
Slavery and human trafficking statement

For the financial year ended 31 December 2025

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 for the financial year ended 31 December 2025. It sets out the steps taken by Otsuka Pharmaceutical Europe Limited (“OPEL”) to minimise the risk of modern slavery and human trafficking in its operations and supply chain.

1. Organisational structure, business and supply chains

OPEL is a subsidiary of Japan-based, Otsuka Pharmaceutical Co., Ltd. (OPC), which oversees sales and marketing operations in France, Germany, Italy, the Nordics, Spain, Portugal, Switzerland, BeNeLux, the United Kingdom (UK), Ireland and Austria. Operations in other EU markets are managed via distribution companies. This statement summarises the activities of OPEL only.

OPEL is headquartered in England and has a primary focus at this time on the pharmaceutical business, operating in a number of therapeutic fields. Otsuka Pharmaceutical Netherlands B.V. (OPNL) is the Marketing Authorisation Holder for most of the products in OPEL’s operating model. OPNL is a wholly owned subsidiary of OPEL and OPEL has retained the exclusive rights to commercialise these products in the UK and European Economic Area (“EEA”).

OPEL is guided by an overarching corporate philosophy of “**Otsuka-people creating new products for better health worldwide**”. Otsuka Holdings Co., Ltd., which is the holding company of OPC, became a signatory to the United Nations Global Compact (UNGC)¹ on 16 November 2016 to express its commitment to sustainability, and OPEL’s modern slavery approach is consistent with the spirit of the United Nations Global Compact (“UNGC”). Slavery and human trafficking are intolerable crimes and so OPEL is committed to ensuring that where it can have influence, it will minimise the risk of modern slavery or human trafficking in its supply chain or in any part of its business.

2. Policies in relation to slavery and human trafficking

OPEL has a standalone modern slavery policy in place, the purpose of which is to outline OPEL’s commitment to minimising the risk of modern slavery in its operations and supply chains, and to lay the foundation for embedding modern slavery considerations into the way it operates and conducts business. The policy sets out the responsibilities of specific teams and departments within OPEL with regards to modern slavery. There is an Otsuka Group Human Rights Policy with respect to which employees conduct a refresher training each year.

Both the European Otsuka Code of Conduct, applicable to OPEL and its affiliates, and the Global Code of Business Ethics incorporate modern slavery considerations. The European Otsuka Code of Conduct document is available on the OPEL and local affiliates public facing corporate website. Further, the Global Code of Business Ethics and a page on “Respect for Human Rights” is available on the corporate website of Otsuka Holdings Co., Ltd.

3. Due diligence processes

A global Third-Party Risk Management project has been developed in 2023 to identify and harmonise, when possible, due diligences processes and procedures across the world. One of the documents proposed included a specific Human Rights / Labour Rights due diligence questionnaire, developed to align with the highest ethical standards and to ensure the organisation is aligned with existing and future legal requirements.

Due to local specificities and applicable laws and regulations requirements that may differ from one region to another, every entity is responsible for developing and ensuring the relevant due diligence standards are applying in its remits. In 2025, a European Procurement audit, including due diligence aspects, has been conducted to review OPEL and affiliates practices. The European Sustainability team, established in November

¹ <https://www.unglobalcompact.org/>

2024, has been also working with the European Procurement team to identify sustainability questions, including human rights aspects, that could be integrated into our due diligence questionnaires as part of the implementation of the audit recommendations in 2026.

In parallel, the European Sustainability team has also worked with the European and Global Business Development due diligence teams to integrate from 2026 sustainability questions, and reviewed the existing one to ensure relevant topics, such as human rights, are taken into consideration.

Regarding Human Rights, OPEL includes modern slavery considerations into existing procurement processes as they relate to engagements with a value over EUR 100,000, to ensure OPEL's modern slavery approach is integrated with current practices within the business. OPEL has published and trained all employees at OPEL and its affiliates on its: (i) procurement policy; and (ii) due diligence and contract management policies. Both such policies place importance upon and consideration with regards to modern slavery.

OPEL includes modern slavery clauses in the terms and conditions of its contracts and purchase orders, and requires its third parties to uphold the same standards and use reasonable endeavours to require the same of its subcontractors.

OPEL continues to utilise specific questions relating to modern slavery risks for new suppliers at OPEL. A risk-based approach is used to identify which potential suppliers are required to answer these questions. Please see item '4. Risk assessment and management', below, for more details.

Finally, OPEL has a whistleblowing facility (Speak Up Line) managed by an external third party (NAVEX) and incident management system in place through which employees are encouraged to report concerns regarding unethical behaviours and/or practices without fear of retaliation or retribution. OPEL has extended the scope of this facility for employees to report any modern slavery concerns, following the process described within the EU whistleblowing policy.

OPEL and OPEL's affiliates' corporate public websites also contain a link to the Otsuka Speak Up page in 2024, Otsuka Holdings also launched the Otsuka Group Business Partner Code of Ethics with an associated speak up line. For more information, please click on the following link: [Driving Sustainability With our Business Partners | Sustainability Management | Sustainability | Otsuka Holdings Co., Ltd.](#)

4. Risk assessment and management

OPEL utilises a modern slavery risk assessment framework to assess suppliers based on the level of risk associated with their sector and the level of risk associated with the supplier country of location².

In addition, at the request for proposal stage, OPEL requests information from the potential new UK registered vendors to elicit details in relation to its compliance modern slavery standards. Furthermore, OPEL is utilising a risk assessment with suppliers prior to contracting during the tender process or when extending a contract, if the contract value is EUR 100,000 or higher.

5. Key Performance Indicators and effectiveness

OPEL monitors its risk in relation to modern slavery and human trafficking through its procurement process.

6. Training


OPEL will continue to deliver training to all its employees, contractors and consultants. In addition, the European Sustainability team has trained the local ESG Ambassadors on Human rights considerations in November 2025 and disclosed dedicated communication to employees on the World Human Rights Day on 10th December 2025.

² OPEL has used the Global Slavery Index, particularly the prevalence of modern slavery as a percentage of a country's total population, to indicate the level of modern slavery risk in each country. <http://www.globalslaveryindex.org/>

This statement has been approved by the OPEL Board of Directors on 12 February 2026.

By Junichi Hashimoto

Chair of the Board of Directors of Otsuka Pharmaceutical Europe Limited

A handwritten signature in black ink, reading "Junichi Hashimoto". The signature is written in a cursive style with a horizontal line underneath the name.

on behalf of Otsuka Pharmaceutical Europe Limited

Date 12 Mar, 2026