



Published on June 2025

CHUGAI PHARMA MODERN SLAVERY STATEMENT

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 2024 to 31 December 2024. 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 7,500 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, Korea, 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 the management of all European central functions, encompassing Research and Development; Compliance, Legal and Quality; Finance and Business Services; People and Culture; Regulatory

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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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:

- Employee Code of Conduct
- Supplier Code of Conduct
- Policy on Respect for Human Rights
- European Human Rights Directive
- EU Purchasing Directive
- SOP for Responding to Reports and Consultations in European Affiliates
- SOP for Verification of Authorised Supply Chain
- SOP for Third Party Selection and Contracts
- SOP for Audits and Self-Inspections
- SOP for Supply Management of Marketed Products and In-licensed Products

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 around these codes and processes through our learning management system, and new trainings are provided whenever there is a Policy/SOP update or on a two-yearly basis. Training records are retained by our Quality Assurance department.

In addition to these policies, we also have 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, 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 *Sanofi Winthrop Industrie* in France. This facility also receives needles, solvent syringes, and back-stop plunger rods from suppliers in Belgium, Spain, and France. *Sanofi Winthrop Industrie* assembles these components, manufactures, and packages the final product, which is



Published on June 2025

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

All our partners operate within the European Economic Area, which presents local laws that safeguard human rights. In the United Kingdom, we have established a structured procurement process in the first quarter of 2024 to evaluate, register, and monitor all our suppliers and service providers. The process is set up in our EU Purchasing Directive and was successfully extended to all European affiliates by the last quarter of 2024.

Before any engagement, third parties are required to submit relevant information through a designated form. Upon submission, they are registered in our internal systems and agree to Terms and Conditions that also mandate 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. The suppliers' details are subject to thorough due diligence and continuous monitoring. This includes examining company profiles, failure risk scores, corporate family trees, financial statements, public filings, beneficial ownership data, ESG ratings, sanctions, PEPs (politically exposed persons), adverse media screenings, and more. For each supplier, risk reports are generated, and any updates in the company information are promptly flagged to our Procurement team.

Training

By the second quarter of 2024, the Chugai European group developed and implemented an 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 any kind of forced or compulsory labour, including modern slavery and human trafficking in all its forms. Training on the directive was provided to all staff, refreshed every two years, and is given to all new joiners.

Furthermore, all CPE and CPU employees receive specific training regarding transparency, respect to human rights, combat of modern-slavery and human trafficking, and identification of related practices in our operations and supply chains. This training is undertaken every two years and was successfully disseminated to all staff during the first semester of 2024. The next round



Published on June 2025

of training is due to be provided in the first semester of 2026, in line with our two-year training schedule.

Actions and Future

In 2022, a specialist consultancy was hired to assess Chugai's practices in the UK regarding the combat of modern slavery. A report was finalized in April 2023, identifying the foundations for a robust and well-structured modern slavery programme, and providing detailed recommendations. Demonstrating our commitment, the Chugai Group included in its global objectives for 2024: (i) the establishment of a Corporate Governance Framework based on Human Rights, and (ii) the development of a sustainable Supply Chain.

By the end of the last quarter of 2024 all the mentioned global objectives were successfully achieved through the implementation of the following actions: (i) extension of the due diligence and third-party risk management to all European affiliates; (ii) development of the Chugai's European Human Rights Directive in alignment with relevant internal policies, local laws and regulations, and the United Nations Guiding Principles on Business and Human Rights³; (iii) awareness raising actions on the programme and processes throughout the organisation, and provision of the necessary training and support to the implementation of all the report's recommendations.

For the year 2025, the objective is to strengthen the governance framework developed as a foundation over the past few years and focus on enhancing our second line defence mechanisms across the business. This involves reinforcing our compliance structures and ensuring robust monitoring and investigation processes.

In the first quarter of 2025, the Chugai European group onboarded a Compliance Insights Senior Manager. The primary goal of this role is to leverage data to build intelligence around compliance operations, thereby structuring the monitoring and investigation cycle more effectively. This strategic move aims to enhance our ability to identify and address compliance issues proactively across the business.

Additionally, until the end of 2025, the Standard Operating Procedure (SOP) for Responding to Reports and Consultations in European Affiliates will be updated to improve whistleblowing operations. This update is part of our action plans to further solidify the group's framework for human rights protection and combating modern slavery and human trafficking. By integrating whistleblowing mechanisms, we aim to provide a secure and confidential channel for reporting concerns, thereby fostering a culture of transparency and accountability.

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

³ <https://www.business-humanrights.org/en/big-issues/un-guiding-principles-on-business-human-rights/>



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This statement was approved by the European Executive Committee of Chugai Pharma Europe Limited on 28th May 2025 and published on 2nd June 2025. 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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