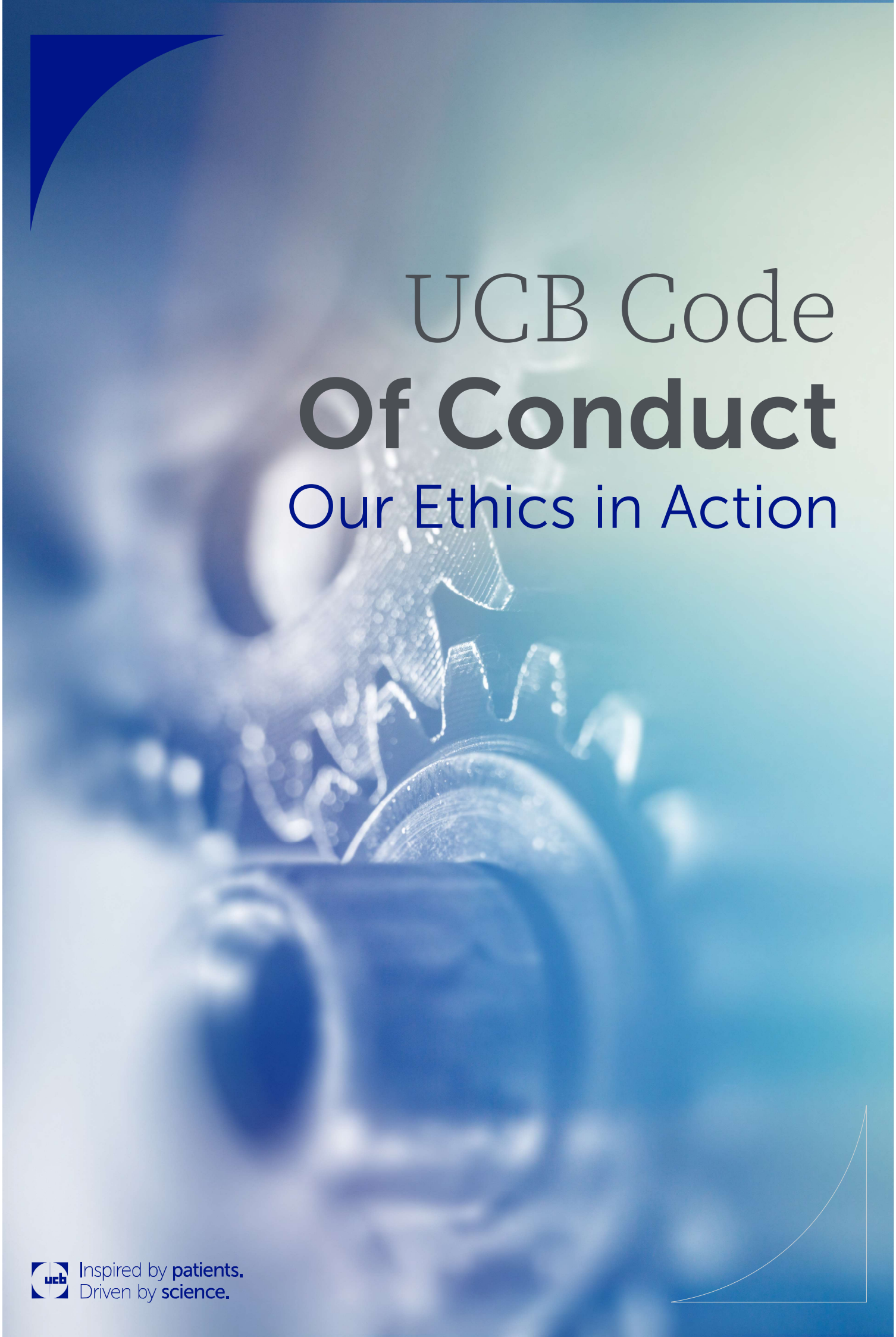

UCB Code
Of Conduct
Our Ethics in Action

Inspired by **patients.**
Driven by **science.**

UCB Code of Conduct
Our Ethics in Action

1. Letter from our CEO

2. The Ethical Principles Driving our Actions
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8. Closing Note from General Counsel and Chief Ethics & Compliance Officer

Inspired by **patients.**
Driven by **science.**

01 Letter from **Our CEO**



Every one of us at UCB is connected by a shared purpose: creating value for patients living with severe diseases, now and into the future. This shared purpose makes working at UCB uniquely rewarding and links all of us, no matter where in the world we are or what role we take on.

At UCB, we know the challenges facing the world are inextricably linked and we have a key role to play to ensure a sustainable future for all. Sustainability lies at the heart of everything we do. It drives our ambition for positive impacts on society and the environment as well as our long-term financial success. Ethical business practices are a core foundational element in driving sustainable business growth.

We care for people; this is core to the way we work. We always see the person first – whether they are a colleague, a partner, or a person living with a severe disease. We meet people where they are and engage with curiosity and empathy, striving to act based on a deep understanding of their needs.

This Code provides a set of ethical principles that can help you to navigate the complex situations you will face. It is important that each of us take the time to ask questions with curiosity and humility so we can make informed decisions.

The mission we have accepted is complex and brings ethical demands that make each of us reflect on that complexity. For decades, UCB has been looked to as a leader in developing meaningful solutions for people living with severe diseases. We know our mission cannot be accomplished alone and without trust. We must work with others – internally and externally – to accomplish our goals. As we take on new challenges and expand our ambition to new patient populations and new innovative therapies, we collaborate with like-minded innovators and partners. Throughout our work, we seek to cooperate in harmony, internally and externally, fostering deeper reflections and respecting diversity of thought with those who share our vision of helping stakeholders in need.

Our efforts will undoubtedly come with new challenges and moments where our ethics, unbiased judgment, and commitments may be tested. This Code provides a set of ethical principles that can help you to navigate the complex situations you will face. It is important that each of us take the time to ask questions with curiosity and humility so we can make informed decisions. It also demands that we hold ourselves – and each other – to the highest standards. Each of you has my trust that when you face these challenging situations you will hold yourself to these standards, which will make us better colleagues, partners, leaders, and citizens. Please seek guidance when you are not sure of what to do and always speak up when something does not look or feel right to you.

I want to thank you for always striving to make choices that are focused on the balanced interests of our stakeholders: the patients, yourselves, our shareholders, our communities and the planet.

Jean-Christophe Tellier, CEO

02 The Ethical Principles **Driving our Actions**



Working at UCB is a unique opportunity to impact and improve the lives of people living with severe diseases. This Code of Conduct: Our Ethics in Action outlines the commitments and aspirations for us as UCB, and the expectations for all of us, as representatives of UCB.

Our industry is subject to many complex rules, regulations and industry codes. UCB is committed to following all applicable laws and regulatory requirements governing our activities. In addition to meeting these obligations, we are guided by the below ethical principles that drive our actions:

- Trust Is Cultivated by Our Actions
- Integrity is Unconditional
- Transparency Makes Us Stronger
- Care is at the Core
- Accountability Powers Our Mission

Trust Is Cultivated **By Our Actions**

Our stakeholders have placed their trust in us to deliver new and meaningful solutions. We take our responsibility to protect confidential information seriously. When we communicate externally, we strive to provide meaningful, accurate, truthful and unbiased information. It is only when we develop and maintain trust from our stakeholders that we can fully pursue our purpose and serve these stakeholders, including patients, their caregivers and healthcare professionals.

Integrity is **Unconditional**

We always strive to do the right thing, even when no one is watching. That means not just following the letter of the law, but also the spirit. We uphold our promises to one another, to the company, and to our stakeholders without expectation of reward or praise. We also strive to ensure we embed integrity into our interactions in order to protect against undue influence in decision making by our employees and stakeholders.

Transparency Makes **Us Stronger**

When working with others, we are transparent, communicating with humility our intent, our thinking and the reasons for our decisions. We create safe spaces for individuals to speak up without fear and use that feedback to improve.

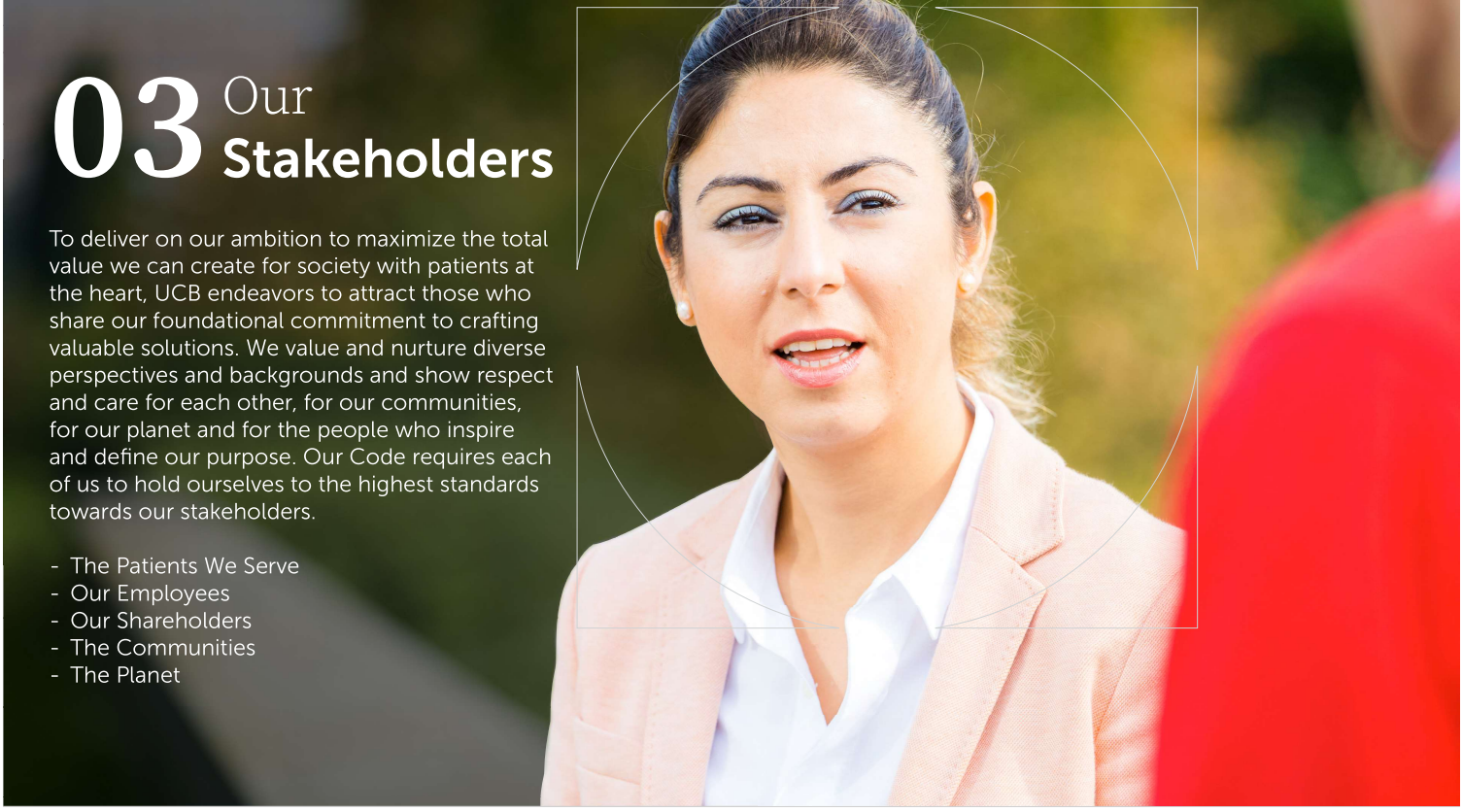
Care is at **The Core**

We always see the person first – whether they are a colleague, a partner, or a person living with a severe disease. We believe all people deserve respect and dignity for who they are. We create a collaborative, respectful, safe, equitable and inclusive workplace that empowers and enables each of us to grow, learn and achieve our highest potential. We listen to each other and to our stakeholders with curiosity and humility and we strive for a deep reflection and understanding of the needs of those around us. We pay attention to where unconscious bias may lessen the impact of our work. We respect the planet and the communities where we operate, and seek to maximize our positive impact. We also encourage those around us to do the same.

Accountability Powers **Our Mission**

UCB is only as strong as its employees, partners, and other stakeholders. None of us can accomplish our work alone. While we hold each other to a high standard, each of us is accountable for our own actions, especially as we operate as representatives of UCB to our stakeholders and the wider world. This also includes our shared accountability to spend and use our company assets responsibly and always with the aim of creating value for patients.

03 Our Stakeholders



To deliver on our ambition to maximize the total value we can create for society with patients at the heart, UCB endeavors to attract those who share our foundational commitment to crafting valuable solutions. We value and nurture diverse perspectives and backgrounds and show respect and care for each other, for our communities, for our planet and for the people who inspire and define our purpose. Our Code requires each of us to hold ourselves to the highest standards towards our stakeholders.

- The Patients We Serve
- Our Employees
- Our Shareholders
- The Communities
- The Planet

The **Patients We Serve**

Our purpose is to create value for patients now and into the future. We can only serve patients by listening with curiosity, empathy and humility to truly understand their needs. We believe open, transparent and meaningful communication with patients can address their individual needs and in pursuing equity in healthcare to support our ambition, that no patient is left behind.

Our **Employees**

We create the right conditions for our employees to be happy, healthy and able to thrive.

Our **Shareholders**

The work we do is funded by those who have chosen to make a stake in UCB's promise, including the descendants of those who founded UCB almost a century ago. Their vision has always been one of long-term value and sustainable business growth, grounded in ethical business practices. When we create value for patients, we grow the value of UCB – and when we fail to live up to our ethical commitments, we place that value at risk.

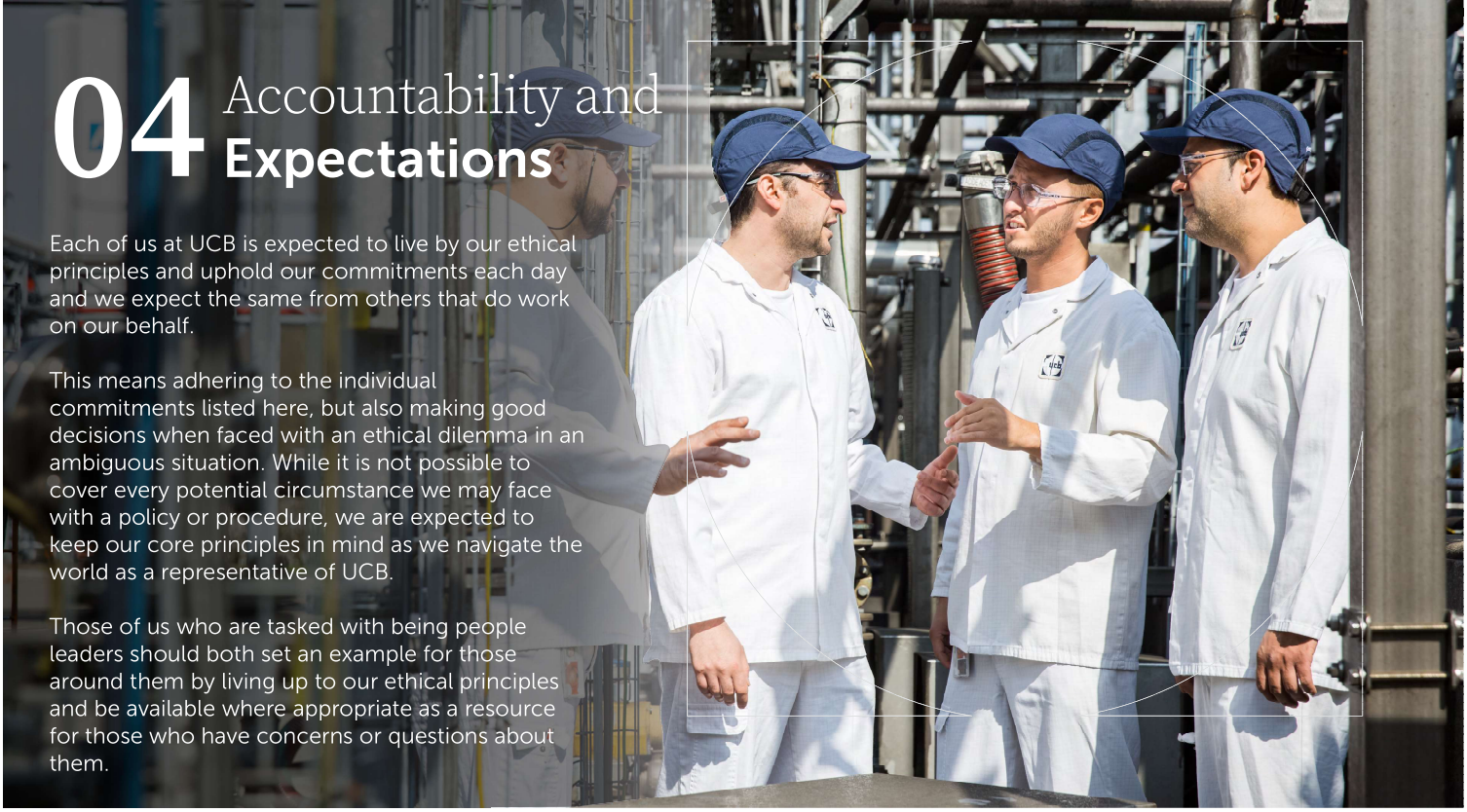
The **Communities**

We are all members of multiple communities – our UCB community, the places we call home, the nationalities, cultures and groups with whom we identify, and the peer groups to which we belong. We strive to be positive forces in each of these communities.

The **Planet**

We recognize the essential link between human health and the health of the planet and make efforts to continuously minimize our environmental footprint through collective awareness and responsible actions within our value chain (including our goods & services suppliers).

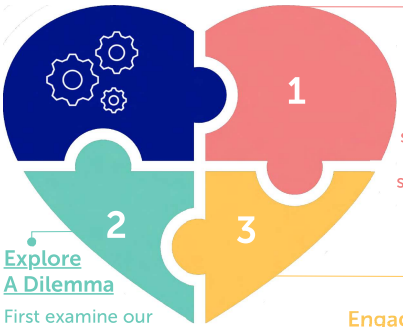
04 Accountability and Expectations



Each of us at UCB is expected to live by our ethical principles and uphold our commitments each day and we expect the same from others that do work on our behalf.

This means adhering to the individual commitments listed here, but also making good decisions when faced with an ethical dilemma in an ambiguous situation. While it is not possible to cover every potential circumstance we may face with a policy or procedure, we are expected to keep our core principles in mind as we navigate the world as a representative of UCB.

Those of us who are tasked with being people leaders should both set an example for those around them by living up to our ethical principles and be available where appropriate as a resource for those who have concerns or questions about them.



Identify A Dilemma

Identifying a dilemma helps us to better understand the dilemma and questions we should consider. At UCB we think that ethical issues share similar characteristics: Breach of a Core Value, Unequal Impact to Stakeholders, and/or No Clear Choice.

Explore A Dilemma

First examine our behaviours related to our role in decision making to ensure we are acting with integrity, deciding with transparency and consistency. We explore the perspective of our Stakeholders and how a decision may impact them as well as UCB and oneself.

Engaging With Colleagues

Engaging colleagues in transparent conversations to explore stakeholder perspectives builds trustful relationships and challenges us to ensure the decisions we make will be sustainable overtime.

05 Ethical Decision-making

When we encounter a situation in which the best choice is not clear, UCB's approach of principle-based decision-making helps us to ask ourselves the right questions and to choose decisions that align with our Commitments. Our principles, along with the behaviors embedded in our Patient Value Strategy, guide the decisions we make.

UCB introduced a tool to support ethical decision-making when we are confronted with complex or ambiguous situations. This tool is a helpful guide in these moments, providing a framework and resources to explore the potential impact of decisions on stakeholders and make thoughtful decisions that are aligned with UCB's core values and responsibilities to our Stakeholders.

06 Speaking Up and Non-Retaliation

Being accountable to preserve the reputation of UCB and the trust patients and stakeholders put in our company is a core element of the mindset we want everybody in UCB to demonstrate. Our leaders must create a trustful and safe environment, which allows colleagues to step up, express different opinions or ideas, engage in healthy debates and challenge the status quo; all this results in fostering innovation, incremental continuous improvement and moving us towards a high patient value impact organization. We expect a speak-up culture where we all stand up to ensure we do the right things in the right way and we feel accountable, comfortable and safe to question ideas that are not aligned with our ethical principles.

If you see something you consider could be illegal, unethical or a behavior that contradicts the ethical principles found in this Code, you are expected to bring this to the attention of a supervisor or manager. You may also contact the Ethics & Compliance, local Talent (HR), or Legal departments, or the UCB Integrity Line.

The UCB Integrity Line is a confidential secure website and toll-free telephone number that are managed by an independent third-party agency. It is available 24 hours a day, 365 days a year, in multiple languages for online reporting and for telephone reports. Reports may be submitted anonymously and will be promptly forwarded to and reviewed by Ethics & Compliance. All reports are treated confidentially, will be investigated and, if warranted, appropriate corrective actions will be taken, including disciplinary action.

You can report situations without fear of retaliation, and you will not be penalized for reporting in good faith what you believe to be a violation, even if it turns out that a violation did not occur. Retaliation is not tolerated in any form, and anyone involved in retaliation will be subject to discipline, up to and including termination.

07 Living our Ethical Principles **Through our Commitments**



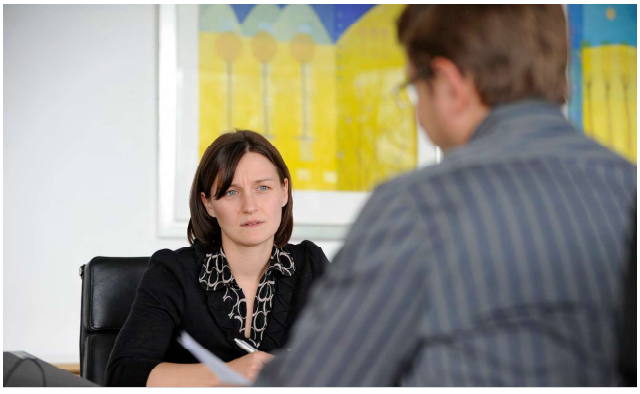
Access to **Medicines**

We respect the right of each patient to healthcare. Therefore, we commit to make decisions that improve the affordability of, and remove delays or barriers to, our medicines for the patients who need them. We do this in a manner that delivers sustainable value to patients, society and UCB.

Animal **Welfare**

We commit to only use animals in research and development when it is necessary, and to uphold the highest standards to protect animal welfare when such research is needed. Whenever possible, animals will be replaced by alternative methods, the total number of animals used will be reduced and experimental protocols and housing conditions will be refined. We commit to hold business partners using animals for research purposes on our behalf to these same standards.





Anti-Corruption and **Anti-Bribery**

We believe that corruption and bribery negatively impact all areas of society and that it is a major obstacle to the effort to bring sustainable value to patients and other stakeholders. We therefore commit to never improperly influence the decisions or actions of others with promises of value. We must never offer, promise, pay or authorize the giving of anything of value – directly or indirectly – that could be construed as influencing the decision or action of an external party – especially the scientists, healthcare providers, and government officials we interact with around the globe. This commitment holds true even if such practice could be considered a local custom.

07 Living our Ethical Principles **Through our Commitments**

Anti-Trust and **Fair Competition**

We believe free and fair competition stimulates innovation and protects the interests of society and patients alike.

We aim to avoid creating even the appearance of improper behavior, agreement or understanding by making sure that all communications and dealings with competitors and other stakeholders have a legitimate business purpose that will not improperly reduce competition. This means we independently decide our business strategy, including how much we will charge for products and where we will sell those products. We also refrain from any illegal exclusionary or predatory practices.

In addition, most countries have anti-trust laws designed to regulate the competitive behavior of companies, with which we rigorously comply.





Artificial **Intelligence (AI)**

Artificial Intelligence (AI) opens up a wide range of opportunities towards our Patient Value Strategy. We commit to using AI in a transparent way with respect for human autonomy, with the ultimate intent of improving the lives of people living with severe diseases. We will ensure a sufficient level of human agency and oversight by considering explicitly and carefully what we delegate to AI and which guardrails we need to put in place, including identifying which decisions a person needs to confirm or take. Any data collection or use to develop and refine AI must respect privacy and data protection. Solutions using AI must be described in understandable terms, and will operate in a trustworthy, ethical and compliant manner.

Clinical Trial **Standards**

At UCB, we conduct all clinical trials in an ethical manner, adhering to international regulations and guidelines (such as the Declaration of Helsinki), codes, principles and local laws. As sponsors of clinical trials, we commit to ensuring patient safety and data integrity, and that patients in our clinical trials are reflective of the population that will ultimately benefit from our new medicines. Additionally, when we outsource any clinical trial activities, we commit to monitoring them regularly and to holding our vendors to these same standards.



07 Living our Ethical Principles **Through our Commitments**



Conflicts of **Interest**

We commit to avoid conflicts of interest to the fullest extent possible. Circumstances may arise where our individual interests may not align with the interest of UCB. It is the responsibility of each of us to identify and disclose situations of potential conflict that cannot be avoided. These can include, amongst others, external engagements, personal relationships, personal financial interests, or receiving benefits from (potential) business partners. In each case, you must manage such situations transparently and UCB reserves the right to take appropriate steps to ensure your judgment is not – or does not ever appear to be – influenced by personal interest.

Customs and International **Trade Compliance**

We are committed to comply with all applicable international trade, import, and export regulations, as explained in the Global Trade Compliance Policy. These include export control restrictions for business activities with sanctioned countries, regions, entities, or persons, or on specific products.





Data Use and **Privacy**

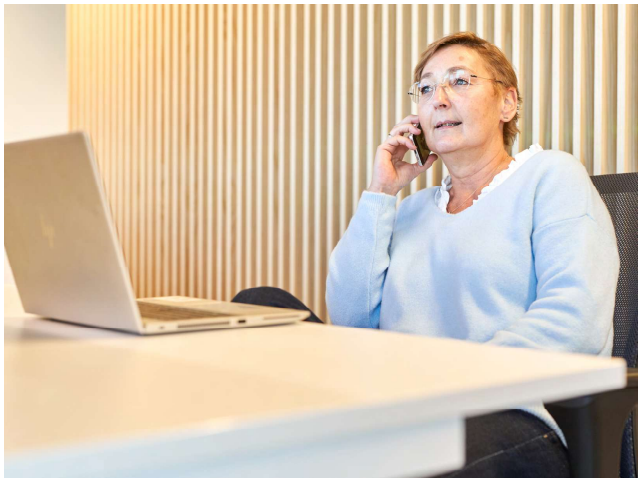
We commit to protecting individuals' personal data in a responsible manner. Each of us is responsible for and has a role in protecting personal data. This includes applying the principles of accountability, transparency, fairness, lawfulness, accuracy, integrity and confidentiality to personal data. We use personal data only for legitimate purposes, limited to what is necessary and only for as long as is necessary.

07 Living our Ethical Principles **Through our Commitments**

Dealing in UCB Securities **and Insider Trading**

As a UCB employee, partner, advisor or contractor, you may be entrusted with material stock price sensitive, precise and non-public information about UCB, or other listed companies, or their securities or operations ("inside information"). In order to protect the investing public and stock markets, those with inside information may not deal in shares, bonds or other related securities of UCB SA/NV and/or of those other listed companies, and may not pass on inside information to anyone.

We are expected to consult and to comply with the UCB Dealing Code and related applicable market abuse regulations. The UCB Dealing Code is intended to prevent both actual and perceived insider trading. It is also designed to promote ethical behaviors and protect our reputation. Violations of the Dealing Code may result in significant personal administrative and criminal sanctions.





Diversity, Equity **and Inclusion**

In order to create value for patients, now and into the future, we embrace diversity in all forms, strengthened by the diverse perspectives, thoughts, talents, backgrounds and experiences of all our colleagues. We inspire a culture of inclusion by providing to all employees equitable opportunities in recruitment, job assignment, promotion, remuneration, training and benefits. An inclusive culture also means fostering an environment where everyone can feel safe, and where all can freely express themselves and their opinions.

We reject harassment or discrimination of any kind, including based on race, color, religion, sex, gender identity or expression, age, national or social origin, citizenship, mental or physical disability, medical condition or disability, sexual orientation or any other characteristic protected by applicable law. We will not accept conduct, actions or comments that create a hostile or offensive working environment and unreasonably interfere with one's ability to work.

Besides embracing diversity, equity and inclusion within our workforce we also consider these aspects in our external interactions, within the communities in which we operate and the patients we aim to serve.

Drug **Safety**

Nothing matters more to us than the safety and wellbeing of our patients. We make every effort to strive for quality and excellence throughout our business to meet the needs of our customers and ensure the safety and efficacy of our products.

This means we commit to monitoring and reporting any adverse events associated with our products. We have an established framework for the timely reporting of any such events, as well as any other safety or quality concerns. Reported events are communicated to the appropriate regulatory authorities in accordance with applicable laws and regulations. Each of us is responsible for reporting any potential adverse events regarding UCB drugs or devices within 24 hours of being made aware of them.



07 Living our Ethical Principles **Through our Commitments**

Freedom of **Association**

Each of us has the right to freely and voluntarily join organizations of our choosing that defend our rights and promote our interests. This includes participating in collective bargaining, which refers to a voluntary process in which colleagues and workers discuss and negotiate terms and conditions of work and relationships between employers, workers and organizations.

Gifts and **Entertainment**

We do not give or receive gifts or entertainment that may appear to compromise the recipient's impartiality or give the impression that the recipient will do something in return.

To this end, UCB colleagues should not provide gifts directly or indirectly to persons not employed by UCB, with the exception that gift giving is allowed to recipients other than HCPs solely if the gift is nominal in value, totally independent from a business decision, and compliant under local laws and customary under local culture.

Similarly, we do not accept gifts, business meals or other forms of hospitality from third parties unless allowed under the limited conditions consistent with our policies and external regulations.

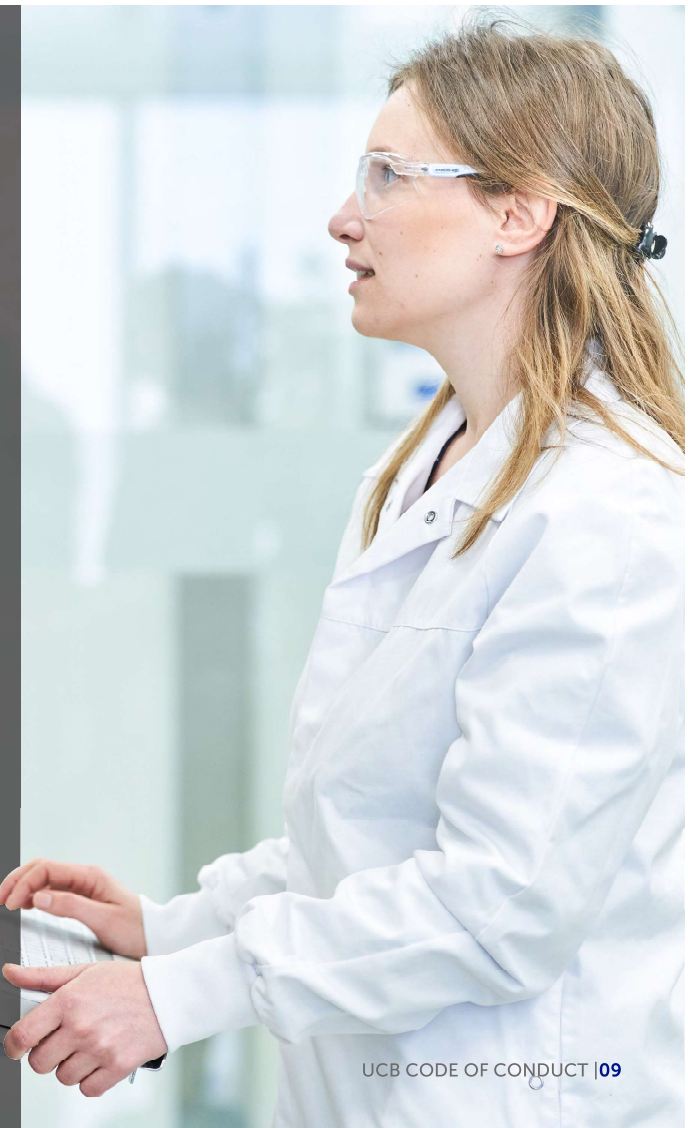
Financial **Integrity**

We commit to use UCB's assets responsibly including not selling, transferring or otherwise disposing of those without appropriate documentation and authorization. Similarly, when spending UCB's resources, all contracts and other financial transactions will have appropriate documentation and authorization. We commit to maintaining systems of internal financial controls, and to ensuring funds are used in an efficient manner and only in accordance with management instructions. Any commitment with third parties must comply with UCB's Delegation of Authority Policy and other applicable policies and procedures.

The integrity of UCB's books, records, accounting practices, and public filings is of the utmost importance for our shareholders and financial markets. We therefore commit to timely and accurate recordkeeping and reporting of all documents that are produced for an official purpose.

As taxation is a logical consequence of our business activities being deployed, we do not attempt to evade taxes. All transactions have a business purpose or economic rationale, and we will pay taxes as a contribution to society on such a basis using generally accepted allocation principles.

We pay corporate income taxes, customs duties, excise taxes, employment taxes, and a variety of local taxes in the jurisdictions where applicable. In addition, we collect and pay employee taxes and indirect taxes such as Value Added Tax (VAT). The taxes we pay and collect represent a significant contribution to the countries and societies in which we operate.



Inspired by **patients.**
Driven by **science.**

07 Living our Ethical Principles **Through our Commitments**



Health, Safety **and Wellbeing**

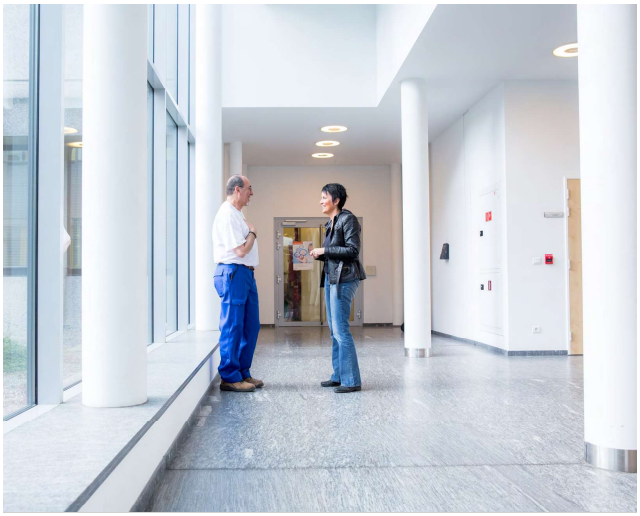
We strive to achieve a working environment and climate where people can be happy, healthy, and safe and are able to thrive. We also offer additional support where needed for colleagues living with a health condition or a disability and for those who are caregivers.

To live up to our health, safety and wellbeing objectives, we have set systems and processes to plan, execute, control and review our performance and those of our business partners (e.g. contractors, temporary workers, visitors).

Human **Rights**

We respect the rights and dignity of all people. We strive to prevent adverse human rights impacts in all parts of our business operations and the communities in which we operate, as defined by the UN Declaration of Human Rights. We expect the same behavior from consultants, suppliers, and other third parties acting on behalf of UCB. If an adverse human rights impact has been caused by UCB, we will strive to find a remedy.





Inquiries and **Investigations**

We are committed to cooperating with all governmental inquiries and investigations, and to answer requests from the investment community and media relations seeking information on our Company's operations, performance and outlook.

All of us are expected to report governmental investigations or inquiries promptly to the Legal Department.

All inquiries from investors, financial analysts, creditors and other capital market participants must be referred to the Investor Relations Department for handling. Questions from the media must be referred to the local or global Communications Department before further handling.

07 Living our Ethical Principles **Through our Commitments**



Philanthropy

At UCB we also believe that our responsibility goes beyond the impact that we can create through our business approach and that we can make a difference in the world around us through targeted philanthropic contributions. For us, philanthropy is an expression of our desire to be part of the solution to many of the issues we are faced with today.

Our philanthropy is equally inspired by health and communities. We endeavor to ensure that our philanthropic contributions are impactful and the impact created is meaningful, measurable and sustainable. We are guided by the firm conviction that we can deepen our impact by addressing challenges at the intersection of our Patient Value Strategy and wider societal interests.

In our philanthropic efforts, we support and partner with organizations and institutions in areas that can contribute to improve health and that can bring about the meaningful impact we desire.

Intellectual Property (IP) & **Confidential Information**

We commit to implement a responsible vision and practice related to IP protection guided by patient and societal value and contribute to UCB's ability to sustainably deliver innovative solutions to patients now and into the future. We achieve this by capturing robust IP protection (including via patents and their relevant extensions, trademarks, regulatory data protection, and orphan market exclusivity) and creating focused and tailored IP strategies for UCB's innovative solutions and assets. Whenever we identify, create or develop any new works of authorship, technological or medical advances, or any other inventions or solutions to technical problems, or business strategies, we must disclose these to the Intellectual Property Department (IPD).

Each of us may be involved in internal projects that are highly sensitive in nature and which involve information that is confidential to UCB, including UCB's trade secrets. Unauthorized access to, or use or disclosure of, confidential information would harm UCB's interests. Therefore, each of us must only access, use and disclose such information if and as allowed by UCB's internal processes.

Consistent with our practices, we are also expected at all times to adhere to any duties of confidentiality pertaining to third-party confidential information, and to respect the IP rights of any third party.

We ensure that we work with the IPD on any matters related to protection of IP or confidential information, including reporting any possible infringement, misuse, or other violation thereof.



07 Living our Ethical Principles **Through our Commitments**

Policymakers and **Political Candidates**

We are committed to the discovery, development, and delivery of differentiated solutions that provide measurable value to patients, improving their lives now and in the future, regardless of age, gender, race, ethnicity, or socio-economic circumstance. We are focused on addressing unmet needs and creating sustainable solutions for patients across society and the healthcare system at large. As such, we are dedicated to the continued evolution of a public policy environment that recognizes and rewards innovation, encourages value-based care, and promotes affordable and equitable access for all patients to the medicines they need.

The work we do is directly affected by the decisions of policymakers and regulators in the countries in which we operate. We believe in the value of exchanging perspectives with these leaders and decision makers in the most transparent way possible, without the appearance of undue influence that could compromise the work we do on behalf of patients. This transparent engagement includes adhering to the reporting requirements for lobbying activity and limits on political campaign contributions in the countries in which we operate.

Where permissible in certain countries and when authorized by the country leadership and the Legal Department or local legal counsel, UCB engages in the political process, specifically in support of candidates for elected office. Supported candidates are selected based on views, voting records, and issue positions that reflect the interests and values of UCB, its employees, and the patients we serve now and in the future, including a candidates' engagement on innovation, affordable access to quality healthcare, sustainability, health disparities, and social justice.



Professional **Practices**

Everything we do, we do for the benefit of people living with severe diseases – this extends from how our products are developed to how our products are marketed. Our scientific and promotional strategies and actions always prioritize truth and accuracy, and have a clear and legitimate intent, especially in the communications of complex medical and scientific information. We are transparent about our funding, products, and services when marketing to healthcare professionals, patients, the public, government agencies and others. We are committed to responsible and compliant promotion. We will only encourage the use of our products based on their approved uses, appropriate scientific merits, and benefits for patients. We will not reward stakeholders for prescribing or purchasing our medications. Each of us is responsible for being aware of local policies and regulations that apply to our area of practice.

Protecting the **Planet**

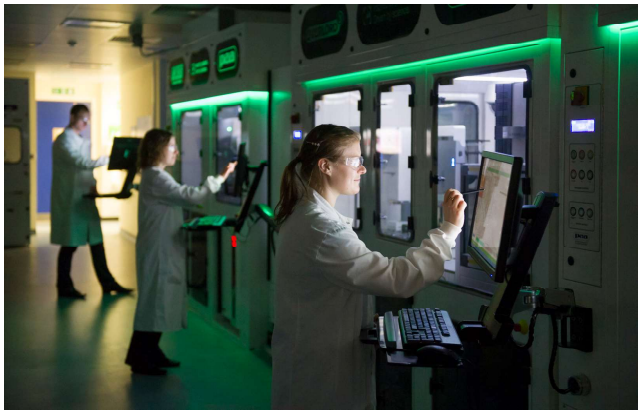
Our goal is to develop and deliver medicines for people with severe diseases in the most environmentally sustainable way possible. All of our activities have an impact on the environment, and we take our responsibility for the health of the planet very seriously.

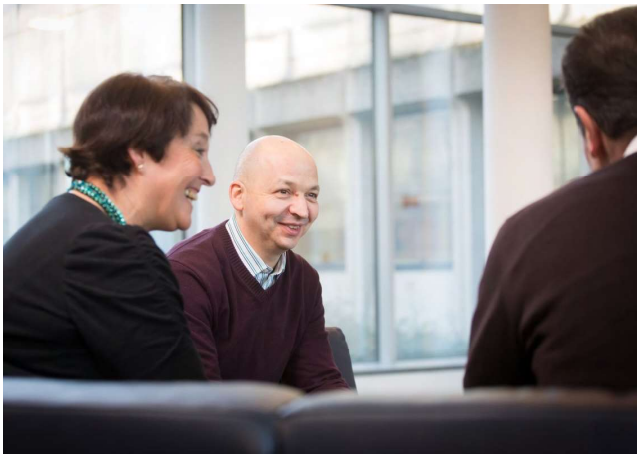
To live up to our environmental objectives, we have set bold targets to minimize our environmental footprint from greenhouse gas emissions, water withdrawal and waste generated through our operations, including those of our business partners.

07 Living our Ethical Principles **Through our Commitments**

Scientific **Ethics**

We commit to transparent scientific communications that include unbiased, credible, accurate, balanced, and up-to-date information, and avoid situations where business pressures or time constraints could compromise the scientific integrity of our work and the resulting data. In our work, we may use new and emerging technologies like genetic engineering, nanotechnology, and stem cell research. As with any scientific endeavor we take on, we should always think critically about how these technologies and innovations can help those living with severe disease, as well as where they may cause new ethical or safety concerns. If valid concerns exist, UCB will offer a safe environment to raise such concerns and explore what could be done to address or mitigate them.





Social **Media**

We commit to engage responsibly on social media. Information posted on UCB social media properties will follow our standards for truthful and non-misleading communications, and only designated individuals may post on social media on behalf of UCB.

We should feel free to interact with UCB's social media content and share UCB news with our own networks at our discretion. In doing so we are required to:

- Exercise good judgment as ambassadors of UCB; each of us is expected to interact in a respectful manner on social media platforms, both while at work and outside of it.
- Act transparently about our affiliation with UCB as we interact with approved UCB posts.
- Maintain the trust people living with severe diseases have placed in us. We should only share information about products or molecules (including those in development), treatment options and claims when this has been specifically authorized. We will not offer medical advice and will refrain from sharing scientific data or anything proprietary or confidential.

Sourcing **Standards**

We consider our suppliers as extensions of our business and commitment to drive sustainable business growth, including ethical ways of working and human rights. We do not conduct business with suppliers who violate international standards on labor rights or working conditions. We commit to engage with diverse suppliers who share our view of the world and are doing their part to reduce the impact they have on the planet and overall society.



08 Closing Note from General Counsel and **Chief Ethics & Compliance Officer**

Being a part of UCB means contributing to a bold and ambitious mission to deliver innovative solutions for people living with severe diseases. This places each of us under the obligation to bring the highest standards of ethics and accountability to the work we do. We hope this Code provides a deeper understanding not just of what ethical behaviors are expected but why they matter.



Anisa Dhalla



Bill Silbey

Each of us is called to live up to the standards set forth in this Code and to hold each other accountable every day. For nearly a century, UCB has grown its ambition and delivered on its purpose – and that success would not have been possible without the trust we built through ethical, responsible, and transparent interactions with colleagues, partners, providers, and most of all patients.

Together, each of us is growing and maintaining the trust that has made UCB a unique force for innovation and hope for so many. If anything in this Code is unclear, or if you need to seek counsel on an ethically challenging situation, resources are available at both a local and global level to help you uphold our commitments to the people we work with and for, and who make our mission possible.

Bill Silbey

General Counsel

Anisa Dhalla

Chief Ethics & Compliance Officer



Inspired by **patients.**
Driven by **science.**

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