

Regeneron Modern Slavery Act Statement 2023

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This Statement is made in relation to section 54(1) of the UK Modern Slavery Act 2015 (the 'Act') and sets out the steps that Regeneron UK Limited ('Regeneron UK') has taken to ensure that modern slavery is not taking place in our supply chains or any part of our business. It covers the period 1 January 2023 to 31 December 2023, and is the second financial year with respect to which Regeneron UK has met the criteria under section 54 of the Act.

Regeneron Pharmaceuticals, Inc. ('RPI') and its subsidiaries (collectively, 'Regeneron') is committed to maintaining high standards of legal and ethical conduct and recognizes the inherent dignity and equal and inalienable rights of every human being. Our commitment to respect and support for human rights extends to all employees, third-party contractors, vendors, suppliers and partners and is based on the key tenets outlined in the United Nation's (U.N.) International Bill of Human Rights, the U.N.'s Universal Declaration of Human Rights and the U.N.'s Guiding Principles on Business and Human Rights. As part of this commitment, Regeneron recognizes the importance of identifying and mitigating modern slavery in our business and supply chain.

[For the purposes of this statement, the term 'modern slavery' encapsulates slavery, servitude, forced or compulsory labour, and human trafficking (that is to say, the practice of illegally transporting someone from one area or country to another, usually for the purposes of being exploited).]

Our Business Structure, Operations and Supply Chain

Our Business Structure and Operations

Regeneron UK, a private limited company incorporated under the laws of England and Wales, is an indirect, wholly-owned subsidiary of RPI, a New York corporation headquartered in the United States. Regeneron is a leading biotechnology company that invents, develops and commercializes life-transforming medicines for people with serious diseases. Founded and led for more than 35 years by physician-scientists, our unique ability to repeatedly and consistently translate science into medicine has led to a number of approved treatments and numerous product candidates in development, almost all of which were homegrown in our laboratories. Our medicines and pipeline are designed to help patients with eye diseases, allergic and inflammatory diseases, cancer, cardiovascular and metabolic diseases, hematologic conditions, infectious diseases and rare diseases.

As of December 31, 2023, Regeneron had a global workforce of 13,450 full-time employees across 21 locations in 12 countries. Employees consist of 10,875 in the U.S., 1,939 in Ireland, and 636 in other countries (primarily in the United Kingdom, Japan and Germany). Of these, 2,393 were within Regeneron's research and preclinical development and regulatory affairs organization, 2,002 were within Regeneron's global clinical development organization, and 6,124 were within Regeneron's industrial operations and product supply organization.

Our Supply Chain

To support Regeneron's business and research activities we procure a range of goods and services through our supply chain. While we currently manufacture bulk drug materials and products at our manufacturing facilities in the U.S. and Ireland, certain bulk drug materials and products are also manufactured by our collaborators, and certain raw materials or products necessary for the manufacture and formulation of our products and product candidates are provided by single-source unaffiliated third-party suppliers. In addition, we rely on our collaborators or third parties to perform packaging, filling, finishing, labeling, distribution, laboratory testing, and other services related to the manufacture of our products and product candidates, and to supply various raw materials and other products.

The modern slavery risks with respect to our manufacturing operations are low based on the jurisdictions in which they are located but we plan to continue to review these risks and those to our wider supply chain, and will consider putting additional measures in place that are appropriate and proportionate to any potential risks identified.

Policies in Relation to Modern Slavery and Human Rights

Regeneron has a zero-tolerance policy against modern slavery and takes steps to prevent trafficking and to ensure compliance with the applicable laws and regulations. This commitment is reflected through the following RPI Codes and position statements that apply to Regeneron UK:

- [Regeneron Code of Business Conduct and Ethics](#) establishes the expectation that all employees, suppliers and contractors are acting in accordance with applicable laws, rules, regulations and Regeneron policies. It sets out our commitment to conduct business in a manner that respects the rights, health and safety of all people.
- [Regeneron Position Statement on Human Rights](#) sets out our commitment to protect, respect and support human rights and identifies the most important and relevant human rights issues in our operations and value chain.
- Regeneron [Vendor](#) and [Distributor](#) Codes of Conduct require our vendors and distributors to comply with all legal and regulatory requirements regarding fair and equitable treatment of employees and state that vendors and distributors shall not use forced, bonded, indentured, involuntary prison labor or human trafficking. Our Codes are aligned with both Regeneron's standards to improve sustainable performance of our organisation, and also the Pharmaceutical Industry Principles For Responsible Supply Chain Management with respect to its principles on human rights, ethics and labor.

Due Diligence, Risk Assessment and Management

At Regeneron, we believe that operating responsibly and ethically is essential to our business. We respect human rights and are committed to identifying and addressing modern slavery risks in both our operations and supply chain, and we intend to develop and refine our policies and procedures in line with this commitment.

Risk Management in Our Own Business

1. All Regeneron employees are trained on the Code of Business Conduct and Ethics, which includes a section on human rights, when they are hired and thereafter on an annual basis. As of March 2024, more than 99% of eligible employees completed our annual Code of Business Conduct and Ethics training.
2. Employees have a duty to speak up and promptly report known or potential violations of law or policy, or other valid concerns and questions. In the case of suspected human trafficking, employees are required to report any suspected trafficking-related activities, including the activities of relevant subcontractors, to Regeneron or the Global Trafficking Hotline.
3. Employees are required to fully cooperate in any internal or external investigation of suspected wrongdoing. Regeneron will not take any adverse action against employees for making an honest report of suspected trafficking-related activities, and employees should not threaten or retaliate against any employee that makes an honest report of a suspected violation. We have nonretaliation policies, confidentiality policies and mechanisms to ensure anonymity to the extent possible, which protect Regeneron employees who report concerns in good faith.

Due Diligence and Risk Management in Our Supply Chain


We hold our suppliers, distributors, contract manufacturers and business collaborators to the same high standards, and we leverage existing policies to ensure adherence.

As outlined in our Vendor and Distributor Codes of conduct, we require that vendors uphold the human rights of workers and all applicable laws, treating them with dignity and respect. Regeneron does not currently require a separate certification in addition to vendors agreeing to abide by the Vendor Code as part of our contractual arrangements.

Recognizing that modern slavery is a complex issue that can manifest at different levels within a company's value chain, we will continue to explore ways to assess modern slavery risks and consider putting additional measures in place that are proportionate and appropriate to the risks within Regeneron's business and supply chain.

As part of our commitment to transparency, Regeneron also provides an annual update on our human rights approach and performance, including policies, due diligence processes and key performance indicators, in our [Responsibility Report](#).

This statement was approved by the Board of Directors of Regeneron UK on 25 June 2024.

A handwritten signature in blue ink, appearing to read 'Zoran Berkovic', with a horizontal line extending to the right.

Zoran Berkovic
Director, Regeneron UK Limited

June, 2024