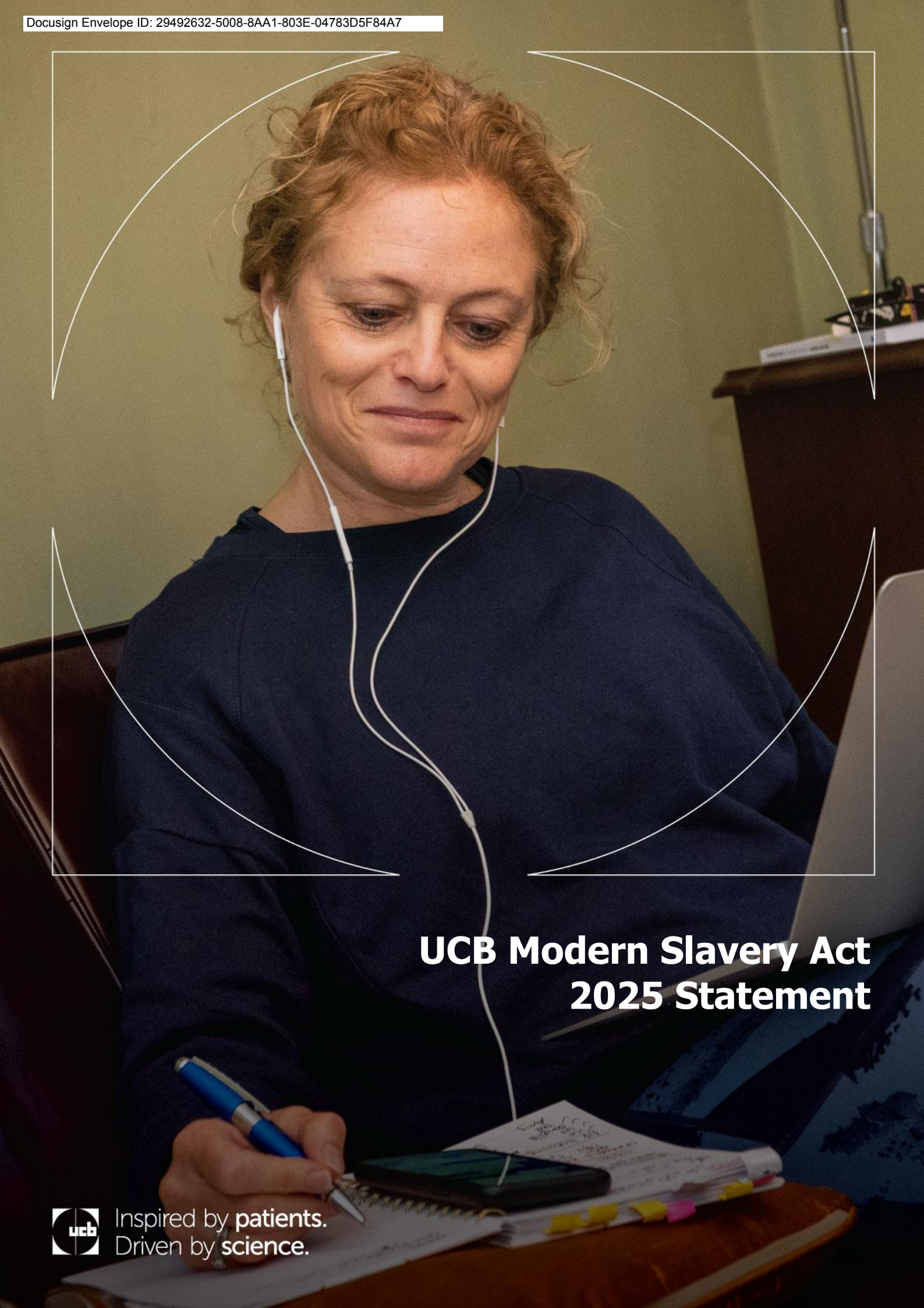




UCB Modern Slavery Act 2025 Statement



Inspired by **patients.**
Driven by **science.**

Introduction

This statement is made pursuant to section 54 of the UK Modern Slavery Act 2015.

UCB is a global group of companies under the holding company UCB S.A., incorporated in Belgium.

The UCB companies operating in the UK covered by this single joint statement are listed below:

- Celltech Group Ltd
- Celltech R&D Ltd
- UCB Biopharma UK
- UCB Celltech
- UCB Pharma Ltd
- Zogenix Europe Ltd.
- Zogenix International Ltd.

This statement refers to the financial year ending 31 December 2025 and sets out the steps we have taken to address modern slavery risks in our business and supply chains.



UCB structure, operations and supply chain

UCB's mission to transform the lives of people with severe diseases is the foundation of our long-term growth. By combining scientific excellence with a clear focus on patient needs, we are building a pipeline of innovation and a business ready to deliver enduring value – not just in the next few years, but well into the future.

UCB headquarters are in Brussels, Belgium. In addition, we have operating sites and R&D centers in nearly 40 countries around the world.

In 2025, we served over 3.1 million patients worldwide by offering impactful medicines to communities around the globe. Total revenue in 2025 was €7.741 billion (around £6.672 billion), to which the UK contributed £152 million.

We employ 10,117 employees worldwide¹, of which 8.7% employed in the UK for the above listed entities. We also regularly utilise agency workers and consultants to supplement our workforce, some of whom work on-site at UCB premises and others who work remotely. UCB entities in the UK, as listed above, employed 162 contractors during 2025.

Further information on our business can be found in our [2025 Integrated Annual Report](#).

UCB's supply chains are global and complex. Through our global supply chain organisation, we ensure end-to-end oversight of supply from raw material procurement to delivery, either through distribution centres or third-party distributors.

We partner with strategic suppliers, contract manufacturing organisations (CMOs) and contract research organizations for the purposes of:

- supporting our research and development,
- production and delivery of medicines to patients, and
- to procure goods and services necessary to operate our business, such as IT, facilities management - and specialist agency support.

¹ The number of employees is reported according to headcount at December 31, 2025. This is the number of active (including permanent and temporary) contract regular and expatriated UCB employees. It does not include the following employee groups: inactive employees, trainees, students and third-party apprentices.

Modern Slavery Risks

UCB has direct suppliers in countries with a risk of child labour in general, including countries such as Brazil, India, Mexico, and Turkey, and with risk for potential forced labour in India.

To identify areas, in our value chain, related to potential child labour, forced labour or human trafficking, and potentially affected vulnerable groups, we carry out regular impact assessments. This exercise also helps identify which human rights are at risk per area, such as right to education, and right to fair working conditions.

The assessment is based on a number of data points, including UCB's value chain analysis, risk information on the EcoVadis platform, and available data from the Pharmaceutical Supply Chain Initiative's (PSCI) Material Specific Human Rights & Environmental Impact Assessment (2020) report on high-risk commodities used in the pharmaceutical industry, in combination with publicly available value chain risk information sources, such as MVO Risico Checker, Fairtrade, U.S. Department of Labor's List of Goods Produced by Child Labor or Forced Labor, and the UNICEF Database on Child Labor.

The risk evaluation is carried out according to the UN Guiding Principles on Business and Human Rights (2011), taking into account risk severity and probability.

Based on our assessment, we have identified that we face the highest risk of contributing to or being linked to labour and human rights, including health and safety impacts when operating with CMOs or using specific high-risk commodities from countries with elevated risks, even though our purchase volumes of such products are low.

UCB's impact assessment, based on our value chain analysis for the PSCI-highlighted materials, found a moderate risk of child labour, forced or compulsory labour related to some commodities with origin in agriculture or mining. These include commodities or products containing rubber, palm oil derivatives, sugar or aluminium.

We recognize that there is a risk of child labour or forced labour in some countries supplying these raw materials, such as Indonesia, Malaysia, Thailand and India.

In the majority of cases, we do not purchase raw materials directly and they originate beyond our first-tier suppliers. We currently have limited visibility on the origin countries for commodities in our value chain beyond direct Tier-1 suppliers. For the commodities containing palm oil derivatives, we have visibility on UCB's suppliers that are Roundtable on Sustainable Palm Oil (RSPO) certified. This certification includes criteria for working conditions and human rights.

We have no evidence of child labour, or of forced or compulsory labour among workers in our value chain.

Steps to address Modern Slavery Risks

1. Policies and Training

At UCB, we believe how we perform business is just as important as what we do. We strive to do business the responsible way – the ethical way – each and every day.

This reflects not just in how UCB and all colleagues commit to comply with all regulatory and legal requirements governing our activities as a pharmaceutical company, but also how we create a culture where ethics and compliance are embedded and where we are driven to act with integrity every day.

Policies

UCB's **Ethics & Business Integrity Program** helps ensure our commitment to Ethics and Business Integrity is continuously upheld, both in relation to our own core values as well as in alignment with the expectations of regulators and standard setters, including leading industry bodies such as the International Federation of Pharmaceutical Manufacturers and Associations (IFPMA). The Program is designed to strengthen as our dynamic business, regulatory, and social environment evolves.

As part of our written standards:

- the UCB Code of Conduct is the governing policy that reflects UCB's core company values, including our commitment to sustainability and ethical business practices. The Code, available in 24 languages, outlines the general principles of business conduct that are expected from UCB colleagues and partners throughout the world. All employees are responsible for embodying the Code of Conduct, living by our commitments to each other and our stakeholders.
- our Human Rights Policy serves as a foundation to identify human rights of the highest priority (salience) and respective due diligence activities that focus on actions to drive continuous improvement of human rights practices.
- through our Anti-Bribery Anti-Corruption Policy, we commit to avoid improperly influencing the decisions or actions of others with inappropriate promises of value, to prevent any adverse human rights impact in our business operations and the communities we operate in, and to hold our colleagues and all third parties to the same standards.



Our 'Leading Through Ethics' strategy promotes ethical leadership and culture, including leadership training focused on ethical decision making, and a communication strategy that emphasizes ethics and the inclusion of ethics-related metrics in performance management.

We have established a process and affiliated systems for employees to raise concerns and to protect reporters from retaliation and identification. Furthermore, the UCB Integrity Line is available on our corporate website allowing anyone inside or outside of the organisation to report any concerns or questions concerning the Company and its policies and practices, concerns about unlawful conduct, or any other wrongdoing.

UCB's policies regarding employee rights and conditions (including those related to recruitment, hiring, discharge and promotion) aim to ensure that UCB's employees receive fair and reasonable remuneration commensurate with their job description and experience and that working conditions are compliant with local laws and UCB's ethical standards. UCB is committed to treating all employees with fairness and respect and will not tolerate any kind of discrimination or unfair treatment, such as may arise out of modern slavery.

As a company, we recognise that we have the moral responsibility and social obligation to make responsible decisions that guarantee both human and environmental health. At UCB, we have a key role to play to ensure a sustainable future for all. We believe that the best way to have a positive impact on society is by engaging with our suppliers and integrating into our supply chain requirements, specifications and criteria that are compatible with our sustainability strategy. The UCB Responsible Sourcing Standards for Business Partners. The Standards were updated in 2024 to align with the updated Pharmaceutical Supply Chain Initiative (PSCI) principles. The Standards set expectations that business partners follow the United Nations Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct.

Both the Human Rights Policy and Responsible Sourcing Standards for Business Partners explicitly prohibit child labour and any form of modern slavery, including forced labour or human trafficking from our business partners. UCB also expects business partners to apply these, or equivalent standards, in their own upstream value chain.

Training

We strive to embed this commitment to ethics and business integrity through our corporate culture (for example, via performance objectives or vendor selection criteria), and all employees and third-party agents are expected to complete annual training on our code of conduct.



In 2025, 99% of UCB employees were compliant with the mandatory Code of Conduct training and 98% of UCB employees were compliant with the Anti-Bribery and Corruption (ABAC) training.

The 2025 data reflect a continued high rate of completion of both Code of Conduct and ABAC training across UCB. Employees who do not complete the required training within the allotted timeframe receive individual follow-ups from the Ethics and Business Integrity team, and completion rates are tracked closely each month.

Internally, we reinforced human rights capacity in our procurement teams and provided a “Human Rights Due Diligence and Procurement” online course to colleagues, including in the UK, involved in procurement activities, to increase their capabilities on managing human rights in the value chain.

Third parties are also expected to acknowledge and adhere to the principles of the Code of Conduct, and this expectation is reflected in our Responsible Sourcing Standards for Business Partners and in their legal agreements with UCB where necessary.

2. Due Diligence of Third-Party risks

We continually engage with rights holders, including suppliers, workers in our value chain, and people living in the communities where we operate. We do this through supplier on-site audits, EcoVadis engagement, and ongoing contact with business partners. On-site health and safety audits of suppliers are aligned with the Pharmaceutical Supply Chain Initiative (PSCI) protocols.

We assess the effectiveness of engagement by monitoring closure of Corrective Action Plans (CAPs) related to the audit findings.

We also engage with suppliers through the EcoVadis platform. We invite our critical, strategic and high-volume suppliers to be evaluated by EcoVadis on their sustainability topics and, where needed, request CAPs to improve their sustainability level. Engagement occurs via designated supplier representatives who conduct the EcoVadis assessment and are accountable for the identified improvement areas, including those related to labour and human rights.

UCB's representatives are in regular contact with our key business partners to discuss sustainability topics in addition to commercial and quality-related matters.

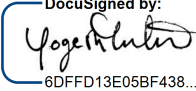
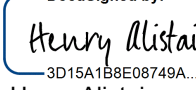
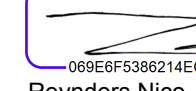
In 2025, 73% of UCB's procurement spend worldwide was covered by a valid EcoVadis score. The target of 70% was exceeded, and there was improvement compared to our 2024 figure. We will continue our efforts to improve our EcoVadis spend coverage in 2026 and actively encourage our suppliers in scope to achieve a EcoVadis minimum score of at least 45. Our suppliers' average EcoVadis labour & human rights score is 65.4, compared to the EcoVadis network's average labour

& human rights score of 52. In UK, 28 out of the 43 suppliers representing nearly 80% of supplier-related spend were assessed by EcoVadis.

63% of UCB suppliers improved their labour and human rights score in 2025, compared with the previous assessment, which was under the target of 50%. We aim to maintain this result in 2026 through encouraging suppliers to carry out proposed labor and human rights-related corrective action plans (CAPs), and by providing capacity building resources to them via PSCI, EcoVadis and the Responsible Health Initiative. The improvement of EcoVadis scores and progress in closing CAPs is how performance is tracked against targets.

This statement has been reviewed and approved by the Boards of Directors of the UCB entities listed and signed on behalf of each company respectively.



	Signature	Date
Celltech Group Limited, the holding company of UCB Pharma Limited and Celltech R&D Limited	DocuSigned by:  6DFFD13E05BF438... Yogesh Khatri	13-Jul-2026
UCB Biopharma UK	DocuSigned by:  3D15A1B8E08749A... Henry Alistair	14-Jul-2026
UCB Celltech	DocuSigned by:  0436163CE3734F9... Vancoillie Caroline	13-Jul-2026
Zogenix Europe Ltd.	Signed by:  069E6F5386214EC... Reynders Nico	13-Jul-2026
Zogenix International Ltd.	DocuSigned by:  009DAE4FE2C24BA... Viral Shah	13-Jul-2026

