



# Sustainability Statement

# General disclosures

UCB is committed to sustainable practices in all our business operations. The following Statement provides details of our sustainability reporting for the full year 2025, in alignment with the European Sustainability Reporting Standards (ESRS) disclosure requirements on our material topics as defined in our double materiality assessment.

For this Integrated Annual Report relating to the year 2025, UCB's reporting obligations on non-financial information follow the rules of the Corporate Sustainability Reporting Directive (CSRD), as implemented in Belgian Law as well as the EU Taxonomy Regulation (Regulation 2020/852). Where applicable, we will also refer in this report to other sustainability reporting standards that we are applying on a voluntary basis, such as the SASB (Sustainability Accounting Standards Board) reporting framework.

## **Basis for preparation** BP-1

The report indicates how UCB's operations respect and react to stakeholders' concerns and interests and primarily addresses investors' expectations, though the report is valuable to many different stakeholders. Assessing, measuring and reporting our activities' positive and negative impacts on society and the planet is a key aspect of UCB's engagement with stakeholders. The presentation of the 2025 report has been prepared considering the material topics from our materiality assessment concluded at the end of 2023 and the constant re-assessment of material issues, which guided UCB's sustainable performance efforts in 2025.

## **Specific circumstances** BP-2

All data presented in this statement relate to the financial year of 2025, unless stated otherwise (such as for the access coverage performance index, time to access index and number of patients reached). The social and governance-related disclosures' scope of consolidation is the same as for the financial statement, while for the environmental disclosures, the scope of consolidation can differ. For energy, water and

waste metrics, the scope includes all manufacturing sites, laboratories, owned offices and all significant affiliates' offices. Overall, we prioritize using data directly available in our systems. In the absence of direct data, we use estimates which are generally outlined in the accounting policy for each specific metric. Metrics related to GHG emissions, energy consumption, water consumption and waste include estimations for UCB sites of less than 500 m<sup>2</sup>. Metrics related to our GHG emissions linked to our own operations have a higher amount of primary data, while value chain GHG emissions (e.g., purchased goods and services) have a higher level of measurement uncertainty. This uncertainty stems from the calculation model using emission factors based on averages, aggregates or spend-based information. Complexity and uncertainty have also been assessed to be higher in the equitable access to medicines metrics, especially metrics developed by UCB (access coverage performance and time to access indices, broadly explained on the metrics methodology) and the patients reached, calculated using estimated average doses.

In the context of enhanced alignment with the European Sustainability Reporting Standards (ESRS), UCB has restated the gender pay gap previously disclosed in the 2024 Annual Report. The indicator has been recalculated to reflect the ESRS-prescribed formula, defined as the difference between the average gross hourly pay level of male employees and that of female employees, divided by the average gross hourly pay level of male employees. In the prior report, an alternative formula was applied, resulting in an inverse presentation of the indicator; the underlying payroll data remain unchanged. In addition, the reported consumption of self-generated non-fuel renewable energy has been corrected to address a typographical error, with the value restated from 11,834 MWh to 11,384 MWh, and the rate of recyclable content in sold UCB products and packaging has been restated from 62.3% to 75%, as previous year used a limited sample data of recyclable content per stock keeping unit (SKU) and in 2025 we increased the sample and re-applied it to volumes sold in 2024.

Forward-looking information, including targets, is inherently uncertain. For more details, please refer to the 'Forward-looking statements' section.

## **Risk management and internal controls over sustainability reporting** GOV-5

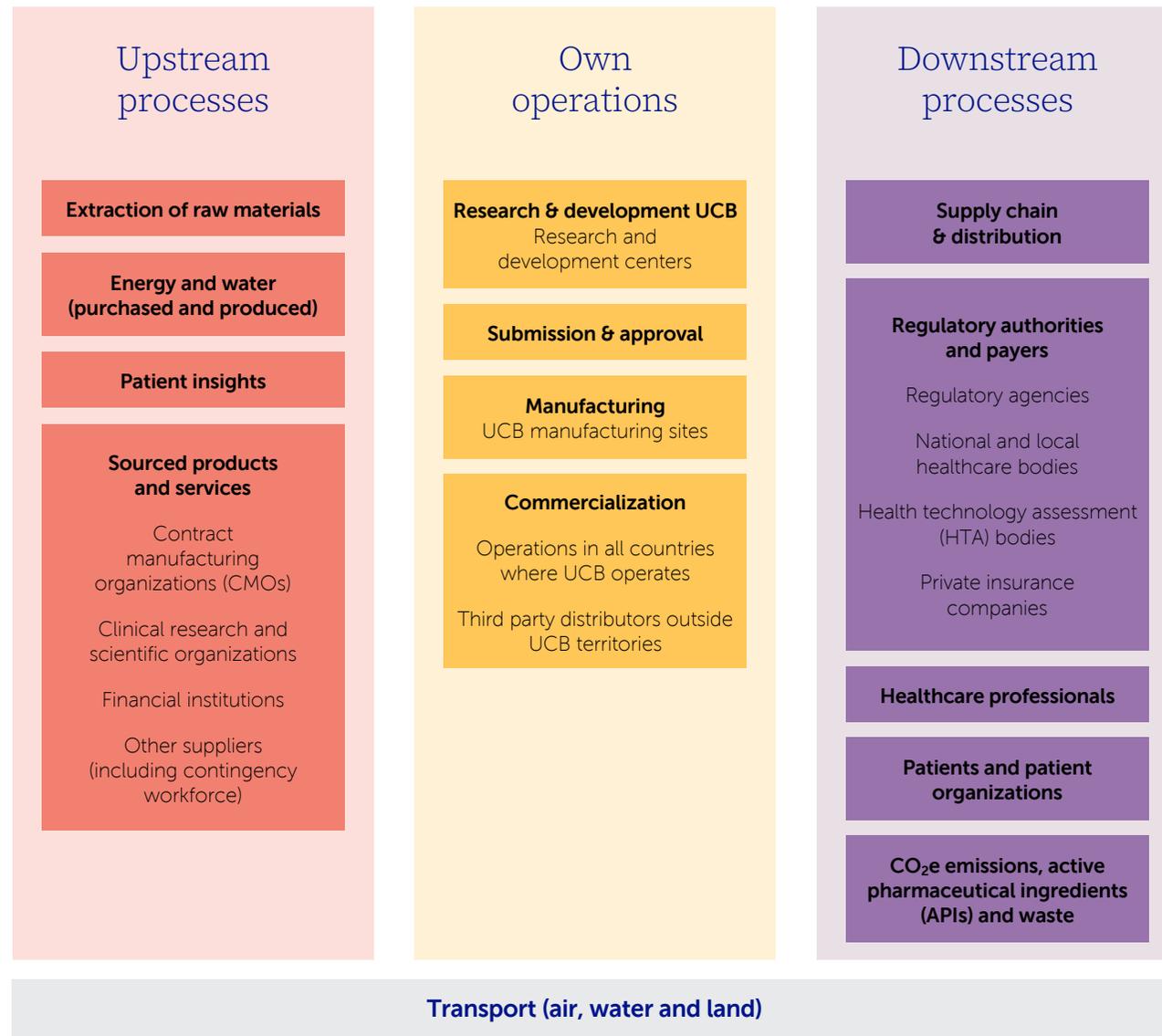
We view internal controls over sustainability reporting as a continuous improvement journey and are committed to strengthening them each year as requirements, systems and stakeholder expectations evolve. UCB has implemented an internal control framework to ensure the accuracy, completeness and reliability of sustainability information disclosed under the Corporate Sustainability Reporting Directive (CSRD) and the European Sustainability Reporting Standards (ESRS). This framework is integrated into UCB's governance model and aligns with the COSO (Committee of Sponsoring Organizations) Internal Control framework. Risks are evaluated at both central and local levels, ensuring alignment between enterprise-wide processes and individual data owners.

Recognizing the importance of UCB's strategic sustainability metrics, we apply a dedicated control framework for quantitative metrics to ensure traceability and data integrity. This includes clear ownership, accountability, documentation standards, audit trails, and periodic reviews of methodologies and data sources. Responsibility to implement internal controls required for non-financial key metrics rests with data owners, ensuring consistent methodologies and accuracy of data.

Risks related to sustainability reporting are assessed through self-assessment checklists, reinforcing accountability and enabling early detection of gaps. Global Internal Audit conducts independent thematic reviews, with findings reported to the Audit Committee and integrated into the improvement cycle. Through these measures, UCB ensures sustainability reporting remains transparent, reliable and aligned with leading practices.

General disclosures continued

Materiality assessment **IRO-1**



At the end of 2023, UCB conducted a structured double materiality assessment in accordance with the requirements of the CSRD and the ESRS. The goal was to identify the most relevant environmental, social and governance topics for UCB, based on how topics might create financial risks and opportunities for the company, and taking into account the company's own impact on people and the environment. The results of this double materiality assessment guided our efforts during 2025 and have been integrated into the company's strategy. UCB has been committed since 2018 to an integrated approach to sustainable performance, to better deliver societal value for key stakeholders – including patients, shareholders, employees and communities, while minimizing our environmental footprint. Materiality assessments are part of this approach, as they not only guide reporting, but inform corporate strategy and guide efforts to improve our impact. Our 2023 materiality assessment was based on the following approach:

**General disclosures** continued

## Our 2023 materiality assessment was based on the following approach:

**1 Define the scope of the materiality assessment exercise and objective**

The scoping of the assessment included an identification of UCB's main activities, value chain mapping and the geographies to be included. The ESRS topics, sub-topics and entity/sector-specific environmental, social and governance topics for UCB were then mapped and clustered to define a tailored list of topics for the assessment, that ensured completeness and CSRD compliance.

**2 Identify topics and impacts, risks and opportunities (IROs)**

Based on the topics identified, a stakeholder engagement strategy was developed by selecting key internal and external stakeholders to be consulted via direct (e.g., semi-structured interviews and workshops) and indirect methods (e.g., internal and external desk research). The process engaged stakeholders from UCB's main geographies, and occasionally beyond, including local analyses from specific countries.<sup>1</sup> Both affected and interested stakeholders were consulted, including UCB employees, the UCB Sustainability Governance Committee, the UCB Board and Executive Committee members and the UCB External Sustainability Advisory Board. Selected representatives of stakeholder groups such as suppliers, business partners, patient organizations, sector associations, NGOs and foundations were also interviewed. Impacts, risks and opportunities were identified in UCB's own operations and upstream or downstream value chain. The non-exhaustive list of internal and external desk research sources consulted included:

- Internal UCB sources of information (e.g., Integrated Annual Reports, Task Force on Climate-related Financial Disclosure (TCFD) results, Human Rights Saliency Assessment, etc.)
- Public media coverage on UCB and/or value chain and/or peers

- Sector and/or governmental reports
- Scientific research papers
- [ENCORE](#) (Exploring Natural Capital Opportunities, Risks and Exposure)
- [Refinitiv](#) data analytics
- Material or minutes from previous engagements with stakeholders, such as employee surveys and investor roadshows.

A consolidated list of IROs was derived for each assessed topic from this desk research and the stakeholder consultation process.

**3 Assess impact and financial materiality**

All qualitative inputs used to assess IROs were translated into quantitative inputs based on a set of defined thresholds for each of the assessed criteria.

Impact materiality was assessed independently from financial materiality by looking at positive and negative impacts and risks and opportunities for each identified topic. For impact materiality, the assessment of each positive or negative impact on society and the environment was based on severity (e.g., scale, scope and remediability for negative impacts) and likelihood. Both criteria of likelihood and remediability were aligned with UCB's enterprise risk management methodology. The scale of impact materiality was assessed mostly using qualitative input, with quantitative data considered only for environmental topics (i.e., "Climate change mitigation", "Water extraction, consumption and discharge" and "Circular economy"). The assessed impacts were marked as material when passing the materiality thresholds with scores categorizing them as important, significant or critical.

For financial materiality, sustainability-related risks and opportunities were identified, evaluated and prioritized using a pre-defined set of thresholds. Risks and opportunities were assessed using the criteria of likelihood and magnitude of financial impacts in the short, medium, or long term. Both criteria were aligned with UCB's enterprise risk management methodology. The magnitude of financial impacts included UCB's ability to continue to use or obtain resources, the impacts on its reputation – in terms of trust, media coverage and relation with authorities – and ESG (environmental, social and governance) risks and opportunities. The assessed risks and opportunities were marked as material when passing the financial materiality thresholds with scores categorizing them as significant or critical. Lastly, risks and opportunities were assessed independently from the assessed impacts for each sustainability topic.

The thresholds and evaluation criteria used to assess the impacts, risks and opportunities followed the recommendations of ESRS. Some of the key assumptions taken were:

- Clustering of similar (sub-)sub-topics as defined in the ESRS standards into one sustainability topic to facilitate the identification of IROs during interviews and workshops. Some of the topics defined by ESRS were tailored to our industry (e.g., health systems resilience in the context of "access to information" and "access to products and services" ESRS sub-sub-topics), in addition to some other topics that were identified during the process (e.g., ethical use of technology).
- Use of inputs of some stakeholders as proxy for a whole stakeholder group.
- Assumption that the consulted stakeholders would share insights on the topics where they have the most knowledge.
- Adoption of existing enterprise risk management criteria or tailor-made categories developed for scale, scope and remediability of IROs, assuming them to be well-suited for the assessment across all sustainability topics.

1. This was done for Belgium, Brazil, China, France, Germany, Italy, Japan, Mexico, Spain, Switzerland, Türkiye, the U.K. and the U.S..

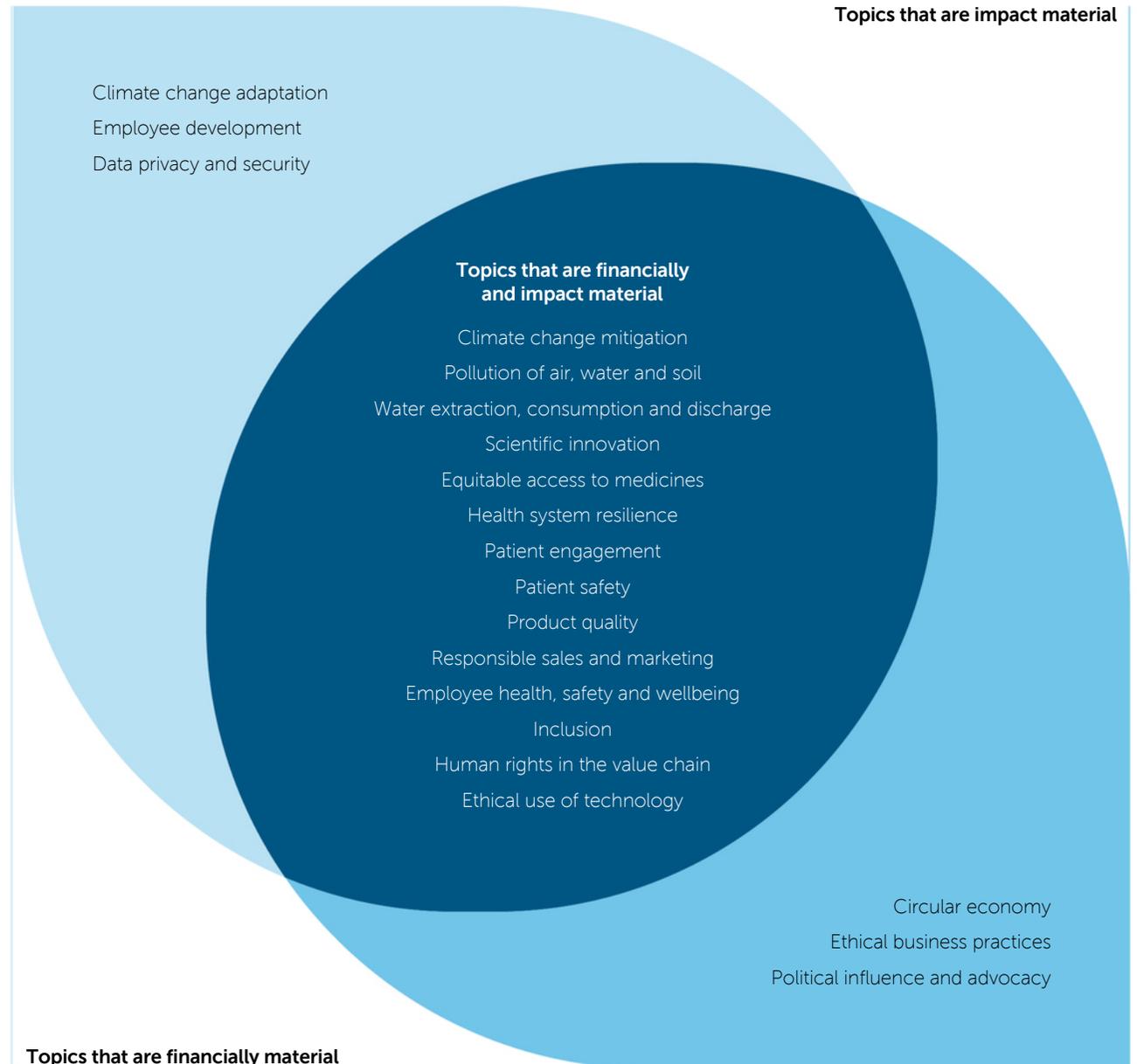
General disclosures continued

**4 Validate material topics**

The following results of the materiality assessment were presented to and validated by the Executive Committee and the Board.

The Enterprise Risk Management (ERM) team and the Corporate Strategy team were actively engaged in the double materiality assessment. The financial impact results (from risks and opportunities) of the double materiality results were fully integrated within the ERM framework. We continuously engage with stakeholder groups throughout UCB's activities and such interactions provide insights to the ongoing enterprise risk management processes.

In 2025, we reviewed the list of IROs to confirm that they continue to be relevant, through the review of all IROs by the Global Sustainability team, internal topic experts and Corporate Strategy team. The review incorporated considerations of the current geopolitical landscape, regulatory changes and trends, as well as insights from internal/external surveys. The list of material topics stayed largely the same with the addition of the topic "Corporate culture", which was previously a sub-topic of "Ethical business practices". "Relationship with suppliers" became non-material, but initiatives across our value chain that impact other material topics are framed within the specific topic (such as supplier engagement actions around "Climate change adaptation", "Climate change mitigation" and "Human rights in the value chain"). The "Workers' rights and working conditions" topic also became non-material, and "Diversity, Equity and Inclusion" was renamed simply "Inclusion" to sharpen the focus on this dimension while ensuring that our long-standing commitment to fairness, respect and equal opportunity remains clear, sustainable and aligned with evolving global expectations.





Environmental  
information

Environmental information continued

# Environmental sustainability policy overview

## Description of key contents

The policy sets environmental principles and commitments for addressing climate change mitigation and resilience, developing sustainable medicines and safeguarding natural resources. The principles set in this global policy are implemented through local policies and standards.

## Scope of policy

All UCB colleagues and partners worldwide, all UCB divisions, subsidiaries, affiliates and other entities operationally controlled by UCB, regardless of location.

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## Accountable for implementation

The Chief Financial Officer is the member of UCB Executive Committee sponsoring our environmental sustainability ambition and performance, in addition to the Head of Sustainability, Corporate Affairs & Risk. The Head of Environmental Sustainability is accountable for the implementation of the policy and ensures its periodic review.

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## Internationally recognized instruments

Aligned with the Paris Agreement and Science-Based Targets initiative (SBTi). The policy is also aligned with the ISO 14001 standard.

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## Availability

The policy is available at [UCB website](#) and intranet.

# Climate change mitigation and adaptation E1

## Impacts, risks and opportunities E1 SBM-3

### Climate change

Sub-topic	IRO type	Time frame	Value chain	Description
Climate change mitigation	- Actual	●○○	◆	Release of GHG emissions (Scope 1 and 2) of UCB's own operations (fossil fuel for energy or company cars, electricity consumed).
	- Actual	●○○	↑ ↓	Release of GHG emissions (Scope 3) from upstream and downstream activities.
	R	●●○	↑ ◆ ↓	Failing to meet UCB's publicly stated net-zero commitments poses a reputational risk, especially as scrutiny intensifies around corporate environmental responsibility. Recent legal actions against companies for environmental harm highlight the growing accountability landscape and the importance of staying ahead of sustainability targets.
	R	●●○	◆	Market shift towards less carbon-intensive products and increased expectations from the healthcare industry for low-carbon products and operations.
Climate change adaptation	R	●●●	↑ ◆	Supply chain and manufacturing disruptions due to an increase in the frequency and/or severity of extreme temperatures, hurricanes, hailstorms, wildfires, focusing on water scarcity and flooding to UCB location as well as supplier.

+ Positive impact   
 - Negative impact   
 R Risk   
 O Opportunity   
 ●○○ Short term   
 ●●○ Medium term   
 ●●● Long term   
 ↑ Upstream   
 ◆ Own operations   
 ↓ Downstream

### Assessing climate-related risks E1 IRO-1

Climate-related risks, including both physical and transition scenario risks, are embedded into UCB's enterprise risk management framework. Different teams systematically evaluate the environmental impact of their business to embed environmental considerations into both day-to-day operations and strategic decisions. This ensures that "bottom-up" risks – including climate-related risks – are systematically identified, assessed and reviewed from financial, reputational and ESG perspectives. Each risk is scored on impact and likelihood, considering both "time to impact" and "time to act", and complemented by a "top-down/outside-in" view. To complement this internal assessment, UCB collaborates with external climate consultancies that perform scenario analysis aligned with TCFD guidelines (Task Force on Climate-related Financial Disclosures). The results of this scenario analysis are integrated into UCB's enterprise risk management (ERM) system.

### 2025 TCFD climate scenario analysis

In 2025, UCB updated its climate scenario analysis in line with TCFD recommendations. Supported by external experts and internal stakeholders, the assessment covered both physical and transition risks and opportunities across the short term (2030), medium term (2050) and long term (2075+), extending the scope from previous assessments (across more than 140 locations).

Physical risks were assessed using Shared Socioeconomic Pathways (SSP) scenarios (SSP1-2.6, SSP2-4.5, SSP5-8.5), and transition risks using Network for Greening the Financial System (NGFS) scenarios (Current Policies, Nationally Determined Contributions and Net Zero 2050). These scenarios span a wide range of plausible climate and policy pathways and are consistent with the macro-assumptions used in UCB's long-term planning. An initial screening identified 14 physical and eight transition risks and opportunities; each was analyzed and prioritized based on materiality, severity and likelihood, and the results are integrated into the ERM system.

### Physical risks and operational resilience

The updated analysis confirms that UCB's most material physical exposures relate to flooding, storms and cyclones, and water stress and drought at selected manufacturing and R&D sites and in the supply chain. Three sites – Saitama (Japan), Bulle (Switzerland) and Braine-l'Alleud (Belgium) – were identified as exposed to physical risks such as cyclones/typhoons, landslides, subsidence or floods, depending on their geolocation. UCB manages these risks through mitigation measures such as dual-sourcing strategies for key materials where feasible, and site-specific mitigation measures, including water-efficiency projects and resilient infrastructure. Insights from the scenario analysis are used to inform decisions on major site investments, supply chain diversification, and infrastructure and equipment upgrades over the medium and long term.

## Climate change mitigation and adaptation continued

### Transition risks, opportunities and business model adaptability

Transition risks were evaluated at company level, reflecting their cross-site nature. Key drivers include evolving carbon-pricing mechanisms and climate policies, as well as regulatory and market changes affecting transportation and fossil-based raw materials. These developments could increase operating costs but also create opportunities, as healthcare systems increasingly expect medicines with a lower environmental footprint.

UCB's transition plan, aligned with the Science Based Targets initiative (SBTi) Net-Zero standard, and tools such as the Green Product Scorecard, help reduce emissions and guide innovation towards lower-impact products. The scorecard assesses environmental performance across the product life cycle to identify key impact drivers and reduction levers for R&D and manufacturing.

As a biopharmaceutical company, UCB's ability to adapt varies by the activity potentially affected by the risk. Adjusting or diversifying a contract manufacturer or logistics route away from a high-risk area is complex and will take several years but remains feasible. In contrast, changing the formulation of an approved medicine to replace a climate-exposed raw material is heavily constrained and often not realistic. These regulatory and operational constraints are considered alongside "time to impact" when selecting and sequencing response options.

### Building strategic and financial resilience

Building resilience involves continuously integrating climate risks into core business processes. Climate-related risks and opportunities are thus increasingly integrated into UCB's strategy development, capital allocation and financial planning. Following the 2025 scenario analysis, UCB performed a financial quantification of a few physical and transition risks assessed as most material. For each risk, potential impacts on revenue, operating expenditure and capital expenditure were assessed under the three climate scenarios and across the 2030, 2040 and 2050 horizons where feasible. The work combines external climate indicators with internal data and expert judgment.

UCB intends to periodically repeat and refine this scenario analysis to reflect evolving science and regulation and to continue strengthening the resilience of its business model to climate change.

### Climate transition plan **E1-1**

UCB is fully committed to achieving net-zero greenhouse gas emissions by 2045. Our science-based target encompasses:

- **Scope 1 emissions**, caused by energy combustion (gas, fuel) at UCB's sites and by UCB's car fleet worldwide, as well as fugitive emissions.
- **Scope 2 emissions**, caused by electricity consumed as an energy source at UCB's sites and purchased heat.
- **Scope 3 emissions**, including fuel- and energy-related emissions, treatment of the waste generated on-site, business travel and employee commuting (for colleagues who do not have a company car), upstream transportation and distribution of our raw materials and finished goods, upstream leased assets, and end-of-life treatment of UCB products' waste after their use.
- **Scope 3 emissions (Category 1)** from purchased goods and services (linked to UCB suppliers) – a category that represents above 75% of our total GHG emissions – which has a dedicated engagement target by 2028.

UCB's ten-year climate transition plan is fully embedded within our business strategy and financial planning. This covers all business needs to finance environmentally conscious investments (i.e., upgrade current infrastructure and equipment), operations required to decarbonize our value chain and plans to embed sustainable features in new investments (i.e., a green-by-design approach). UCB's energy decarbonization strategy focuses on reducing emissions across Scope 1, Scope 2 and upstream leased assets in Scope 3. This includes transitioning to 100% renewable energy by shifting to renewable electricity either through purchasing or production, reducing our needs for natural gas and shifting from natural gas to biogas.

This transition plan, along with its budget, has been fully endorsed by the Executive Committee. Financially, UCB's climate transition plan is supported by an annual capital and operational expenditure budget of about €8 million, adjusted annually according to current projects and needs. The plan is developed and validated through governance bodies such as the Environmental Sustainability Steering Committee (formed by the Global Head of Sustainability, Chief Financial Officer, Chief Procurement Officer, Head of Infrastructure, among others), which identify key initiatives, assess and prioritize them, and ensure overall consolidation before final approval.

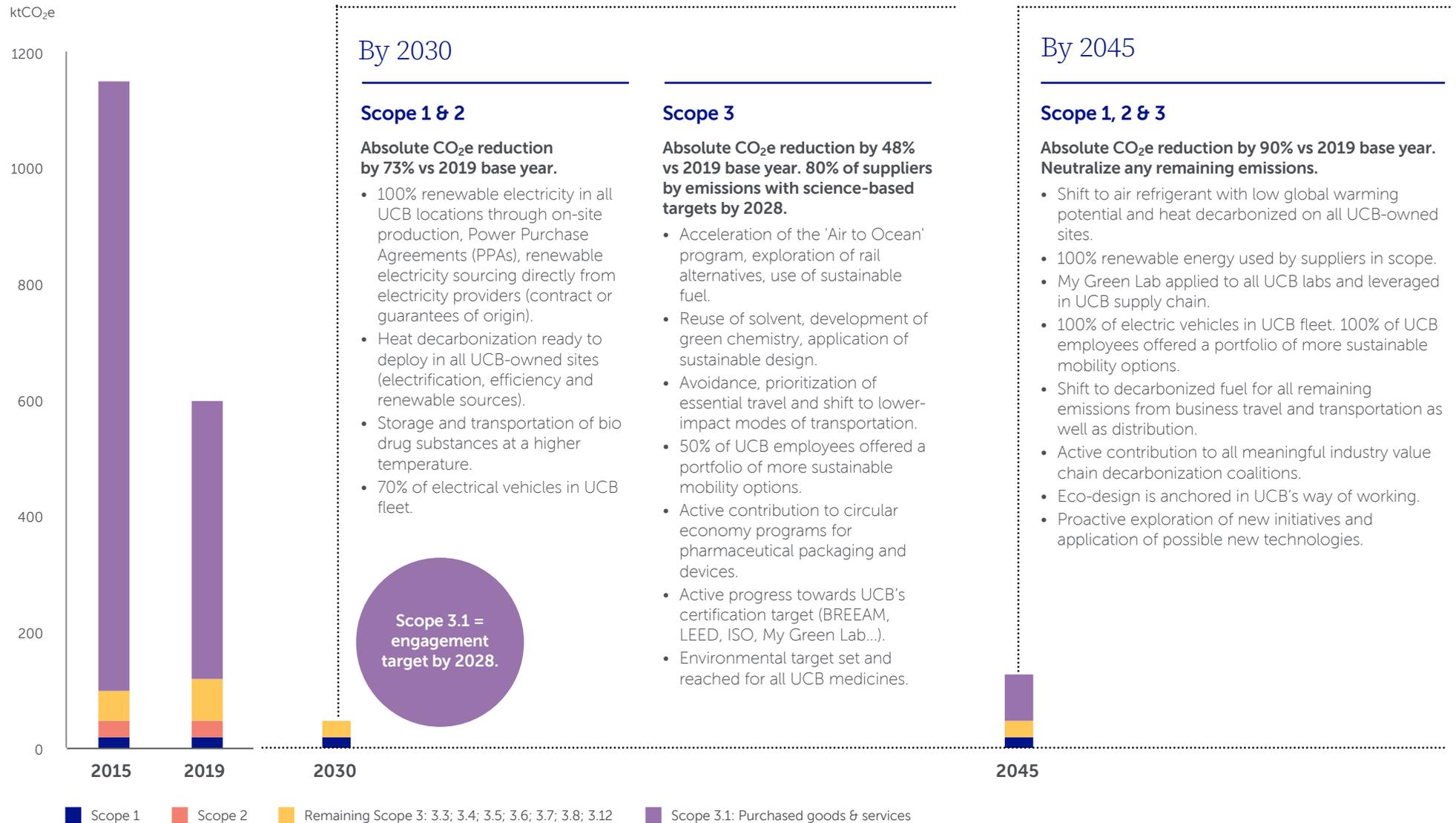
These amounts do not encompass all projects contributing to UCB's environmental transition; some investments are included in product or project-specific budgets. For instance, they don't include green-by-design buildings under UCB's LEED/BREEAM<sup>1</sup> certification program, which target at least 'Gold' or 'Very Good' ratings for new constructions and site renovations, helping to reduce locked-in emissions. Similarly, initiatives such as the development of the Green Product Scorecard and efforts to improve Process Mass Intensity (PMI) that support eco-design throughout product development are also not part of the climate transition plan budget.

UCB is not excluded from EU Paris-aligned benchmarks in accordance with the exclusion criteria stated in Articles 12(1) (d) to (g) and 12(2) of Commission Delegated Regulation (EU) 2020/1818 (Climate Benchmark Standards Regulation).

1. Leadership in Energy and Environmental Design/Building Research Establishment Environmental Assessment Method

## Climate change mitigation and adaptation continued

Additionally, we pursue decarbonization through other levers as part of UCB's transition plan towards net-zero:



## Climate change mitigation and adaptation continued

### Policies E1-2

Our environmental policy emphasizes our commitment to climate change mitigation and adaptation through a climate change transition plan. This plan focuses on reducing GHG emissions, enhancing energy efficiency and promoting sustainable practices across the value chain from raw material sourcing to product disposal. We address both mitigation (reducing emissions) and adaptation (adjusting to the effects of climate change) strategies. We respect third-party standards and initiatives by setting net-zero targets aligned with the Paris Agreement and validated by the Science Based Targets initiative (SBTi).

### Actions E1-3

#### Energy and related activities (Scopes 1, 2 and 3)

UCB continues to advance its transition toward renewable energy, addressing both electricity and gas consumption across global sites. Our decarbonization strategy is guided by a fundamental principle: we focus on improving efficiency first, followed by transitioning to cleaner energy sources. This means we prioritize reducing consumption through energy audits, optimized HVAC (heating, ventilation and air conditioning) systems, heat recovery projects, and environmental management tools that provide structured visibility into equipment performance and guide investment decisions. We also maintain our commitment in laboratories through the My Green Lab certification program.

We are progressively reducing our reliance on fossil-based natural gas through different opportunities. This includes connecting to local renewable steam networks where available and exploring on-site heat production projects using biomass and geothermal energy at sites with sufficient potential. We are also increasing the use of biogas sourced via certificates, produced exclusively from waste. Our ambition is to reach 100% biogas coverage for Scope 1 emissions by 2030.

To support the shift to renewable electricity, UCB combines sourcing from certified renewable options, on-site generation and long-term market commitments.

In this context:

- In 2023, UCB signed a physical Power Purchase Agreement (PPA) for our Belgium site.
- To reinforce the long-term robustness of our renewable electricity sourcing, UCB signed a Virtual Power Purchase Agreement (VPPA) in 2024 as part of the Energize coalition, a cross-industry initiative supporting corporate access to renewable energy. This agreement enabled the development of new solar infrastructure in Europe and will contribute additional renewable capacity to the grid once operational in 2026.

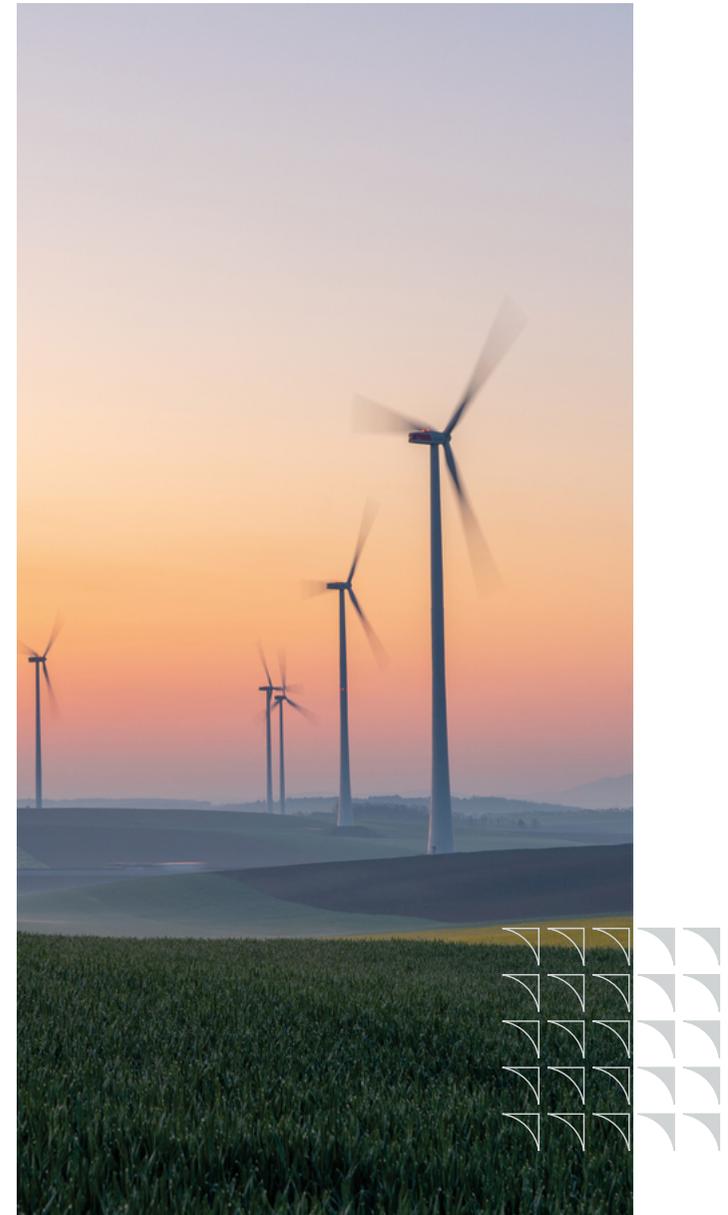
#### Car fleet (Scope 1)

UCB is accelerating the transition of its company car fleet to electric vehicles (EV) as part of its broader decarbonization strategy. Our ambition is to achieve 70% electric vehicles by 2030. To reach this goal, we are developing a country-level strategy and prioritizing deployment in markets with favorable charging infrastructure and conditions for EV adoption. To support this transition, we are installing charging stations in the offices where infrastructure allows and promoting employee awareness programs to encourage adoption.

#### Responsible sourcing (Scope 3)

UCB works with suppliers, including contract manufacturing organizations (CMOs), to accelerate their transition to low-carbon operations, focusing on those representing 80% of our purchased goods and services carbon footprint. We apply selection criteria prioritizing suppliers with science-based targets and embedding sustainability clauses in contracts. UCB is also digitalizing its CO<sub>2</sub>e data collection, refining calculations from spend to product footprint for better supplier differentiation.

Through its Supplier Recognition Program, UCB acknowledges suppliers that demonstrate ambitious climate targets and integrate sustainability practices.



## Climate change mitigation and adaptation continued

In 2025, we held a Supplier Sustainability Campaign that brought together around 100 suppliers to advance responsible sourcing and reinforce our collaborative approach. To support suppliers in their decarbonization journey, we also provide tools, guidelines and engagement opportunities, complemented by participation in key industry initiatives:

- **Energize:** A collaboration of pharma peers to accelerate renewable electricity adoption through training and joint VPPA in EU and U.S..
- **Activate:** A global program helping Active Pharmaceutical Ingredients (API) manufacturers develop decarbonization roadmaps and track measurable sustainability improvements.
- **Converge:** Enables laboratory suppliers to monitor and manage sustainability performance, improve transparency and implement effective carbon reduction planning.

### Lower-carbon distribution (Scope 3)

Our expanded "Air to Ocean" program aims to shift more distribution to sea-freight transport and assess the feasibility of extending this to rail transportation. In 2025, we successfully validated the maritime shipment of products requiring controlled temperatures (+2°C to +8°C). This achievement ensures product integrity throughout ocean transport and enables us to extend sea freight to a broader range of our portfolio.

Additionally, we continue to explore the acquisition of Sustainable Aviation Fuel (SAF) certificates as a complementary solution for air shipments when these remain necessary.

### Employee mobility (Scope 3)

We are committed to embedding a sustainable mobility mindset into UCB's culture and encouraging behavioral change in commuting, company car fleet and business travel. These changes require time and a shift in mindset.

To enable this transformation, we are reinforcing governance structures and integrating mobility objectives into our corporate objectives, making responsible mobility a shared priority across the organization. In 2025, we updated our travel policy to promote intentional travel by reducing non-essential trips, limiting air travel for destinations reachable within three hours by rail, and encouraging virtual collaboration. In addition, we are piloting an inclusive, site-specific approach that combines data and employee personas to design tailored mobility plans for each location.

### Targets E1-4

Our 2030 near-term targets include:<sup>1</sup>

- Reducing absolute Scope 1 and 2 GHG emissions by 73% from a 2019 base year.
- Reducing absolute Scope 3 GHG<sup>2</sup> emissions by 48% from a 2019 base year.
- Having 80% of our purchased goods and services suppliers, by emissions, with science-based targets by 2028.

For 2026, we have the target of decreasing by 4% our Scope 1, 2 and 3 (except 3.1) emissions compared to 2025 and for 80% of our suppliers, by emissions, to have science-based targets.

Our long-term ambition by 2045 is to reduce absolute Scope 1, 2 and 3 GHG emissions by 90% compared to the 2019 base year. UCB also committed to neutralizing any residual emissions once we reach our reduction target, ensuring net-zero emissions.

Our GHG emission inventory boundaries are fully aligned with the GHG Protocol and SBTi requirements. Additionally, our target setting adheres to the 1.5°C framework, ensuring that climate goals are consistent with the global ambition to limit temperature rise and support a transition to net-zero emissions. UCB's targets have been validated by the SBTi to ensure our baseline value and target coverage is representative of the activities covered and accounts for influences from external factors. This validation process includes the review of the baseline, GHG emission inventory, target coverage, target date and alignment with climate science, specifically the 1.5°C framework.

1. The target boundary for scope includes land-related emissions and removals from bioenergy feedstocks.

2. These include fuel- and energy-related activities, upstream transportation and distribution, waste generated in operations, business travel, employee commuting, upstream leased assets, and the end-of-life treatment of sold products.

**Climate change mitigation and adaptation** continued**Metrics****Energy consumption and mix** **E1-5**

	2024	2025
Fuel consumption from coal and coal products (MWh)	0	<b>0</b>
Fuel consumption from crude oil, petroleum and other fossil sources (MWh)	838	<b>737</b>
Fuel consumption from natural gas (MWh)	20 506	<b>43 131</b>
Energy (electricity) from other fossil fuel sources (MWh)	2 277	<b>2 059</b>
Consumption of self-generated non-renewable energy (MWh)	1 994	<b>1 977</b>
Consumption of purchased or acquired electricity, heat, steam and cooling from fossil sources (MWh)	23	<b>72</b>
<b>Total fossil energy consumption (MWh)</b>	<b>25 637</b>	<b>47 977</b>
Share of fossil sources in total energy consumption (%)	13.0%	<b>22.8%</b>
Consumption from nuclear sources (MWh)	1 089	<b>1 079</b>
Share of consumption from nuclear sources in total energy consumption (%)	0.5%	<b>0.5%</b>
Fuel consumption for renewable sources, including biomass (MWh)	78 000	<b>63 000</b>
Consumption of purchased or acquired electricity, heat, steam and cooling from renewable sources (MWh)	80 946	<b>83 485</b>
Consumption of self-generated non-fuel renewable energy (MWh)	11 384	<b>14 785</b>
<b>Total renewable energy consumption (MWh)</b>	<b>170 330</b>	<b>161 270</b>
Share of renewable sources in total energy consumption (%)	86.4%	<b>76.7%</b>
Share of renewable sources in total electricity consumption (%)	100%	<b>100%</b>
<b>Total energy consumption (MWh)</b>	<b>197 057</b>	<b>210 326</b>

**Energy intensity per net revenue**

	2024	2025
Total energy consumption per net revenue (MWh/m€)	34.7	<b>28.1</b>

In 2025, UCB maintained 100% renewable electricity coverage across all manufacturing sites, owned offices and laboratories, while further strengthening the resilience of its renewable electricity sourcing through a diversified mix of sourcing approaches. The majority of renewable electricity (around 70%) is supplied through direct green supply contracts. Additionally, around 15% is sourced via power purchase agreements and around 14% is covered through Renewable Energy Certificates (for the U.S. and Brazil offices, leased laboratories and the Saitama site). A small share is self-generated through solar panels installed on UCB-owned buildings where structurally feasible.

UCB also continued to reduce thermal energy emissions across its main manufacturing sites by prioritizing optimization and efficiency measures. Progress toward renewable heat solutions advanced through on-site projects such as biomass and geothermal systems. Although these efforts are ongoing, the share of renewable energy in our energy mix decreased in 2025 due to a lower proportion of biomethane certificates. Nevertheless, we remain firmly committed to our long-term transition away from natural gas.

**Accounting policy**

Data on electricity, gas and fuel consumption is gathered through energy invoices for all our manufacturing sites, laboratories and offices of more than 500m<sup>2</sup>, ensuring accuracy and completeness. For offices of less than 500m<sup>2</sup> and following a materiality approach, we estimate energy consumption based on activity, geographical and square footage data.

Renewable electricity is consolidated through a combination of measurement of self-produced renewable electricity, direct purchase from suppliers via contractual agreements, Power Purchase Agreements and renewable electricity certificates, which cover all aspects of our renewable electricity consumption. Additionally, our biomethane consumption is verified through the acquisition of biomethane certificates, completing the renewable energy scope.

Nuclear energy consumption is measured by analyzing the energy mix of locations where our operations are based, and calculating our share of nuclear energy from the electricity sourced from the grid.

Net revenue from high climate impact sectors to calculate energy intensity is aligned with the turnover numerator for the EU Taxonomy disclosure for activities connected to the manufacturing of medicinal products. The specific lines from the financial statement for reconciliation are: Net sales before hedging (€ 7 294 million) + Contract manufacturing sales (€ 184 million) + Milestones received by UCB relating to UCB products already sold on the related markets (€ 9 million) = Net revenue from activities in high climate impact sectors (€ 7 487 million). Net revenue from activities in high climate impact sectors (€ 7 487 million) + Designated hedges reclassified to net sales (€ 94 million) + Royalty income and fees (€ 88 million) + Other revenue than contract manufacturing and milestones received related to UCB products already sold on the related markets (€ 35 million) = Total net revenue in accordance with IFRS 15 (€ 7 704 million).

## Climate change mitigation and adaptation continued

### GHG emissions E1-6

	Baseline value	2024	2025	Annual % target/ Base year
<b>Gross Scope 1 GHG emissions (tCO<sub>2</sub>e)</b>	44 059	21 718	<b>22 194</b>	-49.6%
Stationary combustion (gas and fuel)	27 171	5 655	<b>8 863</b>	-67.4%
Mobile combustion (car fleet)	12 982	12 867	<b>10 346</b>	-20.3%
Fugitive emissions	3 905	3 196	<b>2 986</b>	-23.5%
Percentage of Scope 1 GHG emissions from regulated emission trading schemes (%)	24%	42%	<b>39%</b>	—%
<b>Gross location-based Scope 2 GHG emissions (tCO<sub>2</sub>e)</b>	20 056	16 291	<b>16 238</b>	-19.0%
<b>Gross market-based Scope 2 GHG emissions (tCO<sub>2</sub>e)</b>	5 316	5	<b>15</b>	-99.7%
<b>Total Gross indirect (Scope 3) GHG emissions (tCO<sub>2</sub>e)</b>	568 003	769 143	<b>849 796</b>	49.6%
1 Purchased goods and services	469 714	692 013	<b>776 696</b>	65.4%
2 Capital goods	—	—	<b>—</b>	—%
3 Fuel- and energy-related activities	11 167	9 129	<b>9 038</b>	-19.1%
4 Upstream transportation and distribution	39 512	30 443	<b>27 953</b>	-29.3%
5 Waste generated in operations	1 155	1 568	<b>1 986</b>	72.0%
6 Business travel	31 016	24 873	<b>24 312</b>	-21.6%
7 Employee commuting	10 763	7 562	<b>6 809</b>	-36.7%
8 Upstream leased assets (location-based)	2 044	821	<b>985</b>	-51.8%
9 Downstream transportation and distribution	—	—	<b>—</b>	—%
10 Processing of sold products	—	—	<b>—</b>	—%
11 Use of sold products	—	—	<b>—</b>	—%
12 End-of-life treatment of sold products	2 630	2 733	<b>2 017</b>	-23.3%
13 Downstream leased assets	—	—	<b>—</b>	—%
14 Franchises	—	—	<b>—</b>	—%
15 Investments	—	—	<b>—</b>	—%
<b>Total GHG emissions (location-based) (tCO<sub>2</sub>e)</b>	632 118	807 152	<b>888 228</b>	40.5%
<b>Total GHG emissions (market-based) (tCO<sub>2</sub>e)</b>	617 378	790 866	<b>871 574</b>	41.2%
<b>Total GHG emissions (market-based) (tCO<sub>2</sub>e) except of 3.1</b>	147 664	98 853	<b>94 878</b>	-35.8%

### GHG intensity per net revenue

	2024	2025
Total GHG emissions (location-based) per net revenue (tCO <sub>2</sub> e/m€)	131.2	<b>114.7</b>
Total GHG emissions (market-based) per net revenue (tCO <sub>2</sub> e/ m€)	128.5	<b>112.6</b>

### GHG supplier engagement

	2024	2025
% suppliers (by GHG emissions) having science-based target	67.8%	<b>77.6%</b>

In 2025, we delivered strong progress, achieving our -4% reduction target for total emissions across Scopes 1, 2, and 3 (excluding 3.1), confirming that our decarbonization trajectory remains robust and aligned with our strategic ambitions. Scope 1 emissions increased, reflecting the phased nature of our roadmap, where major project-driven reductions occur in steps rather than through linear annual declines. Despite this variability, our long-term pathway remains consistent with our 2030 objectives.

Scope 2 emissions remained stable, underscoring the sustained impact of our transition to 100% renewable electricity – achieving our 2030 target ahead of schedule. Emissions from our vehicle fleet continued to improve, supported by the accelerating shift toward electric vehicles across Europe, particularly in Belgium.

**Climate change mitigation and adaptation** continued

We also recorded a decline in Scope 3 emissions (excluding 3.1), driven primarily by improvements in Transportation and Distribution. Despite higher shipment volumes, emissions fell due to the expansion of our "Air to Ocean" program, which shifts air freight to sea freight. In 2025, we shipped 50% of the volumes eligible for sea freight (excluding road and rail), marking a significant milestone. The qualification of three additional controlled-temperature routes (2–8°C) further demonstrates the program's scalability and reinforces our confidence in decoupling operational growth from climate impact.

Positive signals also emerged in employee mobility: business travel stabilized and became more controlled, and improved data on commuting patterns enabled more accurate evaluation and analysis of associated emissions. End-of-life greenhouse gas emissions decreased by 26% year-on-year, primarily due to the strategic divestment of elements of the neurology and allergy portfolio.

On our supplier engagement target, we achieved a solid result with 77.6% of suppliers (by GHG emissions) now having climate science-based targets, which is above our 2025 target. This progress is essential for achieving long term absolute reductions in Purchased Goods and Services. Our next major challenge will be to gather more granular and reliable data to further refine our CO<sub>2</sub>e calculation methodology, ensuring results that more accurately reflect our real footprint. This effort will require significant collaboration and will also place additional demands on our suppliers.

**Accounting policy**

GHG emission reporting covers the period from 1 January to 31 December. The "gross" terminology for UCB is interpreted by reporting our GHG emissions according to our target's scope without canceling any carbon credit.

UCB follows the GHG Protocol guidelines for all GHG emissions reporting, which includes Scope 1, 2, and 3 emissions. For GHG emissions reporting, the consolidation approach of operational control to define the organizational boundary is used.

UCB follows the Science Based Target initiative's approach of excluding a series of emissions sources representing less than 10% of UCB's total GHG inventory from UCB's GHG emissions reporting. The following emissions have been excluded;

- Scope 1: Mobile Combustion (Car Fleet). Countries without existing or planned EV infrastructure were excluded (Romania, Greece, Türkiye, Russia, Poland, Czech Republic, Bulgaria, Hungary, Slovakia, Canada, Mexico and Brazil). This exclusion also impacts related Scope 3, Category 3 emissions (fuel- and energy-related activities).
- Scope 3, Category 2: Capital Goods were excluded due to the short-term nature of contracts, which limits the ability to refine CO<sub>2</sub>e calculations beyond spend-based estimates.

- Scope 3, Category 6: Business Travel. Sales representatives, whose role involves visiting healthcare professionals, were excluded to focus on business non-essential travel.
- Scope 3, Categories 7 & 8: Employee Commuting and Upstream Leased Assets. Offices of less than 500m<sup>2</sup> were excluded due to their minimal impact. These spaces, often rented sections of larger buildings with limited control over energy use, represent less than 5% of UCB's workforce and 2% of total office space.
- Scope 3, Categories 9, 10, & 15: Downstream Transportation and Distribution, Processing of Sold Products and Investments were excluded as they are immaterial and challenging to address within UCB's influence.
- Scope 3, Categories 11, 13 & 14: Use of Sold Products, Downstream Leased Assets and Franchises are not reported as not relevant for UCB activities.

The net revenue used to calculate GHG intensity is the same revenue figure from the consolidated income statement.

The percentage of suppliers (by GHG emissions) with science-based targets is calculated using our annual carbon maturity survey result (cross-checked with the SBTi website and online public information on the companies' science-based target status). We calculate this percentage as follows: total GHG emissions of suppliers that have committed or validated a climate science-based target / total GHG emissions from 3.1 "Purchased goods and services".

## Climate change mitigation and adaptation continued

### Biogenic CO<sub>2</sub> emissions

	2024	2025
Scope 1 (tCO <sub>2</sub> )	23 400	<b>18 900</b>
Scope 2 (tCO <sub>2</sub> )	50	<b>129</b>

#### Accounting policy

Biogenic CO<sub>2</sub> emissions refer to greenhouse gas emissions resulting from the combustion or biodegradation of carbon sequestered by plants during their growth, such as in biomass or biogas. These emissions are distinct from fossil-based emissions and are tracked separately in accordance with international standards.

For UCB, current biogenic CO<sub>2</sub> emissions mainly relate to:

- Scope 1: Biogenic emissions of CO<sub>2</sub> from the combustion of biomethane.
- Scope 2: Biogenic emissions of CO<sub>2</sub> from the consumption of purchased heat produced from wood.

Other biogenic sources will continue to be reassessed as our activities and energy sourcing evolve.

While their current contribution remains limited, UCB is progressively integrating energy from biomass into its energy mix to support CO<sub>2</sub>-reduction efforts, including biomethane- and biomass-based heat. As part of this transition, UCB applies high standards of quality, sustainability and feedstock traceability, consistent with best practices and evolving regulatory requirements. For biomethane, this includes sourcing exclusively from waste- and residue-based feedstocks, excluding energy crops.

For Scope 1 biogenic emissions, we observe a decrease in 2025 compared with 2024. This reflects the inherent variability of our decarbonization roadmap, where progress is driven by major projects rather than linear, year-on-year reductions. This variability also influences the annual share of biomethane.

For Scope 2 purchased heat, we observe an increase in 2025, reflecting a full year of wood-based heat use in Switzerland following its introduction at the end of 2024.

### Carbon credits **E1-7**

Carbon credits planned to be canceled in the future	2024	2025
Total (tCO <sub>2</sub> e)	707 772	<b>689 212</b>

#### Accounting policy

The Desa'a Forest Restoration project (Gold Standard ID: 5618) is a large-scale reforestation initiative, where all credits generated are classified as removals. The project initially applied the CDM<sup>1</sup> reforestation methodology ACM0003, which has recently been replaced by Verra's new VM0047 methodology; validation under this updated framework is expected in 2026. By the end of 2025, 7 813 hectares have been restored for UCB, with an estimated 7.6 million trees planted.

The EcoMakala initiative generates approximately 79% removal credits through the EcoMakala Reforestation Project (Gold Standard ID: 5391) and 21% reduction credits through the EcoMakala Energy Project, which focuses on improved cookstoves and sustainable charcoal production. As of 2025, a total of 626 213 VER credits have been issued under the EcoMakala project, with 449 700 VER credits purchased by UCB.

In 2025, UCB continues its collaboration with [WeForest](#) and [CO2logic](#) to ensure our carbon credits from conservation projects meet global standards. These credits come from natural sources and conservation projects. Although UCB has not started canceling these credits yet, our partners estimate the emissions based on current projects, which also have a positive impact on the local communities.

We intend to report transparently on carbon reduction and removal efforts, subject to data availability.

In addition to planning to invest in neutralization methods that will align with EU regulations and the SBTi framework when available, UCB plays a role in contributing to global neutrality beyond our value chain through the two key projects mentioned above: the [Desa'a Forest](#) restoration in Northern Ethiopia (in collaboration with WeForest) and the [EcoMakala](#) reforestation in Virunga National Park in the Democratic Republic of Congo (in collaboration with CO2logic).

### Internal carbon pricing **E1-8**

In 2025, UCB continued to advance its exploration of internal carbon pricing mechanisms as part of its commitment to environmental sustainability. The organization deepened engagement with internal stakeholders and connected with external peers as the Carbon Pricing Initiative group. These efforts enhanced UCB's understanding of internal carbon pricing frameworks, relevant scopes and best practices, while providing valuable insights into adoption trends and practical implementation strategies.

Looking ahead, UCB's priority for 2026 is to validate the scope of a pilot program designed to test internal carbon pricing within selected categories or business units. This pilot will serve as a key step to validate the value of deploying internal carbon pricing for accelerating emissions reduction and optimization projects, increasing employee awareness, and embedding environmental considerations into core decision-making processes.

1. Clean Development Mechanism

# Pollution E2

## Impacts, risks and opportunities

### Pollution of air, water and soil

Sub-topic	IRO type	Time frame	Value chain	Description
<b>Pollution of water, air and soil</b>	Actual	Short term	Own operations	Direct release of waste (solvents, chemicals, plastic, non-GHG emissions, etc.) from UCB manufacturing sites affecting the environment and society (water streams, fields, etc.).
<b>Pollution of air and soil</b>	Actual	Short term	Upstream	Direct release of waste (solvents, chemicals, plastic, non-GHG emissions, etc.) from outsourced products and services (CMOs) affecting the environment and society (water streams, fields, etc.).
<b>Pollution of air</b>	Actual	Short term	Own operations	Indirect release of non-GHG emissions and ground-level ozone through organic solvents reacting in the atmosphere and increasing air pollution.
<b>Pollution of water</b>	Actual	Short term	Downstream	Release of Active Pharmaceutical Ingredients (APIs) into the environment via patient excretion following use of a medicine.

### Substances of concern

Sub-topic	IRO type	Time frame	Value chain	Description
<b>Substances of concern</b>	Potential	Short term	Own operations	Use or unintended release of substances of concern (SoC) during manufacturing activities. Regulatory changes requiring substitution of SoC can affect (re)approval times of products.

+ Positive impact  
 - Negative impact  
 R Risk  
 O Opportunity  
 ●○○ Short term  
 ●●○ Medium term  
 ●●● Long term  
 ↑ Upstream  
 ◆ Own operations  
 ↓ Downstream

## Assessing pollution-related risks E2 IRO-1

Pollution-related risks are embedded in UCB’s risk management process.

UCB defined the parameters of the Nature assessment performed in 2025 (by using “Taskforce on Nature-related Financial Disclosures” framework and methodology) to include pollution impacts, risks and opportunities not related to substances of concern. We modeled it using two scenarios (Sustainable World vs. Degraded World) and three timeframes (baseline, 2030, 2050). In parallel, we tested regulatory-tightening pathways relevant to pollution controls. Results of the assessment will inform the next double materiality updates.

Looking ahead, we will periodically refresh this assessment as external rules, Nature models and databases evolve.

For substances of concern, internal product safety and compliance governance provides a standardized framework to identify associated risks, assess emerging hazard information and regulatory developments and determine the necessary actions. This governance applies across the entire company portfolio, from early-stage research and development to commercial product activities.

## Pollution of water, air and soil

### Policies E2-1

UCB’s environmental policy addresses air emissions, soil and wastewater management through environmental risk assessment, prevention and preparedness plans for potential operational incidents.

The policy emphasizes minimizing pollution as a key component of UCB’s commitment to environmental sustainability. We focus on preventing harm to the environment by implementing measures to control and reduce pollution from our operations, aiming to protect natural resources and ecosystems and ensuring compliance with environmental regulations.

## Pollution continued

Our policy aims to avoid incidents and emergency situations, and to control and limit their impact on people and the environment if they occur. Each site must have an emergency response and preparedness process in place to ensure any environmental adverse event is properly managed. As a minimum, this process will ensure the alarm is raised, an investigation is initiated as soon as possible, relevant parties are informed, relevant emergency response measures are taken and the event is classified according to its severity. Significant spills are reported through a declaration to authorities, as legally required, with mitigation actions in place. They are also consolidated at a global level once a year and disclosed in our Annual Report according to the severity classification.

The policy covers the sub-topics:

- **Air pollution:** We are committed to proactively manage air emissions during manufacturing processes and ensure that air quality is maintained at safe levels.
- **Water pollution:** UCB is dedicated to ensure effective wastewater treatment as part of its commitment to sustainable water resource management. This involves treating wastewater to meet environmental standards and minimize the impact on aquatic ecosystems, by preventing and mitigating water pollution throughout the lifecycle of UCB medicines.
- **Soil pollution:** We minimize soil pollution by managing environmental risks associated with our operations. This includes assessing the environmental risk of pharmaceuticals, maintaining preparedness plans to mitigate the impact of any operational incidents and managing soil contamination if it occurs.

For our offices and small labs, we are currently revamping our Health, Safety and Environment (HS&E) management system to ensure that all affiliates follow a set of minimum HS&E requirements. A new Pollution Standard was introduced in 2025, establishing a comprehensive framework for preventing and controlling pollution in all our leased offices.

### Actions E2-2

#### UCB laboratories and leased offices

For our laboratories, we are striving for all UCB laboratories to be My Green Lab-certified by 2030. Achieving My Green Lab certification supports pollution prevention by promoting sustainable practices in chemical management, waste reduction (amongst others, environmental impact reduction as energy efficiency, minimizing emissions and resource use) across our laboratory's operations.

#### UCB manufacturing sites

For manufacturing sites where pollution is a material concern, we have implemented management systems to control and prevent environmental incidents, minimizing the impact of our operations. All our manufacturing sites are certified ISO 14001.

Focusing on wastewater discharge, we monitor the water discharged from our manufacturing sites to ensure it meets regulatory standards. Metrics used are Chemical Oxygen Demand (COD), which helps us evaluate the organic content in wastewater, BOD (Biologic Oxygen Demand) and TSS (Total Suspended Solids), amongst other parameters. Our manufacturing sites are either equipped with their own wastewater treatment plants and then directed to an external sewerage system, or the wastewater is directly discharged to an external sewerage system. In this last case, the treatment is managed by a third-party provider who adheres to local regulations. In the event of any type of breach, even if the incident is not significant, we systematically report it to the authorities. In 2025, the authorities did not register the occurrence of any breaches occurring at UCB manufacturing sites.

#### Real-time monitoring of wastewater micro-pollutants and complex pollutant combinations as Active Pharmaceutical Ingredients (API)

In line with our environmental policy – which states our commitment to proactively reduce our environmental impact beyond regulatory compliance – we made notable progress in 2025 in the real-time monitoring of water micro-pollutants. These efforts reflect our ambition to proactively go beyond our legal requirements by implementing advanced technologies and risk assessment approaches that support long-term sustainability. At UCB's Braine-l'Alleud campus (Belgium), significant progress was achieved through the use of ToxMate technology for biological monitoring of discharges.

This system continuously detects potential wastewater micro-pollutants and complex pollutant combinations that traditional sensors may miss. Biological responses are now interpreted statistically, with microorganism reactivity triggered at concentration thresholds – aiming to remain below the PNEL (Predicted No-Effect Level). Meanwhile, at the Bulle site (Switzerland), we launched our first measurement campaigns of API discharges in wastewater, aligned with planned manufacturing activities. These campaigns aim to assess environmental risks by comparing measured concentrations against the PNEL. A full mapping of all APIs and their environmental impact per manufacturing line is scheduled for completion in 2026. Today we have mapped 88% of lines.

#### Voluntary disclosure of medicines' environmental risk

As a medicines producer, most of our material water quality risk comes from the excretion of APIs by patients after use of our medicines. The environmental risk assessment of UCB medicines after their use follows recognized standards, such as the European Medicines Agency (EMA) guidelines. Outcomes of UCB medicines' environmental risk assessment (ERA) have been publicly disclosed since 2023 and are available in the Metrics sub-section. The results point to the fact that they are unlikely to pose risks to aquatic environments or sewage treatment plants and are not expected to bioaccumulate significantly after their use.

**Pollution** continued**Substances of concern or very high concern****Policies E2-1**

The topic of substances of concern (SoC) and substances of very high concern (SVHC) is managed under the Regulated Substances Program and will be addressed more explicitly in the Regulated Substances Policy, for which publication has been rescheduled for Q1 2026 and rollout across the organization later in 2026.

The Regulated Substances Program aims at minimizing the use of hazardous substances and promoting substitution. The program strengthens the responsible management of hazardous substances across UCB's operations and portfolio. The program comprehensively addresses health, safety and environmental considerations across the value chain and throughout the lifecycle of raw materials, intermediates, and finished products. Oversight of the program is provided by the Executive Vice President, Patient Supply, a member of UCB's Executive Committee.

**Actions E2-2**

Through a centralized chemical safety system, chemicals purchased, distributed, and manufactured by UCB are monitored. The system enables the identification of substances of concern (SoC) and substances of very high concern (SVHC) used in internal operations to ensure regulatory compliance and the responsible management of health, safety and environmental risks associated with hazardous chemicals. UCB maintains a regulatory intelligence framework to monitor and communicate updates on substance hazard classifications, enabling the timely identification of newly classified SoC and SVHC and the implementation of appropriate risk mitigation measures. UCB actively engages with relevant trade bodies to align on regulatory developments and best practices.

Environmental and safety management systems guide the use of hazardous chemicals to control emissions and prevent exposure across manufacturing activities. Chemical risks are assessed and managed through a hierarchy of controls, including elimination, substitution, engineering and administrative measures, and personal protective equipment (PPE). Employees receive chemical safety training and have access to hazard information through a centralized Safety Data Sheet (SDS) platform, supported by medical surveillance where applicable. Emergency preparedness, spill prevention and response measures are in place to minimize environmental impacts.

**Targets E2-3****Pollution of water, air and soil**

UCB sites monitor and strive to comply with local environmental regulations and permits (e.g., on water discharge or wastewater breaches), and UCB targets transparency by publishing the conclusions of environmental risk assessments submitted to regulatory authorities. A safe discharge program focusing on wastewater pollution from API manufacturing is being deployed across UCB's activities. Following the completion of the current pilot phase, the program is expected to enable quantitative reporting on API concentrations in wastewater from our manufacturing locations. UCB aims to publicly report on this metric once the program reaches full operational maturity, ensuring these levels remain below the Predicted No-Effect Concentration.

**Substances of concern**

Substances of concern (SoC) and substances of very high concern (SVHC) are currently managed locally in accordance with country-specific regulations. Through its Regulated Substances Program, UCB defines a global ambition for the responsible use of these substances. The program establishes centralized oversight and management, aiming to progressively reduce the use of hazardous substances through a chemical hazard-based approach.

Pollution continued

Metrics

Pollution of water, air and soil **E2-4**

Active Pharmaceutical Ingredients

UCB brand name	Generic name	Environmental risk level	Link
BIMZELX®	bimekizumab	Insignificant <sup>1</sup>	<a href="https://www.ucb.com/sites/default/files/2024-05/Bimzelx.pdf">https://www.ucb.com/sites/default/files/2024-05/Bimzelx.pdf</a>
BRIVIACT®	brivaracetam	Insignificant	<a href="https://www.ucb.com/sites/default/files/2024-05/Brivact.pdf">https://www.ucb.com/sites/default/files/2024-05/Brivact.pdf</a>
CIMZIA®	certolizumab pegol	Insignificant <sup>1</sup>	<a href="https://www.ucb.com/sites/default/files/2024-05/Cimzia.pdf">https://www.ucb.com/sites/default/files/2024-05/Cimzia.pdf</a>
CIRRUS®	levocetirizine / pseudoephedrine	N/A <sup>2</sup>	/
EVENITY®	romosozumab	Insignificant <sup>1</sup>	<a href="https://www.ucb.com/sites/default/files/2024-05/Evenity.pdf">https://www.ucb.com/sites/default/files/2024-05/Evenity.pdf</a>
FERRO SANOL®	ferrous (II) glycine sulphate complex	Insignificant <sup>1</sup>	<a href="https://www.ucb.com/sites/default/files/2024-05/Ferro%20Sanol.pdf">https://www.ucb.com/sites/default/files/2024-05/Ferro%20Sanol.pdf</a>
FINTEPLA®	fenfluramine	Insignificant	<a href="https://www.ucb.com/sites/default/files/2024-05/Fintepla.pdf">https://www.ucb.com/sites/default/files/2024-05/Fintepla.pdf</a>
KEPPRA®	levetiracetam	Insignificant	<a href="https://www.ucb.com/sites/default/files/2024-05/Keppra.pdf">https://www.ucb.com/sites/default/files/2024-05/Keppra.pdf</a>
NAYZILAM®	midazolam	N/A <sup>2</sup>	/
NEUPRO®	rotigotine	Low	<a href="https://www.ucb.com/sites/default/files/2024-05/Neupro.pdf">https://www.ucb.com/sites/default/files/2024-05/Neupro.pdf</a>
RYSTIGGO®	rozanolixizumab	Insignificant <sup>1</sup>	<a href="https://www.ucb.com/sites/default/files/2024-05/Rystiggo.pdf">https://www.ucb.com/sites/default/files/2024-05/Rystiggo.pdf</a>
VIMPAT®	lacosamide	Insignificant	<a href="https://www.ucb.com/sites/default/files/2024-05/Vimpat.pdf">https://www.ucb.com/sites/default/files/2024-05/Vimpat.pdf</a>
XYREM®	sodium oxybate	Insignificant	<a href="https://www.ucb.com/sites/default/files/2024-05/Xyrem.pdf">https://www.ucb.com/sites/default/files/2024-05/Xyrem.pdf</a>
XYZAL®	levocetirizine	N/A <sup>2</sup>	/
ZILBRYSQ®	zilucoplan	Insignificant	<a href="https://www.ucb.com/sites/default/files/2024-05/Zilbrysq.pdf">https://www.ucb.com/sites/default/files/2024-05/Zilbrysq.pdf</a>
ZYRTEC®	cetirizine	N/A <sup>2</sup>	/

A growing number of UCB medicines are peptides or proteins, which, as naturally occurring substances, are unlikely to pose environmental risks. According to EMA guidelines, these substances degrade rapidly in the human body and in nature, minimizing their environmental impact. In contrast, the potential water pollutants within UCB's scope are the APIs that are not naturally occurring substances. Their potential impact depends on factors such as their fate in the environment and ecotoxicity, including bioaccumulation and aquatic chronic toxicity.

1. Due to their nature, vitamins, electrolytes, amino acids, peptides, proteins, carbohydrates and lipids are unlikely to result in a significant risk to the environment so no PEC (Predicted Environmental Concentration) nor PNEC (Predicted No-Effect Concentration) has been calculated.
2. Insufficient data available currently.
3. Wennmalm A, Gunnarsson B. Pharmaceutical management through environmental product labeling in Sweden. *Environ Int.* 2009 Jul;35(5):775-7. doi: 10.1016/j.envint.2008.12.008. Epub 2009 Feb 3. PMID: 19193440.

**Accounting policy**

We follow the European Medicines Agency's (EMA) scientific guideline on the environmental risk assessment of medicinal products for human use to identify water pollution risks from our pharmaceuticals. The environmental risk is assessed with the Predicted Environmental Concentration (PEC) and Predicted No-Effect Concentration (PNEC) based on OECD protocols.

For Pharmaceuticals in the Environment due to patient excretions, the ratio between the PEC and the PNEC defines the environmental risk level, aligned with scientific recommendations<sup>3</sup>:

- PEC/PNEC below 0.1: insignificant environmental risk level
- PEC/PNEC between 0.1 & 1: low environmental risk level

- PEC/PNEC between 1 & 10: medium environmental risk level
- PEC/PNEC higher than 10: high environmental risk level

The PEC (Predicted Environmental Concentration), which estimates the quantity of pharmaceuticals expected to be released into the environment, is assessed for each medicine. These assessments are based on conservative, worst-case assumptions, including maximum expected usage of UCB's medicines and the highest potential concentration in water, assuming no degradation occurs in the human body or during sewage treatment. The PNEC (Predicted No-Effect Concentration), which represents the maximum quantity of pharmaceuticals below which no harm to the environment is expected, is calculated in accordance with EMA guidelines. It is determined as one tenth of the worst ecotoxicity value available for each pharmaceutical, with ecotoxicity measurements conducted following OECD test standards.

## Pollution continued

### Spills

	2024	2025
Total significant spills	0	2
Total volume of significant spills (liters)	0	10 500

In 2025, two significant environmental spill events were identified at UCB facilities. Both were promptly contained and managed in accordance with applicable regulatory requirements and internal procedures.

At the Braine campus in Belgium, a process-related overflow occurred in February. The incident was immediately contained, assessed and reported to the competent environmental authorities. Corrective and preventive measures have since been implemented to strengthen equipment reliability and reduce the risk of recurrence.

At the Bulle site in Switzerland, an unintentional release was detected in December. The discharge was stopped quickly, escalated internally and is currently undergoing further technical assessment. Preventive enhancements, including improved valve-control systems, are being deployed to avoid future incidents.

#### Accounting policy

A spill is any accidental release of a hazardous substance that can affect human health, land, vegetation, waterbodies and groundwater. Significant spills are reported through declaration to authorities, as legally required, supported by reports which include mitigation actions and results of the actions.

The Spill Index calculation is based on three criteria: the nature, volume and fate of a spill ( $\text{Spill Index} = N \times V \times F$ ). Each is given a score depending on its importance, where N (Nature) refers to the hazardous nature of the substance(s) involved; V (Volume) refers to the magnitude of the spill or release; and F (Fate) refers to the extent to which the substance enters the receiving environment. We recognize a significant leakage when the Spill Index exceeds a score of 30.

### Substances of concern E2-5

To strengthen our ability to report on substances of concern (SoC), UCB is developing a central chemical management system.

This system initially prioritizes SoC and SVHC used in internal manufacturing operations, where volumes and associated risks are greatest. Over time, its scope will broaden to include substances used in laboratory settings as well as the chemical composition of other items across the UCB portfolio, enabling more comprehensive oversight and lifecycle management.



# Water withdrawal, consumption and discharge E3

## Impacts, risks and opportunities

### Water

Sub-topic	IRO type	Time frame	Value chain	Description
Water withdrawal				Scaling recycled wastewater to reduce water withdrawal in high water stress areas.
	 Actual			High amounts of water withdrawn for the production of solutions at UCB manufacturing sites impact the availability of water for ecosystems and communities.
	 Potential			High amounts of water withdrawn for the production of solutions at UCB CMOs' manufacturing plants impact the availability of water for ecosystems and communities.

+ Positive impact  
 - Negative impact  
 R Risk  
 O Opportunity  
  Short term  
  Medium term  
  Long term  
  Upstream  
  Own operations  
  Downstream

### Assessing water-related risks E3 IRO-1

Water-related risks and dependencies are embedded in UCB's risk management process. Building on the previous climate change risks/opportunities assessment towards UCB's value chain in the UCB TCFD assessment from 2022, UCB updated its analysis in 2025 with wider site and value chain coverage, and by adding a complementary assessment on nature impacts and dependencies (using Task Force on Climate-related Financial Disclosures and Taskforce on Nature-related Financial Disclosures international frameworks that help companies identify, assess and disclose risks and opportunities, impacts and dependencies).

Water is thus analyzed via both frameworks: climate-driven water stress/drought (following best practices from TCFD framework and methodology) modeled using SSP scenarios SSP1-2.6, SSP2-4.5, SSP5-8.5 over 2030, 2040, 2050 horizons, and nature dependencies/impacts on freshwater and marine resources (following best practices from TNFD framework and methodology) modeled using two scenarios: sustainable/degraded world over 2030 and 2050 horizons.

### Water-related risks, dependencies and operational resilience

For freshwater scarcity or drought, from the 147 locations assessed, one UCB site and 16% of value chain sites assessed are located in areas facing major structural water stress risk. UCB's Braine-l'Alleud site in Belgium, which hosts manufacturing, laboratories, warehouses and other support functions, is the key UCB site impacted. Mitigations include achieving our water target reduction through implementing efficiency projects, investigating possibilities of local water stewardship action, ensuring dual or alternative sourcing, putting site-level continuity plans in place and leveraging accurate insights to inform CapEx and network decisions.

For marine resource dependency, certain microbiology release tests rely on marine-derived materials, e.g., horseshoe crab blood. This creates exposures to supply constraints and discontinuity risks, regulatory and ethical scrutiny, biodiversity concerns, price volatility and potential testing bottlenecks if availability tightens. UCB is progressively transitioning to alternatives by validating and implementing non-animal-derived testing methods (e.g. recombinant-based endotoxin tests), when scientifically robust and acceptable by regulators.

### Building strategic and financial resilience

Qualitatively, risk is concentrated at a limited number of sites; response focuses on water demand reduction, resilience investments and supply diversification. UCB will periodically refresh the water analysis and embed it in UCB's risk management strategy and long-term financial planning.

### Policies E3-1

Our environmental policy includes general principles on water management, outlining our commitment to conserving water, ensuring effective wastewater treatment and practicing sustainable water resource management to minimize impacts on aquatic ecosystems. It also addresses mitigating water scarcity risks through reduced water withdrawal, improved water efficiency and recycling within manufacturing plants.

The policy highlights the goal of increasing efficiency and recycling of water resources, with a focus on areas experiencing high water stress, reflecting our commitment to reducing water withdrawal where it is most needed.

Aligned with our policy, we strive to design products with decreased impact on water-related issues and that contribute to the preservation of marine resources.

## Water withdrawal, consumption and discharge continued

### Actions E3-2

#### Lowering our bioproduct water intensity

For all our biologic molecules, we calculate the water process mass intensity (water PMI) using the metric developed by biopharmaceutical industry members of the American Chemical Society Green Chemistry Institute Pharmaceutical Roundtable. Each new UCB biologic has a target at launch of water PMI at least 20% lower than a baseline average (baseline formed by average water PMI of the process for producing biological molecules at the time the target was set), integrated into our Green Product Scorecard (more information on the Green Product Scorecard in the Circular economy section). As of 2025, three UCB biologic products under development are already reaching PMI results with reductions far better than the water PMI target, and new processes for producing other biologic products show a continuous reduction in water intensity.

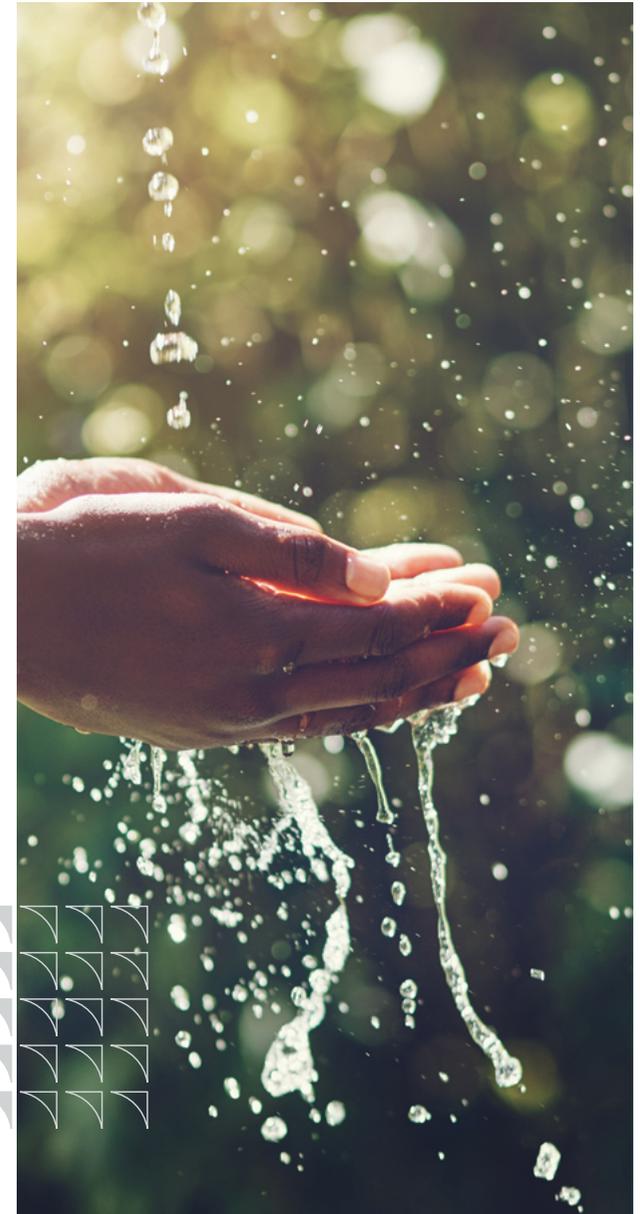
#### Specific actions in high water stress areas

Key manufacturing sites have long-term action plans to decrease water withdrawal and reduce risk in water stress areas through monitoring, reducing and recycling water, including actions such as optimizing water sampling, automating cooling tower fans and improving the efficiency of HVAC systems. For example, in 2025, a water efficiency study has been performed on some buildings at the Braine-l'Alleud campus (Belgium) which will be translated into an action plan in 2026. In Bulle (Switzerland), we implemented water saving initiatives and projects in the biomanufacturing building that included closing open loops used for monitoring, optimizing cleaning cycles and processes for starting purified water generators, leading to savings of more than 4 000m<sup>3</sup> per year. Our water conservation actions relate primarily to the Braine-l'Alleud campus (Belgium), as this site is our only major owned manufacturing location situated in a high or extremely high water stress area as defined by the WRI Aqueduct mapping tool.

Other UCB sites in water risk areas are limited to offices and small laboratories. In 2025, we continued with the detailed design of water recycling projects at the Braine-l'Alleud (Belgium) and Bulle (Switzerland) manufacturing sites to reduce the amount of water withdrawn. These projects will be implemented by phases, to reach a planned full implementation in 2030 and savings of 26% versus 2024 water withdrawal on these two sites.

### Targets E3-3

Our water conservation target is a 15% absolute reduction by 2030 compared to 2019. This voluntary target is accompanied by strict compliance with water and wastewater-related regulations. Producing biopharmaceuticals is a water-intensive process. As UCB's pipeline evolves, we need to increase production capacity to support new product launches, including several biopharmaceutical products, presenting a substantial challenge to our absolute water target in m<sup>3</sup>. This has pushed us to find innovative solutions to decouple our growth from the increased demand for this vital resource, especially in areas facing high water risk.



## Water withdrawal, consumption and discharge continued

### Metrics E3-4

#### Water

	Base year 2019	2024	2025	Variance (%) Base year
Main (city) water (m <sup>3</sup> )	554 427	470 472	<b>451 296</b>	-18.6%
Ground and surface water (m <sup>3</sup> )	65 848	27 134	<b>33 144</b>	-49.7%
Total water withdrawn (m <sup>3</sup> )	620 275	497 606	<b>484 440</b>	-21.9%
Total water withdrawn in areas at water risk, including areas of high water stress (m <sup>3</sup> )	300 091	268 115	<b>287 287</b>	-4.3%
Percentage of water withdrawn in areas with water stress	48.4%	53.9%	<b>59.3%</b>	22.5%
Water intensity (m <sup>3</sup> /m€)	126.2	81.0	<b>62.6</b>	-50.4%
Total water recycled (m <sup>3</sup> )	—	957	<b>2 124</b>	—

UCB's total water withdrawal decreased by 3% compared with 2024. The divestment of our Zhuhai site in China contributed to this reduction, offsetting increases linked to activity growth at other locations. In addition, efficiency projects at our Switzerland manufacturing site—such as optimized cleaning cycles and improved water sampling in production—and the implementation of water recycling in sanitary facilities at our Japan manufacturing site further supported this reduction.

The amount of water withdrawn in areas facing high or extremely high water stress risk decreased by 4.3% compared with our 2019 base year. However, the overall proportion of water withdrawal occurring in high water stress areas has increased. Our Braine-l'Alleud campus accounts for around 80% of withdrawals in these areas, and the industrial water recycling project currently being designed at this site will allow us to drive further reductions. Insights from this project will inform the rollout of similar initiatives across additional sites.

#### Accounting policy

UCB prioritizes water withdrawal metrics over water consumption, as withdrawal data provides a better understanding of overall water use and dependence on water resources, following the CDP's position.

UCB reports on water withdrawal across its sites, defining it as the total volume of water withdrawn from all sources (including surface water, groundwater, rainwater and municipal water supply) into the site boundaries during the reporting period. Specifically, all UCB sites larger than 500m<sup>2</sup> report their water withdrawal based on supplier invoices. When invoices are unavailable and water meters cannot be installed, consumption is estimated using site activities, geographical location and square footage. UCB-owned sites are equipped with a network of strategically placed water meters to monitor water withdrawal, detect deviations and promptly investigate root causes of any anomalies. The collected data are cross-checked monthly against received invoices to ensure accuracy.

The net revenue used to calculate water intensity is the same revenue figure from the consolidated income statement.

# Circular economy E5

## Impacts, risks and opportunities

### Circular economy

Sub-topic	IRO type	Time frame	Value chain	Description
Waste	Actual			Disposing of single-use devices needed for self-medication of biopharmaceutical solutions.

Positive impact  
 Negative impact  
 Risk  
 Opportunity  
 Short term  
 Medium term  
 Long term  
 Upstream  
 Own operations  
 Downstream

### Assessing circular economy-related risks E5 IRO-1

Resources, raw materials and circularity are embedded in UCB’s enterprise risk management process. UCB defined parameters for the dependencies/impacts and risks/opportunities assessment to include raw materials (following best practices from Taskforce on Nature-related Financial Disclosures framework and methodology). We modeled it using two scenarios (Sustainable World vs. Degraded World) and three timeframes (baseline, 2030, 2050). We included fossil-fuel based raw materials (e.g., solvents, natural gas), some bio-based raw materials (e.g., rubber) and some key strategic commodities (e.g. corn, timber, palm oil, sugar). Worldwide-recognized databases (e.g., NGFS, IEA) helped us to model evolution of price and availability, internal expertise was used to collect data and identify related circularity levers (e.g., substitution, recycled content, reuse), and both were combined to define an appropriate methodology for each analyzed item.

Under the current scope and UCB risk impact and likelihood materiality thresholds, no raw materials-related risk, opportunity, dependency or impact was assessed as material. Looking ahead, we will periodically refresh this assessment as external rules, Nature models and databases evolve.

### Policies E5-1

Our environmental policy addresses practices that seek to ensure the sustainable sourcing of resources, optimize resource efficiency and emphasize the increased use of secondary (recycled) resources. The policy includes measures to manage waste responsibly and ensure that waste is disposed of in the best available manner.

We promote circular economy by implementing comprehensive solvent recycling, enhancing packaging recyclability, increasing the use of renewable materials and utilizing the Green Product Scorecard (described in the Actions sub-section) to continuously optimize resource efficiency.

### Actions E5-2

#### Improving resource efficiency based on UCB’s Green Product Scorecard

UCB’s Green Product Scorecard scores our products’ environmental performance in design, development and production, based on a cradle-to-grave lifecycle analysis (LCA).<sup>1</sup> This spans from the carbon footprint and water impact of raw materials to manufacturing, distribution and usage, through to end-of-life treatment of packaging and device waste after use. We assess different segments of our product lifecycle to identify resource optimization opportunities.

The Green Product Scorecard is aligned with the waste hierarchy framework, structured around the following hierarchy: preventing inflow and outflow; reducing inflow and outflow; and utilizing recycled inflow while enhancing recyclability of outflows.

All core UCB products are covered by our Green Product Scorecard, which includes customized targets for each product.<sup>2</sup>

#### Reducing and replacing solvents

Solvents are the most significant resource used to manufacture small molecules used as Active Pharmaceutical Ingredients (APIs). Through UCB’s Green Product Scorecard, each medicine must be covered by a targeted action plan based on replacing solvents for greener inflow, reducing, reusing and recycling in this order of priority. All action plans are coined through a comprehensive analysis realized using the Process Mass Intensity (PMI) metric and the Global Warming Potential (GWP – in kilograms of CO<sub>2</sub>e emissions linked to the use of raw materials to manufacture 1kg of active ingredient), both developed by the American Chemical Society’s (ACS) Green Chemistry Institute (GCI) Pharmaceutical Roundtable.

1. Our internal LCA tool was developed by the ERM International Group – based on Ecoinvent 3.6 Database and Process Mass Intensity (PMI) developed by the ACS GCI PR.  
 2. UCB’s Green Product Scorecard is based on a streamlined Life Cycle Assessment, accompanied by several workshops to bring together cross-departmental expertise related to touchpoints such as product development, industrialization, packaging, marketing or strategy. Opportunities were mapped, prioritized and used to build a customized environmental footprint reduction roadmap with an associated target for each medicine.

## Circular economy continued

In 2025, progress was made toward reducing the environmental impact of an API process currently under development. A project that demonstrated a 64% reduction in raw material use across three manufacturing steps at laboratory scale in 2024 is now being prepared for industrial implementation. This represents an important step in a series of initiatives designed to reach the Global Warming Potential target of the API manufacturing process.

To support implementation, UCB conducts cross-departmental workshops, leveraging expertise in product development, industrialization, packaging and strategic planning.

Beyond APIs, UCB uses its Formulation Environmental Decision Tool (FEDT) to compare various drug product compositions and manufacturing processes, systematically guiding the drug process development team toward the most sustainable options.

### Packaging and device resource minimization and circularity

UCB's "green-by-design" approach integrates environmental considerations into feasibility studies for all packaging and devices intended for patient use, using feedback on packaging and device sustainability perceptions from a broad pool of intended users at an early design stage. We are also working closely with our partners and contract manufacturing organizations (CMOs) to ensure that safety and sustainable design criteria are embedded in the solutions they design for our medicines.

Following the 2024 redesign of CIMZIA® 200mg prefilled syringe packaging for Japan, we extended the initiative to re-engineer CIMZIA® syringe and autoinjector packs for Europe and other countries. The updated design prioritizes recyclability and is planned for launch in early 2027.

Ongoing initiatives to promote medical device circularity across UCB medicines' lifecycle include our participation in the non-profit Circularity in Primary Pharmaceutical Packaging Accelerator (CiPPPA) in the U.K. and returpen™, a pioneering medical waste recycling program in Denmark. We are also assessing the feasibility of launching a similar program in Belgium and exploring pan-European synergies to advance a comprehensive end-to-end strategy for managing waste generated by medical devices and packaging.

### Targets E5-3

UCB has set a voluntary absolute reduction target for waste generation on-site, committing to reduce our waste production by 18% by 2030 compared to 2019.

UCB has set targets to increase sustainable sourcing of resources, optimize resource efficiency and emphasize the increased use of secondary (recycled) resources, deployed through the Green Product Scorecard program. Green Product Scorecard targets aiming to reduce our product footprint encompass metrics on the Process Mass Intensity (PMI) to optimize resource use, "green-by-design" principles on circularity, waste treatment and product environmental footprints. Products are given an overall score based on these metrics, and each UCB solution is re-evaluated every three to four years to incorporate new opportunities for improvement.

Additionally, UCB's climate targets encompass the end-of-life stage of our products, addressing waste treatment after their use to further mitigate environmental impact.

### Metrics E5-5

#### Waste

	2024	2025
Amount of hazardous waste diverted from disposal and prepared for reuse	—	<b>6</b>
Amount of hazardous waste diverted from disposal for recycling	1 475	<b>1 203</b>
Amount of hazardous waste diverted from disposal for other recovery methods	—	—
Total amount of hazardous waste diverted from disposal	1 475	<b>1 209</b>
Amount of non-hazardous waste diverted from disposal and prepared for reuse	—	<b>1</b>
Amount of non-hazardous waste diverted from disposal for recycling	2 431	<b>2 027</b>
Amount of non-hazardous waste diverted from disposal for other recovery methods	294	<b>15</b>
Total amount of non-hazardous waste diverted from disposal	2 725	<b>2 044</b>
Total amount of waste diverted from disposal	4 140	<b>3 253</b>
Amount of hazardous waste directed to disposal for incineration	1 483	<b>1 739</b>
Amount of hazardous waste directed to disposal to landfill	1	—
Amount of hazardous waste directed to disposal for other disposal operations	33	<b>18</b>
Total amount of hazardous waste directed to disposal	1 517	<b>1 757</b>
Amount of non-hazardous waste directed to disposal for incineration	619	<b>704</b>
Amount of non-hazardous waste directed to disposal to landfill	27	<b>50</b>
Amount of non-hazardous waste directed to disposal for other disposal operations	—	—
Total amount of non-hazardous waste directed to disposal	646	<b>753</b>
Total amount of waste directed to disposal	2 163	<b>2 510</b>
Total amount of non-recycled waste	2 457	<b>2 533</b>
Percentage of non-recycled waste	39%	<b>44%</b>
Total amount of hazardous waste	2 932	<b>2 966</b>
Total amount of non-hazardous waste	3 371	<b>2 797</b>
Total amount of radioactive waste generated	0.008	<b>0.007</b>
Total amount of waste generated	6 303	<b>5 763</b>

## Circular economy continued

UCB continues to strengthen its efforts to minimize on-site waste generation and increase the share of waste diverted from disposal, pursuing the best available options such as reuse and recycling, which reached 56.4% in 2025.

Our reported waste volumes decreased by 9.6% compared with 2024. This reduction is mainly attributable to the broader use of primary data—replacing earlier conservative estimates based on worst-case assumptions — as well as the divestment of the manufacturing site in Zhuhai, China. To ensure year-on-year comparability, pre-2025 data will be recalculated with our most recent methodology once we initiate a formal base-year recalculation.

### Accounting policy

UCB on-site resource outflow consists of the total amount of hazardous and non-hazardous waste information across its sites, as defined per local legislation at the point of generation, created by UCB sites during the reporting period. UCB sites report on waste information based on waste management information, such as waste management invoices or waste balance sheets that allow us to track our waste stream (type of waste associated with the type of treatment) globally.

UCB has recently increased the accuracy and granularity of its waste data reporting, including details on waste category and associated treatment types. However, this level of detail was not available before 2023. As a result, it is not possible to retroactively calculate the waste footprint using the new methodology, and comparisons to the 2019 baseline for each category and treatment type cannot be made.

### Products and materials

	2024	2025
Rate of recyclable at scale content in UCB products and packaging	75%	<b>72%</b>

#### Waste composition from end-of-life UCB products

Carton	23.7%
Paper	17.0%
Metal	2.5%
Plastic	25.4%
Glass	31.4%

### Accounting policy

UCB's downstream resource outflows consist of the packaging materials and medical devices associated with the medicines sold during the reporting year. Each packaged product is detailed in a Master Bill of Material, which specifies all components and their respective weights. These data are combined with the total sales volumes for the reporting year to determine the overall weight of outflows.

The recyclability at scale of the outflows is assessed with the support of the Ellen MacArthur Foundation tool, specifically made to evaluate plastic goods that are recyclable in practice and at scale, from plastic goods that are only technically recyclable.



# EU Taxonomy

## Definitions

The EU Taxonomy (Regulation (EU) 2020/852) establishes a classification system used by the European Union to assess the environmental sustainability of specific economic activities. It is intended to support the transition toward a low-carbon and resource-efficient economy by providing companies and financial actors with a common framework and technical criteria. While the Taxonomy aims to guide investment toward more sustainable activities, its practical uptake is still evolving and investor engagement remains uneven at this stage.

Under this framework, an economic activity is considered Taxonomy-eligible when it is described in the Delegated Acts supplementing the Taxonomy Regulation. Eligibility reflects the scope of activities covered by the EU Taxonomy but does not in itself indicate environmental performance.

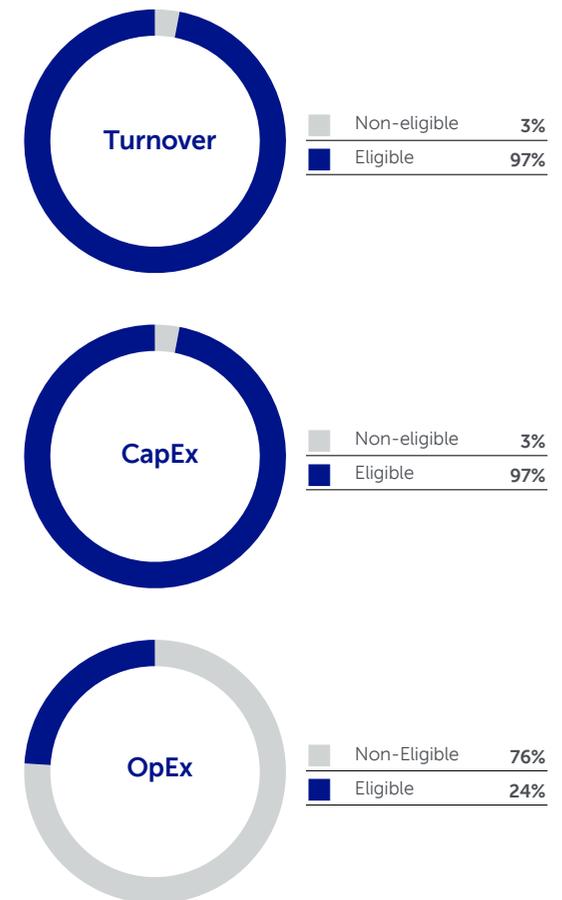
An activity is considered Taxonomy-aligned when:

- it meets all applicable technical screening criteria;
- it makes a substantial contribution to at least one of the EU's environmental objectives;
- and it does no significant harm (DNSH) to any of the others; and
- it is conducted in compliance with minimum safeguards, which include requirements related to human rights, anti-corruption, fair competition and responsible taxation.

The six environmental objectives defined by the EU Taxonomy are climate change mitigation, climate change adaptation, sustainable use and protection of water and marine resources, transition to a circular economy, pollution prevention and control and the protection and restoration of biodiversity and ecosystems. For pharmaceutical industries, pollution prevention and control is the most impacted objective, which is why it is considered as substantial contribution.

Activities that are not described in the Delegated Acts are considered Taxonomy-non-eligible. These activities fall outside the scope of assessment under the current Taxonomy framework. As the regulatory landscape continues to evolve, particularly with the Omnibus amendments, the scope of eligible and aligned activities may expand as well.

## Our activities



## EU Taxonomy continued

### Taxonomy-eligibility

Between 2024 and 2025, we did not introduce any changes to our methodology. It remains consistent with that applied in the previous reporting period.

We keep reporting under our core-business activity "1.2 Manufacture of medicinal products" for the CapEx and OpEx KPIs. We have followed the approach that the only economic activity of the UCB Group is the manufacture of medicinal products. All the OpEx and CapEx support this economic activity with which we generate revenue. Indeed, our mission is to produce differentiated medicines to reach as many patients as possible. The essence of our activity is to bring solutions to patients, producing medicines for them.

However, as the legislation has evolved, with voluntary application for 2025 reports and applicable to our next annual report, we will perform a comprehensive review of this methodology in 2026 to ensure full alignment with the new regulatory requirements.

### Taxonomy-alignment

UCB is dedicated to delivering innovative and differentiated treatment options to patients. As part of our commitment to sustainable performance, we have undertaken a comprehensive review to assess the alignment of our core business activity, the "Manufacture of Medicinal Products", with the EU Taxonomy Technical Screening Criteria (TSC).

In addition to focusing our analysis on this core economic activity, we concentrated our assessment on UCB's two strategic manufacturing sites, which together represent the backbone of our industrial capacity for biological and pharmaceutical production. These sites manufacture active pharmaceutical ingredients (APIs), which constitute the products with the highest environmental footprint. Both sites are actively progressing through the Taxonomy assessment process.

According to the EU Taxonomy system, medicines can only be deemed sustainable if they meet specific criteria. This includes verifying whether substances are naturally occurring, biodegradable or mineralized, or demonstrating the absence of technically feasible alternative ingredients. Assessing the environmental performance of medicinal

products requires extensive and highly specific data collection, particularly regarding ingredient characteristics. Furthermore, the Taxonomy requires verification relating to the presence of certain substances of concern and the lack of viable substitutes, which demands additional scientific, regulatory and operational evidence.

Despite the EU Taxonomy complexity, UCB supports the implementation of the EU Taxonomy framework. We recognize the value of having a common definition for environmentally sustainable turnover, CapEx and OpEx.

In 2025, we have continued our data gap assessment process. In our case, a detailed assessment shows that a substantial portion of our APIs already meet the EU Taxonomy criteria related to environmental degradation, either through demonstrated biodegradability or mineralization potential. The other APIs are still under evaluation, as additional testing is required before conclusions can be drawn.

Our analysis has shown that while our products meet some criteria, they do not fulfill all of them. This "all or nothing" approach results in a 0% alignment.

We share the concerns expressed by the European Federation of Pharmaceutical Industries and Associations<sup>1</sup> and its members that the TSC do not adequately reflect the sustainable practices of the pharmaceutical industry. We believe that the current approach does not acknowledge the unique characteristics of medicinal products and fails to incentivize environmental improvements made to these products.

UCB has been committed for over 15 years, and remains committed, to reducing the environmental footprint of our operations and our medicines. Our policies, actions, targets and performance to minimize our impact on the planet are presented throughout the 'Sustainability Statement'.

While the EU Taxonomy is not yet fully aligned to the realities of our sector, UCB will continue to use the technical criteria as a guiding reference to shape our long-term ambition and support future environmental improvements.

However, given the complexity of the EU Taxonomy, we may not commit to any changes linked to the alignment process if they are not reasonable or are not in line with our strategic goals.

### Minimum safeguards

Ethics and business integrity is a priority area for UCB and we have different practices that strive to protect the minimum safeguards as defined in the EU Taxonomy. We will assess and harmonize due diligence processes to comply with the Corporate Sustainability Due Diligence Directive by 2028. Our commitment to respecting human rights across our value chain is described in the 'Workers in the value chain' section and our anti-bribery and anti-corruption practices are described in the 'Business conduct' section.

UCB will continue to monitor and consider any changes in the EU Taxonomy regulation going forward, along with overall readiness procedures for next year's Annual Report.

### Taxonomy-eligible economic activities

Economic activities	Description
<b>1.2 Manufacture of medicinal products</b>	Manufacture and sale of medicines produced by the group or by a contract manufacturing organization (CMO) intended for patients living with diseases in immunology, neurology, and other therapeutic areas.

We consider as Taxonomy-eligible under activity 1.2, the revenue coming from medicinal products and OpEx and CapEx that support the assets used in the production of the medicinal products.

### Our KPIs and accounting policies

The key performance indicators (KPIs) include the turnover KPI, the CapEx KPI and the OpEx KPI. For presenting the Taxonomy KPIs, we use the templates provided in Annex II of the Disclosures Delegated Act. None of our activities contribute to multiple environmental objectives, so no disaggregation of KPIs is required.

1. [How the EU can incentivise environmental sustainability of new medicines](#)

## EU Taxonomy continued

## Turnover template for financial year 2025

Economic Activities	Code	Turnover € million	Proportion of turnover, year 2025 %	Substantial contribution criteria						Does not significantly harm criteria (DNSH)						Minimum safeguards Y/N	Proportion of Taxonomy aligned or - eligible turnover, year 2024 %	Category enabling activity E	Category transitional activity T
				Climate change mitigation Y; N; N/EL (a)	Climate change adaptation Y; N N/EL (a)	Water Y; N; N/EL (a)	Pollution Y; N; N/EL (a)	Circular economy Y; N; N/EL (a)	Biodiversity Y; N N/EL (a)	Climate change mitigation Y/N	Climate change adaptation Y/N	Water Y/N	Pollution Y/N	Circular economy Y/N	Biodiversity Y/N				
<b>A. Taxonomy-eligible activities</b>																			
<b>A.1 Environmentally sustainable activities (Taxonomy-aligned)</b>																			
Manufacture of medicinal products	PPC 1.2	-	0%	-	-	-	-	-	-	-	-	-	-	-	-	-	0%	-	-
<b>Turnover of environmentally sustainable activities (Taxonomy-aligned) (A.1)</b>		-	0%	-	-	-	-	-	-	-	-	-	-	-	-	-	0%	-	-
<b>A.2 Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities)</b>																			
				EL; N/ EL (b)	EL; N/ EL (b)	EL; N/ EL (b)	EL; N/ EL (b)	EL; N/ EL (b)	EL; N/ EL (b)										
Manufacture of medicinal products	PPC 1.2	7 487	97%	N/EL	N/EL	N/EL	EL	N/EL	N/EL	-	-	-	-	-	-	-	93%	-	-
<b>Turnover of Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities)(A.2)</b>		7 487	97%	0%	0%	0%	97%	0%	0%	-	-	-	-	-	-	-	93%	-	-
A. Turnover of Taxonomy-eligible activities (A.1 + A.2)		7 487	97%	0%	0%	0%	97%	0%	0%	-	-	-	-	-	-	-	93%	-	-
<b>B. Taxonomy-non eligible activities</b>																			
<b>Turnover of Taxonomy-non eligible activities (B)</b>		217	3%																
<b>Total</b>		7 704	100%																

(a) Y Yes, Taxonomy-eligible and Taxonomy-aligned activity with the relevant environmental objective.

N No, Taxonomy-eligible but not Taxonomy-aligned activity with the relevant environmental objective.

N/EL Not eligible, Taxonomy-non-eligible activity for the relevant environmental objective.

(b) EL Taxonomy-eligible activity for the relevant objective.

N/EL Taxonomy-non-eligible activity for the relevant objective.

## EU Taxonomy continued

## CapEx template for financial year 2025

Economic Activities	Code	CapEx € million	Proportion of CapEx, year 2025 %	Substantial contribution criteria							Does not significantly harm criteria (DNSH)							Proportion of Taxonomy- aligned or - eligible CapEx, year 2024 %	Category enabling activity E	Category transitional activity T
				Climate change mitigation Y; N; N/EL (a)	Climate change adaptation Y; N N/EL (a)	Water Y; N; N/ EL (a)	Pollution Y; N; N/EL (a)	Circular economy Y; N; N/EL (a)	Biodiversity Y; N N/EL (a)	Climate change mitigation Y/N	Climate change adaptation Y/N	Water Y/N	Pollution Y/N	Circular economy Y/N	Biodiversity Y/N	Minimum safeguards Y/N				
<b>A. Taxonomy-eligible activities</b>																				
<b>A.1 Environmentally sustainable activities (Taxonomy-aligned)</b>																				
Manufacture of medicinal products	PPC 1.2	-	0%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0%	-	-
CapEx of environmentally sustainable activities (Taxonomy-aligned) (A.1)		-	0%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0%	-	-
<b>A.2 Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities)</b>																				
				EL; N/ EL (b)	EL; N/ EL (b)	EL; N/ EL (b)	EL; N/ EL (b)	EL; N/ EL (b)	EL; N/ EL (b)	EL; N/ EL (b)										
Manufacture of medicinal products	PPC 1.2	601	97%	N/EL	N/EL	N/EL	EL	N/EL	N/EL		-	-	-	-	-	-	-	95%	-	-
<b>CapEx of Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities)(A.2)</b>		601	97%	0%	0%	0%	97%	0%	0%		-	-	-	-	-	-	-	95%	-	-
A. CapEx of Taxonomy-eligible activities (A.1 + A.2)		601	97%	0%	0%	0%	97%	0%	0%		-	-	-	-	-	-	-	95%	-	-
<b>B. Taxonomy-non eligible activities</b>																				
<b>CapEx of Taxonomy-non eligible activities (B)</b>		17	3%																	
<b>Total</b>		618	100%																	

(a) Y Yes, Taxonomy-eligible and Taxonomy-aligned activity with the relevant environmental objective.

N No, Taxonomy-eligible but not Taxonomy-aligned activity with the relevant environmental objective.

N/EL Not eligible, Taxonomy-non-eligible activity for the relevant environmental objective.

(b) EL Taxonomy-eligible activity for the relevant objective.

N/EL Taxonomy-non-eligible activity for the relevant objective.

## EU Taxonomy continued

## OpEx template for financial year 2025

Economic Activities	Code	OpEx € million	Proportion of OpEx, year 2025 %	Substantial contribution criteria						Does not significantly harm criteria (DNSH)						Minimum safeguards Y/N	Proportion of Taxonomy- aligned or - eligible OpEx, year 2024 %	Category enabling activity E	Category transitional activity T	
				Climate change mitigation Y; N; N/EL (a)	Climate change adaptation Y; N N/EL (a)	Water Y; N; N/EL (a)	Pollution Y; N; N/EL (a)	Circular economy Y; N; N/EL (a)	Biodiversity Y; N N/EL (a)	Climate change mitigation Y/N	Climate change adaptation Y/N	Water Y/N	Pollution Y/N	Circular economy Y/N	Biodiversity Y/N					
<b>A. Taxonomy-eligible activities</b>																				
<b>A.1 Environmentally sustainable activities (Taxonomy-aligned)</b>																				
Manufacture of medicinal products	PPC 1.2	-	0%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0%	-	-
<b>OpEx of environmentally sustainable activities (Taxonomy-aligned) (A.1)</b>		-	0%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0%	-	-
<b>A.2 Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities)</b>																				
				EL; N/ EL (b)	EL; N/ EL (b)	EL; N/ EL (b)	EL; N/ EL (b)	EL; N/ EL (b)	EL; N/ EL (b)	EL; N/ EL (b)										
Manufacture of medicinal products	PPC 1.2	120	24%	N/EL	N/EL	N/EL	EL	N/EL	N/EL		-	-	-	-	-	-	-	23%	-	-
<b>OpEx of Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) (A.2)</b>		120	24%	0%	0%	0%	24%	0%	0%		-	-	-	-	-	-	-	23%	-	-
A. OpEx of Taxonomy-eligible activities (A.1 + A.2)		120	24%	0%	0%	0%	24%	0%	0%		-	-	-	-	-	-	-	23%	-	-
<b>B. Taxonomy-non eligible activities</b>																				
<b>OpEx of Taxonomy-non eligible activities (B)</b>		387	76%																	
<b>Total</b>		507	100%																	

(a) Y Yes, Taxonomy-eligible and Taxonomy-aligned activity with the relevant environmental objective.

N No, Taxonomy-eligible but not Taxonomy-aligned activity with the relevant environmental objective.

N/EL Not eligible, Taxonomy-non-eligible activity for the relevant environmental objective.

(b) EL Taxonomy-eligible activity for the relevant objective.

N/EL Taxonomy-non-eligible activity for the relevant objective.

## EU Taxonomy continued

### UCB SA – Consolidated disclosures pursuant to Article 8 of the Taxonomy Regulation

In this section, as a non-financial parent undertaking, we present the share of our Group turnover, capital expenditure (CapEx) and operating expenditure (OpEx) according to the EU Taxonomy requirements for the reporting period of 2025. These are associated with the Taxonomy-eligibility and Taxonomy-alignment of the economic activity "1.2 Manufacture of medicinal products" related to the Pollution Prevention and Control (PPC) environmental objective, in accordance with Article 8 of the Taxonomy Regulation.

#### Turnover KPI

In 2024 and in 2025, we used the IFRS 15 revenue figure as a denominator, which is the total net turnover as disclosed in [Note 7 Revenue from contracts with customers](#). To calculate the numerator, we consider the net sales before hedging, the contract manufacturing and the milestones received by UCB relating to UCB products already sold on the related market.



## EU Taxonomy continued

### CapEx KPI

The CapEx KPI is defined as Taxonomy-eligible CapEx (numerator) divided by our total CapEx (denominator).

Total CapEx consists of additions to tangible and intangible assets during the financial year, before depreciation, amortization, and any remeasurements, including those resulting from revaluations and impairments, as well as excluding changes in fair value. It includes acquisitions of tangible fixed assets (IAS 16), intangible fixed assets (IAS 38) and right-of-use assets (IFRS 16). Goodwill is not included in CapEx, because it is not defined as an intangible asset in accordance with IAS 38. For further details on our accounting policies regarding our CapEx, see a summary of our significant accounting policies (Note 3 [Summary of significant accounting policies](#)). The denominator can be reconciled with the additions available in Note 20 [Intangible assets](#) and Note 22 [Property, plant and equipment](#), plant and equipment. The denominator shall also cover additions to tangible and intangible assets resulting from business combinations (refer to the additions in Note 8 [Business combinations](#)) but we do not have any for the fiscal years 2024 and 2025.

To determine the numerator, we consider that assets and processes are associated with Taxonomy-eligible economic activities when they are essential components for executing an economic activity.

### Contextual information

UCB does not carry out activities in the nuclear or fossil fuel sectors.

#### **Nuclear energy-related activities**

1. The undertaking carries out, funds or has exposures to research, development, demonstration and deployment of innovative electricity generation facilities that produce energy from nuclear processes with minimal waste from the fuel cycle.	No
2. The undertaking carries out, funds or has exposures to construction and safe operation of new nuclear installations to produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production, as well as their safety upgrades, using best available technologies.	No
3. The undertaking carries out, funds or has exposures to safe operation of existing nuclear installations that produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production from nuclear energy, as well as their safety upgrades.	No

#### **Fossil gas-related activities**

4. The undertaking carries out, funds or has exposures to construction or operation of electricity generation facilities that produce electricity using fossil gaseous fuels.	No
5. The undertaking carries out, funds or has exposures to construction, refurbishment, and operation of combined heat/cool and power generation facilities using fossil gaseous fuels.	No
6. The undertaking carries out, funds or has exposures to construction, refurbishment and operation of heat generation facilities that produce heat/cool using fossil gaseous fuels.	No

1. [Commission notice on the interpretation of legal provisions of EU Taxonomy February 2022](#)

### OpEx KPI

EU Taxonomy defines OpEx differently compared to financial reporting, therefore OpEx as defined by EU Taxonomy would not equal the total operating expenditure in the financial statements.

The OpEx KPI is defined as Taxonomy-eligible OpEx (numerator) divided by the total defined as Taxonomy OpEx (denominator).

Following the EU Taxonomy regulation,<sup>1</sup> the total OpEx consists of direct non-capitalized costs related to research and development (R&D), building renovation measures, short-term leases, plant and laboratory equipment purchased but not capitalized, as well as all forms of maintenance and repair. Any other direct expenditures relating to the day-to-day servicing of assets of Property, plant and equipment by the entity or third party to whom activities are outsourced, that are necessary to ensure the continued and effective function of the asset, should also be part of the denominator.

Only a small part of R&D expenses has been taken into account in the denominator, as depreciation and indirect expenses were excluded. For depreciation, the costs have been excluded to avoid a double count, as assets that are depreciated are already taken in CapEx in previous years. For the other R&D expenses, a lot of these expenses concern expenses that are not directly related to projects. OpEx for EU Taxonomy reporting should exclude overheads, raw materials, costs of employees operating machines, cost of managing research and development projects and electricity, fluids or reagents needed to operate the property, plant and equipment.

During the clinical and preclinical development phases in the biopharmaceutical industry, there is still quite some uncertainty whether these projects will lead to regulatory approval and hence products that will generate revenues. Therefore the R&D expenses that are directly related to projects (as taken in the denominator) have not been considered as Taxonomy eligible OpEx (for the numerator) for the economic activity "Manufacture of medicinal products".

Maintenance and repair expenditures were determined based on the maintenance and repair costs allocated to our internal cost centers. The related cost items can be found in various line items in our income statement, including cost of sales (maintenance in operations,) and general and administrative expenses (such as maintenance of IT systems). In general, these expenditures include costs for services and material costs for daily servicing, as well as for regular and unplanned maintenance and repair measures. These costs are directly allocated to the property, plant and equipment. This does not include expenditures relating to the day-to-day operation of the property, plant and equipment, such as raw materials, cost of employees operating the machinery, electricity or fluids that are necessary to operate the property, plant and equipment. Amortization and depreciation are also excluded in the OpEx KPI.

Costs for building renovation measures and short-term leases are also included in the numerator and denominator of the OpEx KPI.



# Social information

## Social Information continued

# Human rights policy overview

## Description of key contents

The policy defines UCB's human rights commitment, roles, responsibilities, and the key principles guiding decisions and activities to safeguard and uphold human rights. Identified commitments include third-party related risks (notably labor rights, environmental impacts, corruption) and non-discrimination, non-harassment and fair treatment for UCB employees, the right to health and ethical clinical trials.

It also establishes how UCB identifies salient human rights issues, conducts due diligence, engages with rights holders and provides remedy when adverse impacts occur.

## Scope of policy

All UCB employees, including those working on our behalf. Third-party expectations are defined in the UCB Responsible Sourcing Standards for Business Partners.

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## Accountable for implementation

The Chief Ethics and Compliance Officer serves as the key sponsor for UCB-wide human rights activities and reports regularly on human rights matters to UCB's Board of Directors and Executive Committee.

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## Internationally recognized instruments

Aligned with the International Bill of Human Rights, the Declaration on Fundamental Principles and Rights at Work and the UN Global Compact (to which UCB is a signatory). We also affirm our commitment to the UN Guiding Principles on Business and Human Rights.

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## Availability

The policy is available at [UCB website](#) and intranet. Employees are informed of this policy through a mandatory training.

# Own workforce S1

## Impacts, risks and opportunities S1 SBM-3

### Inclusion

Sub-topic	IRO type	Time frame	Value chain	Description
<b>Diversity, Measures against violence and harassment in the workplace</b>	+ Potential	●○○	◇	Promoting inclusive practices in UCB's workforce (e.g., equal promotion, inclusive recruitment) can lead to an increase in employee satisfaction and wellbeing.
	- Actual	●○○	◇	Harassment and discrimination, which should be reported through the UCB Integrity Line, can affect employee wellbeing, productivity and retention rates.
<b>Diversity</b>	- Actual	●○○	◇	Lack of representation in UCB's workforce at all levels of the organization (including executive level in particular) can lead to employee discouragement, loss of productivity and ultimately turnover.
	- Actual	●○○	◇	A lack of equal opportunity for career advancement opportunities can lead to employee discouragement, loss of productivity and ultimately turnover.
	○	●●○	◇	Leverage business leaders as enablers to help drive the principles of inclusion throughout UCB (e.g., diversity in clinical trials, equal opportunities and pay equity) which should lead to enhanced reputation, talent attraction, productivity and broader market insights.

### Employee development

Sub-topic	IRO type	Time frame	Value chain	Description
<b>Training and skills development</b>	R	●●○	◇	Inability to upskill and recruit employees with new industry technological skills needed (e.g., AI, machine learning) at the required speed of the business transformation can lead to a competitive disadvantage for UCB.
	○	●●●	◇	Reaching social, environmental and financial performance can lead to increased attractiveness of the company towards younger generations.

### Health, safety and wellbeing

Sub-topic	IRO type	Time frame	Value chain	Description
<b>Health and safety</b>	+ Actual	●○○	◇	Adhering to high employee health, safety and wellbeing standards (above legal obligations) and ensuring employees feel safe to speak up.
	- Actual	●●○	◇	Old/aged manufacturing infrastructure and equipment and its associated impact on employee physical safety.
	- Actual	●●●	◇ ↓	Using organic solvents with toxic and carcinogenic properties that directly impact the UCB employee and their family.
	- Actual	●○○	◇	High-risk manufacturing activities, such as working at height, in confined spaces, in explosive atmospheres, with pressurized equipment or close to construction activities, leading to fatalities or severe injuries.
<b>Work-life balance</b>	- Actual	●○○	◇	High work pressure and long working hours, leading to screen fatigue, lack of movement, burnouts and a decrease in work efficiency.
<b>Health and safety, Work-life balance</b>	R	●○○	◇	Reputational and investor risk of UCB over global health, safety and wellbeing (HSWB) ambitions and HSWB targets/policies/actions.

+ Positive impact   
 - Negative impact   
 R Risk   
 O Opportunity   
 ●○○ Short term   
 ●●○ Medium term   
 ●●● Long term   
 ↑ Upstream   
 ◇ Own operations   
 ↓ Downstream

**Own workforce** continued**Inclusion****Policies S1-1**

In 2025, UCB continued to embed the principles of Inclusion across the organization, as set out in the UCB Code of Conduct, Human Rights Policy and other internal policies, across the business. In 2026, we will continue to assess and update our policies as needed to emphasize our ongoing commitment to advance these principles in a legally compliant manner, while continuing to prevent discrimination across our workforce and supply chain. The implementation of these policies is overseen by the Chief Human Resources Officer (member of the Executive Committee) and the Global Head of Inclusion.

UCB follows applicable local laws and regulations on workplace inclusion and non-discrimination, including providing specific local guidance on areas such as disability accommodations and parental leave in each market.

**Actions S1-4**

Our global inclusion roadmap aims to ensure these principles are woven into all aspects of our company. Such initiatives are backed by equipping internal advocates with resources to boost awareness and understanding, as well as continuing our commitments to inclusive recruitment and to pay equity, as may be required by applicable law.

UCB's network of inclusive communities are open to all employees. They consist of nine Local Inclusion Councils, eight Employee Resource Groups (ERG) and allies. These communities help ensure that the principles of inclusion are integrated throughout our business operations at a local level. Their activities include initiating mentorship programs, hosting community events, and educating the wider workforce on the importance of inclusion.

Monthly "ERG Office Hours" exchanges between the Global Inclusion team, ERG leaders and a joint community encourage interactions and sharing of best practices across these groups. These exchanges serve as a platform to gain insights and feedback from ERG to help address any potential challenges in fostering an inclusive work environment.

UCB's commitment to equal opportunity and nondiscrimination is also embedded throughout all our talent processes, supported by an extensive onboarding and learning portfolio. Our hiring processes seek to ensure that our internal talent pool is consistently leveraged for new opportunities, including posting all open positions to enhance transparency. Hiring managers have been trained on promoting equal opportunity and mitigating bias in our talent attraction processes, including with regard to the posting of roles, recruitment, interviewing and hiring.

**Employee development****Policies S1-1**

Our global talent strategy aims to ensure that structured internal mobility, professional development, and referral programs encourage skills development and expertise sharing. Through the internal employee growth center and their Learning and Talent Partners, all UCB employees can access learning platforms and cross-functional skill development and explore internal mobility and leadership opportunities. This is supported by increased investment into accelerated leadership learning programs, an increased focus on developing digital skills (e.g., AI), and transversal skills to support our evolving business strategy. A capability-building process is in place to ensure we are constantly addressing current and future skill gaps in the workforce.

Our talent strategy aims to mitigate any risk of UCB falling behind industry standards in terms of technology and broader workforce capability skills, as well as the likelihood of employees looking elsewhere as a result of dissatisfaction with their personal development progress. This falls under the oversight of the Chief Human Resources Officer, who is part of the Executive Committee.

UCB's employee development practices are in compliance with local regulations (e.g., Belgian employment legislation on annual training plan and individual training rights).

**Actions S1-4**

We support the progression of employees through ongoing personal development plans and access to learning and mobility platforms, supported by a culture of lifelong learning across UCB.

- To broaden access to learning and better meet the diverse development needs of our employees, we accelerated the rollout of global learning platforms in 2025, making LinkedIn Learning available to all employees who wish to use it.
- To encourage internal mobility, we have a strong early careers strategy, supported by an internal opportunity marketplace and careers site to promote career development opportunities to existing employees. These have helped us achieve our 2025 internal mobility objective comfortably.
- We actively promoted UCB's Transversal Learning Portfolio, our centralized offering designed to help all employees build critical transversal skills, resulting in a significant increase in both participation and overall reach.
- Company-wide 'leadership learning' programs aim to equip leaders (from line managers to senior executives) with the right people management skills and mindset to promote a growth culture among their teams.
- In 2025, we redesigned our performance and growth evaluation process, which will be implemented in 2026. The updated approach provides greater clarity and transparency regarding performance expectations, and introduces a new 'growing self and others' dimension, emphasizing feedback, learning, and development as integral components of performance.
- To attract, develop and retain top research and development (R&D) talents in a competitive pharmaceutical talent landscape, we run various initiatives targeted specifically at scientists and R&D professionals, including short-term job rotations to help employees expand their professional horizons and connect with other UCB teams, internal PhD opportunities to develop and retain our top graduates, external PhD sponsorship programs with leading U.K./EU academic institutions to strengthen our early career talent pool and mentoring programs with senior leaders.

**Own workforce** continued**Health, safety and wellbeing****Policies S1-1**

At UCB, the health, safety and wellbeing of all personnel are foundational to our operational excellence and corporate responsibility. We are committed to fostering a culture where every individual – whether employee, contractor or visitor – can thrive in a safe, healthy and supportive working environment. We firmly believe that all injuries are preventable, and we continuously strive to eliminate any potential hazards through proactive risk management and the implementation of industry-leading programs.

- We design, operate and maintain our facilities to industry standards to prevent harm to our people and the environment.
- We ensure compliance with all applicable legal and regulatory requirements related to health, safety and wellbeing.
- We integrate health, safety, wellbeing and product stewardship into our business strategy, planning and decision-making processes.
- We establish clear accountabilities and responsibilities for health, safety and wellbeing performance at every organizational level.
- We provide comprehensive information, instructions, procedures, training and resources to empower our colleagues to work safely and contribute to a culture of shared vigilance and continuous improvement.
- We regularly review and enhance our practices to ensure ongoing compliance, risk mitigation and the advancement of our health, safety and wellbeing objectives.

The global Health, Safety and Wellbeing (HSWB) Policy is supported by a set of global operational procedures governing the main processes of ISO 45001; and the latter are transcribed into local procedures applicable at the site level, taking into account the local operational and regulatory specificities. The policy is endorsed by our CEO, Chief Human Resources Officer, Executive Vice President, Patient Supply and Head of Health, Safety and Wellbeing.

**Actions S1-4**

In 2025, UCB launched a comprehensive, multi-year safety program at the Braine-l'Alleud (Belgium) campus, a strategic site for research, development and manufacturing. This initiative is designed to strengthen the robustness of our safety management system and drive significant improvements in our safety performance. Our mid-term objective is to achieve ISO 45001 certification for the campus, underscoring our commitment to international standards of occupational health and safety.

A cornerstone of this program is the development of Safety Leadership across our management team, beginning with senior leaders. By empowering our leaders with advanced safety competencies, we foster a culture of accountability and proactive risk management throughout the organization.

In addition to this program specifically targeting the Braine campus, several major initiatives have been launched or continued in 2025.

Our high-severity risks mitigation program continues according to plan, focusing on three priority areas: technical assessment of physical assets, deployment of operational standards, and skills and competency enhancement.

Additionally, we have defined and standardized safety requirements for large capital projects, ensuring that every new construction project aligns with our rigorous safety expectations from design to execution to completion. To support continuous improvement, we have enhanced and simplified our reporting tool for near-miss incidents and hazardous situations. This enables timely identification and resolution of potential risks, fostering a transparent and responsive safety culture.

Our Road Safety Program remains a priority, with a particular focus on the United States – UCB's largest car fleet. The program has also been expanded to include all UCB employees on a voluntary basis, reinforcing our commitment to employee wellbeing both on and off site.

We have continued to advance our "The Essentials" program, an initiative designed to ensure that our health and safety management systems are robust, fit-for-purpose and effectively support risk control and the ongoing improvement of the organization's health, safety and wellbeing performance.

Our manufacturing site in Japan (Saitama) has successfully renewed its ISO 45001 certification, following the successful recertification of our Swiss manufacturing site (Bulle) in 2024.

We strengthened global crisis management by designing and deploying a harmonized framework, developing global policies, enhancing infrastructure with a crisis room, and launching a pilot in Italy to begin global rollout. In 2026, priorities are completing the rollout, finalizing documentation, operationalizing the crisis room and expanding training programs. On the wellbeing side, aligned with our listening strategy, we conducted global focus groups to identify the root causes of mental health and workload challenges. We also launched the "Mental Health Happy Hour" podcast in partnership with the Resilience Institute, releasing five episodes throughout the year to support employee wellbeing and mental resilience. Finally, we have established a Health, Safety, Wellbeing & Business (HSWB) Steering Committee at the executive level to provide strategic oversight and governance for our numerous HSWB initiatives, programs and projects.

## Own workforce continued

### Processes for engaging with UCB's own workforce **S1-2**

In 2025, we strengthened our commitment to listening as a strategic enabler of inclusion, wellbeing, ethical business practice and engagement. Our approach reflects UCB's ambition to create a workplace where every voice matters and insights translate into meaningful action. By evolving from one-off surveys to a continuous listening model, we are embedding dialogue at the heart of our culture, ensuring that signals are captured, analyzed and acted upon at the right level of the organization.

We engage with our workforce and their representatives to foster trust, psychological safety and shared accountability. Our goal is to ensure that employees feel heard and empowered, while leaders are equipped to listen on a more targeted level, and to act on insights that improve inclusion, wellbeing and engagement.

One global Pulse survey was conducted in July, focusing on inclusion, which reached 1 000 employees with a participation rate of around 50%. The Pulse provides timely insights while minimizing survey fatigue and it complemented our global employee survey in September.

Beyond surveys, we deepened qualitative understanding through two major focus group initiatives. Approximately 200 employees participated in each, exploring critical topics such as wellbeing and equal opportunities. These sessions provided rich insights into lived experiences and helped identify systemic and local drivers of employee sentiment. Additional channels, including AI-driven social listening on external platforms, exit interviews and informal conversation forums, ensured that feedback was captured across multiple touchpoints.

Listening only creates impact when it leads to action. In 2025, we reinforced governance and accountability to ensure that insights inform decisions and drive change. Strategic oversight is provided by the Executive Committee, supported by an Employee Advisory Board and a dedicated global listening team. Local leaders remain accountable for addressing team-specific challenges, while systemic issues are escalated to senior leadership for resolution. Closing the feedback loop through transparent communication remains a priority, as it strengthens trust and encourages continued participation in listening initiatives.

### Remediation channels for UCB's own workforce **S1-3**

We have established clear channels for employees to report any incidents or concerns, and we are committed to promptly and effectively address any negative impacts on our workforce.

Our investigation processes are designed to address concerns promptly and fairly, and we promote trust through regular training and communication, raising awareness of these mechanisms. To ensure continuous improvement, we continuously update policies, enhance training programs, and adopt new technologies, if needed.

### Channels for reporting incidents

To ensure every voice is heard and valued, multiple channels exist for employees to raise concerns or share feedback confidentially. These include the [UCB Integrity Line](#) (available in over 200 languages and accessible to anyone who wishes to report a concern through an online platform or through phone calls) and robust incident and reporting systems, as well as the encouragement of open conversations between employees, their managers, and designated company representatives.

Any managers receiving reports from their team members must also report them to Ethics and Business Integrity (E&BI). All complaints submitted trigger an assessment, followed by a confidential investigation, which may lead to corrective disciplinary actions.

UCB's Chief Ethics and Compliance Officer is accountable for ensuring that effective processes are in place for employees to speak up and that any reports are appropriately investigated. UCB's Global Head of Investigations tracks and monitors the status of the reports and investigations. UCB is committed to taking all reports seriously and conducting a thorough review. When reports are received either through the UCB Integrity Line or through E&BI, Talent Partners, Legal or another channel, the reporting party receives confirmation of receipt and information on how to get status updates on their report.

### Health, safety and wellbeing reporting mechanisms

UCB has established robust global and local procedures to ensure the consistent and timely notification, investigation, reporting and communication of all health, safety and environmental (HSE) adverse events. These processes are designed to identify root causes, implement corrective actions and facilitate cross-functional learning to prevent recurrence. The scope of these procedures extends to all UCB employees worldwide, including contingent workers, contractors managed by third parties, consultants and visitors.

Proactive risk management is a cornerstone of our safety culture. Employees are encouraged to actively identify and report hazardous situations before incidents occur, enabling the organization to address risks promptly and continuously improve site safety.

UCB tracks HSE performance using defined KPIs and targets, covering both leading and lagging indicators. Monthly results are consolidated into a global dashboard shared with executives, supporting timely analysis and escalation of critical issues.

Own workforce continued



**Addressing grievances**

UCB has comprehensive mechanisms to handle employee grievances or complaints promptly, fairly, and transparently, including confidential Employee Assistance Programs<sup>1</sup> (EAPs) in the majority of countries, and a network of trusted persons responsible for handling grievances and complaints at the local level, ensuring that employees have access to support and resolution mechanisms within their region.

**Non-retaliation policies**

UCB has a strict non-retaliation policy to protect all employees who raise concerns or report misconduct. Confidential reporting channels exist for employees to raise their concerns without fear of their identity being disclosed, such as the [UCB Integrity Line](#), and local trusted persons or talent representatives. Our EAP offers confidential support and resources to employees facing personal or work-related challenges and provides an additional layer of protection and support for employees who may be hesitant to report concerns due to fear of retaliation. UCB conducts regular training and awareness programs to educate employees about their rights and the protections available to them, emphasizing the importance of reporting concerns and our commitment to protecting whistleblowers.

**Promoting awareness and building trust**

We continuously monitor the effectiveness of remediation processes through performance evaluation (KPIs), regular audits, and reviews to identify any gaps or areas for improvement and ensure our approach remains effective and responsive to the needs of our workforce.

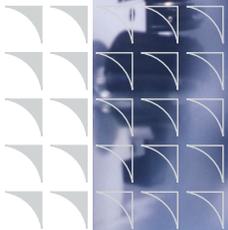
This is also measured through our annual Ethics and Business Integrity Perceptions Survey. The feedback collected helps to identify areas for improvement and ensure that our communication efforts are effective and trusted by employees. UCB also collects feedback from employee representatives and committees on the effectiveness of our reporting processes.

**Targets S1-5**

In 2025, we set the following targets:

Indicator	2025 target	2026 target
Health, safety and wellbeing index	> 81%	<b>≥ 81%</b>
Total Recordable Injury Rate	<2.53	<b>≤ 2.10</b>
Lost Time Injury Rate	<2.17	<b>≤ 1.70</b>
Inclusion index	75%	<b>75%</b>
Employees reporting having good opportunities to learn and grow	>70%	<b>&gt;70%</b>

These targets include all UCB employees worldwide (own workforce, both employees and non-employees, in the case of safety targets) and are developed based on ongoing feedback from different teams within UCB before being approved and endorsed by UCB’s Executive Committee. Talent Partners can track the performance and contributions of their partner teams, initiating reviews to reflect on results and identify necessary improvements.



## Own workforce continued

### Metrics

#### Characteristics of UCB employees S1-6

Headcount by country and gender	2024			2025		
	Male	Female	Total employees	Male	Female	Total employees
<b>Europe</b>	<b>3 118</b>	<b>3 123</b>	<b>6 241</b>	<b>3 440</b>	<b>3 419</b>	<b>6 859</b>
Belgium	1 711	1 480	3 191	1 988	1 718	3 706
Germany	218	325	543	227	340	567
U.K.	372	463	835	380	503	883
Switzerland	426	249	675	466	270	736
Other European countries	391	606	997	379	588	967
<b>Intercontinental</b>	<b>716</b>	<b>513</b>	<b>1 229</b>	<b>797</b>	<b>576</b>	<b>1 373</b>
Japan	475	132	607	496	147	643
Other Intercontinental countries	241	381	622	301	429	730
U.S.	788	1 120	1 908	775	1 110	1 885
<b>Total</b>	<b>4 622</b>	<b>4 756</b>	<b>9 378</b>	<b>5 012</b>	<b>5 105</b>	<b>10 117</b>

Permanent and temporary contracts by gender	2024			2025		
	Male	Female	Total	Male	Female	Total
Number of permanent employees (headcount)	4 466	4 586	9 052	4 830	4 935	9 765
Number of temporary employees (headcount)	156	170	326	182	170	352
Number of non-guaranteed hours employees (headcount)	N/A	N/A	N/A	N/A	N/A	N/A
<b>Total</b>	<b>4 622</b>	<b>4 756</b>	<b>9 378</b>	<b>5 012</b>	<b>5 105</b>	<b>10 117</b>

Permanent and temporary contracts by region	2024				2025			
	Europe	U.S.	Intercontinental	Total	Europe	U.S.	Intercontinental	Total
Number of permanent employees (headcount)	6 089	1 902	1 061	9 052	6 667	1 878	1 220	9 765
Number of temporary employees (headcount)	152	6	168	326	192	7	153	352
Number of non-guaranteed hours employees (headcount)	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
<b>Total</b>	<b>6 241</b>	<b>1 908</b>	<b>1 229</b>	<b>9 378</b>	<b>6 859</b>	<b>1 885</b>	<b>1 373</b>	<b>10 117</b>

#### Accounting policy

The number of employees is reported according to headcount at December 31. 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. The breakdown for countries where UCB has "significant employment" is provided. UCB has set the threshold of significant employment at 300 employees (a lower threshold than the ESRS). Temporary employees are active contract UCB employees in headcount having a fixed-term (limited period) contract type. UCB has no contracts for non-guaranteed hours employees, so this metric is not applicable.

UCB's total headcount increased by 8% in 2025, rising from 9 378 in 2024 to 10 117, reflecting a deliberate expansion of our talent base. This growth supports our ability to advance science, strengthen operational excellence, and deepen engagement with patients, partners, and healthcare systems worldwide.

Headcount growth was geographically broad-based, with several core locations recording notable increases, underscoring ongoing investment in strategic markets.

The expansion was driven primarily by our permanent workforce, which grew from 9 052 to 9 765 employees. Fixed-term contracts remained a small and stable share of total headcount, increasing only from 326 to 352. This balance highlights UCB's commitment to building long-term capabilities while supporting employment stability for our people.

## Own workforce continued

Departures	2024			2025		
	Voluntary	Involuntary	Total	Voluntary	Involuntary	Total
Europe	259	148	407	<b>199</b>	<b>164</b>	<b>363</b>
Intercontinental	120	355	475	<b>91</b>	<b>79</b>	<b>170</b>
U.S.	131	78	209	<b>130</b>	<b>104</b>	<b>234</b>
<b>Total</b>	<b>510</b>	<b>581</b>	<b>1 091</b>	<b>420</b>	<b>347</b>	<b>767</b>

Staff turnover	2024			2025		
	Voluntary	Involuntary	Total	Voluntary	Involuntary	Total
Administration/support staff	4.5%	5.0%	9.5%	<b>3.5%</b>	<b>1.8%</b>	<b>5.3%</b>
Executives	3.9%	2.6%	6.5%	<b>3.7%</b>	<b>4.4%</b>	<b>8.1%</b>
Managers/professionals	4.8%	3.5%	8.3%	<b>3.2%</b>	<b>2.2%</b>	<b>5.4%</b>
Sales force	8.2%	7.4%	15.6%	<b>8.2%</b>	<b>7.7%</b>	<b>15.9%</b>
Technical staff	4.9%	1.6%	6.5%	<b>3.6%</b>	<b>2.4%</b>	<b>6.0%</b>
<b>Total turnover rate</b>	<b>5.3%</b>	<b>4.2%</b>	<b>9.5%</b>	<b>4.1%</b>	<b>3.1%</b>	<b>7.2%</b>

## Diversity metrics **S1-9**

Gender representation at executive level	2024			2025		
	Male	Female	Total	Male	Female	Total
Employees in top management level (headcount)	98	68	166	<b>97</b>	<b>74</b>	<b>171</b>
Employees in top management level (percentage)	59%	41%	100%	<b>57%</b>	<b>43%</b>	<b>100%</b>

Age distribution of employees	2024			2025		
	<30	30-50	>50	<30	30-50	>50
Europe	412	3 839	1 897	<b>491</b>	<b>4 217</b>	<b>2 151</b>
Intercontinental	44	945	333	<b>35</b>	<b>986</b>	<b>352</b>
U.S.	58	1 019	831	<b>55</b>	<b>968</b>	<b>862</b>
<b>Total</b>	<b>514</b>	<b>5 803</b>	<b>3 061</b>	<b>581</b>	<b>6 171</b>	<b>3 365</b>

### Accounting policy

Total turnover is the percentage of voluntary and involuntary terminated permanent contract employees during the last 12 months out of the average 12-month permanent contract employee headcount.

## Other metrics **MDR-M**

	2024	2025
Inclusion Index	70.8 %	<b>71.8 %</b>

In 2025, UCB reviewed and enhanced its listening strategy, reinstating the annual employee survey for all employees. Additionally, global focus groups were introduced to explore flagged opportunities from the 2024 results, providing deeper insights. A mid-year Pulse survey was deployed to monitor the impact of ongoing efforts. Employee perceptions of inclusion, as measured by the Inclusion Index, improved since the previous year, bringing us closer to our 2027 target of 75%. Overall, most inclusion drivers showed improvement, namely "Belonging", "Trust", "Integrating Differences" and "Inclusive Decision-Making". However, "Psychological Safety" emerged as the only declining driver, signaling an area for focused attention. While progress brings us closer to our objectives, there is still room for improvement. Detailed results from all initiatives are analyzed, shared and discussed with leadership teams and key stakeholders. In parallel, each team leader receives a report of their team's results and is encouraged to review them collaboratively, agree on focus areas and take action, supported by their respective Talent Partner.

### Accounting policy

Based on the global employee survey, the Inclusion Index measures UCB employees' sense of belonging, trust, psychological safety, integration of differences and inclusivity in decision-making. It uses survey responses on the listed drivers for a weighted average. The formula is Inclusion Index Score = (Belonging Score \* 1/3) + (Trust and Psychological Safety Scores \* 1/3) + (Integrating Differences and Inclusive Decision-Making Scores \* 1/3). The index uses a weighted average of three pillars: Belonging, Feel Safe, and Fully Participate & Freely Express. The Feel Safe pillar is formed by the Trust and the Psychological Safety inclusion drivers, while the Fully Participate & Freely Express pillar is formed by the Integrating Differences and Inclusive Decision-Making inclusion drivers. Belonging is the inclusion driver with the highest weight, as it is a stand-alone pillar.

Own workforce continued

**Employee development** S1-13

	2024		2025	
Employees reporting having good opportunities to learn and grow	68.5%		<b>68.0%</b>	

	2024		2025	
	Male	Female	Male	Female
% performance reviews	92%	92%	<b>87%</b>	<b>85%</b>
% career development reviews	81%	84%	<b>85%</b>	<b>88%</b>
Average training hours	52.8	43.3	<b>58.1</b>	<b>46.7</b>

Employees' perception of learning and good career opportunities is essential for good employee experience and ultimately retention, so ensuring that employees feel they are learning and growing is critical. While we did not fully reach our 2025 objective of 70% of employees reporting that they 'have good opportunities to learn and grow at UCB,' the results remain encouraging and provide a strong basis for continued progress. In 2026, we aim to further strengthen this outcome by closely monitoring employee satisfaction with our learning and development offerings, including via NPS (Net Promoter Score) of the available trainings.

**Accounting policy**

- Learning and growth questions in UCB employee experience surveys were based on employee responses to the following question: "I have good opportunities to learn and grow at UCB". The 2025 score is based on the 2025 Global Employee Survey.
- Percentage of performance reviews is the percentage of UCB employees eligible for the performance evaluation process who have received a performance rating for the reporting period out of the total UCB employee headcount as at December 31. The formula used is number of employees with reporting period performance rating / December 31 UCB employee headcount \* 100.
- Percentage of career development reviews is the percentage of UCB employees eligible for the talent review process who have received a talent rating for the reporting period out of the total UCB employee headcount as at December 31. The formula used is number of employees with reporting period talent rating / December 31 UCB employee headcount \* 100.

**Health, safety and wellbeing** S1-14

	2024	2025
% of employees covered by health & safety management systems	63.7%	<b>66.1%</b>
Number of fatalities	0	<b>0</b>
Total number of recordable work-related accidents	55	<b>42</b>
Rate of recordable work-related accidents (TRIR)	2.81	<b>2.21</b>
Total number of days lost due to work-related injury	466	<b>889</b>
Lost time incident rate (LTIR)	2.41	<b>1.85</b>
HSWB Index	64.1%	<b>81.2%</b>

In 2025, the HSWB Index reached 81.2%, exceeding the target and marking a significant improvement compared with 2024. The 'HSWB survey' and 'Employee metrics' components remained largely stable year-on-year, while the overall increase was primarily driven by the safety performance component, reflected in the LTIR. Notably, work-related accidents at the Braine-l'Alleud (Belgium) campus were reduced by half compared with 2024. The multi-year safety program launched in 2025 contributed to this progress, underscoring both the strategic importance of safety and the essential role each individual plays in preventing accidents. Building on the renewal of ISO 45001 certifications at Bulle (Switzerland) and Saitama (Japan), the Braine campus' progression toward certification will further strengthen the consistency and robustness of our safety management framework and reinforce employee engagement.

While not explicitly reflected in the index, we also remain focused on preventing severe injuries and fatalities and are pleased to report that no Serious Injury and Fatality (SIF) occurred in 2025.

We are continuing to assess the potential evolution of the HSWB Index, with a possible revision under consideration for 2026–27 to further enhance how we measure impact. This review will enable us to re-evaluate the contributions of each component and confirm whether the selected indicators remain appropriate for accurately reflecting performance.

**Accounting policy**

The rate of recordable work-related accidents or Total Recordable Injury Rate (TRIR) refers to the number of recordable accidents which occurred in the period of one year relative to the total number of hours worked in the period, per million hours worked.

Lost time incident rate (LTIR) refers to the number of recordable accidents resulting in a person being absent from the workplace for one or more days, which occurred in the period of one year, relative to the total number of hours worked in the period, per million hours worked. The metrics cover UCB own workforce, both employees and non-employees, except the HSWB Index (which covers only employees).

Safety within the HSWB Index is measured through a combination of metrics, including the LTIR, which accounts for 30% of the Index. The remaining 70% is based on our HSWB indicator, which combines results from our annual employee survey with employee metrics, such as how many people are promoted, engaged with personal development plans, or have access to an employee assistance program and access to sport. Performance is measured on a calendar year timeframe, covering January to December 2025.

**Own workforce** continued

**Remuneration metrics** S1-16

**Unadjusted gender pay gap**

Country	2024	2025
Belgium	1.6%	<b>-0.2%</b>
Germany	9.5%	<b>11.1%</b>
Japan	2.9%	<b>2.9%</b>
Switzerland	-4.3%	<b>-5.8%</b>
United Kingdom	12.7%	<b>11.9%</b>
United States	8.6%	<b>8.5%</b>
UCB population (weighted average)	4.9%	<b>3.4%</b>

Our pay equity ambition aligns with our core values and cultural foundation, ensuring that rewards are fair in relation to individual contributions and market reality. For the past few years, we have been measuring and regularly monitoring our pay equity positioning per country (considering adjusted pay gaps) and have implemented mechanisms and tools to ensure that actions are taken towards equitable pay, at the time of recruitment and progressively during our annual compensation cycles. A portion of our gender pay gap may be attributable to the company having a higher proportion of women in entry-level roles and a smaller share at the top executive ranks, where compensation levels are higher.

Internally, we have employed a methodology to assess the fairness of individual salaries by comparing actual salaries to predicted fair salaries. This methodology accounts for legitimate factors influencing pay differences, such as job level, seniority and performance over time. Based on this, we can measure the Adjusted gender pay gap (GPG). In most countries with significant employment, the Adjusted GPG falls within the +/-2% range, including the United States, United Kingdom, Belgium, Germany, and Switzerland.

**Accounting policy**

The gender pay gap measures the difference in average earnings between men and women within the organization. The metric refers to the average male base pay level over the average female base pay level (unadjusted pay gap), expressed as a percentage of the average pay of male employees. The method used to calculate this metric is (Average gross hourly pay for male employees - Average gross hourly pay for female employees) / Average gross hourly pay for male employees \* 100.

The gender pay gap is defined at country level and the UCB gender pay gap is calculated based on a population-weighted average of each of the individual country gender pay gaps. We report the information for countries where we have significant employment (more than 300 employees).

**Remuneration ratio**

Country	2024	2025
Belgium	15.5	<b>15.8</b>
Germany	7.0	<b>3.0</b>
Japan	4.6	<b>4.7</b>
Switzerland	4.4	<b>4.7</b>
United Kingdom	4.4	<b>5.6</b>
United States	4.1	<b>4.0</b>

**Accounting policy**

The remuneration ratio metric measures the ratio of the annual base pay compensation of the highest-paid individual in the country to the median annual base pay compensation for all employees in the country, excluding the highest-paid individual.

**Incidents, complaints and severe human rights impacts** S1-17

	2024	2025
Number of complaints filed through channels for people in own workforce to raise concerns (human rights)	9	<b>6</b>
Number of substantiated reports of discrimination	5	<b>9</b>
Amount of fines, penalties, and compensation for damages as a result of incidents of discrimination and complaints about human rights	0	<b>0</b>
Number of severe human rights issues and incidents connected to own workforce	0	<b>0</b>
Amount of fines, penalties, and compensation for damages as a result of severe human rights incidents	0	<b>0</b>

The number of substantiated reports of discrimination include case issue types of substantiated reports of discrimination and harassment. In all substantiated cases the employees in question were investigated and the substantiated cases resulted in disciplinary action. More information on types of cases (beyond discrimination) reported and their outcomes are reported in the Ethical Business Practices section.

**Accounting policy**

- The number of complaints filed through channels for people in own workforce to raise human rights concerns takes into account aggregated reports from all of UCB's reporting channels, including reports made to UCB's Integrity Line and from other channels, including to the Ethics and Business Integrity, Talent, and Legal departments, as well as managers and senior leaders. This numbers excludes the substantiated reports of discrimination.
- Substantiated reports are proven to be true, as supported by evidence.

# Workers in the value chain S2

## Impacts, risks and opportunities S2 SBM-3

### Workers in the value chain

Sub-topic	IRO type	Time frame	Value chain	Description
<b>Health and safety, working time, child labor, forced labor, social dialogue</b>	<b>R</b>	●●○	↑◇	UCB not being compliant with upcoming regulations on human rights due diligence (cf. Corporate Sustainability Due Diligence Directive) impacting UCB.
	<b>R</b>	●●○	↑◇	Risk of reputational damage and litigation due to human rights violations.
<b>Health and safety</b>	<b>-</b> Potential	●●●	↑↓	The use of chemical substances by contract manufacturing organizations (CMOs) or other business partners located in geographies other than Europe, where such substances are strongly regulated, can potentially impact the health of workers in the long run by exposing them to toxic substances or unsafe working conditions.

+ Positive impact  
 - Negative impact  
 **R** Risk  
 **O** Opportunity  
 ●○○ Short term  
 ●●○ Medium term  
 ●●● Long term  
 ↑ Upstream  
 ◇ Own operations  
 ↓ Downstream

We define value chain workers as those working for our direct suppliers (Tier-1) i.e., our CMOs and other business partners, and value chain workers at direct business partners' sub-suppliers, both upstream and downstream. For non-UCB employees working on UCB sites, please see the [Health, safety and wellbeing section](#) for more information on related health and safety management topics. We have identified some value chain worker groups who are particularly vulnerable, such as children, women or migrant workers.

### Assessing human rights risks in the value chain

#### S2 IRO-1

UCB has direct suppliers in countries with a systemic risk of child labor in general, including countries such as Brazil, India, Mexico and Türkiye, and with risk for potential forced labor in India. As such, an impact assessment was updated to identify human rights and environmental issues-related hot spots (i.e., commodities, countries and industry sectors) in our value chain.

The assessment was 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 was carried out according to the [UN Guiding Principles on Business and Human Rights](#), taking into account risk severity and probability. We identified areas systemically related to potential child labor, forced labor or human trafficking, and potentially affected vulnerable groups. We also identified which human rights are at risk per area, such as right to education and right to fair working conditions.

Based on our assessment, we face the highest risk of contributing to or being linked to labor and human rights, including health and safety impacts when operating with CMOs or using specific high-risk commodities from countries with elevated systemic 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 systemic risk of child labor, forced or compulsory labor related to some commodities

with origin in agriculture or mining. These include commodities or products containing palm oil derivatives, sugar or aluminum. We recognize that there is a systemic risk of child labor or forced labor in some countries supplying these raw materials in general, such as Indonesia, Malaysia, Thailand and India.

In the majority of cases, we do not purchase these 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. As we strive to improve the transparency of origin for such commodities, we introduced a risk raw material sustainability questionnaire to our suppliers in 2025 and plan to implement technological solutions to enhance transparency in our value chain next year. 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. So far, we have no evidence of child labor, or of forced or compulsory labor among workers in our value chain.

**Workers in the value chain** continued**Policies S2-1**

Our expectations on high ethical working standards, respect for human rights and fair treatment in our business partners' operations are outlined in our supplier contract templates, as well as in organization-wide UCB policies:

- Code of Conduct
- Human Rights Policy
- Responsible Sourcing Standards for Business Partners
- Health, Safety and Wellbeing Policy
- Third-Party Risk Management Policy
- Non-Retaliation Policy

In our Human Rights Policy, we commit to engaging with rights holders, including workers in our value chain, and individuals in the communities where we operate. We expect our business partners to strive to prevent adverse human rights impacts in all parts of their business, and explicitly to secure the safety and health of their workers, execute fair and timely remuneration of their workforce, and reject harassment or discrimination of any kind, and more broadly to act with integrity while doing business. Additionally, we outline our expectations that business partners minimize the environmental impact of their operations to avoid harming any rights holders.

UCB's Responsible Sourcing Standards for Business Partners set expectations that business partners follow the UN Guiding Principles (UNGP) on Business and Human Rights and the [OECD Guidelines for Multinational Enterprises on Responsible Business Conduct](#). Business partners shall support and respect internationally proclaimed human rights, and make sure that they are not complicit in any human rights violations. The Responsible Sourcing Standards for Business Partners are overseen by the Chief Procurement Officer.

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

Our Health, Safety and Wellbeing Policy (refer to the [Health, safety and wellbeing section](#)) covers non-UCB employees working on UCB sites located anywhere in the world, in addition to UCB staff, employees and visitors.

In 2025, we introduced the internal Third-Party Risk Management Policy, which also covers environmental, social and governance risks, and outlines our commitment to carry out due diligence in our value chains to manage material risks, and potential and actual negative impacts. Furthermore, we issued a Non-Retaliation Policy (more information in the Ethical business practices section).

Our [Modern Slavery Act Statement](#) (U.K.), [Transparency Act](#) (Norway), and [Fighting Against Forced Labour and Child Labour in Supply Chains Statement](#) (Canada) are publicly available.

**Engaging with workers in the value chain S2-2**

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 audits of suppliers are aligned with the Pharmaceutical Supply Chain Initiative (PSCI) protocols. Part of the audit protocol is to interview employees, including supervisors and shop floor workers. Engagement frequency depends on supplier audit intervals, criticality of the business partner and previous audit findings, as well as other criteria (e.g., if previous audits on the supplier carried out by industry peers are available in the shared PSCI member database). We assess the effectiveness of engagement by monitoring closure of corrective action plans (CAPs) related to the audit findings. Managing CMOs' engagement is the responsibility of the Head of External Manufacturing.

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 labor 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. Through such interactions we encourage our partners to pursue sustainable practices related to their own workers and value chain workers.

**Remediation channels for workers in the value chain S2-3**

In the event that UCB causes an adverse human rights impact, we would endeavor to provide a remedy. All workers in our value chain can report potential human rights complaints through the UCB Integrity Line.

As part of our Human Rights Policy, we commit to providing a channel for reporting complaints and a grievance mechanism aligned with the UNGP, allowing rights holders who are negatively impacted to raise concerns. Any substantiated cases of misconduct are escalated to management for appropriate action and for providing access to remedy. The process to investigate and remediate follows the principles laid down in our Non-Retaliation Policy and Global Investigations standard operating procedures. The fundamental safeguards regarding "no retaliation" and confidentiality apply to all concerns raised to us. For more information see [Ethical Business Practices section](#).

In our Responsible Sourcing Standards for Business Partners, we require business partners to establish grievance mechanisms accessible to internal and external stakeholders to report concerns, without retaliation or threat of retaliation. Business partners shall also inform their workers that they can use the UCB Integrity Line to report complaints about non-compliance with UCB's standards.

## Workers in the value chain continued

### Actions S2-4

A key initiative in 2025 was a targeted sustainability campaign to engage selected suppliers that had not yet met certain sustainability standards in the EcoVadis assessment or committed to the Science Based Targets initiative (SBTi). Senior management presented UCB’s strategy and sustainability objectives during campaign webinars, while the Procurement team worked closely with suppliers to support their progress. To further assist improvement efforts, we published a comprehensive [Sustainability Guide](#). As a result of this ongoing campaign, we have seen increased supplier commitment to the SBTi and expanded EcoVadis coverage across our supply base. The improved coverage helps to better monitor and identify actual and potential adverse issues related to workers in the value chain, and to ask for corrective actions from our supplier network. Our suppliers’ average EcoVadis labor & human rights score increased to 65.4 (2024: 64), remaining above the EcoVadis network’s average labor & human rights score of 52 (2024: 50).

We strengthened our due diligence actions by updating our impact assessment of labor and human right risks, and launching new digital tools and questionnaires to evaluate our suppliers’ sustainability performance, including the introduction of a new tool for monitoring controversies related to our business partners, with wider topics covered than previously. We revised our internal guidelines and provided training on how sustainability criteria are evaluated during supplier selection process and periodic risk assessments, and updated sustainability-related contract clauses in UCB’s Master Service Agreement template, to drive our suppliers’ sustainability performance.

We prepared, together with suppliers, to ensure compliance with the European Union Regulation on Deforestation-free Products (EU) 2023/1115, which also covers human rights requirements. The regulation application has been postponed to 2026.

We supported suppliers in building a stronger awareness of human rights through access to training programs such as the [EcoVadis Academy](#), Responsible Health Initiative’s capacity-building webinar series on human rights, and Pharmaceutical Supply Chain Initiative’s supplier-aimed on-demand Learnster courses.

In 2025, UCB expanded on-site audits to cover labor, human rights and ethics topics, in addition to health and safety, environmental, and governance and management systems, where relevant to the audited supplier. We also expanded our audit program to include, in addition to CMOs, other business partners. We conducted altogether six audits in 2025 (2024: six), of which five were full-scope audits. One critical finding related to disciplinary measures was identified during an onsite audit at a CMO. Corrective actions have been initiated and are under active follow-up. If a critical finding is raised during an onsite audit, internal UCB experts will assess the situation and escalate it for follow-up action in UCB’s risk management tools for mitigation actions. As a member of the Pharmaceutical Supply Chain Initiative (PSCI), we have access to audit reports regarding some of our business partners performed by other PSCI members, allowing us to assess their performance indirectly.

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

### Targets S2-5

We strive to engage our critical, strategic, high-volume suppliers across our global supplier network through the EcoVadis platform.

Indicator	2025 target	2026 target
External spending for suppliers with a valid EcoVadis score	70%	<b>75%</b>
Re-assessed suppliers improving their EcoVadis score on labor and human rights	50%	<b>50%</b>

In 2026, we aim to increase the coverage of external spending for suppliers with a valid EcoVadis score to 75% and aim that re-assessed suppliers improving their EcoVadis score on labor and human rights are at least 50%. These targets were defined in collaboration with key internal stakeholders involved in supplier relationship management, including our External Manufacturing team managing CMOs. Improvement in these scores is estimated to correlate with our suppliers reducing their negative impacts on value chain workers and potentially advancing positive impact on value chain workers. Value chain workers, their legitimate representatives or credible proxies have not been engaged directly in setting targets. UCB will investigate methods to engage them in target setting in the future.

## Workers in the value chain continued

### Metrics **MDR-M**

	2024	2025
% of spend coverage with EcoVadis rated suppliers	69%	<b>73%</b>
% of suppliers improving their labor & human rights EcoVadis score	45%	<b>63%</b>

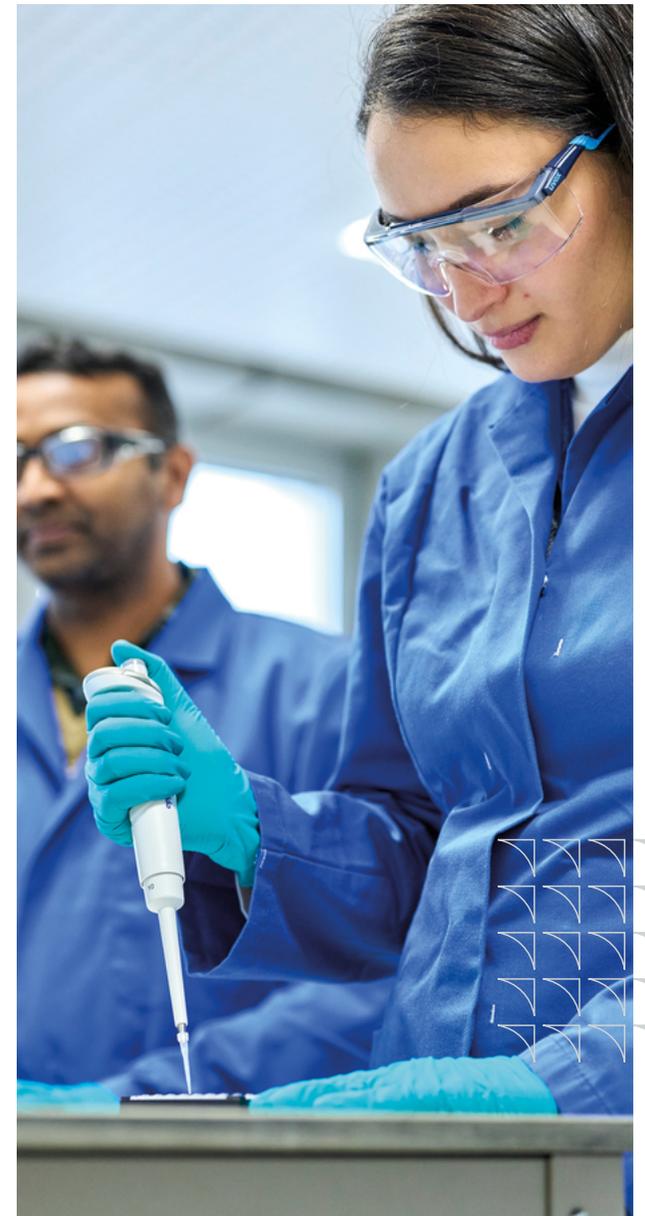
In 2025, 73% of UCB's procurement spend was covered by a valid EcoVadis score. The target of 70% was exceeded, and there was improvement compared to our 2024 level (69%). We will continue our efforts to actively encourage our suppliers in scope to carry out the EcoVadis assessment and achieve a minimum score of at least 45.

In 2025, 63% of UCB suppliers improved their labor & human rights score (2024: 45%), compared with the previous assessment, which was above 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.

In 2025, there were no reports submitted via UCB's Integrity Line related to value chain workers and reported by a non-employee (in 2024, one case was reported, which was found to be unsubstantiated).

### Accounting policy

- The scope of the targets and metrics covers the global supplier network, and the baseline year is the year of the previous EcoVadis assessment. Reporting period is the 2025 calendar year.
- Spend from suppliers who have a valid score in EcoVadis is divided by UCB's supplier-related spending in order to calculate the spend coverage.
- The EcoVadis labor & human rights score assesses suppliers' performance on material topics including working conditions (e.g., health and safety, working time, social dialogue) and other work-related topics (i.e. child and forced labor).
- Percentage of suppliers who improved their EcoVadis labor & human rights score in the reporting period compared to their previous assessment is directly available in the EcoVadis platform. Effectiveness is evaluated by comparing the UCB supplier network score in labor & human rights to general EcoVadis network labor & human rights score.



# Patients S4

## Impacts, risks and opportunities S4 SBM-3

### Scientific innovation

Sub-topic	IRO type	Time frame	Value chain	Description
<b>Scientific innovation</b>	+ Actual	●●○	◇	Established expertise and ground-breaking research and innovation that continues to deliver improvements to the quality of life of patients.
	+ Potential	●●○	◇	Use of technology solutions, such as AI, accelerating drug discovery and development.
	R	●●○	◇	Risk of R&D attrition related to innovation.
	○	●●○	↓	Reaching the patients through solutions that meet their unmet needs.

### Equitable access to medicines

Sub-topic	IRO type	Time frame	Value chain	Description
<b>Equitable access to medicines</b>	+ Actual	●●○	↓	Scaling up health equity models in India and Rwanda.
	+ Potential	●●○	↓	Increase access to UCB's solutions through local health equity partnerships with public, private and non-state actors in selected geographies.
	+ Potential	●●●	↓	Expanding access through evolving the different business models across geographies.
	- Actual	●○○	↓	Launch sequence strategies (also known as "international reference pricing strategies") delaying the launch of new solutions in countries that may trigger potential lower prices.
	R	●○○	◇ ↓	Lack of common definition on the value of pharmaceutical solutions for society (often different assumptions and inputs are used), leading to disparities in coverage and pressure (incl. regulations) to lower the target prices.
	R	●○○	↓	External forces (e.g., market authorization, negative Health Technology Assessments (HTA), payer coverage) and internal forces (e.g., lack of focus/lack of internal alignment) delaying the launch and in some cases the commercialization of UCB solutions.
	R	●●○	◇	The global pricing and market access environment is highly complex and subject to continuous economic, political and social pressures, creating significant uncertainty for our global pricing strategy.
	○	●●●	◇	Evolving the different business models across all UCB's geographies and operations (including providing voluntary licensing for low- and middle-income (LMIC) settings and partners).
<b>Diversity in clinical trials</b>	- Potential	●●○	↓	Lack of implementation of diversity in clinical trials due to an inadequate representation of relevant patient groups to advance clinical knowledge, leading to drugs that are unfit for the needs of different patient populations.
	R	●●●	◇	Lack of focus on diversity in clinical trials can lead to reputational damage and risk of regulatory non-compliance.

+ Positive impact   
 - Negative impact   
 R Risk   
 ○ Opportunity   
 ●○○ Short term   
 ●●○ Medium term   
 ●●● Long term   
 ↑ Upstream   
 ◇ Own operations   
 ↓ Downstream

Patients continued

**Patient safety**

Sub-topic	IRO type	Time frame	Value chain	Description
Health and safety	Actual	●○○	↑	Unexpected events that affect the benefit-risk balance of clinical trials.
	Risk	●●○	◇	Failure to maintain patient safety, including compliance with safety reporting training requirements, can result in reputational damage, regulatory fines, loss of market share affecting the company's profitability, shareholder value and patients' health.

**Product quality**

Sub-topic	IRO type	Time frame	Value chain	Description
Health and safety	Actual	●●●	↓	Protecting patients by going beyond compliance to deliver consistent, high-standard outcomes. This includes proactively exceeding quality standards, preventing counterfeiting, and maintaining reliable product supply to meet patient needs with confidence and integrity.
	Risk	●●○	◇	Failure to maintain high product quality can result in reputational damage, regulatory fines, loss of market share affecting the company's profitability, shareholder value and patient health.

**Health systems resilience**

Sub-topic	IRO type	Time frame	Value chain	Description
Health systems resilience	Actual	●●○	↓	Increased medical and scientific knowledge of health professionals in low- and middle-income (LMI) geographies.
	Potential	●●●	↓	UCB could directly strengthen healthcare systems (e.g., by providing information, contributing to a faster diagnosis rate, ensuring the long-term sustainability of the distribution channels).
	Potential	●●○	↓	Greater collaboration with third parties, such as local government bodies, payers and peers, to strengthen healthcare systems across geographies.
	Risk	●○○	↓	Fragmentation of the healthcare system at large (i.e., lack of holistic approach across and within countries, lack of clear definitions and guidelines, fragmented patient populations).
	Risk	●○○	◇	Healthcare delivery system inefficiencies impacting UCB's financial performance.
	Risk	●●○	◇	Lack of healthcare practitioners impacting patients' access to UCB solutions and exacerbating inequities.
	Risk	●○○	◇	External pressures, such as inflation and economic challenges, impacting investment decisions, choice of business model and long-term performance regarding health system resilience.

Positive impact  
 Negative impact  
 Risk  
 Opportunity  
 ●○○ Short term  
 ●●○ Medium term  
 ●●● Long term  
 ↑ Upstream  
 ◇ Own operations  
 ↓ Downstream

Patients continued

**Data privacy and security**

Sub-topic	IRO type	Time frame	Value chain	Description
Privacy	- Potential	●○○	◇	Potential release of sensitive health data from patients due to data breaches or cybersecurity attacks, resulting in serious consequences for patients if the data falls into the hands of unauthorized individuals.
	R	●○○	◇	Risk of data breaches or cyber attacks at the level of UCB, leading to reputational damage, operational disruption and legal and regulatory consequences.
	R	●●○	◇	Evolving new regulations related to data, privacy, digital, AI and cybersecurity that could affect UCB's operations and increase compliance costs.

**Responsible sales and marketing**

Sub-topic	IRO type	Time frame	Value chain	Description
Access to (quality) information, responsible marketing practices	+ Potential	●●○	◇ ↓	Integrating sustainable impact KPIs in the sales and marketing teams across UCB's operations can promote alignment in the strategic direction of UCB as a company fostering positive impact.
	R	●○○	◇	Reputational and financial (litigation) risks from unethical sales and marketing practices.

**Patient engagement**

Sub-topic	IRO type	Time frame	Value chain	Description
Freedom of expression, non-discrimination	+ Actual	●○○	↓	Delivering solutions addressing patients' needs, priorities and preferences by "co-creating" with them from research to market, leading to better patient outcomes, access and experience.
	R	●○○	◇	Not engaging patients can cause significant financial damage to UCB due to the misalignment between the outcomes delivered by the solution and patients' needs, priorities and preferences.
	○	●●○	↑ ◇ ↓	Consistently and systematically embedding partnerships with patient communities end to end throughout the value chain.
Non-discrimination	○	●●○	↑ ◇ ↓	Further increase consistent and systematic partnerships with patient communities all along the value chain, leading to patient informed decision-making and co-creation as we aspire to the common goal of improving patient outcomes.

+ Positive impact   
 - Negative impact   
 R Risk   
 ○ Opportunity   
 ●○○ Short term   
 ●●○ Medium term   
 ●●● Long term   
 ↑ Upstream   
 ◇ Own operations   
 ↓ Downstream

## Patients continued

### Scientific innovation

#### Policies S4-1

Scientific innovation at UCB is guided by a range of frameworks, decision-making bodies, committees and strategies. Each of these components has specific objectives and scopes covering the entire R&D value chain, under the supervision of our Chief Medical Officer and the Chief Scientific Officer (part of our Executive Committee), and portfolio governance bodies.

Scientific innovation in our pipeline is channeled by key decision criteria applied at each research decision point and stage, such as strategic fit and innovation potential, scientific rationale, risk and feasibility (involving a comprehensive assessment of biological, technical and value-creation risks). A structured framework allocates resources purposefully and balances our portfolio across several dimensions, ranging from pre-pipeline and research projects to technology platforms, development pre- and post-proof of concept stages, modalities and patient populations.

R&D decision-making bodies provide comprehensive oversight across the entire value chain, ensuring value-driven, consistent and evidence-based governance. These bodies facilitate the adoption of new research targets, guide candidate selection and advance projects toward de-risked medicines. They also oversee the review and endorse proof-of-concept criteria, enabling a seamless transition from candidate to asset. This structured governance process helps manage impacts, risks and opportunities related to scientific innovation.

UCB follows an external engagement approach that outlines approaches and processes to engage with the wider scientific community, including scientific partnerships and sponsorships. This approach enables granular tracking of partnerships, ensures strategic alignment at the portfolio level, and promotes consistency, compliance and transparency.

Our Human Rights Policy commitment on the right to health and scientific innovation is closely aligned with our ambition to address unmet medical needs through differentiated solutions. We take a patient-centered approach that prioritizes the rights and needs of people living with severe

diseases in our scientific innovation strategy. In research, this is demonstrated by our human pathobiology approach, which seeks to deeply understand biological alterations in human disease through identifying the etiologic mechanisms of disease, designing human functional models to test hypotheses and increasing our understanding of patient heterogeneity.

#### Actions S4-4

UCB actively engages with patients, healthcare professionals and other stakeholders to understand their concerns and incorporate their feedback into our innovation processes from the earliest stages. Our integrated research approach ensures a balanced focus on uncovering disease pathways, understanding patient needs and leveraging advanced technologies to develop innovative treatments.

The "societal needs" dimension in our Unmet Medical Need (UMN) assessment, which identifies current and future impact of disease to patients and society, ensures that our scientific innovation efforts are recognized to address essential needs aligned with health priorities and disease burdens. This guides our efforts to not only be scientifically robust, but also socially relevant in contributing to reducing the global disease burden.

Our strategic partnerships complement, strengthen and maximize the impact of our R&D efforts on patients by fostering collaboration and innovation. These include bilateral research collaborations, shared PhD studentships, asset in- and out-licensing deals, and participation in public-private consortia. UCB plays a leading role in public-private partnerships at multiple levels – from local engagement, such as the Walloon Region's S3 strategy gene therapy pillar, to European leadership in the PFAS Innovative Health Initiative. Environmental sustainability is embedded in our research ambitions from the outset, with initiatives aimed at reducing restricted substances, including minimizing the use of organic solvents.

In addition, UCB Ventures invests in life science and technology start-ups, providing long-term funding to enable breakthrough innovations in areas adjacent to or beyond UCB's core focus.

Finally, we engage early with regulators and policymakers throughout the development process, through direct, topic-specific interactions and representation in industry-wide consortia, to ensure our scientific innovations meet all necessary standards and support long-term sustainability.

### Equitable access to medicines

#### Policies S4-1

We strive to make our medicines available to as many patients as possible, and work closely with local healthcare systems, payers and partners to improve access through customized approaches that reflect the value of our medicines, the needs of people living with severe diseases and the specificities of individual health systems.

Through our Health Equity Framework, we integrate equitable access strategies from innovation to patient reach, coupled with our value-based pricing framework and early payer engagement. It aims to better understand barriers to equitable access for patients to the medicines they need, and guide UCB to shape the right approach to deliver on our access ambitions.

We design and build our pricing strategies as outlined in our Global Pricing Governance Policy, which describes the decision-making process of launch price setting and re-pricing of UCB products. Our value-based pricing framework is anchored in patient value creation in the context of individual healthcare systems which patients use to access care. This structured approach combines insights from patients about their ability to pay and access medicines (e.g., affordability criteria, treatment waiting times, interactions with healthcare providers) with additional context on local health systems' ability to reward innovation, to analyze the value that each UCB treatment can bring, measuring improvements in indicators such as patients' quality of life and treatment efficacy. The resulting pricing model recognizes differences in health ecosystems and patient needs, and mutually defined priorities in achieving health outcomes. The Executive Committee regularly reviews our approach to pricing, access and affordability of our medicines. It is important to note that our access performance also depends on payers' priorities, the length of negotiations and the value perceived for our solutions.

## Patients continued

UCB is committed to complying with industry self-regulated codes, including the [EFPIA Code of Practice on Relationships Between the Pharmaceutical Industry and Patient Organizations](#). Our pricing and reimbursement approaches also adhere to local laws and regulations.

### Actions S4-4

UCB teams are responsible for translating scientific information into messages that explain the value of our medicines. They help accelerate our access to the markets and support the development of negotiation approaches. A pricing strategy is set up prior to the launch of any new medicine, ensuring alignment with our foundational principles: increasing health and value for patients, sustaining innovation and doing the right thing for the right patient, with specific consideration for product and healthcare systems.

At UCB, respecting the right to health means that we make our medicines as widely available as possible to people with unmet needs. We have introduced a number of Early Access Programs for UCB medicines and we facilitate Named Patient Supply (NPS) Programs, where feasible. Emerging alternative business models, including health equity models and patient support programs in the U.S., are part of our efforts to make it easier for people to access our medicines. More details on how UCB aims to foster an innovative, competitive and value-based system in the U.S. which keeps patients at the center can be found in our U.S. Sustainable Access and Pricing Transparency Report.

Regarding our health equity approach, key initiatives to deliver equitable access and address treatment gaps in specific situations are ongoing:

- We are expanding our health equity model in India to improve treatment for people with epilepsy.
- After *levetiracetam* was approved and included in Rwanda's public insurance coverage in 2024, the oral solution was introduced in 2025 to ensure treatment options for pediatric patients.

- We have developed an end-to-end approach to health equity that starts in early clinical development, when we evaluate each candidate's potential to mitigate or inadvertently exacerbate equity barriers for underserved populations. We then integrate health equity barrier considerations in evidence generation plans. For our current commercial portfolio, we are exploring care optimization partnerships in the U.S. for patients with hidradenitis suppurativa, myasthenia gravis, systemic lupus erythematosus and Dravet Syndrome in city-based proof-of-concept projects, and for patients with Dravet Syndrome in selected European countries.

We have also established a wide network of distributors and partners to ensure we secure presence of our products in markets where we do not have UCB operations, including in low- and middle-income countries.

## Patient safety

### Policies S4-1

Our Global Pharmacovigilance System ensures that we oversee, assess and report safety information to regulatory authorities, and it is regularly updated in line with all pharmacovigilance requirements. The Global Pharmacovigilance (GPV) team is responsible for monitoring, tracking and auditing metrics to assess compliance with internal Standard Operating Procedures and external regulations, through regular reviews, audits and inspections. The Pharmacovigilance System is underpinned by other foundational organization-wide policies designed to protect the health and safety of patients, including the Human Rights Policy where we commit to deliver medicines in line with the highest quality standards and to protect patients from harm. We respect the privacy rights of patients, healthcare professionals and other stakeholders that entrust us to carefully manage and protect personal data, and hold service providers to similar high privacy standards. We inform individuals regarding the collection and processing of their personal data through our [Pharmacovigilance Privacy Policy](#). We collect and process personal data for specific and legitimate business purposes only and secure such data against unauthorized access and misuse, as further described in the Data privacy and security section.

### Actions S4-4

To ensure safety of UCB products and identify potential safety concerns, we continually collect information on adverse reactions to our products (including unexpected reactions) through ongoing system reviews, audits/inspections and compliance monitoring. UCB also facilitates communication and information exchange about patient or product safety among healthcare professionals, regulatory agencies and the pharmaceutical industry.

All patient safety-related actions are taken in agreement with regulatory authorities and endorsed by the UCB Benefit Risk Board (BRB), chaired by our deputy Chief Medical Officer and which includes patient representative input, in case of a significant impact on benefit-risk. The BRB regularly reviews all products and newly emerging data to ensure that all potential changes to a product's benefit-risk are assessed and appropriately communicated to health authorities.

If concerns are raised about the safety of one of our medicines, we take immediate actions in line with regulatory frameworks. Designated roles within Global Pharmacovigilance (GPV) will initiate a medical assessment, guided by the GPV Standard Operating Procedure (SOP) covering authorized products and guided by Benefit/Risk and Medical Safety SOPs for authorized and under-investigation products. Additionally, the Global Pharmacovigilance Quality Council oversees system performance, audits and inspections, and advises on non-compliance or risk of failures in the conduct of pharmacovigilance activities or audits and inspections. A monthly report is also communicated with pharmacovigilance teams and senior GPV leadership to provide an up-to-date overview on compliance and performance of critical processes.

## Patients continued

### Product quality

#### Policies S4-1

UCB operates under clearly defined policies and robust procedures designed to maintain excellence in every pharmaceutical product we provide. At the core of this framework is the UCB Quality Policy, the highest-level document within our Quality Management System. It sets the standards applied throughout the entire product lifecycle and reaffirms our commitment to delivering medicines of exceptional quality, strengthening patient confidence and protecting UCB's reputation.

Patient safety and wellbeing are fundamental ethical principles at UCB. Our Human Rights Policy includes a firm commitment to uphold the right to health and to manufacture medicines in line with the most rigorous quality standards. The UCB Quality Management System spans all stages of the product lifecycle and incorporates dedicated policies and corporate procedures for managing product quality complaints and recall processes. These outline how we identify, assess and address quality-related risks or issues that may affect end-users. Fully aligned with the Code of Conduct, these requirements apply across all UCB business functions, sites and affiliates, ensuring compliance with the relevant Good Practices governing the development and manufacture of medicines.

Our Complaint Policy ensures that comprehensive local and global mechanisms are in place for receiving and handling product quality complaints. These include:

- UCBCares® for all commercialized products;
- Specific local reporting channels, as required by applicable national regulations; and
- UCB's clinical team for any product quality complaints related to investigational medicinal products.

#### Actions S4-4

UCB maintains a comprehensive quality audit program that periodically evaluates all processes, facilities and external partners to ensure compliance with regulatory standards and the requirements of our Quality Management System. Performance metrics are continuously monitored to support Quality Risk Management and foster ongoing improvements.

Any product quality complaint identified as posing a risk to public health or to participants in a clinical study is assessed through the quality issue escalation process. This evaluation determines the necessary actions, which may include notifying the relevant health authority and initiating a product recall. Furthermore, every UCB employee is accountable for promptly reporting and escalating, via the Recall Escalation Process, any information that could potentially trigger a UCB product recall.

### Health systems resilience

#### Policies S4-1

We define Health Systems Resilience (HSR) as the process of supporting, building, and strengthening sustainable healthcare infrastructure and services, as well as promoting evidence-based policies to ensure the continuous delivery of care across diverse healthcare contexts.

Given UCB's role in the healthcare ecosystem, we recognize that strengthening health systems occurs across different stages of the value chain. While our work begins with scientific innovation, our efforts to reinforce healthcare systems come into focus at later stages, ensuring access, capacity building, and long-term resilience.

Key areas where UCB can make the most impact for health systems resilience include:

- Patient Access Programs, enhancing affordability and assistance initiatives;
- Public-Private Partnerships, collaborating with governments and NGOs to strengthen health systems; and
- Capacity Building and Community Engagement, supporting healthcare workforce training, and providing scholarships, fellowships, and educational programs.

By working on these areas, UCB aims to contribute meaningfully to resilient healthcare systems.

#### Patient access programs

While we believe swift and safe regulatory approval is the most effective and sustainable path to broad patient access, we also understand that patients with severe, life-threatening, or life-altering diseases may have limited treatment options. In these circumstances, UCB's Early Access programs, also known as Expanded Access, Compassionate Use, or Managed Access Programs, may provide a pathway to investigational treatments before they are commercially available. UCB's [policy on Early Access to Medicines](#), which governs these programs, is publicly available.

We are guided by considerations of how to secure ongoing access for patients after the program, how to integrate with existing healthcare systems, and how to ensure continued access for patients who need our treatments. UCB is committed to working with governments and healthcare systems to bring our innovative treatments to patients as quickly and safely as possible. Furthermore, UCB endeavors to provide continued treatment for patients who have participated in our clinical studies and who, in their physician's judgment, are deriving benefit from the treatment through Post-Trial Access programs.

## Patients continued

### Public-private partnerships

Our efforts in this area focus on targeted initiatives that aim to increase the capabilities of health systems around the world. While we understand that UCB cannot single-handedly improve health system resilience, we are committed to strategic partnerships where our expertise and resources can be effectively utilized and amplified.

UCB actively engages in global healthcare policy and public affairs to support patients and healthcare systems. Through strategic global engagement, UCB ensures alignment in policy positioning and advocacy to advance solutions in key disease areas. The company fosters collaboration among regional policy experts and stakeholders to drive disease area policy, and broader healthcare initiatives.

### External funding and medical grants

In support of our commitment to patients and caregivers, strengthening healthcare systems and enhancing scientific and medical knowledge, UCB supports a variety of organizations through funding initiatives including sponsorships, memberships, medical grants and donations, collectively called 'External funding'.

- Sponsorships are financial support provided to a healthcare stakeholder, such as organization, institution or patient organization, for support to an event or program such as bona fide scientific, medical or health care-related activities or other initiatives aimed at enhancing education, advancing medical knowledge, supporting research or serving related purposes relevant to UCB's therapeutic areas of interest.
- Through memberships, UCB provides funding for corporate membership, participation and engagement with industry organizations, groups and associations focused on UCB's areas of interest.
- Medical grants are financial support from UCB for unsolicited and independently developed projects or programs, provided to a public or other non-profit organization or patient organization, for the purpose of enhancing healthcare, research or furthering medical or scientific knowledge.

- Donations and philanthropic contributions are in kind financial support freely given by UCB to a public or other non-profit organization for the purpose of benefit to society, provided with no expectation of receiving a tangible benefit in return.

All External Funding support is provided following a strict ethical and compliant procedure, according to a defined global framework and through the management of requests using UCB's Global Funding System. Each funding request is subject to a specific submission process, specific supporting documentation, dedicated reviewers and review criteria.

Every funding request is assessed on the basis of merit, unmet needs, company areas of interest, compliance with legal, ethical and professional obligations and fiscal responsibility. By maintaining a well-defined framework UCB mitigates risks, safeguards its reputation, and fosters trust within the healthcare community.

### Actions **S4-4**

To address delays in diagnosis in chronic inflammatory diseases, UCB supports initiatives that embed scalable solutions into healthcare systems. UCB's [FASTRAX](#) program focuses on reducing time to diagnosis in axial spondyloarthritis (axSpA) through country-specific collaborations in Europe and North America. In the United States, FASTRAX includes a partnership with [University Hospitals Cleveland Medical Center](#), where a digital solution integrated into electronic health records supports the identification of patients with potential undiagnosed axSpA, helping accelerate referral and access to specialist care.

UCB is an active partner in large, multi-stakeholder public-private research consortia that aim to establish shared scientific foundations for future innovation. Through the [Innovative Health Initiative \(IHI\) AutoPiX](#) consortium, UCB collaborates with academic institutions, clinicians, patient representatives and industry partners to develop clinically validated, AI-driven imaging tools for rheumatoid arthritis, psoriatic arthritis and axSpA, with the goal of enabling more precise diagnosis and better-tailored treatment pathways.

In rheumatology, UCB is a long-standing partner of the [Foundation for Research in Rheumatology \(FOREUM\)](#), supported by EULAR, the European Alliance of Associations for Rheumatology, and dedicated to advancing independent, excellence-driven research. This collaboration includes FOREUM Academy Bootcamp initiatives and research calls focused on areas of importance to UCB.

UCB also contributes to international consortia that advance scientific standards and outcome measures in complex immune-mediated diseases. The [Treatment Response Measure for Systemic Lupus Erythematosus \(TRM-SLE\)](#) project brings together academia, regulators, patient advocates and industry to develop and validate a novel clinical trial outcome measure that integrates patient-relevant domains. In parallel, UCB participates in the [Accelerating Medicines Partnership® for Autoimmune and Immune-Mediated Diseases \(AMP AIM\)](#), a multi-stakeholder initiative generating high-quality datasets to deepen understanding of diseases such as systemic lupus erythematosus, rheumatoid arthritis and psoriatic disease spectrum.

In rare diseases, UCB collaborates with global and regional initiatives to strengthen health system readiness and accelerate access to innovation. UCB also supports the mission of the [Global Alliance for Rare Diseases \(GARD\)](#) to improve access to rare disease therapies in low- and middle-income countries, where patients often face significant barriers to diagnosis and treatment.

Through these partnerships, UCB supports shared scientific infrastructure, data generation and validation of new tools that benefit the broader medical community. This sustained engagement reflects UCB's commitment to patient-centred innovation, robust science and long-term collaboration to strengthen healthcare systems and improve outcomes for people living with serious chronic and rare diseases worldwide.

Our commitment to equitable access to medicines is described in the Equitable access to medicines section, including our Access Coverage Performance Index covering also Managed Access Programs. Our engagement with patient organizations is further discussed in the Engaging with patients section, including the amount of funding provided to such groups.

## Patients continued

### Data privacy and security

#### Policies S4-1

UCB complies with privacy and data protection laws across all jurisdictions where we operate. Our Data Protection Program, built on global and local policies aligned with our Global Data Protection Policy, ensures consistent standards. Individuals can contact UCB directly or through UCBCares® for privacy-related requests.

We maintain robust incident response protocols to address any data incidents promptly and communicate with affected individuals when necessary. As regulations evolve, UCB continues to strengthen its program to ensure continued compliance and instill trust.

All IT systems and applications comply with UCB's IT Governance process, which ensures adherence to security, privacy and data protection policies and standards, as well as applicable regulatory requirements including Network and Information Security Directive 2 (NIS2). UCB conducts regular internal and external audits to verify compliance and ensures an appropriate level of privacy and data protection.

#### Actions S4-4

Throughout the year, UCB continued to strengthen its Data Protection Program to meet growing business needs and adapt to evolving technologies and regulatory requirements. Key initiatives focused on enhancing our policy framework and redesigning processes with a strong emphasis on improving end-user experience. In 2025, we fully revised our website privacy notices to provide clear, transparent information on how we collect, use and protect personal data, and how individuals can exercise their rights.

The global trend of increasing cybersecurity-related incidents was reflected across industries. At UCB, we recorded a few incidents and data breaches in 2025, including two that required notifications to the supervisory authorities. However, none of them presented any high risk for the rights and freedoms of the individuals concerned.

UCB has a multifaceted cybersecurity and data management strategy, together with active prevention, detection and response control programs, and continuous improvements to protect critical information assets and systems. Additionally, UCB has cyber incident and crisis management processes in place to manage major security incidents (e.g., data breaches or malware). These include continuous monitoring and analysis, intrusion incident detection and response, security testing, and user awareness training and campaigns.

UCB regularly conducts incident and crisis exercises to test and improve our ability to respond to potential cyber incidents. We have opted for ISO 27001 certification to comply with the European NIS2 directive and its local implementation laws, including the NIS2 Belgian Law published in 2024. Other important components of this compliance program include cybersecurity awareness training, business continuity planning, vendor risk management and the reporting of major incidents to the relevant authorities.

In addition, UCB maintained its commitment to fostering a culture of privacy awareness by ensuring that essential privacy and data protection training is provided to all employees. These efforts reflect our proactive approach to safeguarding personal data and reinforcing trust with patients, partners and stakeholders.

### Responsible sales and marketing

#### Policies S4-1

Our promotional strategies are grounded in truth and accuracy, and they must always serve a clear and legitimate intent, particularly when communicating complex medical and scientific information. We prioritize transparency in all our marketing efforts, whether directed at healthcare professionals, patients, the public, government agencies, or other stakeholders. We are committed to responsible and compliant promotion, and we only encourage the use of our products based on their approved uses, supported by appropriate scientific evidence and the benefits they offer to patients. We do not offer rewards for prescribing or purchasing our medications, and we strictly prohibit any off-label promotion of our products.

Our key relevant company-wide policies on responsible sales and marketing include:

- UCB Social Media Policy
- UCB [Code of Conduct](#).

To ensure compliance with specific local laws, industry codes, and regulations related to pharmaceutical sales and marketing, our country affiliates develop local policies in alignment with UCB's [Code of Conduct](#). All employees are required to complete annual training on these key policies to reinforce awareness and compliance. We also adapt our marketing principles thoughtfully to suit each product and patient population, ensuring responsible practices and the utmost respect for patients. This approach is particularly salient in our work on treatments for rare and ultra-rare diseases, where sensitivity and responsibility are paramount.

#### Social media

We also recognize the unique challenges posed by social media, and we are dedicated to making sure that all UCB employees engage responsibly with content related to UCB across all platforms. Content posted on UCB's social media channels must follow our standards for truthful and non-misleading communication. Only designated individuals are authorized to post on behalf of UCB.

UCB's Social Media Policy permits employees to interact with UCB's social media content if they follow the principles of the policy, including:

- Exercise good judgment as ambassadors of UCB, engaging respectfully on social media platforms, both during and outside of work hours;
- Clearly disclose their affiliation with UCB when engaging with approved posts; and
- Protect the trust that people living with severe diseases place in us. We will not offer medical advice or share proprietary or confidential information.

## Patients continued

Regular training on the Social Media Policy is provided, and employees not following UCB's policies on social media are subject to disciplinary actions. We monitor all social media assets to ensure that they are compliant with requirements. We also include training for people working or engaged on our behalf (e.g., spokespeople and influencers) to ensure that they follow our policies. UCB is adapting to emerging trends and business evolution in this space.

Beyond standard promotional activities, UCB maintains rigorous controls over interactions with healthcare professionals to ensure that engagements are conducted ethically and in compliance with applicable regulations.

### Actions S4-4

All employees undergo training and receive regular communications to ensure they understand the prohibition on off-label promotion, with additional training for those involved in sales and marketing on responsible and ethical practices. Employees are also required to complete annual refresher training on UCB's social media policy, which provides clear guidelines on permissible and prohibited engagement.

To ensure accuracy, objectivity and transparency, all promotional and scientific communications related to our products are reviewed by trained members of the Legal, Regulatory Affairs and Medical Affairs teams, who also regularly monitor changes in the law and other developments related to use of targeted marketing in the healthcare sector.

Interactions with healthcare professionals are regularly assessed through our Ethics and Compliance risk assessment process and monitored, as well as further reviewed, by the Global Internal Audit team.

Activities of all UCB personnel, including sales representatives, are regularly monitored to ensure compliance with our standards. Any reports of misconduct are investigated, and inappropriate actions are addressed through corrective or disciplinary measures. Employees found violating our policies may face disciplinary action, up to and including termination.

### Engaging with patients S4-2

We partner with patients and their representatives across all stages of the lifecycle of our solutions, from early research to post-launch. By implementing patient engagement meaningfully, systematically and consistently into our core operations, we ensure that the needs of people living with severe diseases are understood and included in our decision-making, and that UCB can develop customized solutions and provide dedicated services that support people throughout their treatment journeys.

The UCB Patient Engagement Framework has been established by a cross-functional Steering Committee (composed of senior leaders from Patient Evidence, Clinical Operations, Medical Affairs and Therapeutic Areas) and in consultation with patient representatives. The framework is our central guidance to embed engagement efforts along the medicine lifecycle, through ongoing identification and understanding of patient needs, as well as co-creation to achieve better patient outcomes, aiming to give patients and their representatives a voice across health systems. It was developed to design specific engagement strategies in a cross-functional way, in alignment with frameworks and tools developed by Patient-Focused Medicines Development (PFMD).

Guided by standard operating procedures (SOPs), key activities can be combined in a tailored way to fit specific patient population characteristics and UCB's strategic intent. UCB's SOPs are designed in alignment with best practice recommendations from pharmaceutical bodies such as EFPIA, PhRMA and IFPMA. Our approach is driven by specific research questions to incorporate patient input alongside clinicians' and other stakeholders' input into decision-making (e.g., through patient councils and advisory board participation, patient interviews, focus groups and other patient experience research studies), starting with unmet needs and tailored to the specific phase of the drug development, such as early research or clinical development, and aligned with the objectives of patient communities.

In our end-to-end approach, from early research to post-launch phase, we take action to ensure that people who use our medications fully understand and use them properly. For patients who use our medicines, we have dedicated employees, from UCBcares®, to answer questions about our treatments in local languages, in addition to providing advice on what services exist and what we can offer.

Patient organizations, individual patients, their caregivers and other patient experts have designated UCB points of contact to whom any feedback or questions about engagement activity can be raised, which differentiates it from pharmacovigilance.

UCB has established a number of actions to drive patient engagement:

- Internal capability-building on patient engagement and advocacy, positioning patient engagement as a critical enabler of strategic decision-making and organizational culture. Increased enterprise-wide awareness and patient-centered culture through the company-wide behavioral change program "Let Us Leap" which included engagement sessions across numerous teams.
- Developed a unified outcomes and KPIs framework to measure the value and impact of patient engagement across UCB, providing leadership with clear visibility into contribution, progress and strategic return on investment. A related patient engagement measurement roadmap is developed and will be implemented in a phased way starting in 2026.
- Advanced the Health Equity R&D Community Leaders Board, with six impactful solutions developed for further evaluation by asset/candidate teams for potential integration.
- Continued to embed patients' and caregivers' perspective in benefit risk decisions across different medicines.

Activities are assessed following guidelines from the Patient-Focused Medicines Development's (PFMD) Patient Engagement Quality Guidance in early engagement, and this approach will be expanded following the outcomes and KPIs framework developed. Internal stakeholders can access the Framework and other relevant guidelines, SOPs and additional resources through a dedicated portal.

Patients continued

**Remediation channels for patients S4-3**

We commit to offering all external human rights holders, including patients, clear and accessible channels to report issues, including through the [UCB Integrity Line](#) and [UCBCares®](#). Complaints are collected from various sources, including the market (e.g., patients, healthcare professionals, wholesalers), partners, and third-party logistics or parties involved in clinical studies (e.g., patients, investigators, clinical sites, clinical study supply).

Specific questions on diseases or products are answered via [UCBCares®](#), UCB's global support center that serves as a critical bridge between the company, healthcare providers and patients. It handles over 58 000 inquiries annually, offering real-time, localized assistance on UCB's products. These inquiries span supply, medical, customer service, safety and product quality complaint inquiries. Through [UCBCares®](#), we support patients and caregivers to enhance health literacy, empowering them to make informed decisions about their health and treatment options. Each request and response is tracked and monitored. We also work with physicians, responding to their questions and assisting them in guiding and empowering their patients when appropriate. In addition, we collaborate with healthcare professionals to deliver medicines to patients using data-driven insights, enabling us to create meaningful patient support programs, and offer personalized support on proper storage and administration to ensure that patients use our treatments correctly.

Patients can raise any product quality complaints directly via [UCBCares®](#), which are then reviewed by designated roles within UCB. This initiates a comprehensive investigation, guided by a Global Quality Standard Operating Procedure (SOP) covering all products manufactured, supplied or distributed by UCB in all stages. All UCB's associated actions are monitored and tracked to completion. This process is evaluated annually to ensure effectiveness of the program. Any reports are assessed promptly, confidentially and impartially. In cases where we can confirm that UCB contributed to a negative impact, we work with relevant stakeholders to determine an appropriate remedy.

Patients can contact UCB directly to raise any concerns, including reporting adverse events, and safety reporting information is included in all relevant communications to patients and on the UCB website. All UCB staff and other relevant individuals are trained on safety reporting requirements and are required to immediately send any information on potential adverse events for review.

In addition, in line with the UN Guiding Principles on Business and Human Rights (UNGP), we provide a grievance mechanism for rights holders negatively affected by our operations. Several key policies protect individuals who use our channels to raise concerns or needs, ensuring they are safeguarded against retaliation. These include the UCB Global Incident Review and Investigations Procedure, [Code of Conduct](#), [Human Rights Policy](#) and UCB Non-retaliation policy.

Regarding matters around patient safety, entities of the UCB Group have been named as defendants in several product liability cases in France. The claimants in these actions claim their mothers took Distilbène, a former product of the UCB Group, during their pregnancy, and as a result they suffered bodily injuries. For substantiated cases, UCB has provided compensation. For further information, refer to Financial Note 34 Provisions.

**Targets S4-5**

UCB's annual Access Coverage Performance and Time to Access indices monitor our performance, looking at how UCB medicines with market authorization have achieved market access that enables patient use, and how much earlier positive national reimbursement decisions are received compared to typical industry benchmarks in the countries where UCB operates. The methodology for these two KPIs is further explained in the next section.

While in principle we aspire to reach all patients who need our medicines, we recognize that in practice there will be cases when alignment between all negotiating parties is not reached, limiting equitable access. We therefore set access coverage performance targets in recognition of these challenges. Both annual targets are set globally and split per region, medicine and country. Targets are defined with input from various stakeholders across UCB markets and affiliates. Some targets are also shared and discussed with our Compensation and Benefits team in charge of including Access to Medicines targets into the Long-Term Incentives (LTI) plan of senior executives. Once set, each year's target and quarterly results are communicated to UCB leaders and other relevant stakeholders, with dashboards available that provide a view on performance against the target at geography and product level. Follow up of those targets is happening on a monthly basis and observations are discussed with relevant stakeholders from regions and countries.

	2025 target	2026 target
Access Coverage Performance Index	82%	<b>79%</b>
Time to Access Index	50%	<b>38%</b>

Patients continued

**Metrics** MDR-M

**Scientific innovation**

	2024	2025
Number of molecules in development	9	<b>8</b>
Number of clinical development pipeline programs	9	<b>12</b>
Percentage of revenue reinvested in R&D	29%	<b>24%</b>

We consistently reinvest a significant portion of our revenues into research and development, as we recognize that enabling scientific innovation is a long-term investment to maintain our ability to deliver impactful solutions for those we serve. The outcomes of UCB's R&D investments are further described in the Clinical pipeline update section.

**Accounting policy**

- Number of molecules in development includes number of UCB molecules in clinical development that progress into Phase 2 until submission, including those developed in partnership with other pharmaceutical companies, as at the reporting date.
- Clinical development pipeline programs refer to all clinical programs being conducted with the same investigational drug, including additional indications for molecules on the market, as at the reporting date.
- The percentage of revenue reinvested in R&D is calculated by the total EUR amount of research and development expenses for the reporting period, divided by the total EUR amount of net revenue for the same reporting period (both reported in the consolidated income statement).

**Equitable access to medicines**

	2024	2025
Access Coverage Performance Index	82%	<b>78%</b>
Time to Access Index	55%	<b>43%</b>

UCB's strong global access coverage performance ensures that we remain true to our aspiration to reach an increasing number of patients who need our medicines. In 2025, we landed at 78%, nearly reaching the target of 82%, due to prolonged negotiations, which were aimed at preserving the long-term value of our medicines while ensuring that we could secure access for as many patients as possible. We achieved a total of 60 positive access cases including reimbursements, subnational level coverage and access programs, with more than half of these cases related to BIMZELX®, with rheumatology indications taking the lead (psoriatic arthritis and AxSpa account for 36% of the total cases) while access for the hidradenitis suppurativa indication grew strongly this year with 12% share of these positive cases. For our neurology portfolio, FINTEPLA® was the biggest contributor to the Access Coverage Performance Index with 24% share, while RYSTIGGO® and ZILBRYSQ® combined represent 20% of the positive cases.

At a country level, the Netherlands led the way with most national reimbursements in the year, while the U.S. managed to achieve coverage in six additional channels for BIMZELX®.

Our new 2026 baseline starting point for the Access Coverage Performance Index will be set at 68%, reflecting the upcoming loss of exclusivity of BRIVIACT® and the inclusion of new UCB products which are expected to obtain access.

We remained committed to advancing our efforts to bring solutions timely to patients, landing at a Time to Access index of 43%, though falling short of our 50% target for 2025. The main reason for this shortfall was the prolonged negotiations, which were aimed at preserving the long-term value of our assets while ensuring that we could secure access for as many patients as possible. The previous year results for this index do not form a baseline as we start from a zero baseline every year. In 2025, 34 national reimbursement decisions were obtained ahead of the industry benchmark, the same number as in 2024. The majority (62%) are related to BIMZELX®. For the combined neurology and rare diseases portfolio, we achieved time-to-access as planned for FINTEPLA® and ZILBRYSQ®, while RYSTIGGO® did not meet the expected timeline. The neurology and rare disease portfolio accounted for a larger share of the overall product mix in Time to Access, increasing to 47% from 39% in 2024. This higher share of rare diseases products, combined with cost-effectiveness pressures in health ecosystems, required additional effort to continue to ensure timely access.

**Patients** continued**Accounting policy**

We define "Access" coverage as reimbursed access to the drug, regardless of any restrictions applied or presence of an access program, whereas "No Access" is defined as no reimbursed access to the drug.

The metrics cover 35 countries assessed, alongside all products that have received regulatory approvals in those geographies and for which the patent has not expired, and all indications with regulatory approval for those products. The scope of the Access KPIs includes all UCB medicines and indication combinations. This is determined by the inclusion criteria: i) the market authorization of the product by regional or national authorities (such as the EMA for Europe, FDA for USA or PMDA for Japan); ii) UCB is the Market Authorization Holder for that specific country.

We are not tracking data for KEPPRA® and NEUPRO®, as these are considered historical assets, which for most parts of the world are no longer covered under patent. We deem these products today to be widely accessible and meeting patient needs through available solutions on the market. Hence, these are not specifically measured as part of the performance indicator, which tracks the access performance for new market launches since 2021.

Our baseline year for the reporting period was October 1, 2024 to September 30, 2025.

**Access Coverage Performance Index**

- The index is based on the total number of reimbursement listings and Access Programs achieved for any product/ indication in any country in the reporting year, divided by total number of products/indications in any country that have or will have market authorization and are expected to be reimbursed according to the industry benchmark (provided by the company IQVIA Ltd.) in that year.
- Formula used: Total number of reimbursement listings and access programs achieved for any product/ indication in any country / Total number of products/ indications in any country that have or will have market authorization and are expected to be reimbursed according to the industry benchmark in that year.

- Subnational access is defined at the DMU (Decision-Making Unit) level for these countries for each product and indication. The type of DMUs (e.g., regions, hospitals, sick funds) can differ per country and product depending on the local health system of a nation. The DMUs are weighted through either population data or patient data, corresponding to the DMU. Data for weighting are used from official government or health statistics. We assess if each DMU has Access or No Access. If the sum of DMU weights having access is  $\geq 66\%$ , then we consider Access for our product in this country. We consider as evidence the inclusion of a product in the hospital formulary or a contract in place. There could be cases where subnational data are not immediately available in the months following achievement of a national price or reimbursement listing. In this case we assume a period of six months during which we consider a "Conditional Access" until subnational data are available. If during this period data are available, then we switch to subnational access measurement. After six months, if no data are available then we consider that access is not reached.
- 49 geographies and channels are included in total (U.S. is split into 10 channels; Brazil, Canada and Mexico are split into public and private channels, U.K. is split into England, Wales and Scotland), from three major regions (the EU, Intercontinental and U.S.) where we operate.

**Managed Access Program**

- The term "Access Program" refers to all those mechanisms in which a product could be used prior to reimbursement.
- Under Access Programs, access is considered for a product within a country, determined by meeting three specific criteria: i) the program should be active and will be counted only post-market authorization; ii) there should be a third party (e.g., a hospital) that financially covers the patient's treatment (neither the patient nor UCB covers it); and iii) there should not be a limit for the number of patients to enroll in the program.

**Time to Access (TTA) Index**

- Tracks time between market authorization and payers' decisions to provide reimbursement for new UCB medicines or the setting of an Access Program – measured against the median industry time to reimbursement in individual markets where UCB operates.
- A set of independently sourced TTA industry benchmarks have been used as the external benchmarks for evaluation. These independently sourced TTA industry benchmarks, prepared by IQVIA at UCB's request and direction, represent a measure of the median number of days from market authorization to public reimbursement, and these are separately determined for each country where UCB is operating. IQVIA collects and evaluates these industry "TTA benchmarks" for UCB and updates these on a yearly basis.
- Expressed as a percentage of the pricing and reimbursement listings (as per definitions used by IQVIA for evaluating median time to reimbursement) for UCB products expected during the relevant year of scope (as identified using the industry "TTA benchmarks") which have not exceeded the relevant median time to reimbursement.
- Formula used: number of countries which timely obtained pricing and reimbursement approval or an Access Program within the year (versus industry "TTA benchmarks") / number of countries which were expected to obtain price and reimbursement listing within the year (as identified using the industry "TTA benchmarks") \* 100.
- Time to Access is measured for the countries where UCB has presence, which means the local Pricing & Access team is in charge of negotiating reimbursement and price.
- For an Access Program, the date of access is considered the date the first patient enrolled into the program.
- TTA applies only at national level (even if subnational level exists) and public channel (where public and private channels exist). For U.S. we consider only the first indication of the brand.

## Patients continued

### Number of countries and low- and middle-income countries (LMIC) where UCB's solutions are present, per solution

	2024		2025	
	Number of countries	Number of LMIC	Number of countries	Number of LMIC
BIMZELX®	35	3	42	4
BRIVIACT®	42	4	44	3
CIMZIA®	56	13	55	11
EVENITY®	28	2	27	2
FINTEPLA®	35	2	40	4
KEPPRA®	48	12	48	12
RYSTIGGO®	6	0	17	1
VIMPAT®	53	11	52	11
ZILBRYSQ®	9	0	15	0

In 2025, we successfully retained the reach of our legacy products (KEPPRA®, VIMPAT®, BRIVIACT®, and CIMZIA®) beyond our affiliate countries and into various low- and middle-income countries (LMICs). This year, we broadened the footprint of FINTEPLA® from 35 to 40 countries, including two new LMICs, and BIMZELX® from 35 to 42 countries, including one additional LMIC. Our rare diseases portfolio also saw substantial growth: ZILBRYSQ® increased its presence from 9 to 15 countries (a 67% rise), and RYSTIGGO® expanded from 6 to 17 countries, now including one LMIC.

#### Accounting policy

- Country presence is considered wherever the following criteria apply: i) UCB has sales of the product, either directly or through a partner, in the country (recorded in our systems or in IQVIA reports); ii) in the case of no recorded sales, published evidence of product reimbursement exists (e.g., inclusion in the positive list of the country).
- The scope includes countries where UCB affiliates exist and countries where UCB operates via partners.
- We use the [World Bank's definition](#) of countries and low- and middle-income countries.

### U.S. net price change

In 2025, our U.S. net price change (after discounts and rebates) averaged -1.7% across the U.S. product portfolio (list price change averaged 4.9%). This reflects our significant market rebates and discounts to ensure patients can access UCB medicines.

#### Accounting policy

Net price change represents the year-over-year change in average net price, which is WAC less rebates, discounts, fees and returns, calculated at a product level and weighted across the company's U.S. product portfolio. The methodology used may differ from those used by other companies.

### Other equitable access to medicines metrics

	2024	2025
Number of people who have accessed UCB's solutions	>3.1 million	>3.1 million
Number of people supported through Patient Support Programs in the U.S.	188 246	201 144

#### Accounting policy

Total patient number is calculated using the Moving Annual Total (MAT) patients (Estimated Actual Treated) at the end of Q3 2025 as provided with input data from an external source. The total patient number gathers people who have accessed the following solutions: BIMZELX®, BRIVIACT®, CIMZIA®, EVENITY®, FINTEPLA®, KEPPRA®, NAYZILAM®, RYSTIGGO®, VIMPAT® and ZILBRYSQ®.

### Patient safety

Pharmacovigilance inspections	2024	2025
Critical inspection findings	0	0
Timely reporting of adverse events	98%	98%

In 2025, there were no critical inspection findings reported by the competent authorities. 98% of individual cases safety reports were submitted on time by UCB to the competent authorities.

#### Accounting policy

- Critical inspection findings: Identified by regulatory authority pharmacovigilance inspectors, then presented in the following format: the number of individual critical findings in the reporting period as numerator and number of pharmacovigilance inspections in the reporting period as denominator.
- Reporting compliance rate: The percentage of individual case safety reports submitted on time by or on behalf of UCB to regulatory authorities in the European Union, in compliance with the regulatory requirements, compared to the total number of individual case safety report submissions.

Patients continued

**Product quality**

Recalls	2024	2025
Class I	0	<b>0</b>
Class II	1	<b>1</b>
Class III	0	<b>0</b>

In 2025, UCB reported 55 inspections in our internal and external network across the various good practices (GxPs). This included 33 inspections conducted by various health authorities and regulatory agencies in our internal network of UCB entities in our operating markets. Similarly, UCB partners and vendors underwent a total of 22 inspections conducted by health authorities and regulatory agencies.

In 2025, UCB voluntarily recalled 23 batches of E Keppra® tablets from the Japanese market after detecting cracks in the blister foil during packaging operations. Although no complaints or adverse events related to this defect have been reported, and stability data support a robust profile even under open conditions, the recall was initiated as a precautionary measure while maintaining continuity of supply.

**Accounting policy**

Product recalls is the number of product recalls initiated within a specified period by UCB. It is calculated based on monthly internal data collection and monitoring, with internal records kept and classified by product. UCB's recall process is periodically assessed by regulatory agencies and internal auditors.

The number of inspections in UCB internal network across the product lifecycle and against the various "Good Practices" regulations tracks the number of inspections conducted by health authorities, regulatory agencies or notified bodies (for devices) at UCB entities for a specified period.

The number of inspections in external network across the product lifecycle and against the various "Good Practices" regulations tracks the number of inspections conducted by health authorities, regulatory agencies or notified bodies (for devices) at UCB vendors and partners for a specified period. We expect external vendors and partners to notify UCB of relevant inspections, as agreed in contracts.

**Patient engagement**

Interaction with patient organizations	2024	2025
Funding provided to patient organizations (million euros)	11.4	<b>8.5</b>
Patient engagement activities	190	<b>143</b>
Number of patient organizations engaged	383	<b>394</b>

In 2025, UCB engaged with 394 patient organizations. This included >€ 8.5 million in funding provided to patient organizations. 143 patient engagement activities were tracked through the Activity Notification Form system in 2025.

We are currently deploying a comprehensive measurement roadmap to ensure key decisions are informed by patients, including new KPIs.

**Accounting policy**

- The number of patient organizations engaged is a sum of all patient groups and organizations involved in an activity, tracked through the Activity Notification Form system, grants, donations or sponsorships with a transfer of value. The activity must have taken place (an activity can be created, submitted or approved but canceled before happening) or payment made.
- Patient engagement activities are defined as the number of completed events with participation of patient organizations that took place in 2025, as tracked by our Activity Notification Form system. For each event there could be multiple patient organizations participating. Ongoing activities that started in 2025 but have not been finalized yet are not included in this number.
- The funding provided to patient organizations is the sum of the amount in euros of all transfer of value to patient organizations during activities of fee for service, grants, donations or sponsorships (based on payment made and filled in source systems) in major markets for UCB.
- UCB's policies require an Activity Notification Form to be reviewed and approved prior to engaging with any healthcare stakeholder. The Activity Notification Form must clearly present all the information regarding the engagement activity to allow formal review and evaluation of bona fide assessment and fair market value analysis.





Governance  
information

## Governance information continued

# Code of conduct policy overview

## Description of key contents

UCB's Code of Conduct reinforces our ethical principles and lays out accountability and expectations, as well as principles of ethical decision-making, speaking up and non-retaliation. In 2025, the Code was reviewed to sharpen the focus on this dimension while ensuring that our long-standing commitment to fairness, respect and equal opportunity remains clear, sustainable and aligned with evolving global expectations. The level of excellence expected on sourcing standards was also reinforced.

## Scope of policy

This policy applies to all employees, agents and consultants representing UCB.

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## Accountable for implementation

Implementation of this policy is overseen by the Chief Ethics and Compliance Officer, who reports to the General Counsel and has direct access to senior leadership including the Executive Committee, CEO and Board of Directors.

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## Internationally recognized instruments

Aligned and explicitly mentions the UN Declaration of Human Rights and the Declaration of Helsinki.

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## Availability

The Code is available in 24 languages on [UCB website](#) and intranet, and was developed with input from a wide range of employees through the Employee Resource Groups (ERGs) to ensure a diverse group of employee voices were included. Employees are informed of this policy through an annual mandatory training.

# Business conduct G1

## Impacts, risks and opportunities

### Ethical business practices

Sub-topic	IRO type	Time frame	Value chain	Description
<b>Business conduct</b>	<span style="border: 1px solid black; border-radius: 50%; padding: 2px;">R</span>	●○○	◆	Tariffs and unharmonized implementation of the global minimum tax could lead to a drop in adjusted EBITDA (tariffs) and potential double taxation (net profitability), reducing UCB's cashflows and limiting funds available for investment in innovation.

### Political influence and advocacy

Sub-topic	IRO type	Time frame	Value chain	Description
<b>Political influence and advocacy</b>	<span style="border: 1px solid black; border-radius: 50%; padding: 2px;">+</span> Potential	●●○	◆	Greater collaboration with third parties, such as local government bodies, payers and peers, to strengthen healthcare systems.

### Ethical use of technology

Sub-topic	IRO type	Time frame	Value chain	Description
<b>Data and technology</b>	<span style="border: 1px solid black; border-radius: 50%; padding: 2px;">○</span>	●○○	◆	Ethical use of technology and AI at UCB can lead to increased efficiencies and value creation (e.g., fewer patients required in clinical trials, fewer resources needed in production, faster prediction of the results of experiments and fewer animals in pre-clinical trial development).

+ Positive impact   
 - Negative impact   
 R Risk   
 ○ Opportunity   
 ●○○ Short term   
 ●●○ Medium term   
 ●●● Long term   
 ↑ Upstream   
 ◆ Own operations   
 ↓ Downstream

## Corporate culture G1-1

At UCB, culture is a core driver of value creation. It shapes how we collaborate, make decisions and deliver meaningful outcomes for patients, employees, shareholders and society.

Our cultural reference frame is more than ever anchored in the four principles of UCB's Patient Value Strategy (PVS): from noise to signal; from task to value; space with consistency; and helpfulness and generosity. These four principles articulate how we show up and work together, connecting our purpose to our operating model and long-term ambitions. The most senior leader accountable for shaping and evolving UCB's culture is the Chief Human Resource Officer (CHRO), a member of the Executive Committee. The CHRO ensures that cultural principles are embedded into strategic talent processes – including leadership attributes,

organizational development, recruitment and performance and growth management – reinforcing coherence across UCB's global operations.

UCB advanced its cultural evolution in 2025 to strengthen consistency in how we work across teams and geographies. Rather than introducing a new model, the PVS framework was revamped to reflect emerging organizational needs, including outcome-driven approaches, clearer accountabilities, consent-based decision-making, stronger external orientation and continuous learning.

To bring greater clarity and shared understanding of what these shifts require in practice, UCB introduced 12 behavioral "notions" under the four PVS principles. These notions translate the principles into concrete, observable behaviors that guide how employees listen, prioritize, collaborate,

navigate uncertainty and balance short- and long- term value creation. Making these expectations explicit reduces interpretation gaps and provides a common foundation for leadership, development and performance discussions.

Throughout 2025, the revamped PVS framework and its 12 notions were progressively embedded into key people processes, reinforcing the link between culture, organizational effectiveness and sustainable performance. UCB's performance and growth framework was strengthened by integrating the evolved PVS principles into the behavioral dimension of performance assessment and goal setting. This clarification supports more consistent, meaningful conversations between managers and employees, and enhances alignment between expected behaviors and desired outcomes.

## Business conduct continued

Besides that, our culture is also reinforced by several established talent lifecycle processes:

- annual performance reviews and talent assessments;
- leadership development programs with structured feedback linked to PVS principles;
- reward and recognition systems aligned with cultural expectations;
- recruitment guidelines reflecting our values;
- tailored culture training and onboarding.

### Corporate culture

	2024	2025
UCB's employee engagement score	76%	<b>78%</b>
High-performing benchmark of the top 10% global companies	82%	<b>82%</b>

Employee listening also evolved significantly in 2025 with a more intentional and integrated strategy. The Global Employee Survey reached a 62% participation rate and generated over 13 000 comments. Our engagement score rose to 78% (+2 points), with strong scores in pride (83%) and purpose (81%). These insights help track cultural evolution, guide priority actions and strengthen our understanding of how employees experience UCB's culture in their daily work.

### Accounting policy

The employee engagement score is derived from the anonymous annual employee survey and is based on key drivers and benchmark data from a third-party provider named Glint. The engagement score measures purpose, retention, pride in working at UCB and likelihood to recommend UCB as a great place to work.

## Ethical business practices **G1-1**

### Policies

Key business conduct policies include our [Code of Conduct](#) and [Anti-Bribery Anti-Corruption Policy](#) (ABAC), under the oversight of UCB's Ethics & Business Integrity (E&BI) program.

These policies apply and are made available to all staff and third-party contractors as part of initial onboarding and annual required training and are referenced in UCB's contracts with third-parties where relevant. When new staff are onboarded, UCB conducts compliance training tailored to the individual's role, including expected business conduct relative to their role and responsibilities.

Ethics and compliance activities, including the implementation of these two policies, are overseen by the Chief Ethics and Compliance Officer, who reports to the General Counsel and has direct access to senior leadership including the Executive Committee, CEO and Board of Directors. In addition, the Chief Ethics and Compliance Officer makes annual presentations to the Executive Committee, the Board and the Audit Committee of the Board.

### Speaking up and non-retaliation

If any UCB employee sees something they consider could be illegal, unethical or a behavior that contradicts the ethical principles found in the Code of Conduct, they are expected to bring this to the attention of a supervisor or manager. Employees may also contact the E&BI, Talent (HR) or Legal departments, or the 24/7 [UCB Integrity Line](#).

UCB has a strict non-retaliation policy. Employees are encouraged to report situations without fear of retaliation, and they are not penalized for reporting in good faith, even if it turns out that a violation did not occur. Retaliation is not tolerated in any form, and anyone involved in retaliating is subject to discipline, up to and including termination. The Chief Ethics and Compliance Officer also follows up with reporters to ensure that they are not experiencing retaliation after reporting and monitors for any negative employment actions that may be due to reporting the misconduct.

## Managing incoming grievances

An established, impartial process is used to assess and investigate all incoming grievance reports in a timely manner, and regular updates are provided to the reporter, if they are known. This process is managed by a Global Head of Investigations who is part of the E&BI team, working under the direction of the Chief Ethics and Compliance Officer and involving Legal and Talent leaders. Investigation results are used to support root cause analysis and determine corrective actions and any disciplinary actions. Regular updates on the process are provided to the Board, the Executive Committee and the Audit Committee of the Board.

### Actions

UCB's Ethics and Business Integrity (E&BI) Program aims to enable strategies that enhance financial, social and environmental performance through ethical practices and leadership. The program is built on the established elements of compliance programs defined by the U.S. Office of the Inspector General and adapted based on local country requirements.

Elements include leadership and governance; risk assessments and due diligence; standards, policies and procedures; training and communications; systems for employee reporting; case management and investigations; testing and monitoring; third-party compliance; and continuous improvement. Annual employee reviews include ethical business considerations as a performance metric in individual objective setting. Employees involved in compliance breaches are subject to disciplinary action in alignment with UCB's disciplinary standards. Additionally, third-parties are reviewed to assess risks related to ethics and business integrity and may be subject to audit and oversight from Ethics and Business Integrity or Internal Audit based on detected or emerging risks.

**Business conduct** continued



The E&BI Program collaborates with company leadership to integrate UCB's ethical principles into daily activities and decisions, emphasizing its importance in relation to our business activities through regular communication, guidelines and key events. In 2025, this included:

- The ongoing 'Leading Through Ethics' strategy to promote 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.
- The annual Global Ethics Day, themed "Empowered by Integrity: Doing the Right Thing Together", included activities at all UCB sites and messages from leaders about their commitment to ethics in their business activities.
- UCB is implementing clear performance metrics company-wide that will include elements of ethics, compliance and business integrity, tying compliance and ethical behavior to employee performance and compensation.
- UCB's Ethical Decision-Making Tool is continuously enhanced to include additional topical guidance, case studies, and high-level questions in relevant areas, enabling employees to practice and apply skills in ethical decision-making to dilemmas they face in their work.

**Ethical culture and compliance**

Conducted internally and benchmarked with industry data provided by a third party, our annual anonymous Ethics and Business Integrity Perceptions Survey provides UCB with data on how colleagues see, understand, live and apply ethical principles and behaviors, together with a comparison to a peer benchmark. Using dashboards and metrics, leaders can provide ongoing coaching to their teams and demonstrate leadership commitment to the importance of ethics and compliance.

Our 2025 survey results saw an overall similar score to that obtained in 2024 which reflected an improvement in several key areas of focus during the preceding year, with an employee response rate equal to that of the previous year (54% in both 2024 and 2025). The perceptions of senior leadership ethics improved notably since 2024, rising to 95% of benchmark (up from 91% of benchmark in 2024). Results showed a slight decrease in employee perceptions of their direct managers as ethical leaders, down to 95% of benchmark in 2025 from 100% of benchmark in 2024. Perceptions of organizational justice increased as well, rising to 90% of benchmark in 2025 from 88% of benchmark the prior year. Organizational justice results showed an increase in employees' confidence that UCB enforces its Non-Retaliation Policy. Survey data also showed a continued reduction in the perception of pressure in the workplace. These results will be used to determine key focus areas for 2026.

**Accounting policy**

The annual anonymous survey Ethics and Business Integrity Perception Survey, conducted internally for the first time in 2025, is the input to calculate perceptions of leadership, pressure, and organizational justice scores. The percentages provided are the numbers of respondents agreeing to statements linked to UCB ethical business conduct, such as "I believe disciplinary actions are taken when individuals engage in unethical behavior or misconduct at UCB". The results are compared with Peer Benchmark Data, provided by an external company, Ethisphere, based on data from companies conducting their surveys with Ethisphere.

**Business conduct** continued

**Grievance indicators**

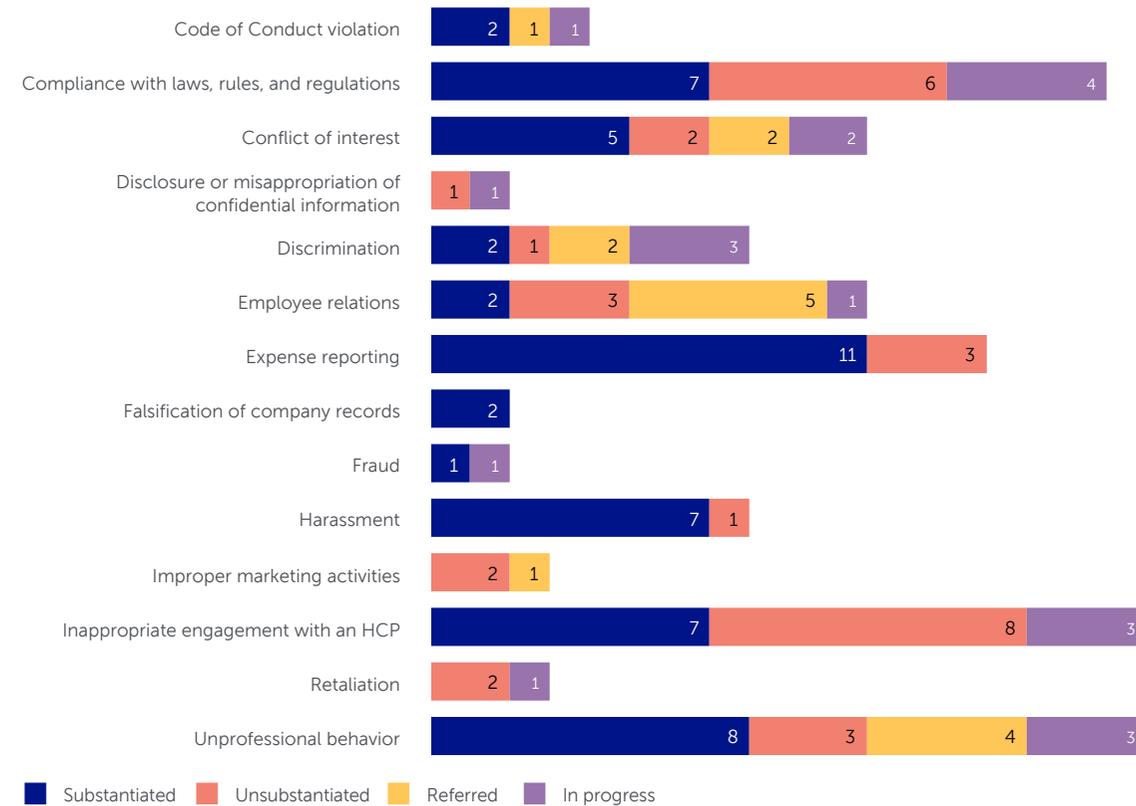
Metric	2024	2025
Number of cases reported per 100 employees	1.78	<b>1.73</b>
% of reports becoming investigations	67%	<b>58%</b>
Anonymous reports	34%	<b>27%</b>
Average case closure time	47 days	<b>56 days</b>
Substantiation rate	48%	<b>53%</b>
Investigations with disciplinary actions	48%	<b>53%</b>

The number of cases reported per 100 employees in 2025 stayed consistent with 2024 rates, with 8% cases coming through monitoring and auditing and 92% of cases coming through UCB grievance mechanisms. The 2025 Ethics and Business Integrity Perception Survey showed a significant reduction in employees reporting observed misconduct, declining from 6.8% in 2024 to 3% in 2025. In addition, the 2025 survey data showed that 88% of employees indicated that they would be willing to report misconduct because "It is the right thing to do". About half of employees (consistent with previous years and about 4% above external benchmark) confirmed that they had reported misconduct that they observed. Continued efforts are ongoing to increase speak-up comfort and awareness by employees. The increase in average case closure time compared to 2024 could be caused by increasing case complexity with several cases requiring expanded investigations and reviews.

**Accounting policy**

The grievance indicators take into account aggregated reports from all of UCB's reporting channels, including reports made to UCB's Integrity Line and from other channels, including to the Ethics and Business Integrity, Talent, and Legal departments, as well as managers.

**Investigation outcome issue type 2025**



**Business conduct** continued

**Anti-bribery and anti-corruption G1-3**

**ABAC Policy**

UCB's [Anti-Bribery Anti-Corruption \(ABAC\) Policy](#) is designed to ensure that UCB personnel, as well as third parties acting on UCB's behalf, understand and comply with applicable global anti-bribery and anti-corruption rules. It is accessible online and on our intranet.

This policy outlines UCB's key anti-bribery and anti-corruption principles and is supported by additional procedures and guidelines that describe how UCB detects, prevents and mitigates bribery and corruption risks in its business activities. The ABAC policy was established taking into consideration input from key stakeholders within UCB, including on topics related to Ethics and Business Integrity, Legal matters, Global Internal Audit, political contributions, intercontinental applicability and funding activities. It is compliant with standards set out by various pharmaceutical industry bodies, including (but not limited to) the International Federation of Pharmaceutical Manufacturers & Associations (IFPMA), European Federation of Pharmaceutical Industries and Associations (EFPIA), Pharmaceutical Research and Manufacturers of America (PhRMA) and OECD Anti-Bribery Convention.

**Prevention and detection of corruption and bribery**

UCB has identified engagement with healthcare stakeholders as the primary anti-bribery and anti-corruption (ABAC) risk area. The E&BI team conducts a risk assessment for every market where UCB operates to assess local risks related to several topics, including corruption. This is in accordance with an established rotational schedule, or on an issue basis where appropriate. These risks, when identified, are addressed through a mitigation plan developed with local leadership teams and reported to the global E&BI leadership team for follow-up. Investigators or investigating committees are separate from any chain of management involved in prevention and detection of corruption or bribery. The Global Internal Audit department periodically reviews UCB's global operations to identify and assess risks in accordance with an established rotational schedule, or on an issue basis where appropriate. As part of the approved 2025 Audit Plan, and in addition to financial assurance procedures, the department

has conducted 39 reviews of various affiliates, partners and global functions. The assessments of local sites, affiliates and partners are carried out on a risk-based cycle and include, among other areas, an evaluation of ABAC procedures and controls. They continuously monitor, enforce and follow up on any compliance-related findings.

Any incidents of bribery and corruption discovered through the monitoring program are referred to the Investigations function within the Ethics and Business Integrity team which operates independently from the country organizations, to ensure full independence of the process. In addition, all cases of bribery and corruption reported by employees or outside stakeholders through our Integrity Line or other reporting channels are promptly investigated. Corrective actions and any necessary disciplinary actions are implemented following the conclusion of the investigation.

**Incidents of corruption or bribery G1-4**

In 2025, no material incidents of corruption or bribery were confirmed. There were no material cases of bribery and corruption that resulted in fines or convictions for violations of anti-corruption and anti-bribery laws.

**Accounting policy**

The total number of substantiated investigations of corruption and/or bribery reported or occurred during the reporting period is calculated using data from the system used to track the cases reported through the UCB Integrity Line and other channels, while the total number of convictions and total amount of fines for violations of anti-corruption and anti-bribery laws to UCB in the reporting period is provided by the Global Litigation team.

A confirmed incident (of corruption and bribery) is a report that has been found to be substantiated. Substantiated reports of corruption do not include reports of corruption that are still under investigation at the end of the reporting period. A determination as substantiated by a court of law is not required. A substantiated report is proven to be true, valid, or supported by evidence.

**Training completion rates**

- 99% of employees were compliant with the Code of Conduct training.
- 98% of employees were compliant with the anti-bribery and anti-corruption (ABAC) training.

ABAC training	All employees
Training coverage	
Total employees required	10 117
Total employees compliant	9 904
Delivery method and duration	
Computer-based training	0.25 hours
Frequency	
How often training is required	Annually
Topics covered	
Definition of corruption	X
Policy	X
Procedures on suspicion/detection	X

The 2025 data reflect a continued high rate of completion of both Code of Conduct and ABAC trainings 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.

**Accounting policy**

- Code of Conduct completion rates are based on the calculation of the proportion of employees who have successfully completed the training for UCB's Code of Conduct or are within the required timeframe to complete the training in the reporting period (i.e., as at December 31, 2025).
- Completion of anti-bribery and anti-corruption (ABAC) training is calculated based on the proportion of employees who have successfully completed the ABAC training or are within the required timeframe to complete the training in the reporting period (i.e., as at December 31, 2025).
- These compliance rates are a sum of employees who have completed and employees who are still within the timeframe to complete and comply with the mandatory training.

**Business conduct** continued

**Political influence and advocacy** **G1-5**

**Policies**

UCB is dedicated to the continued evolution of healthcare ecosystems that recognize and reward innovation, encourage value-based care and promote equitable access to medicines. Given the different regulatory environments across regions, we adapt our approach to public policy while maintaining consistency in our global commitment to ethical engagement and alignment with our purpose. This topic is included in UCB's Code of Conduct and our commitment includes adhering to the reporting requirements for lobbying activity and limits on political campaign contributions in the countries in which we operate.

Where permissible in certain countries and when authorized by the country leadership and the Legal Department or local legal counsel, UCB engages in the political process. Supported candidates are selected based on views, voting records and issue positions that reflect the interests and values of UCB, its employees and the patients we serve now and in the future. The Use of Corporate Resources for Political Activity Policy, specific to the U.S., defines that no company employee may use, or consent to the use of, company funds to make a political contribution to, or an expenditure for the benefit of, any candidate or political committee, unless that employee has obtained prior approval from the Head of U.S. Corporate Affairs and Sustainability, or his or her designee.

In the EU, accountability for the implementation of political influence and advocacy is overseen by the Global Head of Sustainability, Corporate Affairs & Risk. In the U.S., UCB's efforts around this topic are overseen by the Head of U.S. Corporate Affairs and Sustainability and the Head of U.S. Public Policy & Government Relations.

**Actions**

UCB is listed on the following transparency registers:

- EU – Transparency Register (identification number: 294359117093-66)
- Germany – Lobby Register Deutscher Bundestag (identification number: R001559)
- Belgium – Lobby Register/Registre des Lobbies (identification number: N/A)
- U.S. – UCB Inc. or in-house employees are registered at federal state and local levels, based upon the registration and disclosure provisions of each impacted jurisdiction.

It is standard practice for companies in the U.S. to support candidates through Political Action Committees (PACs). UCB's U.S. affiliate has a PAC (U-PAC) to support candidates at the federal and state level, and all contributions are publicly available. All U-PAC and UCB corporate campaign contributions are reviewed in advance of making any such contribution both internally by the U-PAC Governing Board, which is made up of UCB executives and employees, and by outside political law counsel, Politicom Law LLP. We routinely review all candidate contributions and our criteria to ensure that candidates supported by U-PAC reflect the company's views on innovation, affordable access to quality healthcare and health equity. This is the measure we use to decide which candidates to support.

In 2025, UCB engaged in advocacy activities concerning the following topics:

**Innovation**

- Tax incentives to enable continued investment in innovation.
- Proposals to strengthen the intellectual property system.
- Tax policy changes that would have negatively impacted ex-U.S. companies with foreign direct investment into the U.S..
- Trade policy that would negatively impact biopharmaceutical innovation and future investments.
- Strengthening Europe's competitiveness in pharmaceutical research, development, and manufacturing.

**Value-based care**

- Creation of Rare Disease Advisory Boards to enable increased patient voice in public policy related to rare diseases.
- Advocating for the removal of barriers to equitable access to care.
- Advocating for examining the entire prescription drug supply chain to identify reforms that will improve access and affordability while allowing for continued innovation to bring improved treatments to people living with severe diseases.

**Equitable access**

- Removing barriers to manufacturers providing appropriate patient assistance to those who cannot afford their medicines.
- Mechanisms for patients to obtain medically necessary therapies and avoid unnecessary impediments to access.
- Improved access to therapies in U.S. Medicaid programs (for the underserved, including low socioeconomic communities).
- Expand coverage and access to different routes of administration and sites of care for different therapies.

**Political contributions**

	2024	2025
Indirect political contributions (EUR thousands)	100	<b>118</b>

Indirect political contributions are made by UCB only in the U.S., according to standard local practices. Around one quarter of the amount of political contributions reported for 2025 were made through the U-PAC, while around 60% was done through lobbying organizations in states where it is allowed. The remaining amount was related to corporate campaign contributions.

**Business conduct** continued

## Ethical use of technology

UCB has strong technology governance in place, and our approach to AI is evolving in line with its evolution and related regulations, taking the broader societal implications, complex ethical issues and human rights impacts that arise into consideration.

**Policies** **MDR-P**

The [UCB Code of Conduct](#) covers matters related to AI, ensuring that ethical practices are upheld throughout our operations, while the Acceptable Use of IT Policy provides internal guidance for the ethical use of UCB IT systems.

**UCB Code of Conduct**

UCB's Code of Conduct helps our colleagues to make smart and ethical choices about AI technology, accompanied by ongoing training. The Code outlines UCB's expectations regarding technology, including artificial intelligence.

Specifically on AI, the Code of Conduct outlines our commitment to using it in a transparent way which respects human autonomy and aligns with our aim of improving the lives of people living with severe diseases. We carefully consider which tasks we delegate to AI, and put the necessary guardrails in place to ensure we are using it responsibly. Moreover, AI systems at UCB adhere to data protection standards, to ensure that personal data remains private, and descriptions of the way that they work (in understandable terms) are readily available.

**Acceptable Use of IT Policy**

The Acceptable Use of IT Policy, available in UCB's regulated document management system, ensures that all UCB digital systems, devices and data are used in a trustworthy, safe, secure and compliant manner. Ethical, compliant and legal use of technology protects employees, partners, patients and UCB from harm, prevents misuse, and supports responsible digital operations.

The policy applies to any individual using UCB IT systems, devices or data, including employees, contractors, consultants, temporary workers, third-party affiliates and others acting on UCB's behalf. It covers:

- PCs, mobile devices (phone and tablets), media, network, e-mail, internet usage, storage, servers, applications, cloud solutions and other networked and connected devices.
- All UCB Data in electronic format that is created, acquired, accessed, stored, processed or transmitted from or by UCB or its partners (on UCB's behalf), and for which UCB is accountable, responsible or otherwise has a legitimate business interest in.

The policy also emphasizes several key ethical responsibilities:

- Use only authorized systems and software, including GenAI solutions, when performing UCB business.
- Protect data by following UCB's privacy, classification and lifecycle rules, including restrictions on local storage, personal devices, controlled GxP documents, and use of personal email.
- Communicate transparently and responsibly, avoiding technologies such as ephemeral or self-destructing messaging that prevent required retention.
- Use technology for legitimate purposes and within legal and organizational boundaries, including limited and reasonable personal use when it does not create risk.
- Support a culture of accountability by following security guidance, reporting suspicious activity and respecting UCB's ability to monitor systems in line with laws and company policies.

**Actions** **MDR-A**

Actions taken in 2025 included:

- Continuation of the GenAI Hub (established in 2024), which is advising on the ethical considerations of emerging technologies, as well as guiding our use-cases on the ethical use of AI.
- As part of the UCB AI literacy program, a mandatory 'Responsible Use of AI' training for all employees was introduced in August 2025.

- The set up of a transversal legal, intellectual property and ethics team to provide AI use-case risk assessments.
- A self-assessment tool was developed to support UCB employees in reviewing their AI-related use-cases for alignment with the EU AI Act.
- A Global Responsible Use of AI Policy has been developed and is now progressing through the formal approval process. It is designed to align with existing UCB policies such as the Code of Conduct and the Acceptable Use of IT Policy.
- Standard clauses governing the use of AI were added to selected contractual statement of work templates, and a comprehensive set of provisions is being finalized for inclusion in the Master Services Agreement template in early 2026.
- We are currently working on updating the Acceptable Use of IT Policy to include additional elements on ethical use of technology, among other updates. The last update of the policy occurred in March 2025 and strengthened overall ethical themes concerning digital technology. As such, the latest update includes: clearer and broader ethical accountability, more explicit governance of AI and new technologies, stating only authorized tools may be used for UCB operations and business, strengthening of data ethics, balanced and ethical guidance on personal use and others.

# European Sustainability Reporting Standards (ESRS) Index IRO-2

UCB has reported in accordance with the European Sustainability Reporting Standards (ESRS) for the period of January 1, 2025 – December 31, 2025, in alignment with the requirements of the Corporate Sustainability Reporting Directive (CSRD).

## ESRS 2 – General disclosures

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BP-2: Specific circumstances	48, 120
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GOV-2: Governance	137, 141
GOV-3: Incentives schemes	148-149, 151-152
GOV-4: Due diligence	120
GOV-5: Risk management	43-46, 48
SBM-1: Strategy, business model and value chain	8-11, 12-19, 49
SBM-2: Stakeholders	49-51
SBM-3: Strategy and business model	49-51
IRO-1: Processes for IROs	49-51
IRO-2: Disclosure requirements covered	119-120

## ESRS E1 – Climate change

Disclosure requirement	Page
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ESRS 2 SBM-3: Strategy and business model	54
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## ESRS E2 – Pollution

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E2-1: Policies	53, 63-65
E2-2: Actions	64-65
E2-3: Targets	65
E2-4: Pollution of air, water and soil	66-67
E2-5: Substances of concern and substances of very high concern	67

## ESRS E3 – Water and marine resources

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E3-1: Policies	53, 68
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E3-3: Targets	69
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## ESRS E5 – Resource use and circular economy

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ESRS 2 IRO-1: Processes for IROs	49-51, 71
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## European Sustainability Reporting Standards (ESRS) Index continued

### ESRS S1 – Own workforce

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S1-6: Workforce characteristics	88-89
S1-9: Diversity	89
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### ESRS S2 – Workers in the value chain

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ESRS 2 SBM-2: Stakeholders	49-51
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ESRS 2 IRO-1: Processes for IROs	49-51, 92
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S2-3: Remediate negative impacts	93
S2-4: Action	94
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### ESRS S4 – Consumers and end-users

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ESRS 2 SBM-2: Stakeholders	49-51
ESRS 2 SBM-3: Strategy and business model	96-98
S4-1: Policies	82, 99-104
S4-2: Engaging with consumers and end-users	104
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### ESRS G1 – Business conduct

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ESRS 2 GOV-1: Governance roles	137
ESRS 2 IRO-1: Processes for IROs	49-51
G1-1: Corporate culture and business conduct	112-115
G1-3: ABAC prevention	116
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### Statement on due diligence **GOV-4**

Core elements of environmental and social due diligence	Page
a. Embedding due diligence in governance, strategy and business model	14, 49-51, 53, 82, 111, 141
b. Engaging with affected stakeholders in all key steps of the due diligence	49-51, 86, 93, 104
c. Identifying and assessing adverse impacts	49-51, 54-55, 63, 68, 71, 92
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e. Tracking the effectiveness of these efforts and communicating	58-62, 65-67, 69-70, 72-73, 87-91, 94-95, 105-109, 113-114

### Incorporation by reference **BP-2**

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# List of datapoints that derive from other EU legislation

The table below outlines the datapoints derived from other EU legislation as listed in ESRS 2 Appendix B.

It indicates where these data points can be found in our report and identifies which data points are assessed as "Not material".

Disclosure requirement	Data point	SFDR reference	Pillar 3 reference	Benchmark regulation reference	EU climate law reference	Page/ relevance
ESRS 2 GOV-1	21 (d): Board's gender diversity	●		●		142
ESRS 2 GOV-1	21 (e): Percentage of board members who are independent			●		142
ESRS 2 GOV-4	30: Statement on due diligence	●				120
ESRS 2 SBM-1	40 (d) i: Involvement in activities related to fossil fuel activities	●	●	●		N/A
ESRS 2 SBM-1	40 (d) ii: Involvement in activities related to chemical production	●		●		N/A
ESRS 2 SBM-1	40 (d) iii: Involvement in activities related to controversial weapons	●		●		N/A
ESRS 2 SBM-1	40 (d) iv: Involvement in activities related to cultivation and production of tobacco			●		N/A
ESRS E1-1	14: Transition plan to reach climate neutrality by 2050				●	56
ESRS E1-1	16 (g): Undertakings excluded from Paris-aligned benchmarks		●	●		55
ESRS E1-4	34: GHG emission reduction targets	●	●	●		58
ESRS E1-5	38: Energy consumption from fossil sources disaggregated by sources	●				59
ESRS E1-5	37: Energy consumption and mix	●				59
ESRS E1-5	40-43: Energy intensity associated with activities in high climate-impact sectors	●				59
ESRS E1-6	44: Gross Scope 1, 2, 3 and Total GHG emissions	●	●	●		60
ESRS E1-6	53-55: Gross GHG emissions intensity	●	●	●		60
ESRS E1-7	56: GHG removals and carbon credits				●	62
ESRS E1-9	66: Exposure of the benchmark portfolio to climate- related physical risks			●		N/A
ESRS E1-9	66 (a): Disaggregation of monetary amounts by acute and chronic physical risk		●			N/A
	66 (c): Location of significant assets at material physical risk					N/A
ESRS E1-9	67 (c): Breakdown of the carrying value of its real estate assets by energy-efficiency classes		●			N/A
ESRS E1-9	69: Degree of exposure of the portfolio to climate- related opportunities		●			N/A
ESRS E2-4	Amount of each pollutant listed in Annex II of the E-PRTR Regulation emitted to air, water and soil	●				66-67
ESRS E3-1	9: Water and marine resources	●				68
ESRS E3-1	13: Dedicated policy	●				68
ESRS E3-1	14: Sustainable oceans and seas	●				N/A
ESRS E3-4	28 (c): Total water recycled and reused	●				70
ESRS E3-4	29: Total water consumption in m <sup>3</sup> per net revenue on own operations	●				70
ESRS 2 SBM-3 E4	16 (a)	●				N/A
ESRS 2 SBM-3 E4	16 (b)	●				N/A
ESRS 2 SBM-3 E4	16 (c)	●				N/A
ESRS E4-2	24 (b): Sustainable land / agriculture practices or policies	●				N/A

List of datapoints that derive from other EU legislation continued

Disclosure requirement	Data point	SFDR reference	Pillar 3 reference	Benchmark regulation reference	EU climate law reference	Page/ relevance
ESRS E4-2	24 (c): Sustainable oceans / seas practices or policies	●				N/A
ESRS E4-2	24 (d): Policies to address deforestation	●				94
ESRS E5-5	37 (d): Non-recycled waste	●				72
ESRS E5-5	39: Hazardous waste and radioactive waste	●				72
ESRS 2 SBM-3 S1	14 (f): Risk of incidents of forced labor	●				N/A
ESRS 2 SBM-3 S1	14 (g): Risk of incidents of child labor	●				N/A
ESRS S1-1	20: Human rights policy commitments	●				82
ESRS S1-1	21: Due diligence policies on issues addressed by the fundamental International Labour Organization Conventions 1 to 8			●		82
ESRS S1-1	22: Processes and measures for preventing trafficking in human beings	●				N/A
ESRS S1-1	23: Workplace accident prevention policy or management system	●				85-87
ESRS S1-3	32 (c): Grievance/complaints handling mechanisms	●				86-87
ESRS S1-14	88 (b) and (c): Number of fatalities and number and rate of work-related accidents	●		●		90
ESRS S1-14	88 (e): Number of days lost to injuries, accidents, fatalities or illness	●				90
ESRS S1-16	97 (a): Unadjusted gender pay gap	●		●		91
ESRS S1-16	97 (b): Excessive CEO pay ratio	●				91
ESRS S1-17	103 (a): Incidents of discrimination	●				91
ESRS S1-17	104 (a): Non-respect of UNGPs on Business and Human Rights and OECD Guidelines	●		●		91
ESRS 2 SBM-3 S2	11 (b): Significant risk of child labor or forced labor in the value chain	●				92
ESRS S2-1	17: Human rights policy commitments	●				82
ESRS S2-1	18: Policies related to value chain workers	●				93
ESRS S2-1	19: Non-respect of UNGPs on Business and Human Rights principles and OECD guidelines			●		95
ESRS S2-1	19: Due diligence policies on issues addressed by the fundamental International Labour Organization Conventions 1 to 8			●		82
ESRS S2-4	36: Human rights issues and incidents connected to its upstream and downstream value chain	●				95
ESRS S3-1	16: Human rights policy commitments	●				N/A
ESRS S3-1	17: Non-respect of UNGPs on Business and Human Rights, ILO principles or OECD guidelines	●		●		N/A
ESRS S3-4	36: Human rights issues and incidents	●				N/A
ESRS S4-1	16: Policies related to consumers and end-users	●				82, 99-104
ESRS S4-1	17: Non-respect of UNGPs on Business and Human Rights and OECD guidelines	●		●		105
ESRS S4-4	35: Human rights issues and incidents	●				N/A
ESRS G1-1	10 (b): United Nations Convention against Corruption	●				N/A
ESRS G1-1	10 (d): Protection of whistleblowers	●				N/A
ESRS G1-4	24 (a): Fines for violation of anti-corruption and anti-bribery laws	●		●		116
ESRS G1-4	24 (b): Standards of anti-corruption and anti-bribery	●				116

# Sustainability Accounting Standard Board (SASB) Index

		Report reference
<b>Safety of clinical trial participants</b>		
HC-BP-210a	1. Discussion, by region, of management process for ensuring quality and patient safety during clinical trials	Patient safety Product quality
	2. Number of inspections related to clinical trial management and pharmacovigilance that resulted in: (1) entity voluntary remediation or (2) regulatory or administrative actions taken against the entity	Product quality
	3. Total amount of monetary losses as a result of legal proceedings associated with clinical trials in developing countries	Material settlements are reported in Note 34 Provisions
<b>Access to medicines</b>		
HC-BP-240a	1. Description of actions and initiatives to promote access to health care products for priority diseases and in priority countries as defined by the Access to Medicine Index	UCB's purpose & strategy Equitable access to medicines Health systems resilience
	2. List of products on the WHO List of Prequalified Medicinal Products as part of its Prequalification of Medicines Programme (PQP)	UCB has no products in the WHO List of Prequalified Medicinal Products
<b>Affordability and pricing</b>		
HC-BP-240b	2. Percentage change in: (1) weighted average list price and (2) weighted average net price across product portfolio compared to previous reporting period	Equitable access to medicines
	3. Percentage change in: (1) list price and (2) net price of product with largest increase compared to previous reporting period	UCB intends to further report on SASB accounting metrics in the upcoming years
<b>Drug safety</b>		
HC-BP-250a	1. Products listed in public medical product safety or adverse event alert databases	Available at FDA Adverse Event Reporting System (FAERS), the EU EudraVigilance system and WHO's VigiBase
	2. Number of fatalities associated with products	Available at FDA Adverse Event Reporting System (FAERS) and the EU EudraVigilance system (these two databases generally include the same cases)
	3. (1) Number of recalls issued, (2) total units recalled	Product quality
	4. Total amount of product accepted for takeback, reuse, or disposal	UCB intends to further report on SASB accounting metrics in the upcoming years
	5. Number of enforcement actions taken in response to violations of good manufacturing practices (GMP) or equivalent standards, by type	UCB intends to further report on SASB accounting metrics in the upcoming years

**Sustainability Accounting Standard Board (SASB) Index** continued

		Report reference
<b>Counterfeit drugs</b>		
HC-BP-260a	1. Description of methods and technologies used to maintain traceability of products throughout the supply chain and prevent counterfeiting	UCB intends to further report on SASB accounting metrics in the upcoming years
	2. Discussion of process for alerting customers and business partners to potential or known risks associated with counterfeit products	UCB intends to further report on SASB accounting metrics in the upcoming years
	3. Number of actions that led to raids, seizure, arrests, or filing of criminal charges related to counterfeit products	UCB intends to further report on SASB accounting metrics in the upcoming years
<b>Ethical marketing</b>		
HC-BP-270a	1. Total amount of monetary losses as a result of legal proceedings associated with false marketing claims	Material settlements are reported in Note 34. Provisions
	2. Description of code of ethics governing promotion of off-label use of products	Responsible sales and marketing
<b>Employee recruitment, development and retention</b>		
HC-BP-330a	1. Discussion of talent recruitment and retention efforts for scientists and research and development staff	Employee development
	2. (1) Voluntary and (2) involuntary turnover rate for: (a) executives/senior managers, (b) mid-level managers, (c) professionals, and (d) all others	Characteristics of UCB employees
<b>Supply chain management</b>		
HC-BP-430a	1. Percentage of: (1) entity's facilities and (2) Tier 1 suppliers' facilities participating in the Rx-360 International Pharmaceutical Supply Chain Consortium audit program or equivalent third-party audit programs for integrity of supply chain and ingredients	UCB intends to further report on SASB accounting metrics in the upcoming years
<b>Business ethics</b>		
HC-BP-510a	1. Total amount of monetary losses as a result of legal proceedings associated with corruption and bribery	Material settlements are reported in Note 34. Provisions
	2. Description of code of ethics governing interactions with healthcare professionals	Responsible sales and marketing
<b>Activity metrics</b>		
HC-BP-000	A. Number of patients treated	Letter to stakeholders
	B. Number of drugs (1) in portfolio and (2) in research and development (phases 1 to 3)	<a href="http://www.ucb.com/our-products">www.ucb.com/our-products</a> UCB at a glance

# Report of the statutory auditor

## on the limited assurance of the consolidated sustainability information of UCB SA for the year ended on 31 December 2025

### To the Annual General Meeting

As part of our statutory engagement to provide limited assurance on the sustainability information of UCB SA (the "Company") and its subsidiaries (jointly "the Group"), we hereby report to you on this engagement.

We have been appointed by the Annual General Meeting of 25 April 2024, in accordance with the proposal of the Board of Directors and following the recommendation by the audit committee and the proposal formulated by the Works Council of UCB SA to perform a limited assurance engagement on the Group's sustainability information included in section "Sustainability Statement" of the Group Integrated Annual Report as at 31 December 2025 and for the year ended on that date (hereinafter the "Sustainability Information").

Our mandate expires on the date of the General Meeting held to approve the financial statements for the year ended 31 December 2026. We have performed our assurance engagement on UCB's sustainability information for two consecutive years.

### Limited assurance conclusion

We have performed a limited assurance engagement on the Group's consolidated sustainability information.

Based on the procedures we performed and the assurance evidence we obtained, nothing has come to our attention that causes us to believe that the Group's consolidated sustainability information, in all material respects:

- has not been prepared in accordance with the requirements of article 3:32/2 of the Companies' and Associations' Code, including compliance with the applicable European Sustainability Reporting Standards (ESRS);
- is not in accordance with the process (the "Process") carried out by the Group to identify the information reported in the consolidated sustainability statement in accordance with the description set out in note "General disclosures – materiality assessment"; and
- does not comply with the requirements of Article 8 of Regulation (EU) 2020/852 (the "Taxonomy Regulation"), relating to the publication of the information listed in subsection "EU Taxonomy Disclosure" of the environmental section of the management report.

### Basis for conclusion

We conducted our limited assurance engagement in accordance with ISAE 3000 (Revised), Assurance Engagements other than Audits or Reviews of Historical Financial Information ("ISAE 3000 (Revised)"), as applicable in Belgium.

Our responsibilities under this standard are described in more detail in the section of our report entitled "Responsibilities of the statutory auditor in relation to the limited assurance engagement on sustainability information".

We have complied with all the ethical requirements applicable to the assurance of sustainability information in Belgium, including those relating to independence.

We apply International Standard for Quality Management 1 (ISQM 1), which requires the firm to design, implement and maintain a quality management system that includes policies or procedures relating to compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.

We have obtained from the Board of Directors and Company officials the explanations and information required for our limited assurance engagement.

We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our conclusion.

## Report of the statutory auditor on the limited assurance of the consolidated sustainability information of UCB SA continued

### Responsibilities of the Board of Directors regarding the preparation of sustainability reporting

The Company's Board of Directors is responsible for developing and implementing a Process and for publishing this Process in the note "General disclosures – materiality assessment". This responsibility includes:

- understanding the context in which the Group's activities and business relationships take place, and developing an understanding of the stakeholders involved;
- identification of actual and potential impacts (negative and positive) related to sustainability issues, as well as risks and opportunities that affect, or can reasonably be expected to affect, the group's financial position, financial performance, cash flows, access to financing or cost of capital in the short, medium or long term;
- assessing the significance of identified sustainability impacts, risks and opportunities, by selecting and applying appropriate thresholds; and
- the formulation of assumptions and estimates that are reasonable in the circumstances.

The Company's Board of Directors is also responsible for sustainability reporting, which includes the information identified by the Process:

- in accordance with the requirements of article 3:32/2 of the Companies and Associations Code, including the applicable European Sustainability Reporting Standards (ESRS); and
- by complying with the requirements of Article 8 of Regulation (EU) 2020/852 (the "Taxonomy Regulation") relating to the publication of the information listed in subsection "EU Taxonomy Disclosure" of the environmental section of the management report.

This responsibility includes:

- the design, implementation and maintenance of internal controls that the board of directors determines are necessary to enable the preparation of the consolidated Sustainability Statement that is free from material misstatement, whether due to fraud or error; and
- selecting and applying appropriate sustainability reporting methods and making assumptions and estimates that are reasonable in the circumstances.

The Audit Committee is responsible for overseeing the Group's sustainability reporting process.

### Inherent limitations in sustainability reporting

In reporting forward-looking information in accordance with the ESRS, the Company's Board of Directors is required to prepare the forward-looking information on the basis of disclosed assumptions concerning events likely to occur in the future and possible future action on the part of the Group. Actual outcomes are likely to be different since anticipated events frequently do not occur as expected, and such differences could be of material importance.

### Responsibilities of the statutory auditor in relation to the limited assurance engagement on sustainability information

Our responsibility is to plan and perform the assurance engagement to obtain limited assurance about whether the sustainability information is free from material misstatement, whether due to fraud or error, and to issue a limited assurance report that includes our conclusion. Misstatements may be the result of fraud or error and are considered material when, individually or in aggregate, they could reasonably be expected to influence the decisions that users of sustainability information make on the basis of that information.

In the context of a limited assurance engagement in accordance with ISAE 3000 (revised), as applicable in Belgium, and throughout the engagement, we exercise professional judgment and critical thinking. These procedures, to which we refer in the section "Summary of work performed", are less extensive than the procedures for a reasonable assurance engagement. We therefore do not express a reasonable assurance opinion on this engagement.

Since the forward-looking information included in the sustainability information, and the assumptions on which it is based, relate to the future, they may be influenced by events that may occur and/or by any actions taken by the Group. Actual results are likely to differ from assumptions, as assumed events will generally not occur as expected, and such differences could be material. Consequently, our conclusion does not guarantee that the actual results reported will correspond to those contained in the forward-looking sustainability information.

Our responsibilities regarding sustainability information for the Process are as follows:

- Gaining an understanding of the Process, but not for the purpose of providing a conclusion on the effectiveness of the Process, including the outcome of the Process; and
- Designing and implementing procedures to assess whether the Process is consistent with the Group's description of that Process as described in note "General disclosures – materiality assessment".

## Report of the statutory auditor on the limited assurance of the consolidated sustainability information of UCB SA continued

Our other responsibilities regarding sustainability information are as follows:

- Obtaining an understanding of the entity's control environment, processes and information systems relevant to sustainability reporting, but without evaluating the design specific control activities, obtaining audit evidence about their implementation or testing the operating effectiveness of the controls in place;
- Identifying areas where material misstatements in sustainability information are likely to occur, whether as a result of fraud or error; and
- Designing and implementing procedures tailored to areas where material misstatements of sustainability information are likely to occur. The risk of not detecting a material misstatement resulting from fraud is higher than that of a material misstatement resulting from error, as fraud may involve collusion, falsification, deliberate omissions, misrepresentation or override of internal control.

### Summary of work performed

A limited assurance engagement involves performing procedures to obtain evidence about sustainability information. The nature and form of the procedures performed in a limited assurance engagement vary, and their scope is less than in a reasonable assurance engagement. Consequently, the level of assurance obtained in a limited assurance engagement is significantly lower than that which would have been obtained in a reasonable assurance engagement.

The nature, timing and extent of procedures selected depend on professional judgment, including the identification of instances where material misstatement of sustainability information is likely to occur, whether due to fraud or errors.

As part of our limited assurance engagement, regarding the Process, we have:

- Acquired an understanding of the Process by:
  - making inquiries to understand the sources of information used by management (e.g. stakeholder engagement, business plans and strategy documents); and by
  - examining the Group's internal documentation relating to its Process; and
- Assessed whether the evidence obtained from our procedures concerning the Process implemented by the Group was consistent with the description of the Process presented in note "General disclosures – materiality assessment".

As part of our limited assurance engagement, regarding the sustainability information, we have:

- Obtained an understanding of the Group's reporting processes relevant to the preparation of its sustainability statements including the consolidation processes by obtaining an understanding of the Group's control environment, processes and information systems relevant to the preparation of the sustainability statements, but not evaluating the design of particular control activities, obtaining evidence about their implementation or testing their operating effectiveness;
- Evaluated whether material information identified by the process is included in the sustainability statements;
- Evaluated whether the structure and the presentation of the sustainability statements are in accordance with the ESRS;
- Performed inquiries of relevant personnel and analytical procedures on selected information in the sustainability statements;
- Performed substantive procedures on selected information in the sustainability statements;

- Obtained audit evidence about the methods used to develop estimates and forward-looking information, as described in the section on the responsibilities of the statutory auditor relating to the limited assurance engagement on sustainability information;
- Obtained an understanding of the process to identify EU taxonomy eligible and aligned economic activities for turnover, CAPEX and OPEX and the corresponding disclosures in the sustainability statements;
- Evaluated compliance processes, methods, and data for covered activities, assessed minimum safeguards compliance through personnel inquiries, and conducted analytical procedures on EU taxonomy aligned disclosures;
- Evaluated the presentation and use of EU taxonomy templates in accordance with relevant requirements;
- Reconciled and ensured consistency between the reported EU taxonomy economic activities and the items reported in the consolidated financial statements including the disclosures provided in related notes.

### Statement related to independence

Our audit firm and our network have not carried out any engagements incompatible with the limited assurance engagement and our audit firm has remained independent of the Group during our engagement.

Brussels, 25 February 2026

**Forvis Mazars Bedrijfsrevisoren BV**  
Reviseurs d'Entreprises SRL

Statutory Auditor

Represented by

**Sébastien Schueremans**  
Certified auditor