

Emissions, effluents and waste

EN16 Total direct and indirect CO₂ emissions

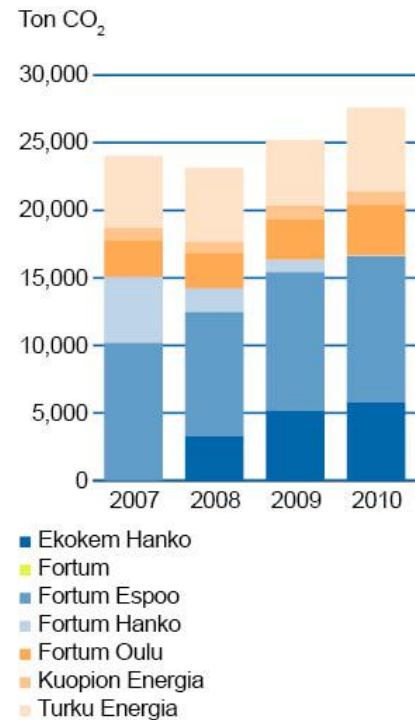
Ton CO ₂	2007	2008	2009	2010
Direct energy	3 442	3 157	3 513	3 818
Scope 1 CO ₂ total	3 442	3 157	3 513	3 818
Indirect energy	24 021	23 145	25 190	27 582
Scope 2 CO ₂ total	24 021	23 145	25 190	27 582
Scope3 CO ₂ total	0	0	0	0
Direct and indirect CO ₂ emissions total	27 463	26 302	28 703	31 400



5 May 2011

Orion Group
Sustainability Report 2010**EN CO₂ emissions of indirect energy**

Ton CO ₂	2007	2008	2009	2010
Ekokem VOC Hanko		3 294	5 197	5 801
Fortum	0	0	0	0
Fortum Espoo	10 193	9 143	10 212	10 768
Fortum Hanko	4 860	1 770	900	76
Fortum Oulu	2 710	2 597	3 021	3 756
Kuopion Energia	925	867	996	964
Turku Energia	5 334	5 473	4 864	6 218
CO₂ emissions of indirect energy total	24 021	23 145	25 190	27 582

**CO₂ emission coefficients g/kWh**

Energy supplier	2007	2008	2009	2010
Ekokem	NA	362.0	356.0	317.0
Fortum Espoo	320.0	300.0	290.0	270.0
Fortum Hanko *)	300.0	300.0	300.0	38.0
Fortum Oulu	282.3	282.3	282.3	321.0
Kuopion Energia	402.0	413.0	424.0	410.0
Turku Energia, district heat	363.7	356.0	310.0	341.4
Turku Energia, steam	330.0	330.0	330.0	348.7

*) The coefficient for Fortum in Hanko has declined to 10% of that for the previous years, after a new boiler plant was taken into use. Fortum started delivering energy with a new boiler plant in Hanko, whereby the coefficient declined to 10% from the previous years. The share of renewable fuels was 88% in 2010. The specific emissions of CO₂ have decreased to levels of 38 g/kWh per energy produced and 34 g/kWh per fuel energy.

CO₂ emissions have been calculated for Orion's direct and indirect energy consumption. Energy consumption and CO₂ emissions do not include the electricity consumption or heating energy of the foreign marketing subsidiaries. The CO₂ emissions from direct energy consumption were calculated based on the emission factors of the fuels. The CO₂ emissions from indirect energy consumption were calculated based on emission factors provided by energy suppliers.

The electricity supplied by Fortum to all units of the Group is produced by nuclear power and is practically carbon neutral. Electricity consumption in 2010 was approximately 72 GWh (indicator EN4).

The growth rate of Orion's total CO₂ emissions during the review periods is proportional to that of the consumption of direct (EN3) and indirect (EN4) district heat and steam. Most of Orion's CO₂ emissions from direct energy consumption originate from the boiler plant of the Espoo site, which produces steam. The boiler uses heavy fuel oil and produced a total of 13 GWh of energy

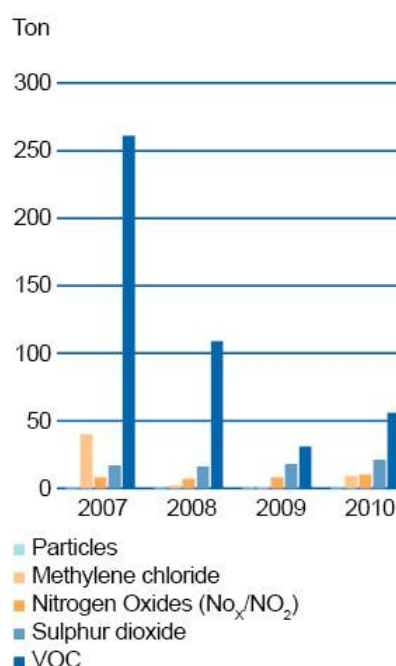
in 2010. The much smaller facility at the pharmaceutical plant in Kuopio uses light fuel oil. It produced about 0.4 GWh of steam in 2010.

CO₂ emissions in 2010 from indirect energy consumption totalled 23,207 tonnes, of which district heat and steam supplied by Fortum accounted for about 44%. In 2007, Fortum's share was almost 75 per cent. Since the VOC gas incineration facility owned and operated by Ekokem at Fermion's plant in Hanko started burning the VOC gases into heat energy, the corresponding purchases of energy from Fortum have reduced significantly. Today, most of the energy consumed by the Hanko plant is generated by the VOC plant, which thus also accounts for most of the CO₂ emissions of Fermion in Hanko.

Fermion's production plants in Hanko and Oulu accounted for over 40% of the total CO₂ emissions reported by Orion for 2010. The Group's facilities in Espoo and Turku accounted for about 28% each, and Kuopio for about 4% of the total.

EN20 Emissions to air

Ton	2007	2008	2009	2010
Particles	1	1	1	1
Methylene chloride	40	2	1	9
Nitrogen oxides (Nox/NO ₂)	8	7	8	10
Sulphur dioxide	17	16	18	21
VOC total	261	109	31	56



Sulphur dioxide and nitrogen oxides mainly originate from the boiler facility of the Espoo plants, which uses heavy fuel oil. The somewhat increased emissions were direct consequence of the increased fuel consumption.

Orion's VOC emissions to air have reduced radically from the levels of 2007 and 2008. Of the VOC emissions of 2010 over half came from the Oulu plant of Fermion. About one-third were from ethanol used as a solvent in the manufacture of tablet masses and in tablet coating processes at the pharmaceutical plants in Espoo and Turku. As explained under "EN1 Materials use", Orion has reduced the use of solvents and aims to reduce it even further by applying manufacturing processes which enable the use of water instead of solvents.

Since late 2007, the environmental permissions granted for of Orion's manufacturing plants have set much more stringent emission limits for VOC emissions than before. To fulfil these requirements, Orion has changed its processes and increased the efficiency of solvent recovery and the treatment of outlet air. Very stringent emission limits apply to dichloromethane (DMC or methylene chloride) and chlorinated hydrocarbons in general. Current environmental permissions require very efficient recovery of methylene chloride and as a result, Orion has stopped using it in pharmaceutical manufacturing. Small amounts are still used in laboratories, but no emissions of the substance are released to the air or elsewhere to the environment.

5 May 2011

Orion Group
Sustainability Report 2010

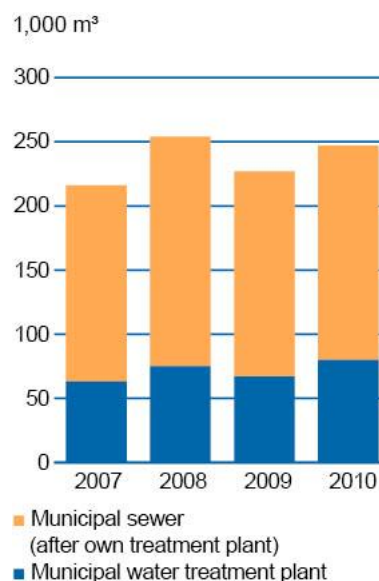
Fermion's challenges include methylene chloride, dimethylformamide and N-methylpyrrolidone, which have not been possible to replace in production as of yet. According to the VOC (volatile organic compound) regulation and the locally granted environmental permits, no more than 15% of the total solvents consumed by Fermion's Oulu plant are allowed to be emitted to the air. The corresponding upper limit for the Hanko plant is as low as 5%. To meet these requirements, Fermion took specialized VOC incineration plants into use in 2008 both Hanko and Oulu, whereby the emissions were brought under efficient control. Thanks to this technology, methylene chloride emissions went down to as low as 1.1 tonnes in 2009 from approximately 40 tonnes in 2007. In 2010, they turned to an increase, however, due to decreased treatment capacity of the VOC plant in Oulu. Despite this and the increased total consumption of solvents, the VOC emissions of the Oulu plant to air were no more than 2% of the total solvents consumed.

Solvents are relatively expensive. The solvents used in the manufacturing processes in Hanko and Oulu are regenerated by distillation for re-use. The Oulu plant uses the regenerated solvents in its processes, whereas the Hanko plant uses a major part of the distillate as a fuel in the VOC treatment plant, i.e., it is turned to energy for use by the API manufacturing processes.

The experience gained so far at Fermion's plants from the treatment and recycling of solvent VOC gases into energy are so good that an investment in corresponding technology is being prepared by Orion for the Espoo site.

EN21 Total water discharges by way of treatment

1 000 m ³	2007	2008	2009	2010
Municipal sewer (after own treatment plant)	63	75	67	80
Municipal water treatment plant	172	217	206	206
Total water discharges	235	292	273	286



No waste waters are discharged by Orion directly to natural waterways. All waste waters from Orion's facilities and plants are led to municipal water treatment plants either directly or after neutralisation.

The waste waters of Fermion's Hanko plant are first treated in a biological water treatment plant from which the treated water is conducted to the sea via the local municipal discharge pipe. Fermion's waste waters contain high levels of nitrogen, but most of the nitrogenous compounds evaporate as nitrogen during treatment.

Solids and substances with biochemical oxygen demand (BOD) or chemical oxygen demand (COD) are removed from Orion's waste waters in water treatment plants. Solid levels contained in Orion's waste waters are low, but the BOD and COD values are still unsatisfactory. Those

5 May 2011

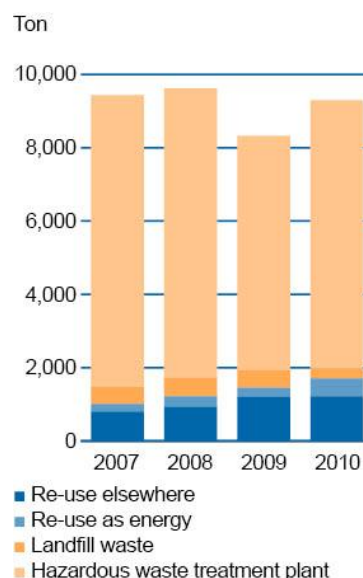
Orion Group
Sustainability Report 2010

reported for the Espoo site have, however, decreased from 2009. The levels of ethanol, a COD increasing substance and escaping through the gas scrubbers of the tablet coating processes to waste waters are monitored and reported by Orion to Finnish water authorities. The small levels of methanol, isopropanol and acetone in the waste waters are also monitored and reported.

Waste

EN22 Waste by disposal method

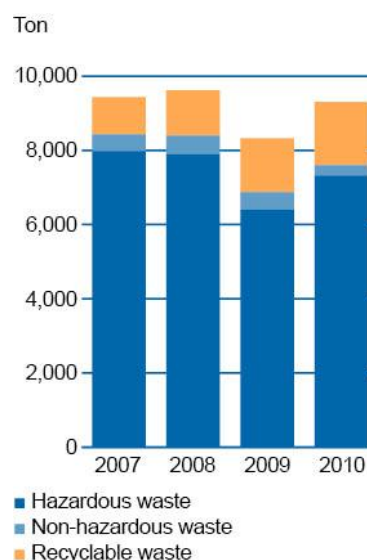
Ton	2007	2008	2009	2010
Re-use elsewhere	804	922	1 211	1 222
Re-use as energy	203	300	246	484
Landfill waste	465	497	473	271
Hazardous waste treatment plant	7 968	7 899	6 396	7 324
Waste total	9 440	9 617	8 327	9 302



EN22 Waste by type, and

EN24 Hazardous waste

Ton	2007	2008	2009	2010
Recyclable waste	1 007	1 221	1 457	1 707
Non-hazardous waste	465	497	473	271
Hazardous waste	7 968	7 899	6 396	7 324
Waste total	9 440	9 617	8 327	9 302



The amount of waste generated by Orion in 2010 increased by 12% from 2009 but was, however, less than in 2007 and 2008. The company was successful in its aims to reduce the amount of landfill waste. Waste delivered for re-use elsewhere was at the previous years' level. An increasing proportion of it is biological waste, the recollection of which has been enhanced at all Orion sites. Also the deliveries and the proportional amount of non-hazardous waste usable in energy production are increasing.

The nature of Orion's manufacturing operations and the composition of its products make most of the generated waste unsuitable or even hazardous for re-use purposes. Thus, incineration in efficient and sufficiently high temperatures at a hazardous waste treatment plant is the only

5 May 2011

Orion Group
Sustainability Report 2010

applicable means of re-using the waste as energy. Hazardous waste has accounted for about 80% of all waste on an annual level, and over 90% of all hazardous waste is generated at Fermion's plants. All the hazardous waste of Orion is treated at the Ekokem plant in Riihimäki. Most of all this waste is incinerated by Ekokem and turned to district heating energy.

Typical materials treated as hazardous waste include pharmaceutical waste, organic and inorganic chemicals and mixtures classified as hazardous or harmful, cytostatic waste, carcinogenic waste, batteries, fluorescent tubes, halogenated solvents, lubricating oils, oil-containing fabrics and filters, mercury waste, adhesive and paint containers and ashes from heavy fuel oil boilers.

The radioactive substances used by Orion Diagnostica in the manufacture of certain diagnostic products generate small amounts of waste which are treated and disposed of according to guidelines received from STUK. The waste is first left to decay and then disposed of as dry waste in landfills or at hazardous waste treatment plants, although not because of radioactivity but because of chemicals.

New waste act to enter into force in April 2012 in Finland

New legislation concerning waste is entering into force in April 2012, after a transition period of one year from the confirmation of the act. The new law is based on EU waste strategy with an aim to lead towards a more efficient and conscious recycling society that conserves natural resources and where:

- as little as possible is thrown away
- waste and renewable materials are re-used as such as raw materials or as products
- products are manufactured to endure and to be recycled using materials that can be easily and safely recycled
- waste is so valuable that only materials and goods that can be no more re-used in any way are regarded as waste.

The new legislation obliges holders and producers of waste to more far-reaching awareness and consideration of the environmental impacts of their operations. A considerable proportion of originator responsibility is allocated to the primary producer of waste, i.e. the manufacturer and importer of the product, compelling the design products in such a way that as little as possible waste is generated and that the resulting waste can be recycled. The law also directs to profound life-cycle planning of products and the materials used for them, underlining awareness of the end-of-life disposal of the materials and knowledge of what happens to them when the ultimate possibilities to use them are deployed.

Industrial originators of waste are required to record in their bookkeeping information on the amount of waste generated in proportion to the scope of their business. The purpose of this requirement concerning so-called specific waste volumes is that enterprises are aware of the amounts and the economic value of waste material generated in their processes and that they improve their processes accordingly. The law also involves more stringent regulatory monitoring and control procedures as well as pledges required from enterprises.

Also the concept of waste is re-defined in the new law: materials and objects previously classified as waste are no more waste but goods with further utility value. Waste is an extreme outcome in the material circulation, end product which is generated in very small amounts. The aim is to make waste so expensive that generating it is avoided as much as possible.

Products and services

EN Total production volumes by type of product

	2007	2008	2009	2010
Tablets, billion pcs	2.4	2.5	2.5	2.7
Injection products, million pcs	8.5	9.3	8.9	7.6
Gels and ointments, tons	486	560	369	562
Liquid preparations, 1,000 litres	403	404	389	360
Diagnostic products, tons	(NA)	507	564	600
API, tons	204	195	165	177

The product portfolio of the Orion Group consists of products in various forms. As there is no commensurate unit which can be used to measure total production volume, the above table representatively indicates total production volumes of typical types of product. Tablets in various forms are the most common pharmaceutical preparations produced.

The production volumes of tablets, APIs and diagnostic products increased in 2010.

The composition of the diagnostic products' portfolio has undergone significant changes in the past few years. Production volumes are increasing, along with the growing sales of the QuikRead test system, the main product. In summer 2010, Orion Diagnostica launched the QuikRead go® test system representing the latest in CRP testing and delivering the test result even more rapidly.

EN26 Initiatives to mitigate environmental impacts of products and services, and extent of impacts of mitigation

Orion has decided to take a major step forward in the management of its environmental affairs. In the course of 2011 the company is preparing to introduce an environmental system based on the ISO14001 standard at its pharmaceutical plants in Espoo, Turku and Kuopio. Orion's goal is to have the system certified by the end of 2012.

Over the recent years, Orion's main initiatives to mitigate environmental impacts have focused on the reduction of solvent emissions. These have already produced good results - not only have emissions reduced dramatically, but also significant cost savings have been achieved.

Orion has been able to increase sorting of waste as the collection services and further processing have provided purposeful means for this. Consumption of office paper has reduced significantly thanks to increased electronic documentation, more efficient version management and storing of documents. Default settings of printers have been set to economic modes. Use of paper is reduced notably also by the new system for research data management and by the introduction of an electronic maintenance system for regulatory documentation.

As a rule, operations are planned and managed in Orion in a cost and risk-conscious manner, whereby also environmental issues are considered as natural criteria of solutions and decision-making.

Changes in the supply chain operations of pharmaceutical industry tend to take a relatively long time to implement because the granted marketing authorisations are based on the manufacturing method presented by the manufacturer. If changes are planned to be made to the manufacturing method due to environmental reasons for example, each national drug authority having granted a marketing authorisation must be proven that the new method does not affect the product's efficacy or safety, and the marketing authorisations must be updated via a so-called variation procedure to reflect the changed manufacturing method.

Compliance

EN28 Monetary value of significant fines and total number of non-monetary sanctions for non-compliance with environmental laws and regulations

Orion has not been reported to have shown non-compliance with environmental laws and regulations during the review period.

Transportation

EN29 Significant environmental impacts of transporting products and other goods and materials used for the organisation's operations, and transporting members of the workforce

Orion does not report on indicator EN29 due to lack of a reliable method for assessing the environmental impacts of transporting the company's goods and materials and work-related travelling of employees.

Driver training of company car holders has led to considerable benefits

About 200 persons in Orion's service in Finland have a company car as an employment benefit. In its company car policy, Orion also emphasises low emissions, fuel economy and traffic safety.

The current policy accepts models with CO₂ emissions not exceeding 160 g/km. Cars exceeding this limit are still included in the fleet, but the average exchange interval being three years, they are gradually exiting. The total CO₂ emissions for 2010 of Orion's company cars were 10% lower than those for 2008.

Since 2009, Orion's company car holders have received training of more economic driving behaviour under the so-called EcoDriving concept. The results have become visible immediately and they are so good that all company car holders are required to take the course.

The improved driving habits have positive impacts on safety as well. This is dealt with in the context of the LA7 indicator.

An increasing number of company car holders have preferred a diesel engine instead of petrol. It is possible, however, that diesel models are less favoured in the longer run along with the progress of engine and hybrid technologies towards superior control of exhaust gas emissions and fuel consumption.

The amount of fuel consumed by Orion's company cars in 2010 decreased by as much as 13% from that of 2008. Due to the transition to diesel cars, the total consumption of petrol was cut to half, and in 2010 the consumption of both fuel types was almost 50-50.

5 May 2011

Orion Group
Sustainability Report 2010

As diesel fuel is somewhat cheaper than that of petrol, the transition to diesel together with the drivers' more economic driving behavior is reflected even more in Orion's economy: the fuel costs for 2010 were 22% lower than in 2008.

EN30 Total environmental protection expenditures and investments

	2007	2008	2009	2010
Environmental investments, EUR million	4.4	1.3	1.1	1.0
Environmental protection expenses, EUR 1,000	23	516	602	762
Environmental expenditures total, EUR million	4.4	1.8	1.7	1.8

The direct environmental investments and expenditures on environmental protection for 2010 consisted of a number of projects for improving energy efficiency, the use and recycling of materials and water and the management of waste and emissions. The actions taken have addressed buildings, machinery and equipment, and systems. The pharmaceutical manufacturing operations accounted for about EUR 1.2 million of the total, Fermion representing for 0.6 million. Expenditure on improvements of energy efficiency was about EUR 0.9 million. Orion Diagnostica's direct environmental expenditure in 2010 was comparatively low.

Orion made relatively significant environmental investments in 2007 to accomplish the strict requirements defined in the location-specific new environmental permits. The most important investments were made to reduce solvent and VOC emissions.

SO – Social Responsibility

The following performance indicator areas are included under Social Responsibility:

LA – Labour Practices and Decent Work

HR – Human Rights

SO – Society

PR – Product Responsibility

LA - Labour Practices and Decent Work

Management approach of Labour Practices and Decent Work (DMA LA)

Goals and performance

Orion is Finland's largest pharmaceutical employer and an international work environment for multi-talented people. Orion employs about 3,100 people. Some 650 of them work at the Group's foreign offices. Orion offers the chance to work in an international environment and provides versatile and challenging career opportunities for experts in different disciplines.

Our success depends on our ability to recruit professional people, develop and train their skills and keep them motivated and engaged in our goals and strategies. Orion needs a wide range of specialists in the fields of natural sciences, business, mathematics, technology, IT and the humanities. A big corporation has need and room for very different types of individuals. We want to include people from different backgrounds in our work community, because interaction between viewpoints offers fertile ground for innovation.

Orion wants to be an interesting and desirable employer. We foster our good employer image by looking after the professional development, working conditions and well-being of every Orion employee. We offer our employees a healthy and safe working environment and a smooth-operating working community. Employees are provided with opportunities for development and career advancement through career paths. We also ensure that our employees have the necessary skills to implement the Group's strategy.

We promote equality and justice throughout the Group by ensuring, e.g., that every employee has equal opportunities for success and development in their work and that the employees treat one another fairly. These objectives are recorded in Orion's Human Resources Policy, accessible at www.orion.fi/human-resources-policy.

5 May 2011

Orion Group
Sustainability Report 2010

Orion develops its operations in an uncomplicated and open cooperation with the personnel. In employee-manager relations, we strive towards flexible, unobstructed and open interaction so that questions that require answers or solutions can be processed quickly and constructively. Cooperation is done in a natural way in normal daily operations. The Group appreciates the work of trade unions and employee representatives and treats them with respect and openness.

Procedures

Orion ensures responsible operations in relation to employees and working conditions by adhering to the Group's shared values, the procedures and responsibilities specified in the Corporate Governance Manual as well as the approved Group Human Resources Policy. Orion's mission "Building well-being" reflects the Group's view towards the personnel: mental and physical well-being at work rewards both the employer and the employee. Orion encourages the employees' joy of accomplishment by supporting coping, development and satisfaction at work. An employee who is happy at work can in turn improve the well-being of the company and the working community.

In human resources management, Orion operates according to effective legislation, collective agreements, security regulations and other responsibilities. Orion's Human Resources Policy emphasises equality and fairness, constructive and unobstructed interaction between personnel and management, opportunities for further occupational development, rewards for good results and creating good working conditions and atmosphere for Orion employees.

Recruitment

Orion's resource planning ensures that the organisation has the required people and skills for the tasks derived from company-level objectives and that the required deputy and backup arrangements are in place to ensure uninterrupted operations. Already existing employees with suitable skills are considered first when seeking employees for new or open positions. As a rule, the job is first announced applicable for the own employees during at least one week in the Group's intranet. The job is announced applicable for public labour markets if no appropriate candidates are found from inside the Group. Job rotation is seen as a means for driving change and as an opportunity for professional development.

Equality

Members of the working community are responsible for treating everyone equally and fairly in daily operations and decision-making. Orion requires and expects that every member of our working communities and organisations acts fairly, not just those acting in a supervisory position. Everyone is responsible for maintaining and promoting a balanced working atmosphere, behaving appropriately and respecting others. Orion's working group for equality affairs supports and promotes all-round equality and fairness in the company. It also maintains the Equal Opportunities Plan for the Finnish operations up to date. The working group comprises representatives from all personnel groups and the employer. Both the supervisors and the employee representatives are responsible for taking action when problems are identified in this area.

Personnel empowerment

Orion considers employee opinions in the decision-making concerning human resources affairs and implementing human resources related decisions. Employee representatives principally take part in the work for preparing new practices or changes to existing ones. In addition to

5 May 2011

Orion Group
Sustainability Report 2010

mandatory employer-employee forums, Orion's management organises regular informal meetings with employees and employee representatives.

Employee representation in Group management is principally agreed with employees. There is one employee representative, nominated by the personnel groups, in Orion's Executive Management Board. The employee representative has no operative liability for the decisions made by the Executive Management Board.

Communication

Quick communication and easily accessible information related to work and working community motivates the employees and supports them in their daily work. In internal communication, Orion uses modern, network-based communication and documentation systems in Group-wide applications shared by all employees. The objective is to offer access to all information which can assist employees in their work.

Occupational health and safety

Most of Orion's industrial safety activities aim to prevent hazardous situations and occupational diseases and ailments. The company offers its employees more comprehensive occupational health services than those required by law. In major locations, Orion runs its own occupational health centres and in smaller facilities the health services are purchased from external service providers.

Rewarding

Orion encourages its employees to good results and long-term commitment by means of rewarding. Rewards must be handed out fairly and according to Group-level principles. Salaries and employee benefits are country-specific and vary depending on national legislation, collective agreements, industry, location and the salary levels of each country.

Monetary incentives and other employee benefits must be of sufficient level and scope to be of interest when compared with the market salary of each position. Personal salary is determined based on the complexity of duties and individual performance. When assessing an employee's individual performance, productivity, expertise, multiple talents, ambition to develop, initiativeness and cooperation skills are considered.

Training and awareness

Orion offers its employees training and coaching based on the Group strategy, business objectives and skill requirements of each individual position. Employees are encouraged to develop themselves by providing a wide range of development opportunities from one-day seminars to long-term training programmes and supplementary training periods. Other methods of development on offer include job rotation, mentoring, on-the-job learning and career path descriptions.

Managers in particular are responsible for ensuring that each employee enhances the required skills. Supervisors are also responsible for organising sufficient induction for new employees, those starting in new roles or those returning from extended absences. Managers are also responsible for ensuring that everyone in their organisation is familiar with Orion's strategy and objectives, the department-level objectives derived from them as well as personal objectives.

5 May 2011

Orion Group
Sustainability Report 2010

Means of developing supervisory skills include a Group-level training programme in which supervisors receive comprehensive training on the maintenance of good working atmosphere and resolving problems. Those in expert positions have their own training programme.

Performance reviews take place at least once every year. During the review, the supervisor and the subordinate agree on objectives and responsibilities and ensure that the employee has the required skills and motivation for the task. The review is also an opportunity for the employees to voice their development wishes and agree on a personal development plan where appropriate.

Orion looks after the occupational health of its employees through various activities to ensure, promote and improve every employee's ability to work throughout their working life.

Monitoring and follow-up

The Happy@Work survey is an important tool for monitoring the workplace atmosphere at both department and Group level. It helps us guide the further development of our working community and well-being at work. Everyone at Orion is invited to participate to the H@W survey. Each unit discusses the results of the survey during department or function level seminars, which also serve as an opportunity for deciding on common improvement objectives and agreeing on the best ways to reach them. In addition, the Executive Management Board defines the most important annual development targets for the entire organisation based on the survey results.

In the so-called 360-degree feedback, supervisors receive personal feedback from their subordinates, colleagues and their own supervisors. Experts receive 180-degree feedback from their supervisors and colleagues.

Orion's performance indicators concerning Labour

Employment

LA1 Total workforce

The Orion Group employs over 3,100 persons in locations across Europe. The workforce represents many nationalities and cultural backgrounds, but is unified by the common Orion business culture, shared values and operating practices. In the following tables under the LA1 indicator, the breakdowns are presented in amounts representing full-time-converted numbers of employees, not true headcounts. The figures are calculated with the same accounting principles as those applied in the Group's IFRS financial reporting.

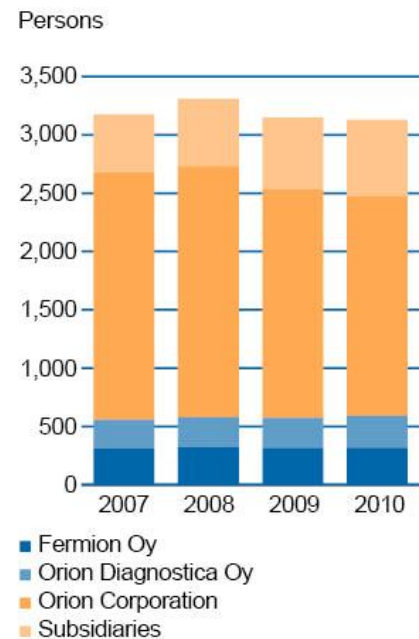
5 May 2011

Orion Group
Sustainability Report 2010**LA1 Personnel by reported organisational unit, converted to full-time employees**

Employees	2007	2008	2009	2010
Fermion Oy	307	319	310	318
Orion Diagnostica Oy	249	258	261	271
Orion Corporation	2 119	2 149	1 959	1 886
Subsidiaries	501	583	617	656
Employees total	3 176	3 309	3 147	3 131

Working hours

1,000 h	2007	2008	2009	2010
Actual	4 114,7	4 290,5	3 729,6	3 644,0
Theoretical	5 140,2	5 208,2	4 582,9	4 476,5

**LA 1 Geographic breakdown of employees**

Employees	2007	2008	2009	2010
Finland	2 675	2 719	2 529	2 475
Other Nordic countries	131	130	131	134
Germany	131	113	113	118
UK and Ireland	59	64	64	64
Russia	53	77	77	73
Other countries	127	206	233	267
Employees total	3 176	3 309	3 147	3 131

The total number of employees in 2010 was at a level close to that of 2009. Workforce in the sales subsidiaries and offices located in over 20 European countries is growing along with the increasing scope of their operations and enhanced product portfolios.

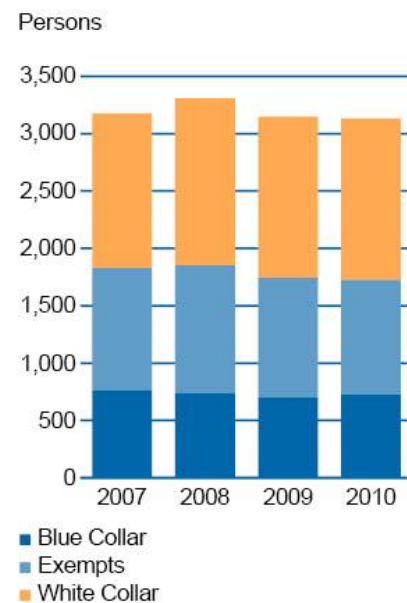
The above table 'Personnel by reported organisational unit' displays personnel numbers grouped according to the same operational structure as is used in the compilation of data for this Report. This grouping differs from that used in Orion's financial reporting, in which the numbers of employees are presented per business segment and division. The figures reported for subsidiaries include the foreign Orion Pharma companies for marketing pharmaceuticals and the foreign Orion Diagnostica companies for marketing diagnostic products.

Orion Corporation's personnel mostly comprises of employees working in pharmaceutical manufacturing, research and development, marketing, business support functions and in financial administration, corporate functions and management.

5 May 2011

Orion Group
Sustainability Report 2010**LA1 Headcount by employee category**

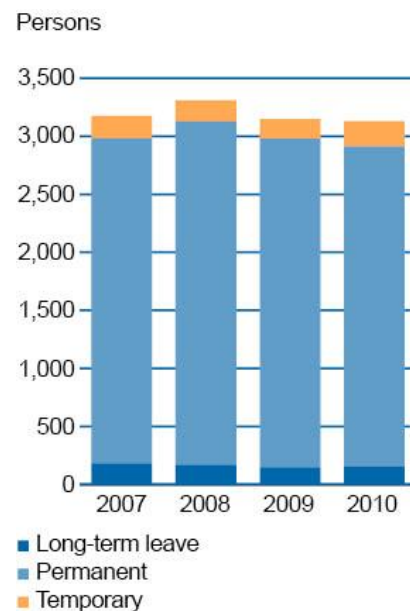
Employees	2007	2008	2009	2010
Blue collar	758	736	700	724
Exempts	1 070	1 117	1 043	999
White collar	1 348	1 456	1 404	1 408
Employees total	3 176	3 309	3 147	3 131



Approximately 77 % of Orion's total workforce in 2010 were clerical employees. White collars accounted for about 45% of the total workforce. About 32% were exempts, i.e. senior clerical employees, most of which working as supervisors or experts. Blue collars consist of employees mainly working in the Supply Chain organisation, in manufacturing, packing and warehousing of pharmaceutical products and diagnostic products at the plants in Espoo, Turku and Kuopio and the API manufacturing plants of Fermion in Hanko and Oulu.

LA1 Headcount by type of employment

Employees	2007	2008	2009	2010
Long-term leave	176	164	148	157
Permanent	2 806	2 962	2 830	2 755
Temporary	194	183	169	219
Employees total	3 176	3 309	3 147	3 131



An annual average of 6% of the total workforce are in temporary employment. In 2010 the share of temporary employees increased by one percentage points to 7%. The figures for 2010 are based on a new register of employees, and they are not directly comparable with the data for years 2007–2009.

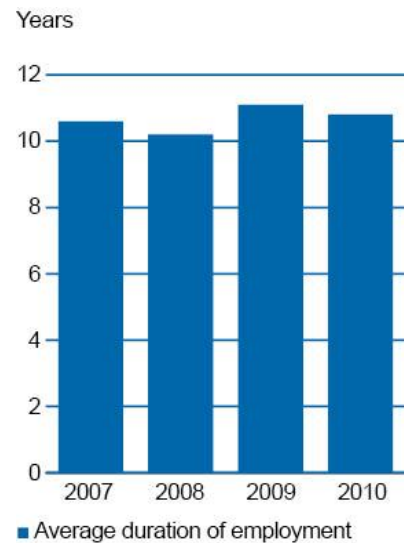
LA2 Employee turnover by employee category

%	2007	2008	2009	2010
Blue collar	6.1 %	5.5 %	2.0 %	4.0 %
White collar and exempts	4.2 %	3.2 %	2.3 %	2.6 %

Employee turnover is calculated as the ratio of resigned employees of the number of employees at year end.

LA Average duration of employment

Employees	2007	2008	2009	2010
Under 2 years	674	683	400	509
2-5 years	576	679	799	819
6-10 years	738	808	672	628
11-15 years	288	295	352	399
16-20 years	398	368	305	245
21-25 years	271	283	285	321
Over 25 years	303	320	313	317
Average duration of employment, years	10.6	10.2	11.1	10.8



The headcounts in the above table have not been converted to full-time employees.

Employment durations are typically relatively long at Orion. Of the 2010 personnel in Orion’s service, approximately 40 per cent of the employees had been working for the company for at least 10 years. Persons with a longer than 25 years’ working history in Orion accounted for about 10%. The average duration of employment was 10.8 years.

LA3 Benefits provided to full-time employees that are not provided to temporary or part-time employees

Orion employees in Finland, other Scandinavian countries and Southern European countries share the same employee benefits offered by Orion regardless of the length or the type of the employment contract.

In certain countries, benefits are available for full-time employees with a permanent service only, as follows:

UK & Ireland: life insurance for death in service.

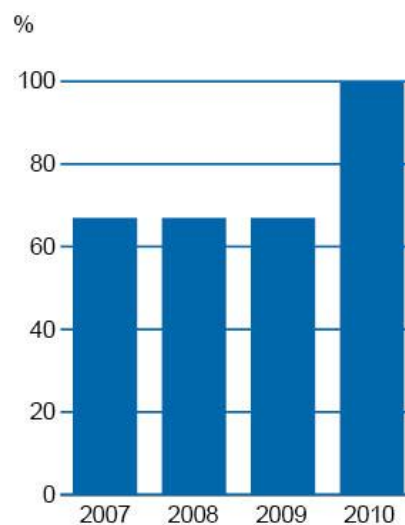
Central Europe: disability/invalidity coverage, maternity/paternity leave, retirement provision, and healthcare insurance.

CIS countries: life insurance, health care and maternity leave.

Labour / management relations

LA4 Percentage of employees covered by collective bargaining agreements

%	2007	2008	2009	2010
Blue collar	100	100	100	100
Exempts	0	0	0	100
White collar	100	100	100	100
Percentage total	66	66	67	100



Orion adheres to current employment legislation and the applicable collective bargaining agreements valid in the country the employee works in.

Until 2010, collective agreements have covered blue collar and white collar employees only. In spring 2010, also the exempts in Orion's Finnish locations came into the scope of collectively bargained terms under an agreement on their conditions of employment. Previously, collective agreements for exempts only covered salary increases, under a so-called common pay record.

LA5 Minimum notice period(s) regarding operational changes, including whether it is specified in collective agreements

The employment contract of each Orion employee specifies the notice period, which is at minimum the period specified in the national employment legislation and applicable collective agreements.

In Finland, when the employer terminates the employment contract, the notice periods are the following for all personnel groups:

Term of employment	Notice period
Max. 1 year	14 days
Over 1 year and max. 4 years	1 month
Over 4 years and max. 8 years	2 months
Over 8 years and max. 12 years	4 months
Over 12 years	6 months

Occupational health and safety

LA6 Percentage of total workforce represented in formal joint management-worker health and safety committees

In the Finnish locations of the Orion Group, all blue collars and white collars, altogether about 59% of the total workforce, are represented in the statutory health & safety committees consisting of representatives of both the employees and the management.

LA7 Absenteeism

Orion starts reporting total absenteeism as of 2010, while previously only absenteeism due to injuries was reported. Reliable data is not available for previous reporting periods.

Causes of and work time lost due absenteeism

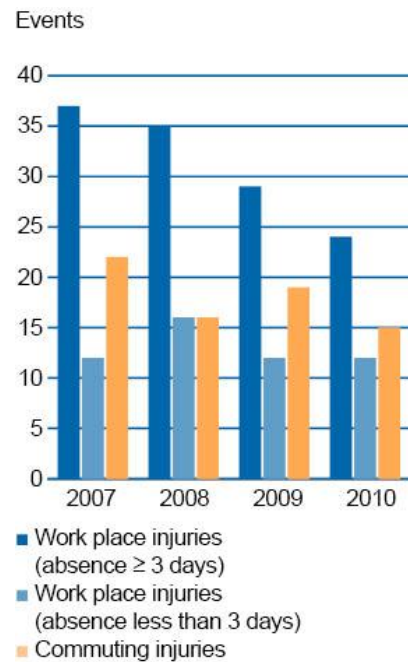
Work time lost, hours	2010
Paid sick leave	146 635
Unpaid absence from work due to child's illness	3 536
Unpaid absence from work due to illness	37 018
Paid absence from work due to child's illness	12 972
Work time lost due to injuries	4 979
<hr/> Total work time lost due to absences	<hr/> 205 140
Absentee rate due to illness	4.1 %
Absentee rate, all absences	5.0 %

Absentee rate due to illness is presented as the proportion of absence hours due to illness of the total regular theoretical working hours.

Absentee rate of all absences is calculated as the proportion of total work time lost of total theoretical working hours.

LA7 Injuries and fatalities

Injuries	2007	2008	2009	2010
Work time injuries causing absence of 3 or more days	37	35	29	24
Work time injuries causing absence of up to 2 days	12	16	12	12
Work time injuries total	49	51	41	36
Commuting injuries total	22	16	19	15
Injuries total	71	67	60	51
Injury rate	9.0	8.2	7.8	6.6



Work time injuries refer to employee injuries caused by accidents that occur during working time.

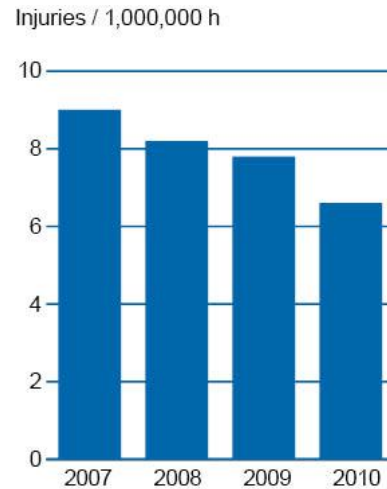
Workplace injuries include injuries caused by accidents that occur at the workplace or its area, or at an external working area outside the primary workplace.

Commuting injuries include injuries caused by accidents that occur when employees commute from home to work or vice versa.

The number of injuries causing absence from work indicates the level of occupational safety at the company.

Injury rate measures the number of workplace injuries per million working hours. It can be used to compare the injury risks of different industries, professional groups, etc. It is also referred to as the LTI Rate (Lost Time Injury Rate). In this report, injury rate includes workplace injuries which led to an absence of 3 or more days.

Injury Rate



LA7 Work time lost and absentee rate due to injuries

Hours	2007	2008	2009	2010
Total work time lost	2 152	3 736	2 888	2 827
Absentee rate in hours per million work hours	419	717	499	631

The figures include the work time lost due to workplace injuries having led to an absence of 3 or more days. The total work time lost indicates the seriousness of workplace accidents.

5 May 2011

Orion Group
Sustainability Report 2010

In 2010, the number of injuries that led to absences of three or more days decreased from 29 to 24 in Orion's Finnish locations. Overall injury rate has clearly decreased, but work time lost due to injuries has increased both in absolute and proportional terms.

Orion's accident statistics are, however, very good in comparison with the averages of the Responsible Care programme based on statistics that cover 104 chemical companies and their 20,000 employees in Finland. According to the annual report on the RC program published by the Chemical Industry Federation of Finland in April 2010 at <http://report.chemind.fi/rcohjelmankattavuus>, there were 10.8 (9.6) accidents per million working hours in the companies participating in the programme. This is 13% more than in 2010. As many as 1,008 (942) hours of work time were lost per million working hours. This is 7% more than in 2010.

In the parent company Orion Corporation, comprising pharmaceutical operations in Espoo, Turku and Kuopio and the head office, injury rate decreased from 5.2 to 3.5. In Kuopio, no absences were reported on events at workplace. Most incidents were mild to moderate and were caused by tripping and slipping as well as scratches and wounds. No injuries were caused by chemicals and sudden physical strain. The longest single absence took 84 work days, caused by an accident in which a maintenance mechanic's fingers were wounded seriously.

Fermion had only one injury case more than in 2009, whereas the work time lost due to injuries increased by one-third from the previous year. Two cases of the total were caused by chemicals.

In Orion Diagnostica, the number of injuries decreased, but here the work time lost due to them was as much as three times higher than in 2009. Serious personal damages were avoided completely. Recovery from an unfortunate incident can take a long time, like in the case of the person who stumbled on a wooden pallet and due to a wounded arm had to stay away from work over 60 days.

In 2010, less commuting injuries occurred to Orion's employees than in 2009 on their way to work or back home, or when travelling at work, but as much as 38% more work days were lost because of them. Commuting injuries and absenteeism were caused by, for example, two car accidents and several incidents with bicycles.

LA9 Health and safety topics covered in formal agreements with trade unions

Orion wants to provide its employees with a healthy and safe working environment and a smoothly functioning working community. Orion's occupational safety and well-being activities focus on the prevention of hazardous situations and occupational diseases and injuries.

Orion's employees are trained to the company's good safety and security practices mainly in work- and task-related training courses and by acquainting themselves with task-specific guidelines. The general guidelines and principles concerning corporate safety and safe working are provided in the Group's Corporate Governance Manual and in the Orion Security Guide. Group-level security instructions are complemented by more detailed function and location specific guidelines. The aspects of safety are also observed in the SOPs (standard operating procedure) defined in detail for tasks and work phases. It is extremely important for Orion that each employee can maintain their capability to work until retirement age, without exposure to health risks or hazards. Orion also emphasises the importance of each employee's awareness of those health and safety risks that are involved in their duties as well as of how to avoid them.

Orion aims to achieve a zero accident rate. To this end, we actively report and investigate accidents and hazardous situations, assess risks regularly and systematically, inspect the safety of the working conditions and working environment, improve the safety of processes and methods and organise safety training to enhance the employees' attitudes, awareness and alertness.

Occupational Safety Card is one of the most visible means of safety development. In 2010, some 70 per cent of the companies in the Responsible Care programme used the card. To date, 1,560 Orion employees have passed the Occupational Safety Card training course. Orion aims to have all laboratory and production employees trained for the card.

In 2010, the Group organised a total of 100 training occasions focusing on environment, health and safety for about 1,620 participants. In 2009, there were 71 corresponding trainings and 1,890 participants.

Driver training for safer traffic behaviour

In the context of the EN29 indicator, the good results from the EcoDriving courses arranged for the about 200 holders of company cars are discussed. Economic driving habits mean patience behind the steering wheel and ability to foresee risks. With these characteristics enhanced, the training programmes run hitherto have led to immediate economic savings and also less risky driving behaviour. In spring 2011, Orion's company car drivers received particular traffic safety training under a so-called SafetyDriving concept enhancing safe driving behavior and acquainting the driver with his/her car's safety systems and their correct use in acute situations of danger.

Orion's sales representatives spend a lot of time on the road in their daily work. Driver training organized by the company has not addressed all of them, however, because many of them prefer to use their own cars for driving at work. Also employees in some of the foreign subsidiaries have been offered driver training, but no systematic policy for doing so has been confirmed for the Group.

Comparatively few traffic accidents have occurred to Orion's employees with company cars. In both 2009 and 2010, one derailment took place. In 2008, three minor crashes and one derailment, but no persons were injured. In 2009, a sales representative of Orion's German marketing organization lost his life in a traffic accident in Germany.

Training and education

All employees in the Orion Group are entitled to training and development offered and arranged by the company regardless of the type or length of the employment.

5 May 2011

Orion Group
Sustainability Report 2010**LA10 Average hours of training per year**

Days	2007	2008	2009	2010
Average training days per employee	6.3	5.5	5.6	5.0

Thematic breakdown of training days

Days	2007	2008	2009	2010
GxP	1.3	0.6	0.6	1.2
Information management	0.7	1.7	1.3	0.4
Language and cultural interaction	0.3	0.3	0.1	0.2
Management	0.7	0.5	0.4	0.3
HSE	0.4	0.4	0.6	0.6
Other occupational development	3.0	2.0	1.9	2.0
Product training	0.3	0.1	0.7	0.4

The currently used reporting system used by Orion for the follow-up of training arranged for the Group's employees in various forms of learning opportunities does not allow the training performance to be reported in the way suggested for the GRI indicator LA10. For example, a specification of training hours by employee categories is not possible to provide. Some uncertainty is also included in the figures, as attendance to external courses and seminars has not necessarily been completely reported by the participants into the follow-up system.

LA11 Programs for skills management and lifelong learning that support the continued employability of employees and assist them in managing career endings

Orion encourages its employees' professional development and offers various internal trainings as well as training provided by third parties designed specifically for the needs of Orion and its employees.

Competence development is planned based on the Group's strategy and goals to determine the kind of competence needed for successful operations both at short and long term. The strategic focus in training is on leadership, management of partnerships and networking, and business understanding. The most effort and widest range of trainings focus on professional development. There is also a tailored training programme for specialists. A permanent focus is on enhancement of supervisory skills. Personal development of leaders and experts is supported by 360 and 180 degrees evaluations. Orion employees are also active in updating their competence e.g. in IT and quality assurance.

5 May 2011

Orion Group
Sustainability Report 2010

LA12 Percentage of employees receiving regular performance and career development reviews

%	2007	2008	2009	2010
Blue collars	-	-	85	83
Exempts	-	-	100	100
White collars	-	-	95	95

Performance reviews are conducted as a standard in the Orion Group. All supervisors have been instructed to organise personal performance reviews with their subordinates at least once a year.

In 2010, approximately 85 per cent of employees had a review session with their supervisors either in a face-to-face discussion or in a collegial group. No less than 95 per cent of white collars discussed their performance with their supervisor during 2010.

The performance review rate for the exempts was practically 100 per cent. Their session includes an assessment of performance in relation to the objectives set for the year in the previous review for the basis of the performance-based bonus system, and setting new personal targets with the supervisor.

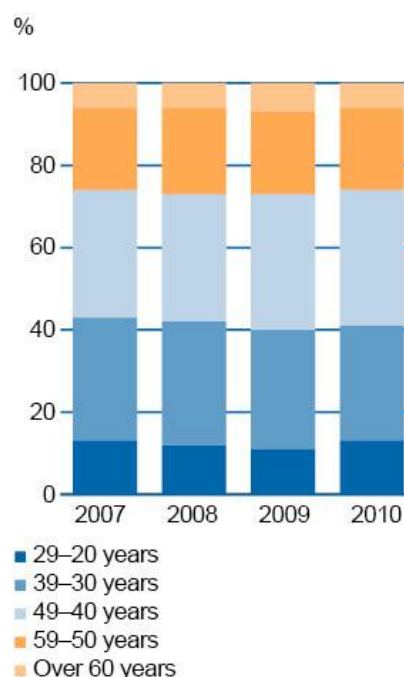
Diversity and equal opportunity

LA13 Breakdown of employees per category according to gender and age

The breakdown of Orion employees by age shows a relatively steady structure over the years under review. Approximately 75% of all employees are under 50 years of age. About 6% of employees have turned 60 and will reach retirement age in the near future.

LA13 Age structure of employees

%	2007	2008	2009	2010
Under 20 years	0.5	0.7	0.5	0.6
20-29 years	13	12	11	13
30-39 years	30	30	29	28
40-49 years	31	31	33	33
50-59 years	20	21	20	20
Over 60 years	5	5	6	6
Total, %	100	100	100	100



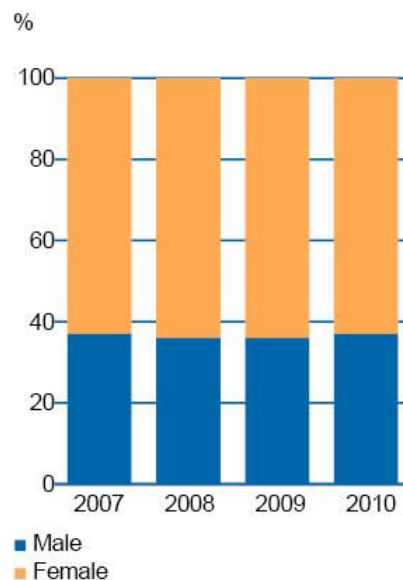
5 May 2011

Orion Group
Sustainability Report 2010

Women form the majority of Orion's total workforce: women represent approximately 63% of the total, one percentage unit less in 2010 than the average for the preceding years. In blue collars, the proportion of men and women is almost 50-50. The absolute and relative number of women is the highest among white collars, 71%. Of exempts, women accounted for about 62%.

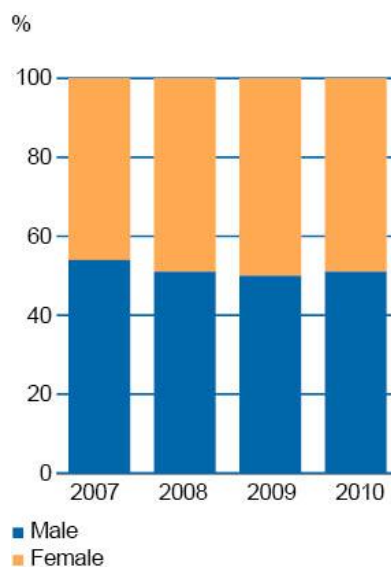
LA13 Gender structure, all employees

Employees (%)	2007	2008	2009	2010
	2 048	2 203	1 989	2 028
Female	(63 %)	(64 %)	(64 %)	(63 %)
Male	(37 %)	(36 %)	(36 %)	(37 %)
Employees total	3 248	3 436	3 127	3 238



LA13 Gender structure, Blue collars

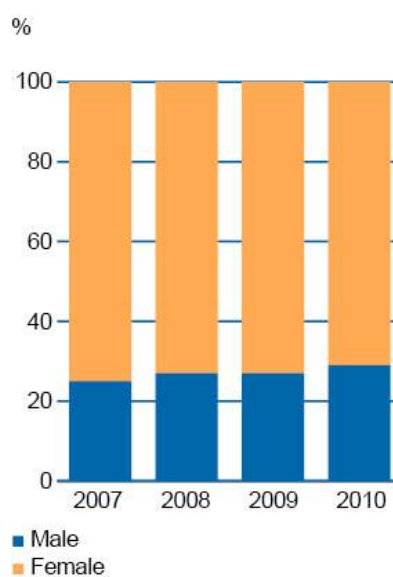
Employees (%)	2007	2008	2009	2010
	353	376	364	359
Female	(46 %)	(49 %)	(50 %)	(49 %)
Male	(54 %)	(51 %)	(50 %)	(51 %)
Blue collars total	773	764	726	740



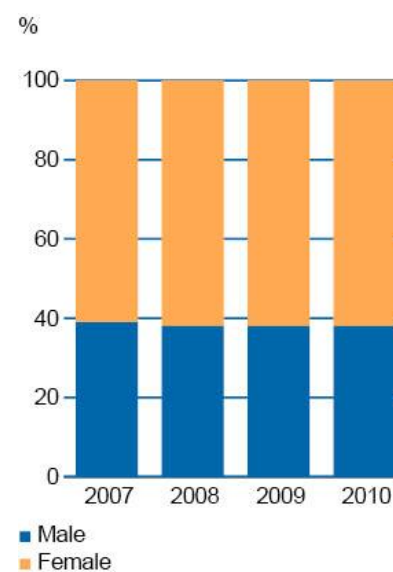
5 May 2011

Orion Group
Sustainability Report 2010**LA13 Gender structure, White collars**

Employees (%)	2007	2008	2009	2010
	1 006	1 097	914	1 000
Female	(75 %)	(76 %)	(73 %)	(71 %)
	333	406	341	414
Male	(25 %)	(24 %)	(27 %)	(29 %)
White collars total	1 339	1 456	1 255	1 414

**LA13 Gender structure, Exempts**

Employees (%)	2007	2008	2009	2010
	689	730	711	669
Female	(61 %)	(62 %)	(62 %)	(62 %)
	447	439	435	415
Male	(39 %)	(38 %)	(38 %)	(38 %)
Exempts total	1 136	1 169	1 146	1 084

**LA13 Gender structure by reported unit in 2010**

Employees (%)	Orion Group	Orion Corp.	Fermion Oy	Orion Diagn. Oy	Subsidiaries
	2 028	1 340	95	200	396
Female	(63 %)	(67 %)	(30 %)	(76 %)	(60 %)
	1 210	660	224	63	260
Male	(37 %)	(33 %)	(70 %)	(24 %)	(40 %)
Total	3 238	2 000	319	263	656

5 May 2011

Orion Group
Sustainability Report 2010

Orion Diagnostica represents the highest proportion of women with 76% of employees being women. One-fourth of them work as laboratory technicians.

The tables turn in Fermion, where 70% of employees were men in 2010. Male employees dominate the production processes in particular: as many as 95% of Fermion's process workers are men. The most common job title is process operator, and held by men only. At Fermion, women tend to work in laboratories and offices.

A clear majority of employees in the manufacture of pharmaceuticals and diagnostic products are women. Most common titles among them are packer and line operator. In quality assurance, laboratory technician is the most common title. Orion employs close to 150 laboratory technicians and most of them are women.

R&D is another area dominated by women. Close to 20% of all Orion employees work in R&D, and approximately 75% of them are women. Most common titles are research scientist and research assistant.

In sales, women are a clear majority; the gender structure in sales being similar to Group-level averages.

In administration, over 80% of employees in Corporate Functions are women. The Human Resources department and employee services are dominated by women. In finance and administration, however, there are only slightly more women than men.

All of Orion's 140 secretaries and assistants are women.

A supervisor's position was held by approximately 470 employees in 2009 and 46 per cent of them were women.

Gender structure of managers and supervisors in 2010

	Orion Group		Orion Corp.	Fermion Oy	Orion Diagn. Oy	Foreign subsidiaries
Female	223	46 %	146	7	22	48
Male	260	54 %	127	50	10	73
Total	483	100 %	273	57	32	121

LA14 Ratio of basic salary of men to women by employee category

Gender does not play a role when salaries are determined at Orion. In the Finnish operations, salary equality is assessed annually by means of a salary mapping method as specified in the Finnish Act on Equality between Women and Men. The outcome of the mapping is reviewed and assessed together by Orion's management and employee representatives and, when necessary, corrective measures are agreed on.

LA Job satisfaction

Throughout the 2000s, Orion has placed special emphasis on human resources management and supervisory work. Results of these efforts are monitored by means such as the *Happy@Work* surveys conducted annually with the Finnish Institute of Occupational Health. All Orion employees are invited to participate in the survey. In the national comparison, Orion's

management performance results have been clearly above the Finnish long-term average, and the results show that Orion is one of Finland's top companies in terms of good management.

The annual response rate of the Group-wide Happy@Work survey has been very high, around 85–90% over the past 3 years. In 2010, the response rate was 90%, the best in the history of the survey so far. The survey is conducted mainly on the web, with only a few units using paper forms.

The contents of the survey were revamped in 2009 to include themes considered important by Orion employees, such as how useful the employees consider performance reviews to be.

The results of Orion's Happy@Work survey in 2010 were consolidated with the new national "Better Workplace" index where Orion scored 14.1 against the average 13.7 for Finnish companies. Once again Orion employees ranked nearly all of the measured factors higher than the Finnish average.

LA Employee benefits

Orion's entire staff works actively to promote a good working atmosphere and a safe working environment. Orion wants its workplaces to be characterised by good management practices, encouraging colleagues and an atmosphere of confidence, all of which are important elements of well-being.

In their free time, employees can take part in the numerous activities of recreational clubs supported by the company and reserve accommodation in the company's recreation areas for its employees in several locations in Finland. Employees can use culture vouchers sponsored by Orion for sports and cultural activities. Gym and sauna facilities are available for the employees at Orion's premises in Espoo. High-quality workplace catering is one of the priorities. The staff shops in Turku and Espoo and the OrionNetshop on the web offer favourable purchasing opportunities to employees. Pharmaceuticals are, however, not included in their product selections.

Occupational healthcare services provided by Orion are more comprehensive than those required by law, with an aim to secure a healthy and safe working environment, as well as a well functioning working community. Most of Orion's occupational safety and well-being activities focus on prevention.

Health checkups are performed by age group to evaluate occupational fitness and the need of measures to promote it, such as "shape-up" courses sponsored by the company. Systematic assessments of the workplace and risks are carried out to continuously develop working conditions.

Building well-being at work

In the project Building well-being at work initiated in Orion in 2010, uniform operational patterns are being evaluated and developed for Orion's operations in Finland to promote well-being at work and to enable better management of the risks of disability. The achievement of the goals will be monitored by the help of a variety of indicators, such as the replies received to the questions of the Happy@Work survey dealing with well-being at work, as well as with data on the changes in absences due to illness.

The project has already generated operational models for early support, treatment practices for the occupational healthcare for musculo-skeletal and mental disorders as well as a review of the management of ageing employees.

5 May 2011

Orion Group
Sustainability Report 2010

Read also the article '*Building personnel well-being*' accessible in the Well-being Lounge of Orion's Annual Report 2010 website, at <http://well-beinglounge.orion.fi/en> > Stories of responsibility.

In Finland, the development of well-being at workplaces has been adopted as a common mission by all major labour market parties. In March 2011, Chemical Industry Finland, which represents Finnish chemical industry employers, and three labour organizations (TEAM Teollisuusalojen ammattiliitto ry, Ammattiliitto Pro ry and Ylemmät Toimihenkilöt YTN ry) gave a start to a three-year collaboration project named Hyvää huomenta - Hyvää huomista! (Good morning - Good tomorrow!) with a purpose to enhance competence, prolong work careers, decrease absences due to illness and to increase productivity at all workplaces representing chemical industry. New aspects and ideas as well as concrete means and tools are being sought for daily work. A press release published by Chemical Industry Finland on 22 March 2011 explains more about the project, but regrettably, in Finnish only, accessible at <http://www.chemind.fi/tiedote?id=20632973>.

HR – Human Rights

Management approach of Human Rights (DMA HR)

Goals and performance

Orion respects human rights in all its operations and works towards eliminating any human rights violating practices from the Group's as well as its subcontractors' and suppliers' operating procedures. Orion is committed to the principles of the UN's universal declaration of human rights and the declaration on the rights of indigenous peoples as well as the ILO agreements, and expects the same from its partners as well.

Orion regards that every Orion employee and everyone involved in the manufacturing of Orion products has the right to be treated well and with respect by supervisors, subordinates and colleagues. Orion does not accept discrimination in any form. Orion acknowledges the right of indigenous peoples to their cultural and spiritual values. Orion does not condone or tolerate the use of child labour or forced or compulsory labour in any of its operations nor in any such operations of its subcontractors that are related to Orion's products.

Orion acknowledges that its employees are legally entitled to freedom of association and collective agreements. Freedom of association is considered a personal matter. Orion respects the legal rights of the employees and their representative organisations and treats them openly and honestly.

According to the Group's general principle of legal compliance, Orion honours binding collective agreements. This is also recorded in Orion's Human Resources Policy, which is part of Orion's mandatory Corporate Governance Manual.

As a rule, Orion requires that suppliers participating in the company's supply chains fulfil the requirements by Orion for responsible operating practices and principles. When selecting suppliers, Orion is especially critical towards so-called risk countries where there is a risk of possible human and employee right violations and/or use of child labour and where the national labour legislation is weak or weakly endorsed. In countries where a better position for the employees is ensured by the international labour norms and ILO's central labour agreements in particular than by the national legislation, Orion requires the supplier to conform to the ILO norms.

Organisational responsibility

Every manager at every level of the organisation is responsible for ensuring that the human rights principles are upheld and that the necessary steps re-taken without delay if they are violated. Orion also emphasises the personal responsibility of every Orion employee to ensure that human rights are respected in the workplace.

Training and awareness

All Orion managers receive training on human rights in the mandatory supervisor training and also in the trainings which focus on human resources policy and the procurement and investing principles of Orion. Employee rights, including freedom of association, are also discussed during supervisor training. As part of the Human Resources Policy, these rights are also regularly discussed in company-wide human resources information sessions.

Monitoring and follow-up

Orion monitors compliance to the human rights principles and reacts to any violation thereof with the same corporate governance practices as are applied to other corporate internal guidelines.

Orion controls the enforcement of the requirements set for its partners by performing reviews and by auditing the facilities of the product and service suppliers. Follow-up and auditing measures are in place to ensure the continuity and compliance of Orion's operations and to manage supply chain risks. Should an external party, which operates in Orion's supply chain, blatantly violate the human rights principles, international agreements or legislation, Orion would undertake corrective action and, in an extreme case, terminate the cooperation with such party and appoint a compliant supplier.

Orion's performance indicators of Human Rights

Non-discrimination

HR4 Incidents of discrimination and actions taken

Orion has no record of any violations of the discrimination ban.

Freedom of association and collective bargaining

HR5 Operations identified in which the right to exercise freedom of association and collective bargaining may be at significant risk, and actions taken to support these rights

There have been no violations of employee rights or collective agreements during the review period.

Child labour

HR6 Operations identified as having significant risk for incidents of child labour, and measures taken to contribute to the elimination of child labour

Orion has no operations where the risk for using child labour is significant. Orion has no record of any situations where child labour or forced or compulsory labour has been used in relation to its operations.

5 May 2011

Orion Group
Sustainability Report 2010

Forced and compulsory labour

HR7 Operations identified as having significant risk for incidents of forced or compulsory labour, and measures taken to contribute to the elimination of forced or compulsory labour

Orion has no operations where the risk for using forced or compulsory labour is significant. Orion has no record of situations where forced or compulsory labour has been used in relation to its operations.

Indigenous rights

HR 9 Incidents of violations involving rights of indigenous peoples and actions taken

No issues related to the rights of indigenous peoples have emerged in relation to Orion's business so far.

SO – Society

Management approach of Society performance (DMA SO)

Goals and performance

The practices and methods pursued by Orion to community relations, social and political relations, restrictions of competition and corruption are derived from the general principles of Orion's Corporate Governance Manual, according to which the operations of the Orion Group are based on compliance with valid laws and regulations issued there under as well as with ethically acceptable operating principles. This is the guiding principle also in the ethical standards determined in the Code of Conduct (www.orion.fi/code-of-conduct) which is meant to be followed by all Orion units and employees all over the Orion Group.

All community relations are based on open and honest communication, which considers both parties' justified expectations.

Orion accepts that reasonable gifts are part of normal business culture within the framework of legislation and ethically acceptable practices. Giving or receiving of bribes or any comparable benefits is unambiguously forbidden by the Orion Group.

According to the donation policy of the Group, when deciding on donations, it must be confirmed that each donation adheres to applicable laws and regulations and ethically acceptable operating practices.

The principal channel for Orion for influencing political decision-making is via relevant industry associations.

Orion does not support political parties or associations. Even though Orion as a company does not participate in the operation of political parties, Orion respects the legal right of its employees for political action, which is considered a private matter.

Orion adheres to current competitive legislation. Orion is in favour of fair competition and promotion thereof, and aims to ensure that the objectives of applicable competitive legislation are honoured in its operations. Orion strives to avoid any breaches of competitive legislation.

Legal and regulatory compliance is the cornerstone of all operations. Orion expects that every employee is aware of the legislation and regulations that apply to their work. It is the responsibility of managers and supervisors to ensure that up-to-date regulations are available and acknowledged.

Procedures

The divisions and organisations that form the Group are responsible for managing authority relations in those areas that fall in the scope of their operations and responsibilities.

5 May 2011

Orion Group
Sustainability Report 2010

When Orion wants to inform political decision-makers and authorities of its opinion, e.g. when new laws or regulations are being drafted, the company aims to do so via channels such as national and international industry organisations. Orion is a member of the following organisations: Pharma Industry Finland (PIF), the European Federation of Pharmaceutical Industries Associations (EFPIA) and Chemical Industry Federation of Finland, which is part of the Confederation of Finnish Industries EK. As the voice of business, regional and central chambers of commerce are also relevant channels for Orion.

When necessary, Orion's managers approach decision-makers directly. To be able to voice its opinion, the Group considers good and appropriate relations important, in particular with local decision-makers in the regions where the company has operational presence, relevant regulatory authorities and, most importantly, the national and municipal decision-makers and officials preparing decisions affecting the operating conditions of the healthcare industry.

As regards hospitality, Orion adheres to the principle of reasonable level.

Most of the annual donations made by the Group for purposes of public interest are based on the decision by the Annual General Meeting to donate part of the distributable assets of Orion Corporation to medical research and other purposes of public interest. The Board of Directors decides on the allocation of the donations.

As a pharmaceutical company, it is natural for Orion to support the work of patient organisations. Here, Orion applies the established industry practices, which have recently become increasingly transparent. As of 2008, Orion publishes on its website an annual summary of its collaboration with patient organisations, at www.orion.fi/patient-organization-collaboration.

Organisational responsibilities

At the Group level, the Executive Management Board is responsible for community relations.

Training and awareness

The practices and means related to community relations, social and political influencing, competitive legislation and corruption are dealt with in both the company guidelines and supervisor and expert training, induction of new employees and other training and information sessions where it is natural to discuss these issues. Guidelines and instructions are defined also in the Group's Code of Conduct.

The employees of the Orion Group are unambiguously instructed to refuse from giving or receiving bribes or any comparable benefit for the purpose of promoting the company's business or the throughput of its interests.

In addition to the principle of legal and ethical compliance specified in Orion's Corporate Governance Manual and the Code of Conduct, the Group also has established particular guidelines concerning competition law, which every Group employee is expected to adhere to. Orion organises training related to competitive legislation and agreements for all employees who are involved in making agreements or other tasks which may fall in the scope of competition law.

In addition, guidelines approved and binding Group-wide apply for agreements and documents signed in the names of the Orion Group companies. These guidelines are in place to ensure that all agreements are made with sufficient legal expertise and in writing, that agreements are approved at the appropriate decision-making level based on their scope and that only authorised signatories of the companies can sign agreements.

Orion's operations are very highly regulated by legislation and special regulations.

Orion organises various training opportunities for its personnel in areas related to regulatory compliance by means of courses, information sessions and self-learning. Also personal effort is required to acquaint with the provisions.

Monitoring and follow-up

Orion monitors legal and regulatory compliance in the same ways as those concerning internal guidelines. The company also reacts towards incompliance by applying the same procedures as are applied to breaches of other internal guidelines.

Orion's indicators of Society performance

Corruption

SO4 Actions taken in response to incidents of corruption

Orion has no record of incidents where the company or a company representative has been under suspicion of giving or taking any bribes during the reporting period.

Public policy

SO5 Public policy positions and participation in public policy development and lobbying

Orion's policies on influencing political decision-making and lobbying are described under the DMA of Society performance.

SO6 Total value of financial and in-kind contributions to political parties, politicians, and related institutions by country

Orion does not support political parties, politicians or related institutions with financial contributions or other donations.

Anti-competitive behaviour

SO7 Total number of legal actions for anti-competitive behaviour, anti-trust, and monopoly practices and their outcomes

Orion aims to avoid any anti-competitive behaviour. Orion's performance in this respect is excellent.

Compliance

SO8 Monetary value of significant fines and total number of non-monetary sanctions for non-compliance with laws and regulations

Orion has not received fines or other sanctions for non-compliance with laws and regulations.

PR – Product Responsibility

Management approach of Product Responsibility (DMA PR)

Goals and performance

As a pharmaceutical company, Orion must ensure that the drugs developed, manufactured and marketed by it are proven to be safe, effective in the indications they are approved for, meet the quality requirements set for them as well as the needs of the customers and patients. As a manufacturer of diagnostics products, Orion is responsible for ensuring that the tests work as planned and produce reliable results of the patient's condition to support appropriate treatment decisions.

Orion maintains good readiness for required action in case significant adverse effects were identified or drugs or other products of improper quality were released for sales and distribution.

In pharmaceutical research and development operations, Orion follows the relevant legislation regulating these activities as well the ethical principles confirmed in the Helsinki Declaration

For these goals, Orion applies systems and procedures which allow the planning, implementation, monitoring and continuous improvement of appropriate operations.

Procedures

The key product responsibility principles for drugs and diagnostic tests are specified in the *quality manuals* approved by Orion's management. Critical operations are furnished with guidelines to manage activities and ensure quality.

Orion purchases the materials, consumables and tools required in product manufacturing from qualified suppliers. Raw materials and packaging materials for pharmaceuticals are inspected before approval to production.

Pharmaceuticals and diagnostic tests are manufactured according to good manufacturing procedures (GMP) and validated processes.

To ensure uncompromised product safety and quality, Orion inspects each manufactured batch to verify its quality before approval to sales. All materials, manufacturing and quality management phases as well as distribution phases are fully traceable.

For products contract-manufactured or developed for Orion by a third party, Orion ensures the regulatory compliance and performance of the manufacturer or the research service provider as well as the appropriateness of the manufacturing and research facilities by relevant agreements and regular audits.

Orion systematically collects information about the adverse effects of the drugs it markets and continuously assesses their safety profiles and risk/benefit ratios. When required, appropriate

5 May 2011

Orion Group
Sustainability Report 2010

action is taken based on this information to ensure safe use of the drug. Documents describing the properties of the drug to healthcare professionals and patients are updated as necessary and in cooperation with the authorities so that those taking or prescribing the drug have access to essential information required for safe use of the drug. In some cases, it may be necessary to withdraw a product from the market, for safety reasons.

Customer complaints of the drugs and diagnostics products are recorded for the basis of checking whether defective products have been released to the market despite the quality assurance procedures. This can be done reliably, thanks to the good traceability of materials and operations. When necessary, Orion recalls its preparations from the delivery chain and, depending on the severity of the defect, also from the consumers.

The product recall cases are carefully explored by Orion to identify the mechanism that caused the defect and to launch required corrective and preventive measures.

Organisational responsibilities

The authorisations and responsibilities as well as the management structure for product responsibility are specified and described in the quality manuals and more detailed instruction documents approved by Orion's management.

The organisation which is responsible for the quality of the drugs and diagnostic tests must be independent so as to be qualified to make decisions. The release the product for sale is exclusively subject to Quality Assurance, QA, which is an organization independent from the company's other functions.

Training and awareness

Thanks to their academic training and professional experience, the persons in charge are able to assess the situations and introduce solutions in the correct scale.

Other personnel have been instructed to escalate any adverse effect issues to the responsible organisation.

In addition to Orion's personnel, the operators who provide Orion's phone services have been trained to escalate any queries which call for urgent action and are made outside office hours to Orion's experts.

Monitoring and follow-up

Manufacturing and sales of drugs requires certain regulatory permissions. During the authorisation procedure, the regulatory authorities have ensured that Orion has the appropriate qualities for the operations and that each drug released by Orion meets the specified requirements.

For the part of outsourced products and research services, Orion confirms the manufacturers' and contract research organizations' qualifications and regulatory compliance as well as the adequateness of their manufacturing or research facilities with relevant agreements and by doing regular audits.

The pharmaceutical regulatory authorities (Fimea in Finland) and the regulatory authorities responsible for healthcare equipment and supplies (Valvira in Finland) monitor and assess Orion's research and supply chain operations in regular inspections. These inspections also assess the effectiveness of the procedures in place for the follow-up and processing of adverse effects and complaints and the readiness to withdraw a product from the markets.

Numerous international business partners also assess Orion's ability for regulatory and contractual compliance every year.

Orion monitors its operations with internal audits and management reviews and develops internal procedures systematically.

Counterfeit medicines pose an increasing global risk. Orion has not been affected by counterfeit products yet, but monitors the situation closely. By monitoring the situation, Orion maintains a readiness to react in case the legislation in this area changes.

Orion's performance indicators of Product Responsibility

PR1 Life cycle stages in which health and safety impacts of products and services are assessed for improvement, and percentage of significant products and services categories subject to such procedures

Practically 100 per cent of Orion's pharmaceutical products fall under the scope of PR1, and also the proportion of the full product range is very close to that.

Orion is responsible for monitoring the safety of every pharmaceutical product throughout the entire time the product is available on the market. No drug comes without adverse effects, but continuous monitoring and reporting to authorities help ensure that adverse effects do not surpass the drug's medicinal treatment benefits. Orion collects all the quality feedback received for its products from all the markets where the products are used and assesses the feedback systematically.

As the marketing authorisation holder, Orion is responsible for the quality and safety of its products to the Finnish Medicines Agency (Fimea), which according to the Pharmaceutical Products Act is the authority also inspecting pharmaceutical plants and their contract manufacturers. This also covers pharmacovigilance and premises of the marketing authorisation holder as well as the pharmaceutical R&D operations.

The product safety requirements of diagnostic tests are not as strict as those for pharmaceuticals, but the US Food and Drug Administration (FDA), for example, requires that queries are responded within certain time limits, i.e., the manufacturer has a monitoring obligation. The Finnish regulatory authority responsible for diagnostic tests is Valvira.

PR2 Total number of incidents of non-compliance with regulations and voluntary codes concerning health and safety impacts of products and services during their life cycle, by type of outcomes

Orion has no record of incidents of non-compliance with regulations and voluntary codes concerning health and safety impacts of its products and services during their life cycle.

PR Product traceability and product recall procedures

The key principles of product responsibility for pharmaceuticals and diagnostic tests are specified in Orion's Quality Manuals. All materials, manufacturing and quality control stages and distribution stages are 100 per cent traceable.

Traceability of products and operations

Orion maintains documentation systems which enable the traceability of all events, actions and results relating to the development, manufacture, quality or safety of medicines reliably and rapidly, independent of the means used for storing information.

Each medicinal product bears a code defining a single batch. By the help of the code, the correctness and propriety of the batch can be ensured. This traceability is of vital importance for finding out whether a mistake has occurred during the manufacture of a batch.

Also the diagnostic products are traceable by the help of the batch code all the way throughout the supply chain, from the materials to the finished product.

Product recalls

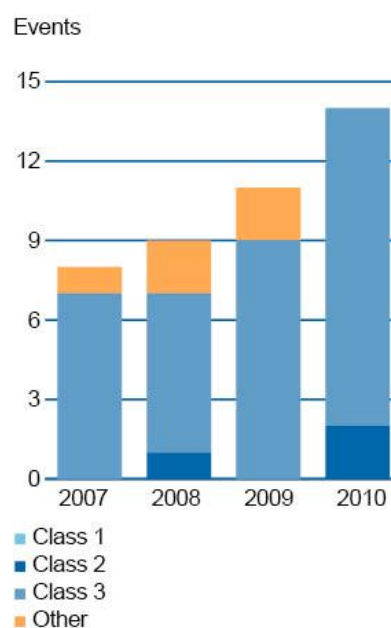
Medicinal products failing to comply with their specifications and which may cause harm to their users are recalled by Orion from the market. Depending of severity the case, medicines are withdrawn either from the wholesalers and retailers only or also from patients.

Orion has the systems in place to enable a prompt initiation of a recall procedure, and a prompt and accurate communication. The recall can be initiated also outside the business hours if necessary. The effectiveness of the recall procedures is tested regularly.

The criteria for product recall for diagnostic products are specified in the Quality Manual and the procedures in internal guidelines on customer complaints and hazardous situations caused to customers. The key guidelines are related to handling customer complaints, sales restrictions or recalling batches from the market. They also address country-specific guidelines, such as Warnings and Sales restrictions in Canada and Vigilance Reporting in the United States.

PR Product recalls and product defects

Events	2007	2008	2009	2010
Class 1 (critical)	0	0	0	0
Class 2 (harmful)	0	1	0	2
Class 3 (minor)	7	6	9	12
Class 4 (other defect)	1	2	2	0
Product recalls total	8	9	11	14



5 May 2011

Orion Group
Sustainability Report 2010

Defects identified in medicinal products are classified to critical, harmful or minor, depending on the degree of severity.

Class1 (Critical): product defects that are or may be life-threatening or pose a serious health hazard to users.

Class2 (Harmful): product defects that are or may be harmful to the users or may affect medical treatment, but which are not included in Class 1.

Class 3 (Minor): product defects not likely to pose a significant health hazard to the users, but where removal of the defective product from the market is otherwise justified.

Class 4 (Other defect): product defects which are not harmful and there is no need to recall defected products due to safety reason.

Orion has not had any Class 1 (Critical) product defect incidents during the years under review. In 2010, two medicinal product batches were withdrawn due to a packaging error of Class 2 (Harmful). Five medicine batches were withdrawn due to Class 3 (Minor) defects. Seven diagnostic product batches were also withdrawn due to Class 3 defects.

A few minor Class 4 (Other defect) product recalls have occurred each year. These have been caused by reasons like errors in the printed packaging material, deviations from the stability values specified, incorrect expiry dates, incomplete packages and leaking dose bags. In these cases, batches have been recalled from wholesalers and pharmacies, but consumers have not been invited to return the products.

Objectives set for quality

In the course of 2010, the units of the Orion Group have determined objectives for the quality levels of their products. Main metrics address product withdrawals from the market due to quality defects and critical observations reported by third parties in their audits of Orion's operations. As a standard, Orion wants to show uncompromised quality level in its operations and performance. Also the feedback from customers and consumers is followed up actively and translated to serving as a basis of monitoring operations.

PR Inspections of operations and sites

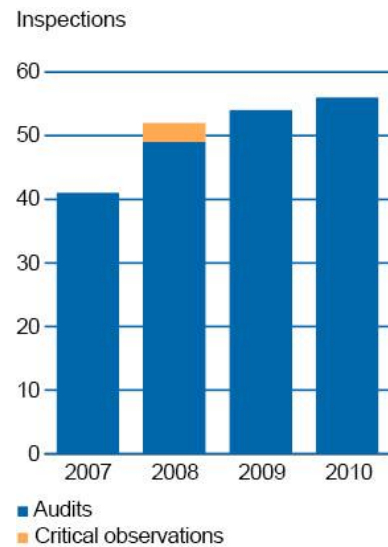
The guiding principles of the quality standards of Orion's entire supply chain are based on full compliance with the EU-regulated good operating practices in manufacturing, laboratories, and R&D, and efficiency and fluency of processes, product safety and consistent quality and high delivery reliability.

The adequateness and regulatory compliance of Orion's operations and facilities for the supply chain and R&D of pharmaceuticals, APIs and diagnostic products are inspected and audited both by regulatory authorities, customers, partners and contract manufacturing principals.

By making own inspections, Orion ensures that also external parties involved in its supply chain and R&D meet these requirements. Orion also follows up and monitors the implementation of actions to correct the defects identified in the audits.

PR Inspections of Orion’s operations and sites conducted by third parties

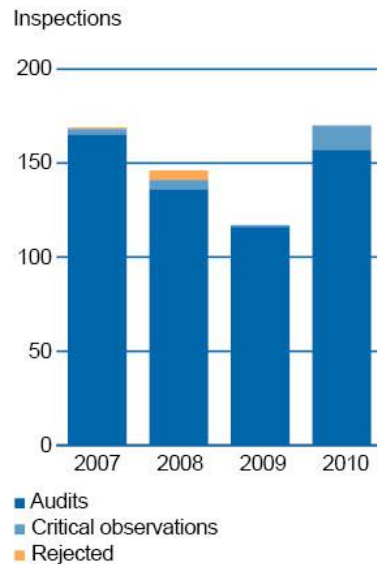
Inspections	2007	2008	2009	2010
Inspections total	41	49	54	56
Critical observations	0	3	0	0



Of the altogether 56 inspections made in 2010 at Orion’s sites, 21 were carried out by healthcare authorities. Altogether 7 of those inspections were made at the manufacturing locations in Espoo, Turku and Kuopio. Fermion’s plants in Hanko and Oulu had 4 and Orion Diagnostica one regulatory audit. R&D operations and facilities underwent 7 inspections by healthcare authorities. Orion’s customers and contract manufacturing principals conducted altogether 35 inspections at Orion. No critical observations were included in the final reports received on the inspections. Corrective actions were undertaken immediately to abolish the defects observed in the audits.

PR Inspections of material and service suppliers’ and contract manufacturers’ operations and sites conducted by Orion

Audits	2007	2008	2009	2010
Audits total	165	136	116	157
Observations	3	5	1	13
Rejections	1	5	0	0



Altogether 13 critical observations were recorded by Orion in its inspections of partners’ operations. Six of those observations addressed operations of two R&D service providers. Five of them were defects revealed in the clinical research practices of one CRO (contract-based clinical research organization), and one concerned a provider of packing and distribution services for investigational medicines. All the defects were abolished without compromising the safety of the research objects or the validity of the research results.

In inspections of service providers of information systems and management, 7 critical observations were booked. They were related to the service providers’ management, training

and operational instructions of their personnel, the documentation of systems infrastructure, risk management of changes and the administration of VPN certificates (virtual private network). Immediate actions were initiated by the service providers to correct the shortcomings.

The heaviest emphasis of audits conducted by Orion has been on API manufactures, suppliers of raw materials and materials, contract manufacturers, and organisations providing clinical research services to Orion. In 2007 and 2008, Orion conducted a notably high number of inspections and audits in the facilities of API suppliers and contract research organisations to assess their eligibility as contract partners.

Relatively few critical shortcomings have been identified by Orion during these audits because agreements are made with partners only if they meet strict selection criteria and because regulatory authorities also ensure their compliance by audits.

Product and service labelling

PR3 Type of product and service information required by procedures, and percentage of significant products and services subject to such information requirements

Pharmaceutical products can be sold and used only under a product-specific marketing authorisation granted by a pharmaceutical regulatory authority. A marketing authorisation is granted for products which are safe to use for their indicated purpose, proven to be therapeutically effective, appropriate as drugs, meet the quality requirements set and are appropriately manufactured and labelled.

Pharmaceutical legislation and regulatory authorities provide that for products classified as drugs, the pharmaceutical company may only provide information contained in the Summary of Product Characteristics (SPC) and exclusively that. The product information leaflet in the package contains the main facts about the drug and its use in the form approved by authorities. The drug and health authorities maintain national and international drug databases which contain up-to-date information for each product with a valid marketing authorisation. The information and arguments presented by the manufacturer and/or the marketer in any communication about the product must always be in full conformity with the information confirmed in the regulatory Product Information confirmed for the basis of the valid marketing authorization.

In EU countries, pharmaceutical companies are not allowed provide information about prescription drugs directly to consumers. Instead, it is the responsibility of healthcare professionals like doctors and pharmacies to do so. Marketing self-medication products directly to consumers is allowed, although under strictly regulated terms.

Orion aims to look after patient safety also by sharing accurate up-to-date information about the use, storage and safety of its products via its own marketing and corporate communications channels, in the extent permitted by law.

Regulations related to diagnostic products require that the product packages contain all essential information about the product, manufacturer, purpose of product, storage and validity. The package contains appropriate warnings. The end user will always receive detailed user instructions with the package. When required, an analysis certificate, information on product calibration traceability and a safety data sheet is provided for each batch.

5 May 2011

Orion Group
Sustainability Report 2010

Read also articles 'Reliable pharmaceutical information on the Internet', 'Combating the most common diseases' and 'A new website to support Parkinson's patients' accessible in the Well-being Lounge of Orion's Annual Report 2010 website, at <http://well-beinglounge.orion.fi/en> > Stories of responsibility.

PR4 Total number of incidents on non-compliance with regulations and voluntary codes concerning product and service information and labelling, by type of outcomes

Orion has not had incidents of non-compliance with regulations and voluntary codes concerning product and service information during the reporting period.

PR5 Practices related to customer satisfaction, including results of surveys measuring customer satisfaction

Orion monitors customer satisfaction based on monthly market data. Changes in trends indicate changes in customer satisfaction in relation to the competitive situation. In addition to monthly sales statistics, Orion also collects qualitative data continuously for its key accounts. In addition to continuous monitoring, Orion also conducts a comprehensive customer satisfaction survey on its main markets, the results of which provide guidelines for strategic targets and operational development.

Marketing communications

PR6 Programs for adherence to laws, standards, and voluntary codes related to marketing communications, including advertising, promotion, and sponsorship

Orion is committed to the commonly agreed ethical codes for marketing pharmaceuticals in all the markets covered by the company's operations. In Europe, these are recorded in the *Code of Practice on the Promotion of Medicines* issued by EFPIA, the European Federation of Pharmaceutical Industries Associations. As an EFPIA member company, Orion acknowledges the meaning and purpose of the Code, stated in the [EFPIA Leadership Statement on Ethical Practices](#) in the following words:

As industry leaders, we are committed to working in partnership with all stakeholders to improve healthcare across Europe. In doing so, we are conscious of the importance of providing accurate, fair and objective information about our medicines to allow rational decisions to be made about their use. As such, we fully respect the role that EU legislation plays in regulating interactions between pharmaceutical companies and healthcare professionals.

The member associations of EFPIA have further defined country-specific codes based on the EFPIA Code. Many of the national codes are even stricter than the basic code. So is the case in Finland, for instance. The national codes of ethical marketing are accessible via the EFPIA internet website at <http://www.efpia.eu/content/default.asp?PageID=296/> (National Codes of Practice for the Promotion of Medicines).

The Codes of Ethics for marketing medicinal products typically include instructions and guidelines for

- pharmaceutical marketing
- good medical representative conduct
- co-operation between the pharmaceutical industry and patient organizations
- health awareness information and other information on health and diseases targeted at consumers

In Finland, the Supervisory Commission for the Marketing of Medicinal Products, operating under the Pharma Industry Finland organization, a member association of EFPIA, guides and monitors the compliance of Finnish pharma companies with the Finnish code of ethics. The Commission issues fines and penalties on breaches of the code, depending on the severity of the case.

For the marketing of diagnostic products, recommendations have been provided by EDMA to its member organisations. As a member of SaiLab, a Finnish association of manufacturers of hospital laboratory equipment, Orion Diagnostica follows both them and those of the European Medical Device association EUCOMED. No sanctions are included in these recommendations.

Every Orion employee is expected by Orion to adhere to local legislation and marketing codes and guidelines. The purpose of the sales and marketing training and coaching provided to Orion employees is to ensure their familiarity with these practices and full compliance of marketing and sales operations. Training is arranged continuously to ensure sustained competence and compliance.

When preparing marketing communications and advertising material, the legislative and regulatory compliance of the content is always checked and confirmed before publication.

Orion's Medical Affairs organization at the corporate headquarters in Finland coordinates and monitors all planned marketing communication concerning pharmaceuticals in order to confirm its compliance with national and transnational regulations. For consistency and compliance, collaboration is kept with the non-Orion marketers that promote Orion's products under licenses in their agreed market areas.

Collaboration with patient organizations

In the ethical codes, particular instructions and requirements are set for pharmaceutical companies concerning their relationships with patient organizations. For increased transparency of these relationships, the codes require the companies to disclose an annual specification of the forms of collaboration they have had with patient organizations. As of 2010, Orion discloses a Group-wide annual summary of the forms of collaboration with patient organizations comprising every country where Orion has an own marketing organization. This information is presented in the *Sustainability* section on the corporate website, at www.orion.fi/patient-organization-collaboration.

EFPIA publishes an annual Activity Report on breaches by European pharmaceutical companies of the codes concerning collaboration with patient organizations. The Activity Reports are accessible at <http://www.efpia.org/content/default.asp?PageID=615>.

Support to Pink Ribbon

Orion is one of the main sponsors of the Pink Ribbon campaign in Finland in 2010–2011. Four per cent of the annual sales of the Bevita skin care products are donated by Orion to the Fund that promotes Finnish breast cancer research and awareness. Also Orion is committed to spreading awareness about the significance of research in combating breast cancer. In 2010, the Pink Ribbon Fund received EUR 43,000 from Orion.

Read more in the article '*Orion as a main sponsor in the Pink Ribbon campaign*' accessible in the Well-being Lounge of Orion's Annual Report 2010 website, at <http://well-beinglounge.orion.fi/en> > Stories of responsibility.

PR7 Total number of incidents of non-compliance with regulations and voluntary codes concerning marketing communications, including advertising, promotion, and sponsorship by type of outcomes

Orion has no breaches to be reported on incidents of non-compliance with regulations and voluntary codes concerning marketing communications, including advertising, promotion, and sponsorship.

Customer privacy

PR8 Total number of substantiated complaints regarding breaches of customer privacy and losses of customer data

Orion has no complaints to be reported regarding breaches of customer privacy or losses of customer or research subject data during the reporting period.

Compliance

PR9 Monetary value of significant fines for non-compliance with laws and regulations concerning the provision and use of products and services

Orion has no events to be reported on non-compliance with laws and regulations concerning the provision and use of products and services during the reporting period.

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