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# Chugai Pharma's Modern Slavery Statement

## Modern Slavery and Human Trafficking Statement

This statement has been published in accordance with the Modern Slavery Act 2015. It sets out the actions which Chugai Pharma Europe Limited (CPE) and Chugai Pharma UK Limited (CPU) have taken to understand all potential modern slavery risks related to their businesses and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in their businesses and supply chains. This statement relates to actions and activities during the financial year 1 January 2021 to 31 December 2021. Both organisations recognise that they have a responsibility to take a robust approach to slavery and human trafficking and are committed to preventing slavery and human trafficking in their corporate activities, and to ensuring that their supply chains are free from slavery and human trafficking.

## Our Business and Structure

Chugai is consistently creating and delivering innovative medicines and is one of Japan's leading pharmaceutical companies. Founded in 1925, we now employ nearly 7000 people. In addition to our head office in Tokyo our research and development, manufacturing and commercial operations span Germany, France, America, the UK, Taiwan, China, Korea, and Singapore. In 2002, we entered a strategic alliance with F Hoffman-la Roche Limited and we are now focused solely on prescription pharmaceuticals based on our own, as well as Roche's research and development.

## The UK and Europe

In 1986, we established our UK representative office to handle the frontline coordination for future product clinical development in Europe and marketing anticipation. In 1993, we were formerly established as Chugai Pharma UK Limited (CPU) and were one of the first subsidiaries in Europe to be wholly-owned by a Japanese pharmaceutical company. In 1994, we expanded our operations and formed Chugai Pharma Europe Limited (CPE) to focus on assessing research drug candidates from Tokyo and provide advice on likely regulatory success in Europe. Initially, CPE was totally focused on development activities and responsible for the European input to Chugai's international product development pipeline as an integral part of the tripartite team structure [based in Japan, North America, and Europe] developing the product candidates from the pre-clinical stage through to Phase III in preparation for launch. However, in June 2015, all subsidiaries in Europe were integrated and reorganised with CPE serving as an umbrella organisation, in order to oversee all core functions including Research & Development, Commercial (Sales & Marketing), Medical, Safety and Regulatory.

## Our Supply Chains

Our supply chains include drug manufacturers, distributors, and wholesalers which have all been licenced by the local Competent Authority in the territory they operate in.

In regards to Chugai's marketed products in Europe, Granocyte is manufactured in Japan by our parent company Chugai Pharmaceutical Co. Aloxi and Akynzeo are both manufactured in Ireland by Helsinn Birex Pharmaceuticals. For all of the aforementioned products, all of our extended supply chain (wholesalers, warehouses, distribution centres, packaging and release sites, etc) are based in the European Economic Area.

## Relevant Policies and Standard Operating Procedures (SOPs)

Chugai Pharma operates the following policies/SOPs that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:

- Whistleblowing
- Employee Code of Conduct
- Supplier Code of Conduct
- Policy on Respect for Human Rights

All of the above policies/SOPs are stored on our Quality Management intranet site and Chugai staff are required to adhere to them. In addition, they also receive training around these in our Learning Management System. Further training is provided whenever there is an update to the Policy/SOP, or on a two-yearly basis. Training records are retained by our Quality Assurance department.

## Training

All Chugai employees receive training regarding modern slavery, transparency and identification of this in our supply chains. This training is undertaken every two years. Our contract with the previous training provider ended in July 2021 and we are currently in the process of selecting a new vendor.

## Taking Action

In 2020, we launched a new online whistleblowing system for internal reporting. This is a secure platform operated by external vendor under strict confidentiality, offering the opportunity to our staff to anonymously report any issues or concerns. Any reported issues are then subject to an internal investigation and once a conclusion has been reached, an action plan will be determined based on; the severity of the report, the applicable policies and UK regulations. The report is subject to our SOP on Responding to Reports & Consultations in European Affiliates. Creating a workplace environment where employees can Speak up and share their concerns gives us the best opportunity to address issues early and quickly. This gives us the chance to improve our business, our practices and our workplace, and to support our people.

## Due Diligence

We take a risk-based approach regarding the country of origin of our suppliers. All partners are inside the European economic area, where there are local laws which ensure the protection of human rights. We would apply due diligence for countries outside of the EEA, if required.

## Future Plans

We have recently instructed a consulting firm to conduct a comprehensive review of our Modern Slavery practices in the UK. Our aim is to build a Modern Slavery framework and programme which further enhances our third-party risk assessment and supplier due diligence. We plan to publish an update with regards to this project in Q3 of 2022.

We have also started the consideration of establishing a whistleblowing system for external stakeholders. These would include suppliers' workers in our extended supply chain, in order to further mitigate potential human rights issues.

This statement was approved by the Executive Committee of Chugai Pharma Europe Limited on 30<sup>th</sup> June 2022. This committee is a regional body which has oversight of all of Chugai's affiliates in Europe.

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