



## UCB, Inc. Annual Declaration of Compliance

### Introduction

To the best of our knowledge, and based on our good faith and understanding of the statutory requirements, UCB, Inc. (UCB) has established a Comprehensive Compliance Program (CCP) in accordance with the “Compliance Program Guidance for Pharmaceutical Manufacturers” published by the Office of Inspector General, U.S. Department of Health and Human Services (the “HHS-OIG Guidance”) (May 2003) and in compliance with the requirements of Cal. Safety & Health Code § 119402(e) (effective July 1, 2005.).

A description of UCB’s Comprehensive Compliance Program (CPP) can be found [“Here”](#)

UCB has developed a CCP that is tailored to the size, organizational structure, and resources of the company; however, recognizing that compliance is a dynamic concept that must be adapted to the characteristics of a particular company, we are continually reassessing our program and will continue to revise our compliance elements as necessary.

Additionally, in accordance with the California Act, UCB has established an annual limit of \$1700 that can be applied to providing promotional marketing materials, items and activities provided by a UCB employee who markets to a medical or health professional within the state of California.

Exclusions to the annual limit include payments and transfers of value for legitimate professional services provided that such services do not exceed the fair market value of the services rendered.

### Declaration:

By making this declaration, we are not asserting that we can prevent individual employees from improper conduct; however, to the best of our knowledge and as of the date of this statement, UCB declares that we are following the requirements of the California Act. Our systems will be reassessed on an annual basis.

**Effective: June 30, 2026**