

Celltrion Healthcare UK Ltd. 2024 Modern Slavery Statement

Introduction

At Celltrion Healthcare UK Ltd. (hereinafter "We" or "Company), people are at the center of everything we do – including our employees, consumers, suppliers, and the communities we engage with. We recognize that respect for human rights is a fundamental responsibility and a cornerstone of ethical and sustainable business conduct. We are firmly committed to preventing any form of modern slavery, forced labor, or human trafficking within our operations and supply chains. This uncompromising stance shapes the way we operate, make decisions, and engage with our partners. We believe that fostering relationships based on mutual respect and a steadfast commitment to human dignity not only reflects our core values but also underpins the long-term sustainability and integrity of our business.

This statement is made pursuant to the UK Modern Slavery Act 2015 and covers the financial year ending on 31 December 2024. It applies to Celltrion Healthcare UK Ltd. and its supply chain. This statement serves as a testament to our ongoing efforts to uphold human rights and eliminate modern slavery risks across our global value chain. These efforts are guided by our Global Human Rights Policy and Global Due Diligence Policy, which outlines our approach to key human rights issues and related management processes. We also adhere to internationally recognized standards, including the UN Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises, and the International Bill of Human Rights.

In addition to this statement, our broader sustainability commitments and performance can be found in <u>2024 Celltrion Europe Sustainability Report</u>, which provides further transparency on our ESG initiatives – including human rights, environmental stewardship, and responsible business conduct.

Our Operations

Celltrion Healthcare UK Ltd. is part of the wider Celltrion Group, led by Celltrion Inc., a globally recognized South Korean biopharmaceutical company specializing in the research, development, manufacturing, and distribution of innovative biologics and small molecule therapies. In collaboration with the Celltrion Group, we are committed to advancing patient access to high-quality, affordable treatments and contributing to a future where no patient is left untreated.

We are incorporated and domiciled in the United Kingdom, where we engage in the sales, marketing, and distribution of pharmaceutical products, developed by Celltrion Inc., within the UK healthcare market.

Our Employees

As of 31 December 2024, 28 employees¹ were employed by Celltrion Healthcare UK Ltd., of whom less than 10% were temporary staff. We are committed to fostering a diverse, inclusive, and respectful

¹ HQ (Celltrion Inc.) dispatch or any employees who have employment contract with Celltrion Inc. has not been counted in the figure.



work environment that upholds fair employment practices and actively works to prevent any form of modern slavery or labor exploitation.

Our workforce is comprised of 54% female and 46% male employees, with the majority aged between 30 and 50 (61%), followed by 28% over the age of 50, and 11% under the age of 30. This demographic profile informs us of our approach to human rights due diligence, enabling us to identify and address potential vulnerabilities. We remain dedicated to ensuring that all individuals engaged in our operations are treated with dignity, protected from exploitation, and afforded equal opportunity.

Our Supply Chain



Upstream/Suppliers

Celltrion Inc. is responsible for the manufacturing and supply of essential raw materials, including the drug substances used in our products. Celltrion Healthcare Hungary, as the Marketing Authorization Holder (MAH), plays a central role in the distribution of these products across Europe. In this capacity, Celltrion Healthcare Hungary ensures compliance with stringent regulatory standards while supporting the efficient and compliant movement of products within the upstream segment of our supply chain. Additionally, Celltrion Healthcare Hungary engages with contract manufacturing organizations (CMOs) that provide fill and finish services before the finished products are distributed to Celltrion Healthcare UK Ltd.

Downstream/Customers

Our main customers can be divided into 3 types: The NHS, independent aseptic compounders, clinical homecare providers. Please see below for further information of our customers.

- The NHS: our single largest customer in the UK with most products being supplied directly to NHS hospitals, clinics and integrated aseptic compounding units. They procure our products via our UK healthcare logistics partner, Alloga UK.
- Independent aseptic compounders: purchase our products to prepare (compound) customised medication tailored to individual patient needs.
- Clinical homecare providers: purchase our products and deliver them directly to patients in their homes

As for the reporting period, the majority of our customer sales were made to the NHS, with the



remainder attributed to clinical homecare providers and independent aseptic compounders.

Modern Slavery Risk Assessment (Due Diligence)

We assess modern slavery risks across our value chain through our Global Due Diligence Process, which adopts a risk-based approach to identifying, preventing, and addressing sustainability-related impacts. Human rights considerations, including modern slavery, are integrated as a core component of this framework. Below are the steps of our due diligence process that we undertake annually.

- 1 Identify:
 - Double Materiality Assessment² is utilized to figure out our material sustainability topics, including human rights issues (modern slavery included)
 - Through the assessment, both internal and external stakeholders are engaged to identify material topics and issues that are most relevant to our operations, supply chain, and broader sustainability impact.
- (2) Assess & Prioritize
 - It is not always feasible to prevent, mitigate, end, or minimize all identified adverse risks. These risks will be prioritized based on the severity and likelihood of occurrence.
 - We conduct a supplier screening process to identify those with elevated risks potential, based on industry and geographic sustainability risks and the significance of business relationships.
- (3) Prevent & Correct
 - We implement preventive and corrective measures in proportion to the severity and probability of the harmful effect.
 - Plans, where relevant, will include the following:
 - Measures to monitor the progress of plans
 - · Qualitative or quantitative indicators for measuring improvements
 - Necessary financial or non-financial investments
 - Necessary modifications of, or improvements to business plans and strategies

Further details on our due diligence measures can be found in the Celltrion Global Due Diligence Policy.

This year, we conducted a sustainability screening of our direct suppliers³ whose 2024 transaction volumes ranked within the top 50th percentile. Through the screening, we were able to evaluate our suppliers in terms of both transactional significance and potential sustainability risks.

 $^{^2}$ Double Materiality Assessment: A process to identify topics that are financially material to the company and those through which the company significantly impacts the environment or society.

³ Direct suppliers: A contractor to a supply or service that provides service directly necessary to produce undertaking's products or for the provision of the services. [A contractor that supplies good or service...]



Country% of total transaction amount (50th percentile)UK (OECD)66.8%Hungary (OECD)32.9%Lithuania (OECD)0.2%Republic of Korea (OECD)0.1%France (OECD)0.01%

Below is the % of total transaction amount per countries (50th percentile)

Below is the % of total transaction amount per industry (50th percentile)

Industry	% of total transaction amount (50 th percentile)
Transportation & distribution	63%
Pharmaceuticals, Biotechnology & Life Science	36%
Commercial & professional services	0.3%
Capital goods	0.1%

To assess the potential sustainability risks of our suppliers, we assessed the factors below.

- Industrial materiality:

Assessment of the extent to which a supplier's industry has the potential to impact Environmental, Social and Governance outcomes. A globally recognized set of industry specific ESG risk indicators were used to ensure credibility and broad applicability across diverse sectors.

- Regional Sustainability Risk:

- Environmental criteria
- Climate risk index, biodiversity intactness index, environmental performance index, energy intensity, water risk
- Social criteria
 - Human development index, fragile state index, slavery index, gender gap index, health security index
- Governance criteria
 - Corruption index, conflict index, property rights index, cybersecurity index, political stability index, regulatory quality index

Based on the assessment of the aforementioned criteria, we identified 11 suppliers for further investigation. It is important to note that the results of this screening do not suggest an absence of risk management measures by these suppliers; rather, they reflect a relatively higher level of inherent exposure to sustainability risks compared to others.

Below is the summary of 11 suppliers selected for further review. Company names are not disclosed in order to preserve confidentiality.

Company #	Industry	Country
Company 1	Pharmaceuticals,	Hungary
	biotechnology & life Science	
Company 2	Commercial & professional	Lithuania
	Services	



Company 3	Transportation & distribution	UK
Company 4	Transportation & distribution	UK
Company 5	Transportation & distribution	UK
Company 6	Commercial & professional	Republic of Korea
	services	
Company 7	Transportation & distribution	UK
Company 8	Transportation & distribution	UK
Company 9	Pharmaceuticals,	UK
	biotechnology & life Science	
Company 10	Capital goods	UK
Company 11	Pharmaceuticals,	UK
	biotechnology & life Science	

The above suppliers will be subject to a review for a further assessment through a tailored selfassessment questionnaire. The responses will provide a thorough analysis of the level of management demonstrated by the suppliers regarding sustainability risks. Risks identified through the questionnaire are prioritized based on their severity and likelihood and further contextualized by considering the material issues identified through the Double Materiality Assessment. The outcomes of this in-depth evaluation, along with any actions taken to mitigate or address the identified risks, will be disclosed in next year's statement.

Within our own operations, there were no reported incidents related to modern slavery during the reporting period. We monitor and manage modern slavery risks internally through established mechanisms such as our Speak-Up channel, regular compliance reviews and HR management. These processes are designed to ensure early detection, promote a culture of accountability, and uphold our commitment to ethical business practices across all levels of the organization.

Policies & Governance

We are committed to upholding human rights and preventing all forms of modern slavery – including forced labor, human trafficking and child labor – across our operations and supply chain and have established policies and procedures. Thes policies form the foundation of our approach to identifying, mitigating, and addressing modern slavery risks, and are integrated into our due diligence processes, supplier engagement, and internal governance frameworks.

Global Code of Conduct

Our Code of Conduct serves as a key reference point in our efforts to prevent modern slavery across our operations. It sets out the fundamental principles for fostering a respectful, inclusive, and transparent workplace, and underpins a range of policies and procedures designed to uphold human rights and protect workers throughout our value chain.

The Code of Conduct strictly prohibits child labour, illegal work, workplace abuse, and forced labour. Through the Code of Conduct, we comply with laws and standard procedures related to the health, safety and security of all employees and expect suppliers and business partners to maintain the same standard. Any suspected non-compliance with the Code of Conduct can be reported through the Speak-Up channel.

Employee Handbook

The employee handbook guarantees equal opportunities in all aspects of employment and strictly prohibits any form of discrimination whether within the Company or in its professional dealings with



third parties including suppliers and customers. The handbook further states that it is committed to compliance with the obligations set out in the Modern Slavery Act 2015. Any suspected non-compliance with the handbook can be reported through the Speak-Up channel.

Celltrion Supplier Code of Conduct

Our Supplier Code of Conduct sets clear expectations regarding labor and human rights. The Code explicitly prohibits forced labor, human trafficking, child labor, and discriminations and requires suppliers to provide safe and fair working conditions. It is aligned with the International Labour Organization (ILO) standards and reflects our dedication to ethical sourcing.

Global Due Diligence Policy

As previously noted, our modern slavery due diligence is driven by the overarching sustainability due diligence framework set out in our Global Due Diligence Policy. The policy reflects our commitment to upholding human rights, environmental responsibility, and ethical business practices across its operations and supply chain. The policy provides a structured framework for identifying, assessing, and addressing potential impacts, including risks related to modern slavery. It applies to all stakeholders involved in or affected by the Company's activities – including employees, subsidiaries, and business partners – and underscores the importance of stakeholder engagement throughout the due diligence process.

Global Whistleblowing Policy and Global Speak-up Policy⁴

The policies apply to all internal and external stakeholders. The two policies establish a clear mechanism to identify, report, and respond to potential misconduct, including concerns related to modern slavery, human rights violations, and unethical practices. The policies clearly outline the procedures for reporting, investigation, and follow-up actions, and ensure that the identity of those who report in good faith is protected and only disclosed to authorized personnel. Any form of retaliation or harassment against individuals who raise concerns is strictly prohibited.

Global Human Rights Policy

Our Global Human Rights Policy outlines our key human rights focus areas, including equal treatment and opportunities for all, fair working conditions, the prohibition of child labour, protection of whistleblowers, and patient safety. The policy also defines the processes in place to uphold human rights across our operations and supply chain and clearly sets out the roles and responsibilities for effective human rights management.

Training & Awareness

All employees receive training on Celltrion's Global Code of Conduct and Employee Handbook upon joining the company which includes guidance on ethical business practices, human rights, prohibition of modern slavery and whistleblowing mechanism. To further raise awareness, all relevant policies are distributed via email and made accessible through the company's intraware.

Measuring Effectiveness

We recognize that meaningful progress in addressing modern slavery requires continuous evaluations.

⁴ Please note that our website is currently undergoing a renewal, meaning our Speak-up channel will be available after the renewal. The renewal will be completed within 2025.



As such, we track a range of indicators to assess whether our actions are effectively mitigating risk and driving improvement.

- Number of high-risk suppliers identified during the screening phase compared to the number of high-risk suppliers that completed the self-assessment questionnaire
- Number of preventive/corrective measures assigned to suppliers compared to the number of
 preventive/corrective measures implemented by suppliers
- Number of grievances received through the whistleblowing (Speak-Up) channel compared to the number of grievances that have been resolved

The above indicators serve as key benchmarks for evaluating the effectiveness of our modern slavery risk management framework. Should these indicators show insufficient improvement within a twoyear timeframe, we will review and revise our policies and procedures accordingly. In parallel, we conduct ongoing regulatory monitoring to ensure our approach remains aligned with evolving legal requirements and industry best practices.

Declaration and Sign-off

This statement has been approved by the board of directors (or equivalent management body) and is made pursuant to the UK Modern Slavery Act 2015. It reflects the actions taken during the financial year ending 2024 to prevent modern slavery in our operations and supply chains.

Signature:

Name: Hansi Lee Title: pirector Date: June. 30th - 2025

Signature Name: Title: EMO Date: 6