



Human Rights Policy (HuRi)



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

Why this policy?

Purpose

At UCB, we are committed to respecting the rights and dignity of all people. We strive to prevent adverse human rights impacts in all parts of our business, and we expect the same behavior from our business partners such as service providers, suppliers and other third parties acting on behalf of UCB.

We know that the societal and environmental challenges our world is facing are inextricably linked and that every business decision we make has an effect on the people we serve. The 'rights holders' we serve are our patients, their families and caregivers, people working on our behalf, shareholders, workers in our supply chain, and people living in the communities we operate in.

We see sustainability as a core requirement at the heart of all we do and this is strongly linked with UCB's commitment to respect human rights. Being guided by sustainability and human rights principles helps us to accomplish our ambition of making a positive impact on society and the environment, while delivering solutions for patients and supporting us to ensure UCB's long-term success.

This policy defines our basic human rights commitment, roles and responsibilities, and the key principles that guide our decisions and activities to safeguard how we achieve our commitment to respect and uphold human rights. This policy serves as the basis for selecting the issues of highest priority ("salient human rights"), for guiding the associated due diligence processes, for our engagement with rights holders, and for providing remedy if an adverse human rights impact was caused.

Key takeaways

Fundamental standards of good human rights management

We are deeply committed to operating with high ethical standards, respecting the rights and dignity of all people. The "do no harm" principle is the foundation for our corporate responsibility and we apply the following fundamental standards of good human rights management:

1. In our own operations, we commit not to violate any human rights and swiftly address any potential adverse human rights impact.
2. We ensure that we are not complicit in human rights abuses and leverage our influence to mitigate any negative impact on the rights of all rights holders. In our third-party operations we hold our partners to the same standards and expect them to comply with national human rights law.

3. We will not undermine government measures to protect human rights. However, in the case of inadequate human rights protections by local governments, we will continue to uphold our responsibility to respect human rights to the greatest extent possible.
4. We will comply with applicable local and national law whether or not it is enforced. Where national law is absent or sub-standard on a specific topic, we will respect the principles of relevant international law.
5. Where local law conflicts with relevant international human rights standards, we will strive to uphold the spirit of internationally recognized human rights. In cases where the local law is more restrictive, we will apply the requirements of the local law.

We take a proactive and constructive role in society, promoting and actively supporting internationally proclaimed human rights.

Scope

Scope, Applicability and Responsibilities

UCB's human rights commitment applies to all rights holders that could be negatively affected by our operations and work directly or indirectly within our business and value chain. The UCB Code of Conduct—Our Ethics in Action addresses our commitment to several human rights elements and these are further elaborated in this policy. UCB's specific human rights expectations for third parties are defined in the UCB Responsible Sourcing Standards for Business Partners.

- UCB's External Sustainability Advisory Board, which includes members of the UCB SA Board of Directors, has endorsed this policy. This policy was jointly developed by the Ethics and Compliance department and the Sustainability department, working with a cross-functional group of colleagues across the company and with input from our External Sustainability Advisory Board and other external experts on this topic. The ownership of the policy is held within the Ethics and Compliance department. UCB will regularly review this policy and our approach to ensure that it remains current and aligned with external standards and best practices as well as expectations of UCB's internal and external stakeholders.
- The UCB Executive Committee has endorsed this policy and is accountable for the overall human rights commitment and its implementation
- The Ethics and Compliance department will organize the due diligence program and prioritize implementation activities for this policy in collaboration with a cross-functional group and UCB line management supervises adherence to this policy within their respective areas of responsibility and its implementation in the relevant systems and processes across our business. We will provide periodic updates on the status of the policy and its' implementation to the UCB Sustainability Governance Board and these updates will be made available through relevant external reporting mechanisms.
- All UCB employees, including those working on our behalf must adhere to the binding obligations set out in this policy.

Policy requirements

1. "General" Rights and Commitments

1.1 Non-discrimination, non-harassment and fair treatment

What do we commit to do:

At UCB, we treat all employees with fairness, dignity and respect and we are committed to creating a diverse, equitable and inclusive work environment. Embracing diversity is both a moral imperative and a central element of UCB's identity.

Any form of workplace discrimination, harassment or bullying related to (but not limited to) nationality, gender, age, expression of opinion, language, color, ethnicity, religion, sexual orientation, gender identity or expression, disability, health status, membership of an association or any other characteristics protected by law, is not tolerated. UCB will take all appropriate remedial action to address such behaviors. We expect third parties with whom we work to have and apply similar standards.

We proactively seek to identify and combat discrimination in order to address and reverse any systematic discrimination that might exist.

We engage with rights holders on matters of non-discrimination and fair treatment which supports us to become a more inclusive, fair and equitable workplace.

Why we commit to this:

Respect of these principles is necessary so to not deny the equal moral status people hold and to mitigate any potential harm or disadvantage, as well as uphold equality of opportunity. Embracing diversity allows us to better understand communities, patients, employees, and other stakeholders and ensures the right conditions for innovation and collaboration.

1.2 Labor rights

What do we commit to do:

As an employer, we ensure that our employees experience fair practices and safe conditions in the workplace. We commit to respect internationally recognized labor rights across our business and throughout our value chain. This means that we prohibit child labor and slavery including forced labor or human trafficking. We support the rights of our employees to join a union, to receive a living wage, to have reasonable working hours and conditions, to provide overtime compensation in accordance with applicable law, and guarantee parental and holiday leave, as described in the ILO convention¹.

At UCB, reintegration after a leave of absence, including physical or mental illness or disability, is completed using care management concepts, adapted workplaces, and adapted working conditions, in line with local laws and regulations.

All UCB employees have the option to leave employment within lawful contractual terms and the right to be provided with proper documentation of their working relationship with UCB.

Why we commit to this:

Slavery or forced labor is a human rights abuse and unethical. Work or services should never be performed under threatening circumstances. Children deserve special protection and care since they are particularly vulnerable. Child labor denies children the important opportunity of an education and results in mental and physical suffering.

Other labor rights mentioned above also significantly impact the lives of employees, their health and wellbeing, as well as the livelihood of them and their families.

1.3 Freedom of Association, Ensuring Fairness and Respect

What do we commit to do:

We respect the right of our employees to freely join independent trade unions and organizations of their own choice without fear of reprisal or discrimination, in accordance with local law. This includes participating in collective bargaining. In situations where local laws restrict independent trade unions, our associates can join employee associations that are not prohibited under local law. We commit to constructive dialogue with representatives of our workforce. We also ensure that our activities do not undermine the right of our employees to join other legitimate and lawful organizations

Why we commit to this:

We understand the right to freedom of association as an important vehicle to exercise many other civil, cultural, economic, political, and social rights. It represents an essential component of a free society as it empowers all people to express their political opinions and engage with others in the pursuit of political, social and economic goals.

1.4 Freedom of Expression

What do we commit to do:

We respect each employee's entitlement to freedom of opinion, expression, and speech, consistent with standards of respectful behavior, as long as the exercise of this freedom does not violate the rights of other people or public order.

We nurture a culture of fairness and reciprocity and are committed to cultivating an environment where everyone feels comfortable and psychologically safe to express opinions and contribute ideas.

Why we commit to this:

Freedom of expression is a fundamental prerequisite of societies in which people participate in dialogue, public debate, or discussions and are able to influence important issues. At UCB, we believe that this right is also fundamental to allow our employees to contribute to issues of importance for UCB.

1.5 Employee Welfare: Health & Safety

What do we commit to do:

We commit to protecting the safety, wellbeing and health of our employees throughout our operations. We ensure adequately high standards of occupational health and safety to minimize workplace hazards. This includes physical threat caused by safety violations and unethical conduct or unreasonable business pressure that may negatively affect mental and physical health. Management is responsible for implementing and maintaining good health, wellbeing, and safety practices and standards and leads by example. All UCB employees fully understand safety, wellbeing, and health, and respond appropriately.

Why we commit to this:

This commitment is imperative to the success of UCB in delivering against its goals. Workplace hazards materialize because health and safety standards are not maintained or not managed properly, there is a risk of harm, including severe bodily injury, mental health issues or loss of life. To endanger the physical and mental health of employees because of weak or negligent safety standards and practices at the workplace is unethical and unacceptable.

1.6 Privacy

What do we commit to do:

We respect the privacy rights of our employees, patients, their caregivers, physicians, and other stakeholders that entrust us to carefully manage and protect personal information. We expect that the service providers we work with adhere to similar high privacy standards. We inform individuals regarding the collection and processing of their personal data, allowing them to make informed decisions and understand and exercise their rights. We collect and process personal data for specific and legitimate business purposes only and secure such data against unauthorized access and misuse.

Why we commit to this:

Privacy is a fundamental human right that gives everyone the exclusive right to exercise control over personal information, including when, how, and to what extent information about us is communicated to others. It is essential to autonomy and the protection of human dignity. It enables us to create barriers and manage boundaries to protect ourselves from unwarranted interference in our lives.

1.7 Environmental protection

What do we commit to do:

We commit to minimize the impact that UCB, our operations and our products, have on the environment and to use a pragmatic approach to reduce our footprint. We apply precautionary measures to avoid these negative impacts and focus on areas of the business where our

activities have the biggest impact. We do so primarily because such impact could harm the livelihoods of the people and communities we serve. We require our third parties to follow similar standards with regards to environmental protection to avoid harming any rights holders.

Why we commit to this:

The United Nations General Assembly has recognized the right to a clean, healthy and sustainable environment as a human right². Negatively impacting the environment harms the rights of rights holders today as well as those of future generations. Specific attention needs to be given to vulnerable communities that are particularly exposed to negative changes in the environment such as pollution of water sources, climate impacts, and displacements due to climate change, which can hamper their health and capacity to make a living under those conditions.

1.8 Artificial Intelligence

What we commit to do:

We commit to use Artificial Intelligence systems only if they respect the rights of the respective rights holders and if they properly consider principles of privacy, accountability, data safety and security, transparency, fairness and non-discrimination, human control, and professional responsibility.

Why we commit to this:

The growing abilities of Artificial Intelligence and the scope of its application impacts decision making and will increasingly affect the daily life of people, whether or not they are aware of its presence. This exacerbates existing privacy concerns and introduces new ethical problems to consider, requiring continued attention. Artificial Intelligence should only be applied in full respect of all relevant human rights and must be socially beneficial. It must be based on ethical algorithms, since otherwise there is a risk of physical or mental harm as well as discrimination.

1.9 Third Party Management

What do we commit to do:

We respect internationally recognized human and labor rights in our own operations, and we expect our business partners, suppliers, and service providers to do the same. Our Suppliers Code of Conduct forms a key part of procurement's efforts to drive environmental sustainability and respect for human rights. We specifically expect our business partners to minimize the environmental impact of their operations, secure the safety and health of their workers, execute the fair and timely remuneration of their workforce, ensure the welfare of

experimental animals used for research, and more broadly act with integrity while doing business. UCB also expects business partners to apply these, or equivalent standards, in their own supply chain.³

Why we commit to this:

The respect of human rights is a universal obligation that companies have irrespective of where they operate. Third parties with which we work across our business and value chain are critical partners for us in delivering on our ambition to improve access to quality care and medicines for people living with severe diseases around the globe. However, a good partnership for UCB means that all together we commit to upholding and respecting all human rights.

1.10 Anti-Corruption

What do we commit to do:

We do not improperly influence the decisions or actions of others. We never offer, promise, pay, authorize, or accept the giving of anything of value – directly or indirectly – that could be construed as influencing the decision or action of an external party – including the scientists, healthcare stakeholders, and government officials we interact with around the globe. This commitment holds true even if such practice could be considered a local custom.

Why we commit to this:

Corruption is a strong constraint on growth and development. It undermines just and fair treatment, fair competition, and good political governance as well as the rule of law. Corruption can impact the availability, quality and accessibility of human rights-related goods and services. Because public policies and public resources are largely beneficial to people with lower income, these are the people who suffer the most harmful effects of corruption.

1.11 Intellectual Property Rights

What do we commit to do:

We protect and enforce intellectual property rights in a focused, responsible, and sustainable way, that addresses unmet need and contributes to the promotion and dissemination of scientific and technological innovation, now and in the future.

Why we commit to this:

Owning and benefitting from property rights as a human right is justified by the concept that everyone has personal property, which includes the work they produce. This right encourages people and companies to contribute towards the common good. This concept also applies to the development of novel treatments which are the result of the work and the investments

that have been made by several actors, however, ownership and the right to property must be balanced with the obligation to respect the rights of others.

2. "Specific" Rights and Commitments

2.1 Right to Health (The right to the highest attainable standard of physical and mental health)

What do we commit to do:

We respect the right to the highest attainable standard of physical and mental health. We believe that the right to health can only be fulfilled if all relevant actors in the healthcare sector, such as government, medical professionals, and the private sector jointly work together to guarantee this right. At UCB, respecting the right to health means that we make our medicines as widely available as possible to patients with unmet need. This also applies to innovative new medical therapies that shall be made available to as many patients as possible. We also commit to manufacture medicines in line with the highest quality standards. If concerns are raised about the safety of one of our medicines, we will take immediate action in line with regulatory frameworks to protect patients from harm. We commit to work with patients and caregivers and make sure that they are fully informed and empowered, giving them the tools to seek and provide the best possible care.

Why we commit to this:

Our business activities play a key role in society, discovering and developing new medicines for unmet need. We strive to make these medicines available to as many patients as possible, in collaboration with states who have the primary responsibility to ensure this right. We always consider the rights of other rights holders, including shareholders and future patients, and how we can maintain the sustainability of our business to continue to bring long-term solutions to patients. Patient health and safety is a fundamental ethical cornerstone of our work since quality issues can lead to severe harm to patients.

2.2 Clinical Trials

What do we commit to do:

We commit to always use our research & development activities for the advancement of medical care and to conduct clinical research with respect for the rights, safety and dignity of individuals and communities, as well as to protect scientific integrity.

We offer the highest possible protection of clinical trial participants through our values of respecting the right to life, health, privacy, and autonomy, in accordance with international human rights standards, including the Declaration of Helsinki⁴, the Council for International

Organizations of Medical Sciences⁵, and the International Council for Harmonization for Good Clinical Practice Guideline⁶. We endeavor to avoid conducting clinical trials in countries where there is not a reasonable expectation that the product will be available to patients once they have participated in a trial. Where medically justified, we endeavor to make trial medication available to trial participants until the product is locally available.

We encourage diversity in our clinical trials, with the aim that they reflect the diversity of the target population. We commit to take special care when recruiting trial participants from vulnerable populations, such as children or low-income participants. Globally valid principles of voluntary and informed consent must respect local specifications and language. If literacy or comprehension are of concern, we involve family, community representatives and/or independent witnesses. Trial participants must understand that they are free to withdraw from a research activity at any time.

Why we commit to this:

Involving humans in clinical trials is only ethically acceptable when the risks for trial participants are acceptable. The rights, safety, wellbeing, and privacy of trial participants must prevail over the interests of science and society. The participant must be fully informed and understand both the associated risks and potential benefit from trial participation. Trial participation under any type of pressure is unethical, as participation must be voluntary.

2.3 Advanced Medical Therapies (gene therapy, somatic cell therapy and tissue engineered products)

What do we commit to do:

All medical treatments or technologies that we develop and commercialize, and that lead to a modification of the human genome, is only done for preventive or therapeutic reasons. It is paramount for UCB that research priorities, as well as the resulting treatments and applications, never prevail over respect for the human rights, freedoms and dignity of individuals or groups of people.

Why we commit to this:

We recognize the potential positive impact of research into the human genome and the resulting applications for improving the health of individuals and of society. However, we also understand concerns around the possibility of negative consequences related to the application and potential misuse of these technological developments. The importance of the human genome and its integrity means that the highest level of ethical behavior and research quality in all related activities must be upheld.

3. Reporting and Remedy

3.1 Reporting of Violations and Access to Solutions

What do we commit to do:

We commit to offer all employees, as well as external rights holders outside of our organization, a channel to report complaints. This will trigger an investigation to assess the merits of a complaint and appropriate corrective and disciplinary actions will be taken at the conclusion of the investigative process. We are committed to prompt and confidential handling of all reports and UCB has a strict non-retaliation policy to protect all employees that raise concerns or report misconduct. We will provide a grievance mechanism (in line with the UNGP) to the rights holders that are negatively affected and escalate any substantiated cases of misconduct to management for appropriate action and for providing access to remedy.

Reports can be submitted to the [UCB Integrity Line](https://www.ucb.com/Integrity-line) at <https://www.ucb.com/Integrity-line> which provides access to [phone](#) or web reporting in multiple languages, and including the option for anonymous reporting.

Why we commit to this:

Accountability means that we need to create an environment and formal mechanisms in which people – often in a vulnerable position – feel comfortable to come forward with their concerns and complaints. Only if we harbor such environments and intentionally create these levels of safety, are we staying true to our commitment to hold ourselves, and all at UCB, accountable.

Regulatory references

Internal References

The UCB Code of Conduct defines how we conduct business across our value chain. Specific human rights issues are defined and managed via binding issue- and function-specific standards at UCB. From our regular Materiality Analysis, we also prioritize the importance of specific human rights and their intersection with our sustainability priorities.

Main external References

We respect and support the protection of human rights, as set out in the International Bill of Human Rights. We are also committed to upholding the core labor rights conventions of the International Labor Organization (ILO), set out in the Declaration on Fundamental Principles and Rights at Work. Since 2021, we have been a signatory of the UN Global Compact, endorsing the 10 universal principles covering human rights, labor, the environment, and anti-corruption. We also affirm our commitment to the UN Guiding Principles on Business and Human Rights and implement them within UCB where appropriate.

¹ ILO Declaration on Fundamental Principles and Rights at Work, 1998, as amended in 2022. Available at: [Key document - ILO Declaration on Fundamental Principles and Rights at Work \(1998\), as amended in 2022](#)

² [The human right to a clean, healthy and sustainable environment : \(un.org\)](#) (15.02.2023)

³ [Final-UCB-Responsible-Sourcing-Code-of-Conduct.pdf](#)

⁴ [Declaration of Helsinki – WMA – The World Medical Association](#)

⁵ [2016 International ethical guidelines for health-related research involving humans - CIOMS](#)

⁶ International Council for Harmonization for Good Clinical Practice Guideline

Need more information?

The related associated documents are managed in **UCB's electronic content management system of controlled documents**. Please refer to the system.

Abbreviations and definitions, used in this document, are in accordance with the **UCB Glossary**.