



# UCB Norwegian Transparency Act Statement

For the financial year 2025



Inspired by patients.  
Driven by science.

## Introduction

This statement is made pursuant to the Norwegian Transparency Act (åpenhetsloven) as described in the "Lovvedtak 176 (2020-2021)" effective since July 1<sup>st</sup>, 2022.

UCB is a global group of companies under the holding company UCB S.A., incorporated in Belgium. This statement is prepared for UCB Pharma AS operating in Norway.

This statement refers to the financial year ending 31 December 2025 and sets out the steps we have taken to address respect for human rights and decent working conditions (including the provision of a living wage) across our operations and supply chains.

## UCB structure, operations and supply chain

UCB is a global biopharmaceutical company operating in 36 markets, with a focus on neurology and immunology, and other areas where our expertise aligns with unmet needs. We research, develop, manufacture, distribute, market and sell pharmaceutical products. UCB is continuously working to advance science and embrace innovation. We are leveraging scientific advances and skills in areas such as genetics, biomarkers and human biology. Our scientists collaborate with leading researchers from academia and industry to advance science and deliver the solutions patients need. Our open approach to innovation equips us to meet today's biggest healthcare challenges.

In 2025, we touched the lives of over 3.1 million patients worldwide by offering impactful medicines to communities around the globe. Total revenue in 2025 was €7.7 billion, to which Norway contributed with 263 million NOK (€22,3 million). We employ over 10,000 employees across 36 markets, of which 5 are employed in Norway. We also regularly utilize agency workers and consultants to supplement our workforce, some of whom work on-site at UCB premises and others who work remotely.

We have global commercial, research and manufacturing operations with our main research centres and manufacturing sites based in Europe, the US and Asia. Norway has primarily commercial operations. Further information on our business can be found in our [Annual Report](#) and on our company website: [Our Company | UCB](#)

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.

## Policies and governance

UCB takes the necessary steps to promote and encourage high ethical standards of working and fair treatment of human beings. We have a zero-tolerance approach to any form of human rights abuses, including forced or child labour, modern slavery, or human trafficking. UCB and all colleagues are required to comply with all applicable laws and to respect human rights and act with diligence to avoid infringing on the rights of others, as expressed by the International Bill of Human Rights and the principles set out in the International Labour Organization's Declaration on Fundamental Principles and Rights at Work.

At UCB, we have a cross-functional working group on human rights in place that has elaborated a [Human Rights Policy](#). UCB's External Sustainability Advisory Board, which includes members of the UCB SA Board of Directors, has endorsed this policy. Furthermore, the UCB Executive Committee has endorsed this policy and is accountable for the overall human rights commitment and its implementation.

The [UCB Code of Conduct](#) is our governing policy that reflects UCB's core company values, including our commitment to sustainability and ethical business practices, which covers human rights. The Code outlines the general principles of business conduct that are expected from UCB colleagues. We expect the same behaviour from consultants, suppliers, and other third parties acting on behalf of UCB. If an adverse human rights impact has been caused by UCB, we will strive to find a remedy.

We have an established process and affiliated systems in place 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 both inside and 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 will do its best to respond within a reasonable timeframe as per UCB's processes on incident and investigation management.

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, unfair treatment or indecent working conditions.

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 and safety. At UCB, 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. UCB's [Responsible Sourcing Standards for Business Partners](#) forms a key part of our efforts to drive sustainability, outlining UCB's set of values and principles that it expects suppliers should follow, also in their own upstream value chain.

## Third party supplier due diligence

Considering the nature of our operations, due diligence for our third-party relationships is also a part of our Ethics and Business Integrity Program. UCB expects the same behavior from consultants, suppliers and others acting on behalf of UCB (supply chains, i.e., purchasing of goods and services). UCB monitors our relationships with third parties, since this is the area where risks related to human rights are most likely to materialize, particularly in countries where we operate which may be regarded as requiring enhanced due diligence measures.

Any interactions with third parties are analyzed to ensure that there is a need to engage with the third party and that activities are performed in an ethical way by partners. This includes reviewing any efforts third parties may take to conceal unethical actions such as bribes to foreign officials or other international business transactions. It also includes a review of compensation standards for industry/geographic region as well as tracking those third parties that do not meet our due diligence standards.

Our Code of Conduct, a robust due diligence process and audits conducted by our Global Internal Audit team aim to mitigate these risks.

We are committed to prohibiting, identifying, and preventing forced or child labor, modern slavery and human trafficking in all operations and supply chains.

UCB continues to use EcoVadis as its partner to assess our suppliers on dimensions such as environmental protection, labour and human rights, and ethical business practices. Assessment outcomes are discussed with suppliers and where necessary, mitigation plans agreed to improve practices. Outcomes and mitigation plans are reviewed regularly with critical suppliers. Our expectation is that all suppliers maintain a minimum EcoVadis score of 45/100 per theme and follow corrective action plans, when necessary, to continuously improve their performance.

In 2025, 73% of the supplier-related spend was covered by EcoVadis. In Norway, 6 out of 45 suppliers were assessed by EcoVadis, representing 15% of the country's supplier-related spend.

The country assigned to the spend is based on the cost center's location, not the supplier's country.



We initiated collaboration with Everstream, a supply chain risk management software, to identify potential risks related to fair labour practices, human rights, and ethical business conduct,

## Training

The fully revamped UCB Code of Conduct was rolled out in 2022. The [UCB Code of Conduct](#) reinforces the ethical principles and commitments (including commitment to human rights) which must drive our decisions and actions. Available in 24 languages (including Norwegian), the Code applies to all employees, agents and consultants acting on behalf of UCB. We are responsible for embodying our Code of Conduct, living by our commitments to each other and our stakeholders.

In 2025, 99% of UCB employees completed the Code of Conduct training. 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.

## Our performance on human rights

We have embarked on a journey to expand our efforts and make continued progress to respect human rights within our operations and throughout our supply chain. In 2022, we started a process to further implement requirements of the United Nations Guiding Principles on Business and Human Rights (UNGP). We act diligently to avoid infringing on the rights of others, as expressed by the International Bill of Human Rights and principles set out in the International Labor Organization's Declaration on Fundamental Principles and Rights at Work, and we are a signatory of the UN Global Compact. We set up a multidisciplinary, ongoing human rights working group in charge of reviewing our human rights systems policies and processes (including due diligence processes to ensure alignment with OECD guidelines) and of identifying risk areas where rights holders' rights could be potentially infringed. The UCB Human Rights Policy was implemented in 2023. In 2025, 98% of UCB employees completed the mandatory annual training. The 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. Priority areas were confirmed through a salience assessment which established the following areas for 2025:

- Third party related risks (notably labor rights, environmental impacts, corruption)
- Non-discrimination, non-harassment, and fair treatment for UCB employees
- Clinical studies
- Artificial Intelligence
- Environment (connections between environmental and social impacts)
- Right to health



UCB established a governance framework in 2024 to provide oversight on our human rights approach and actively continues to integrate the voices of rights holders into our activities.

'Human rights in the value chain' was identified as one of the topics that is both financially material and impact material that was presented to and validated by the Executive Committee and the Board. In 2025, there were no material cases of human rights policy violations.

This statement has been reviewed and approved by the Board of Directors of UCB Pharma AS and signed on behalf of the company.

Chairman of the Board:

Christina Jeppesen

Signed by:  
*Christina Jeppesen*  
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Board member:

Jaana Mattila

Signed by:  
*Jaana Mattila*  
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Board member and General Manager:

Fredrik Arneberg

Signed by:  
*Fredrik Arneberg*  
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