

A woman with dark hair, wearing a black puffer vest over a black long-sleeved top, a light blue scarf, and dark blue trousers, stands in a field. She is looking off to the side with a slight smile. The background shows a green field with a wooden fence and trees with some autumn-colored leaves. The entire image is framed by a white circular border.

# UCB Modern Slavery Act Statement 2022



Inspired by patients.  
Driven by science.

## Introduction

This statement is made pursuant to section 54 of the UK Modern Slavery Act 2015. UCB is a global group of companies under the holding company UCB S.A., incorporated in Belgium. This statement is prepared for the following UCB companies operating in the UK:

- UCB Pharma Limited
- Celltech R&D Limited
- Zogenix International Limited
- UCB Celltech (the UK registered establishment of UCB Pharma SA)
- UCB Biopharma UK (the UK registered establishment of UCB Biopharma Srl)

This statement refers to the financial year ending 31 December 2022 and sets out the steps we have taken to address modern slavery risks in our business and supply chains.

## UCB structure, operations and supply chain

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

In 2022, we touched the lives of over 3.4 million patients worldwide by offering impactful medicines to communities around the globe. Total revenue in 2022 was €5.5 billion (£4.7 billion), to which the UK contributed 2.4%. We employ over 8,700 employees across 36 markets, of which 9.9% are employed in the UK for the above listed entities. We also regularly utilise agency workers and consultants to supplement our workforce, some of whom work on-site at UCB premises and others who work remotely. UCB entities in the UK, as listed above, employed 146 contractors during 2022.

We have global commercial, research and manufacturing operations with our main research centres and manufacturing sites based in Europe, the US and Asia. The UK has commercial operations and is one of three research hubs. Further information on our business can be found in our [Annual Report](#).

UCB's supply chains are global and complex. Through our global supply chain organisation, we ensure end-to-end oversight of supply from raw material procurement to delivery, either through distribution centres or third-party distributors. We partner with strategic suppliers, contract manufacturing organisations (CMOs) and contract research organizations for the purposes of

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

In 2022, above-listed UCB UK entities accounted for 5.7% of global spend. Of this, nearly 80% was distributed across 40 suppliers, who provided labour, equipment, materials and supplies, professional and creative services and logistics. Of these 40 suppliers, 75% are UK-based companies, the remainder are based in Europe or the US.

## Policies and governance

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

The [UCB Code of Conduct](#) is our governing policy that reflects UCB's core company values, including our commitment to sustainability and ethical business practices, which covers human rights. The Code outlines the general principles of business conduct that are expected from UCB colleagues and partners throughout the world.

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

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

As a company, we recognise that we have the moral responsibility and social obligation to make responsible decisions that guarantee both human and environmental health. At UCB, we have a key role to play to ensure a sustainable future for all. We believe that the best way to have a positive impact on society is by engaging with our suppliers and integrating into our supply chain requirements, specifications and criteria that are compatible with our sustainability strategy. The [Suppliers Code of Conduct](#) forms a key part of our efforts to drive sustainability, outlining UCB's set of values and principles that it expects suppliers should follow.

## Risk management

Within Enterprise Risk Management at UCB, we maintain our commitment to our purpose, strategy and sustainable approach and seek to find new ways to manage risks and deliver impact in an increasingly volatile, complex, fast moving and ambiguous environment. Our approach is to educate, connect and enable all stakeholders throughout UCB to integrate key, vertical and transversal risk identification, assessment, and response planning. By analysing potential risk exposure, decisions can be made in a more informed manner.

In 2022, the core focus was to strengthen our connection to the corporate strategy as we seek to empower business leaders to calibrate risks at the right level and integrate risk considerations into their decision making. We did so by continuing to enhance the interfaces between strategic planning teams, enterprise risk management, business stakeholders and external risk experts and networks. We also further advanced our understanding of both internal and external emerging uncertainties.

Engaging with key representatives from all operational, functional, and strategic business areas, risks are identified and assessed by each business area and the respective leadership team. In addition, a 'top-down/outside-in' assessment is conducted to complete a holistic risk profile. To maximise the impact, top risks are connected to the strategic priorities. An understanding of both how the risk is trending and how well UCB is prepared to respond, is communicated to and discussed with both, our Executive Committee and our Board of Directors.

'Human rights' is identified as a UCB enterprise risk and has been included as a top social risk in 2022. To date, no report of an infringement of human rights associated with UCB or its suppliers has been identified to the company.

### Third party supplier due diligence

Considering the nature of our operations, due diligence for our third-party relationships is also a part of our Ethics and Compliance Program. UCB expects the same behaviour from consultants and others acting on behalf of UCB (supply chains, i.e., purchasing of goods and services). UCB monitors our relationships with third parties, since this is the area where risks related to Human Rights are most likely to materialise, particularly in countries where we operate which may be regarded as higher risk.

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

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

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

In 2022, UCB increased the number of suppliers included in the EcoVadis sustainability performance audit to 284 suppliers. In the UK, 15 of our top 40 suppliers have been assessed by EcoVadis, accounting for 26% of spend.

We also continue to collaborate with [RiskMethods](#), a supply chain risk management software, to identify potential risk in terms of fair labour practices and human rights, and ethical business behaviour. 50% of our top 40 suppliers are monitoring through the RiskMethods platform.

## Training

Finalised in 2021 and rolled out in 2022, the new [UCB Code of Conduct](#) reinforces the ethical principles and commitments which must drive our decisions and actions. Available in 24 languages, the Code applies to all employees, agents and consultants acting on behalf of UCB. We are responsible for embodying our Code of Conduct, living by our commitments to each other and our stakeholders. In 2022, 100% employees completed the Code of Conduct training. Third parties are also expected to acknowledge and adhere to the principles of the Code of Conduct, and this expectation is reflected in our [Supplier Code of Conduct](#) and in their legal agreements with UCB where necessary.

## Collaborations

UCB decided to join forces with other pharmaceutical companies in the area of sustainability and joined two initiatives: the Responsible Health Initiative ([RHI](#)), and Pharmaceutical Supply Chain Initiative ([PSCI](#)) which both aim to leverage the influence, resources and expertise of other members. Both programs have their specific characteristics but have in common the aim to improve the visibility, efficiency and sustainability impact of the global health supply chain. Through these initiatives, UCB pursues different objectives: increase visibility, improve recognition and collaboration, encourage and build the sustainability performance of suppliers, share best practices and maximise our outreach.

UCB is also a corporate member of Business for Social Responsibility ([BSR](#)). One of their current initiatives is 'Global Business Coalition Against Human Trafficking' which focuses on advancing cross-industry progress to combat modern slavery in global supply chains.

## Monitoring and evaluation

UCB measures its conduct and performance in sustainability areas against Key Performance Indicators (KPIs), including human rights. These include KPIs which are in line with the Global Reporting Initiative (GRI), a global standard for sustainability reporting, as well as progress on the UN Global Compact 10 Principles. Our performance for 2022 is reported in our [2022 Integrated Annual Report](#) (pages 303 – 327), which confirms that no event of infringement of human rights was identified.

## Next steps

We have embarked on a journey to expand our efforts and make continued progress to respect human rights within our operations and throughout our supply chain. In 2022, we started a process to further implement requirements of the United Nations Guiding Principles on Business and Human Rights (UNGP). We set up a multidisciplinary group in charge of reviewing our human rights systems policies and processes and of identifying risk areas where rights holders' rights could be potentially infringed. A new human rights policy will be communicated in 2023, which will include specific training. Implementation of the policy will begin in 2023 through assessments of changes to existing processes. The approach on selecting third parties for EcoVadis assessments and monitoring will shift from a business critical to a wider risk-based approach, including human rights risk, to ensure more organisations with a significant risk profile will have assessments and monitoring.

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

- Approved by the board of directors of Celltech Group Limited, the holding company of UCB Pharma Limited and Celltech R&D Limited, on 20 June 2023.
- Approved by the board of directors of Zogenix International Limited on 21 June 2023.
- Approved by the board of directors of UCB Pharma SA on 22 June 2023.
- Approved by the board of directors of UCB Biopharma Srl on 22 June 2023.

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**Yogesh Khatri**

Celltech Group Limited  
*Director*

Zogenix International Limited  
*Director*

UCB Celltech (UK registered  
 establishment of UCB Pharma SA)  
*Authorised Representative*

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**Alistair Henry**

UCB Biopharma UK (UK registered  
 establishment of UCB Biopharma Srl)  
*Authorised Representative*