

UCB appreciates long-term suppliers throughout each business area. We choose our suppliers with care and on the basis of objective factors such as quality, reliability, delivery and price. Compliance with laws and regulations as well as respect for international human rights are required for each Supplier.

The purpose of this document is to define the basic principles that guide the purchasing policy and therefore, that must be considered by present and potential Suppliers.

DATE	REVISION	RESUMEN DE CAMBIOS
13/04/2023	0	Initial issue
01/09/2026	1	Revision of energy aspects in the procurement

1. UCB - Purchasing Policy

Basic points of actuation:

- Have a solvent and sufficiently broad panel of suppliers to guarantee continued plant activity and response to the end customer in terms of quality, cost and specified services.
- Optimize purchase prices of our commodities within a framework of exposure to defined economic risk
- Establish partnerships/relationships of trust with key suppliers, based on collaboration and responsiveness. Our suppliers are important to us and may indirectly influence on our reputation towards customers and other interests, both in a positive and negative way. We therefore work professionally and in a long time perspective with our selected suppliers to mutually improve our productivity and quality.
- Maintain, search and if necessary, permanently develop suppliers of products and services that can provide all of the Group's plants locally and/or globally with competitive costs.
- Work with streamlined suppliers that allow us to reduce stocks, increase rotation and improve plant based services.
- Bring suppliers in line with the UCB Quality and Environment Policy

The way we act: "I listen to what you say, but more interested at what you do".

2. Supplier – General Requirements

All Products and Services shall comply with UCB's specifications and requirements.

UCB expectation is "Right the first time" on all Products and Services delivered from Suppliers. In line with this, suppliers are required to

- Demonstrate compliance with process controls and capability requirements
- Explicitly review and understand all requirements provided concerning products and services requested
- Possess expertise and resources to perform effective root cause analysis, and to take corrective and preventive actions
- Ensure that its employees, who are involved in quality issue resolution have necessary competences regarding quality tools
- Ensure that all UCB requirements are flowed down to the entire supply chain
- Any Supplier's action that carries cost liability to UCB must be authorized by the UCB procurement organization.

3. Supplier – Qualification

The Supplier Qualification ensures that has a documented and effective management system in place to supply Products and Services fulfilling all UCB specifications, and be capable to continue to improve quality, delivery and cost.

Ideally, the Supplier shall be certified/registered to one of the following international quality management standards by a recognized, independent and accredited third party certification/registration entity.

Supplier must notify UCB if registration expires and shall send an updated copy of certificate each time it is renewed. The certificate shall be sent to Purchasing Area.

In addition, UCB reserves the right to conduct its own quality audit, at a mutually agreed time with the Supplier. This means:

- Management System Audit: for this purpose UCB shall have access to all Supplier facilities and supply chain, staff and documents relevant for the audit, and only in what UCB products concerns.
- Code of Conduct Audit
- Technology, Process and Product Audit: when necessary due to onboarding requirements, projects or non-conformances. When required, audits will be conducted of the Supplier's facilities and supply chain.

Own quality audit must be done under consideration of following Code of Conduct: integrity, discretion, industrial and intellectual property, confidentiality, openness and transparency.

4. Supplier – Sample Products Approval Process (SPAP)

Production Item Approval Process ensures that the Product is capable of meeting UCB technical and performance needs.

- Sample Products: Supplier shall provide the required number of sample products as specified in the SPAP order. All products are to be produced consecutively in the Supplier's production. In some cases, the SPAP order may also require a 2nd production run in order to capture variation in the Supplier's process.
- Material, Performance and Reliability Test Results: Supplier (or a qualified independent third party) shall provide specific material, performance and/or reliability test results. Actual results must be compared against agreed upon specifications. When required, UCB may require third party testing.
- Special Characteristics: is any feature of a material or test that has a significant influence on Product fit or UCB process. UCB will select or identify the Special Characteristic, which the Supplier shall control. Special Characteristics will be communicated through Purchasing Product Data Sheet.

5. Supplier – Non Conforming Products

This section outlines the Supplier requirements and responsibilities as a result of non-conforming product due to Supplier's fault. Supplier shall carry out corrective and preventive actions based on mutual discussions between UCB and Supplier, but subject to UCB's sole and final decision.

- Reimbursement: in order to cover UCB costs related to non-conforming products, the Supplier shall reimburse the product when required. In the same way and when required, Supplier will compensate extra costs originated by faulty supply. In that cases detailed report will be provided by UCB. The costs will be reimbursed through an invoice from UCB.
- Immediate Containment Actions due to Non-conformances identified after Shipment: where applies, if non-conforming products are identified after shipment from Supplier, one or more of following actions shall be initiated, based on mutual agreement between UCB and the Supplier:
 - The Supplier shall inspect and sort Products with unidentified status at defined place (UCB, external warehouse, others). All costs incurred will be at the Supplier's expense.
 - Suspected batch/lot/shipment will be retained for one or more of following actions:
 - Immediate replacement of the Product
 - Return of batch/lot/shipment to the Supplier, with the condition of complete replacement, sorting or rework of the Products, and any other charges incurred, at the Supplier's expense.
 - Supplier sorting at UCB or any other site specified by UCB, at Supplier's expense.
 - Scrap, loss, and any other additional costs incurred by UCB, as a result of Non-conforming Products, are at the Supplier's expense.

It is Supplier's responsibility to deliver high quality products to UCB, which is in line with UCB's expectations of "Right the first time".

- Corrective and Preventive Actions: when non-conforming products are discovered, the Supplier shall submit a formal written corrective and preventive action at Non Conformity emitted by UCB. Supplier's answer requested by UCB can vary from a simple action, to 8D Action Report, depending on defect and/or Product supplied.

6. Supplier - Monitoring and Development

UCB will continuously measure and monitor Supplier's performance based on, but not limited to, the following areas:

- Quality Performance
- Costs of Poor Quality related to supplier non-conformities
- Delivery Performance
- QMS Compliance (ISO 9001 certificate, etc)

Selected suppliers will receive the UCB Score Card on frequent basis. This will support the common understanding of the supplier performance and allows the Supplier to take actions to address problems and trends before UCB may request the Supplier to take action.

The monitoring and actions are closely tied to the promoting and demoting of the Supplier's classification within UCB's Supplier Management System. A Supplier's failure to fulfill UCB's performance requirements can result in, but not limited to, new business hold and/or phase-out.

7. Supplier – Change Management

After receiving Product approval from UCB, Supplier shall not make any changes to the product and processes which are concerning intended and unintended impact on safety, form, fit, function, quality,

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reliability, durability, appearance, delivery, service without prior written notification and agreement with UCB.

Changes include, but are not limited to:

- Any Product changes, including packaging changes
- Any material or material composition changes in the Product
- Changes to regulatory, statutory or legal status/documentation requirements.
- Any manufacturing process changes that may be relevant to UCB's own process.

Supplier's non-compliance with the above requirements is considered a material breach of SPAP Process. UCB reserves the right to requalify the Product with appropriate SPAP.

8. Supplier – Identification, Traceability and Quality records

Special delivery marking/identification of products has to be done according:

- UCB label indicated at Purchasing Product Data Sheet and/or
- When required by UCB at delivery instructions.

Mandatory is to fulfill information required at UCB label, and use it for every pallet identifying.

The following quality information is required to be recorded by supplier with appropriate data back-up method implemented, and made available to UCB upon request:

- Resourced used in product manufacturing
- Process parameters, inspection and testing results
- Manufacturing location
- Manufacturing and shipping date and quantity
- Used raw materials (manufacturer, type and manufacturing date)
- Certification data
- Purchase order number

The Supplier shall retain the appropriate quality records for Product on each shipment to support any request made by UCB. Suppliers are responsible to have Inventory control systems that positively identify and control obsolete material to prevent unnoticed shipments to UCB. Where feasible, suppliers shall maintain First In First Out (FIFO) inventory management practice. The system FIFO control must ensure controls extend to rework/repair, test activity and off-site (sub-contract) processes.

9. Supplier – Health, Safety and Environmental, Energy efficiency and Circular Economy Requirements

- The Supplier shall identify all activities that are needed in order to ensure that all Products and Production processes, are in conformance with legal requirements. Environmental Management System: Supplier is expected to deploy, and maintain an EMS based on ISO 14001 or equivalent.
- Health and Safety Management System: Supplier is expected to deploy, and maintain an HSMS based on ISO 45001 or equivalent.
- **Energy Performance and Energy Efficiency: For the procurement of energy-using products, equipment and services that may have a significant impact on UCB's energy performance or Significant Energy Uses (SEUs), energy performance shall be considered as one of the procurement evaluation criteria. Where applicable, UCB shall define specific energy performance requirements for the products, equipment or**

services to be purchased. Such requirements shall be included in the applicable technical supply specifications or other purchasing documentation and communicated to the Supplier. Products, equipment and services purchased by UCB shall not adversely affect UCB's energy performance or Significant Energy Uses (SEUs).

Where applicable, evidence of the following aspects may be considered during supplier selection and purchasing:

- Continue improving the energy performance and cost effectiveness of the Supplier's processes.
- Increase the use of renewable and alternative energy sources.
- Demonstrate compliance with the energy performance requirements defined by UCB for the products, equipment or services supplied.
- Circular Economy: Circular economy is a model of production and consumption which involves sharing, leasing, reusing, repairing, refurbishing and recycling existing materials and products for as long as possible. According to that:
 - Evidence of the above aspects, as well as any data or initiatives aimed at reducing waste to a minimum, will be considered during supplier selection, where applicable.
 - If requested by UCB, the Supplier's carbon footprint calculation shall be made available.

10. Supplier – UCB Property Maintenance

All Manufacturing tools belonging to UCB must be clearly and indelibly marked as the property of UCB in a way that they can be identified as such.

11. UCB – Working Structure Pillars

