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CHUGAI MODERN SLAVERY STATEMENT - 2026

Modern Slavery and Human Trafficking Statement

In accordance with the Modern Slavery Act 2015, this statement outlines the actions taken by Chugai Pharma Europe Limited (CPE) and Chugai Pharma UK Limited (CPU) to evaluate and address the risks of modern slavery and human trafficking within their business operations and supply chains. It encompasses the fiscal year from 1 January 2025 to 31 December 2025. CPU and CPE, as representatives of the Chugai Group in the United Kingdom, recognise their responsibility and are committed to combating the risks of modern slavery and human trafficking in their business activities, as well as ensuring that their supply chains remain free of such practices.

Business and Structure

The Chugai Group is consistently innovating and delivering cutting-edge medicines, standing as one of Japan's leading pharmaceutical companies. Established in 1925, we have a global workforce of over 7,800 people¹. Beyond our Tokyo headquarters, our research and development, manufacturing and commercial operations extend across the United Kingdom, Germany, France, the United States, Taiwan, China, and Singapore. In 2002, we formed a strategic alliance with the Roche Group², creating a unique business model based in independency and co-promotion, leveraging the strengths, expertise, and infrastructure of both entities.

Presence in the United Kingdom and Europe

In 1986, we inaugurated our representative office in the United Kingdom to coordinate anticipation marketing activities and the forthcoming clinical development of products in Europe. By 1993 we had formally established CPU, marking our presence as one of the first European subsidiaries fully owned by a Japanese pharmaceutical company. The subsequent year, 1994, we extended our scope and established CPE with the objective of assessing research drug candidates from Tokyo and providing insights for regulatory success within Europe.

Initially, CPE was focussed on development activities, providing European insights into the Chugai Group's global product development pipeline. This approach was integral to a cooperative tripartite team framework with bases in Japan, North America, and Europe, which was committed to advancing product candidates from the pre-clinical stage to Phase III, in preparation for market introduction.

A significant group restructuring occurred in June 2015, leading to the integration of all Chugai European subsidiaries. CPE was repositioned as the central group entity in Europe, entrusted with

¹ <https://www.chugai-pharm.co.jp/english/profile/about/outline.html>

² https://www.chugai-pharm.co.jp/english/ir/roche_alliance/index.html



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the management of all European central functions, encompassing Research and Development; Compliance, Legal and Quality; Finance and Business Services; People and Culture; Regulatory and Pharmacovigilance; Portfolio and Lifecycle Management; Business Development; Customer Engagement and Digital Experience; and Medical Affairs.

Relevant Policies and Standard Operating Procedures (SOPs)

CPE and CPU operate the following policies/SOPs, which set up their approach to identifying, preventing, and combating the risks of modern slavery and human trafficking in their business activities, as well as ensuring that their operations and supply chains remain free of such practices:

- Chugai Code of Conduct (CCC)³
- Supplier Code of Conduct (SCC)⁴
- Chugai Group Human Rights Statement⁵
- European Human Rights Directive - dirG0002EU
- EU Purchasing Directive - dirF0001EU
- SOP for Non-GxP Incident and Whistleblowing Management - sopG0010EU
- SOP for Verification of Authorised Supply Chain - sopD0005EU
- SOP for GDP and GMP Audits and Audit Strategy for CPE and Affiliates - sopD0001EU
- SOP for Verification of the Authorised Supply Chain - sopD0005EU
- SOP for Personnel Training in Europe - sopQ0003EU
- SOP for Third Party Selection and Contracts - sopD1003GB
- SOP for Supply of Marketed Products to UK and Ireland - sopD1002GB
- SOP for GDP and GMP Audits and Self-Inspections at CPE and CPU - sopD1005GB

All the above policies/SOPs are stored in our quality management internal platform, and all CPE and CPU staff are required to adhere to them. The employees receive training on these codes and processes through our learning management system, and refresher trainings are provided whenever there is a Policy/SOP update or on a three-yearly basis. Training records are retained by our Quality Assurance department.

In addition to these policies, we also have our Whistleblowing Guidance on how to report an alert and how to use the Chugai Pharmaceutical Co. internal 'Speak-Up' line, which is an online whistleblowing system for internal reporting. These two systems, offered at different levels,

³ <https://www.chugai-pharm.co.jp/english/profile/vision/philosophy.html>

⁴ <https://www.chugai.eu/wp-content/uploads/2025/09/ChugaiGroup-SCC-Jul2025-ENG.pdf>

⁵ https://www.chugai-pharm.co.jp/english/sustainability/humanrights/policy/pdf/ehuman-rights_policy.pdf



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ensure strict confidentiality of information and offer the opportunity to our staff to report any issues or concerns.

Supply Chains

The Chugai Group's global supply chains include drug manufacturers, pre-wholesalers, wholesalers and service providers, all properly licensed by their respective local authorities.

Within Europe, CPE and CPU are responsible for managing the distribution network of three oncology products, which are part of two distinct supply chains. The active ingredient of one of these products is produced in Japan by our parent company, Chugai Pharmaceutical Co., and shipped to *Adragos Pharma MAF SAS* in France. This facility also receives needles, solvent syringes, and back-stop plunger rods from suppliers in Belgium, Spain, and France. *Adragos Pharma MAF SAS* assembles these components, manufactures, and packages the final product, which is then transported directly by third parties to Germany, Ireland, the UK, and a warehouse in France, from where it is further distributed to France and Belgium.

In contrast, the other two products are manufactured in Ireland by *Helsinn Birex Pharmaceuticals* and transported by a third party to warehouses in the UK and Ireland. These products are then sold directly by two certified wholesalers, one in each country.

To ensure compliance with anti-modern slavery and human trafficking regulations across Europe, we make sure all entities within our extended supply chain publish annual statements describing the actions they take to prevent and combat these practices on their own operations. Furthermore, the warehouses undergo audits every two years and provide daily, weekly, and monthly stock movement reports to the Chugai Group.

Due Diligence

The European Chugai Group, including CPE and CPU, operate a structured procurement process detailed in our EU Purchasing Directive to effectively evaluate, register, and monitor all our suppliers and service providers. Additionally, all our partners operate within the European Economic Area, where local laws safeguard human rights.

Before engaging any third parties, they undergo a supplier onboarding process, where relevant information is provided through a designated form. Upon submission, suppliers are registered in our internal systems and agree to Terms and Conditions that require compliance with the Modern Slavery Act 2015. This third-party information is shared with an external provider, *Dun & Bradstreet*, which is a UK-based firm specialised in due diligence solutions. Suppliers are subject to thorough due diligence and continuous monitoring, including review of company profiles, failure



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risk scores, corporate family trees, financial statements, public filings, beneficial ownership data, ESG ratings, sanctions, politically exposed persons (PEPs), adverse media screenings, and other relevant information. A risk report is generated for each supplier, and any updates in the company's status and risk rate are promptly flagged by the system to our Procurement team.

Training

In 2024, the Chugai European group developed and implemented a European Human Rights Directive, outlining our commitment to respecting and promoting human rights across all our operations and business relationships. The directive reinforces our position in combatting all forms of forced or compulsory labour, including modern slavery and human trafficking in all its forms. Training on the directive was provided to all staff, is included in onboarding for new joiners, and is refreshed every three years. The next refresher is due to be provided in 2027.

In addition, all CPE and CPU employees receive specific training on respecting human rights, combat of modern-slavery and human trafficking, and identification of related practices in our operations and supply chains. This training is delivered every two years, and the next round of training is due to be provided before the end of 2026.

Actions and Future

In 2022, a specialist consultancy assessed Chugai's approach to combating modern slavery in the UK. Its report, finalised in April 2023, set out the foundations of a robust and well-structured modern slavery programme, which was fully implemented between 2023 and 2025.

Chugai European Group has now in place a complete Human Rights Corporate Governance Framework supported by a three-line compliance programme, including the European Human Rights Directive and the EU Purchasing Directive; due diligence, third-party risk management, and whistleblowing processes; awareness-raising activities and training schedules; and regular audits.

During 2025, several actions were taken to strengthen this Human Rights Corporate Governance Framework, reinforce our compliance structures, and support robust monitoring and investigation processes. During the first half of the year, a second line review was conducted on the subject. In the second half, an internal audit assessed the business compliance with the European Human Rights Directive, finding that governance arrangements were effective and identifying only minor areas for improvement. Additionally, the 'SOP for Non-GxP Incident and Whistleblowing Management - sopG0010EU' and the 'Whistleblowing Guidance' were updated to provide secure, confidential channels for reporting concerns and to promote a culture of



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transparency and accountability. Training was also provided to staff on how to use these whistleblowing systems.

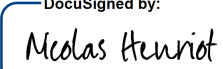
The Chugai Group's 2025 Modern Slavery Statement was voluntarily registered on the UK Government's Modern Slavery Statement Registry, and is available for public access through their website⁶, enhancing transparency with the UK Government and the public in general. In addition, in 2025 Chugai completed an assessment through the UK Government's Modern Slavery Assessment Tool and achieved a score of 77 out of 100, demonstrating our Human Rights Governance Framework is structured and robust according to UK Government standards.

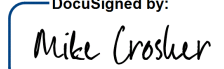
In 2026, Chugai will continue to strengthen the governance framework in place and further enhance our first and second-line defence mechanisms across the business. This will include the delivery of refresher training specifically on human rights, combating modern slavery and human trafficking, and identifying related practices in our operations and supply chains, alongside continued reinforcement of our compliance structures, and monitoring and investigation processes.

Chugai's commitment to these initiatives underscores our dedication to maintaining high standards of corporate compliance and safeguarding human rights across all our operations.

This statement was approved by the European Executive Committee of Chugai Pharma Europe Limited on 8th June 2026 and published on 15th June 2026. The committee is the highest internal body of the regional group, with oversight of all of Chugai's affiliates in Europe.

If you have any queries or would like any further information, please contact modernslavery@chugai-pharm.co.uk

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⁶ <https://modern-slavery-statement-registry.service.gov.uk/statement-summary/E7rBsQht/2025>