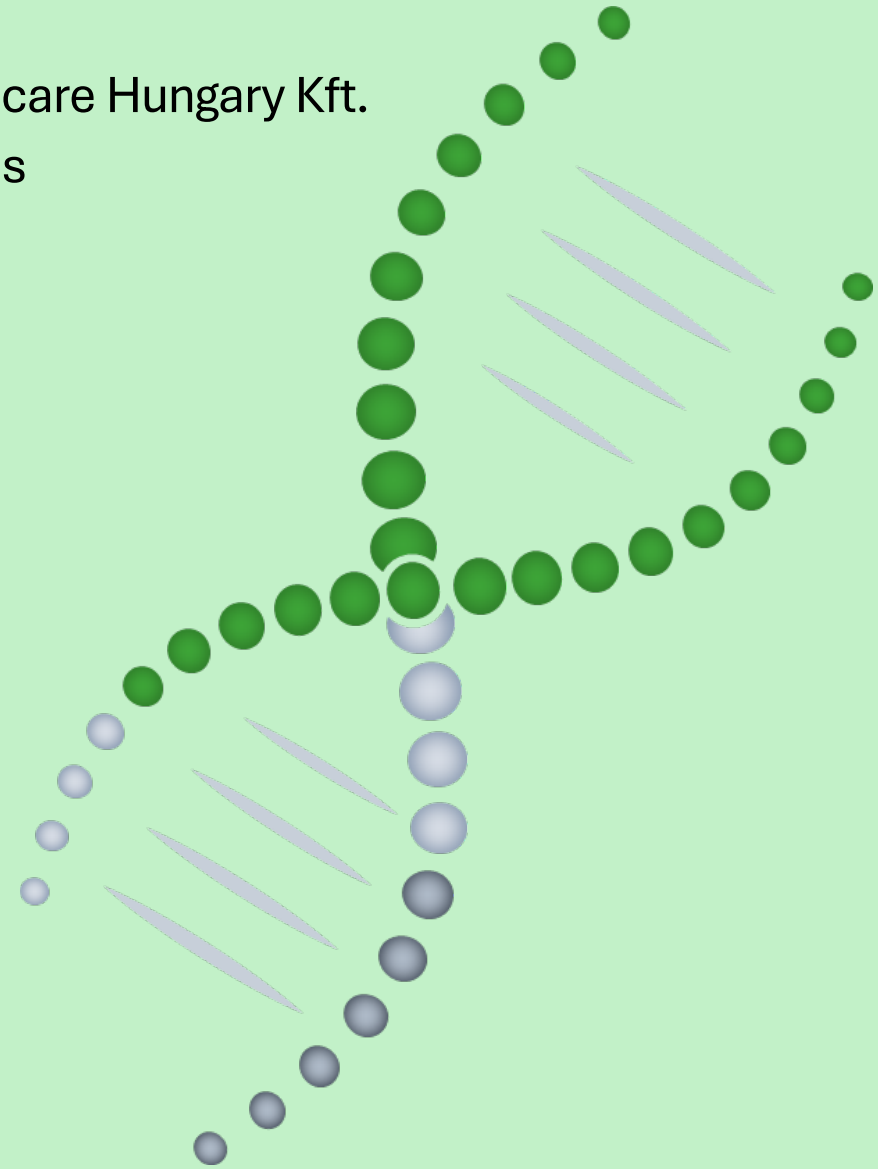
Sustainability Report*

2024

Celltrion Healthcare Hungary Kft.
& its subsidiaries



*This report covers environmental, social and governance (ESG) performance of Celltrion's Europe-based operations

Table of content

1. General Disclosures

1.1 Basis for preparation of sustainability statement

General basis for preparation of the sustainability statement

BP-1

This year marks the preparation of Celltrion Healthcare Hungary Kft.'s (hereafter: Celltrion Healthcare Hungary or Celltrion) first sustainability report (hereinafter: sustainability statement, sustainability report or report), developed as a voluntary initiative to enhance transparency and prepare for future reporting obligations under EU Directive 2022/2464 on Corporate Sustainability Reporting (CSRD). The scope of the report covers the Group's European operations (referred to as Celltrion Europe entities in the report). While this sustainability statement is not subject to mandatory CSRD application at this time; it has been prepared with reference to selected data points outlined in the European Sustainability Reporting Standards (ESRS) as specified in Commission Delegated Regulation 2023/2772, where applicable and feasible.

This report does not constitute a CSRD – compliant sustainability statement and has not been subject to limited assurance as required under the Directive. Nonetheless, it reflects Celltrion Healthcare Hungary's ongoing efforts to align with evolving EU sustainability disclosure expectations. The report includes information related to the following topics of the European Sustainability Reporting Standards (ESRS Set 1):

- ESRS 2 -General information
- ESRS E1 and E5 – Environmental information
- ESRS S1, S2, S3 and S4 – Social information
- ESRS G1 – Governance information

The European Commission's proposal for simplification (EU Omnibus proposal package), published on 26 February 2025, intends to amend, among other things, the current timetable, scope and content of reporting under the CSRD in two stages. According to the first Commission proposal ("Stop-the-clock"), which has since been adopted at the European Union level, the mandatory CSRD reporting for large companies and listed SMEs (commonly referred to as Wave 2 &3) will be delayed by two years. Under the second Commission proposal (content directive), the threshold for reporting would be raised to 1000 employees, while maintaining the threshold of EUR 25 million in balance sheet total or EUR 50 million annual turnover at both individual and group level. This would result in a number of companies currently in scope being exempt from mandatory reporting. Given the uncertainties, whether Celltrion will fall under the scope of CSRD in the future, Celltrion Europe entities will continuously monitor any changes and adjust its reporting framework accordingly. Nonethless, as a demonstration of management's commitment to sustainability and transparency, Celltrion has proactively chosen to prepare a report for the fiscal year 2024 with reference to Directive 2022/2464 and Commission Delegated Regulation 2023/2772.

The ultimate parent company of the entities included in this report is Celltrion Inc., located in South Korea, which publishes consolidated financial statement for all entities globally, including

all its European operations. The largest entity in terms of net revenue in the jurisdiction of the European Union is Celltrion Healthcare Hungary Kft. which is the parent company of all European entities (except Celltrion Healthcare Netherlands Bv., the only European entity that is a subsidiary of Celltrion Inc). However, its subsidiaries are not consolidated in its financial statement. Given Celltrion Healthcare Hungary's size in terms of revenue in the European Union, the management have decided that in the future this entity shall prepare a sustainability statement consolidating its subsidiaries as well as Celltrion Healthcare Netherlands Bv. by means of artificial consolidation (based on Transitional provision 48i). The scope of the consolidation includes Celltrion Healthcare Hungary and its subsidiaries and in addition, Celltrion Healthcare Netherlands Bv. The inclusion of the information of Celltrion Healthcare Netherlands Bv. was done on a voluntary basis, as the entity itself will likely exceed the thresholds for CSRD reporting in the future. Celltrion Healthcare France Sas and Celltrion Healthcare Italy s.r.l. currently exceed the threshold for CSRD large enterprises but at the moment do not to plan disclose a standalone report in the future[1]. They will include their information in the sustainability statement of Celltrion Healthcare Hungary. The list of consolidated entities for this report is shown in *Table 1*. These entities are commonly referred to as Celltrion Europe entities or Celltrion Healthcare Hungary and its subsidiaries throughout this report.

Table 1: List of consolidated entities

	Name of undertaking	Legal parent company
Reporting undertaking	Celltrion Healthcare Hungary Kft.	Celltrion Inc.
Scope of the sustainability statement	Celltrion Healthcare UK Ltd.	Subsidiary of Celltrion Healthcare Hungary Kft.
	Celltrion Healthcare Ireland Ltd.	Subsidiary of Celltrion Healthcare Hungary Kft.
	Celltrion Healthcare Denmark Aps.	Subsidiary of Celltrion Healthcare Hungary Kft.
	Celltrion Healthcare Austria GmbH.	Subsidiary of Celltrion Healthcare Hungary Kft.
	Celltrion Healthcare Italy s.r.l.	Subsidiary of Celltrion Healthcare Hungary Kft.
	Celltrion Healthcare Deutschland GmbH.	Subsidiary of Celltrion Healthcare Hungary Kft.
	Celltrion Healthcare Belgium Bv.	Subsidiary of Celltrion Healthcare Hungary Kft.
	Celltrion Healthcare Norway AS.	Subsidiary of Celltrion Healthcare Hungary Kft.
	Celltrion Healthcare France Sas.	Subsidiary of Celltrion Healthcare Hungary Kft.
	Celltrion Healthcare Finland Oy.	Subsidiary of Celltrion Healthcare Hungary Kft.
	Celltrion Healthcare Czech Republic Sro.	Subsidiary of Celltrion Healthcare Hungary Kft.
	Celltrion Healthcare Romania S.R.L.	Subsidiary of Celltrion Healthcare Hungary Kft.
	Celltrion Poland Sp. z o.o.	Subsidiary of Celltrion Healthcare Hungary Kft.
	Celltrion Switzerland GmbH.	Subsidiary of Celltrion Healthcare Hungary Kft.
	Celltrion Farmaceutica (España) SL.	Subsidiary of Celltrion Healthcare Hungary Kft.

[1] Based on current regulation they will be exempted from individual reporting as per Directive (EU) 2022/2464 Article 19a.

	Celltrion Portugal, Unipessoal Lda.	Subsidiary of Celltrion Healthcare Hungary Kft.
	Celltrion Sweden AB.	Subsidiary of Celltrion Healthcare Hungary Kft.
	iQone Healthcare Switzerland SA.	Subsidiary of Celltrion Healthcare Hungary Kft.
	Celltrion Healthcare Netherlands Bv.	Subsidiary of Celltrion Inc.
Reporting period	1st January 2024 – 31st December 2024	
Reporting cycle	Annual	

Value chain information and its limitations

Celltrion Europe entities are continuously collecting detailed information about the value chain, which results in varying levels of data depth and quality. Consequently, the representation of the value chain is provided on a best-effort basis, acknowledging these limitations.

The sustainability statement, as well as the double materiality assessment covers the own operations, downstream and upstream value chain of Celltrion Europe entities in relation to the identified material impacts, risks and opportunities.

The main stakeholders in the upstream value chain include Celltrion Inc., the sole producer of pharmaceuticals also responsible for R&D activity; Contract Manufacturing Organizations (CMOs); and logistics organizations responsible for transportation and warehousing. The management tasks related to manufacturing are handled by Celltrion Inc., including product transportation between South Korea and Europe.

In Europe, commercial and supply chain management departments belong to their own operations. They are responsible for handling sales and distribution amongst local customers and partners, ensuring compliance with local laws and regulations, thereby tailoring Celltrion's products to the European market.

Logistics partners - responsible for warehousing and delivery services - costumers, primarily consisting of wholesalers, patients, hospitals and governmental health organisations are part of the downstream value chain.

For more information about the value chain please see Chapter *1.2 Value chain*.

Information corresponding to intellectual property

Celltrion Europe entities did not take advantage of the opportunity outlined in ESRS to omit specific information that qualifies as intellectual property, know-how, or innovation results. The report discloses all relevant information, thereby ensuring completeness and transparency in sustainability reporting.

Disclosure of impending developments or matters in the course of negotiation

Celltrion Healthcare Hungary has not utilized any exemptions to withhold information regarding impending developments or matters under negotiation.

Disclosures in relation to specific circumstances

BP-2

Time horizons

Since this report is Celltrion Healthcare Hungary's first sustainability statement with reference to ESRS requirements, the data and information included in the report pertain solely to the reporting period. Regarding forward-looking information, the time horizons defined by ESRS are being used during the reporting process. Thus, short-term refers to a period of 1 year, medium-term to a period between 1-5 years, and long-term to a period longer than 5 years. Any deviations from these definitions will be indicated in the respective disclosure with justification.

Sources of estimation and outcome uncertainty

Celltrion strives for factual and accurate, clear and concise data provision, which also includes the most precise determination of metrics. Thus, for all disclosures that cannot be measured directly, estimates or assumptions were applied, the fact of which is clearly indicated in the report together with the level of uncertainty—if this is possible and available. These pieces of information related to measurement estimates and estimation uncertainty will be indicated at the relevant associated data tables. Additionally, if relevant, the process of data collection will be presented, as well as a summary of the techniques, methodologies and sources used for calculating or estimating the data, and the planned measures for future improvement of the data. These pieces of information related to measurement estimates and estimation uncertainty will be indicated at the relevant associated data tables.

Changes in preparation or presentation of sustainability information

The present sustainability report is the first of its kind issued by Celltrion Healthcare Hungary that incorporates ESRS requirements. As there are no prior figures for comparison, presenting changes in metrics for this reporting period is not applicable. 2024 was the first year to perform a double materiality assessment for the entities included in the report, consequently there are no changes to material impacts, risks and opportunities disclosed under *chapter 1.4 Impact, risk and opportunity management*.

Reporting errors in prior period

The presentation of reporting errors and changes related to the previous reporting period will be relevant in the next reporting cycle.

Application of sector specific standards

To accurately reflect the sustainability performance of key pharmaceutical sales and distribution activities of Celltrion Europe entities, the report also incorporates entity-specific standards, in addition to the European Sustainability Reporting Standards (ESRS). In the absence of EFRAG's sector-specific standards, Celltrion references widely recognized standards established by the Sustainability Accounting Standards Board (SASB) which is part of the International Financial Reporting Standards (IFRS) Foundation. Specifically, the Drug Retailers Standard, Biotechnology and Pharmaceuticals Standard, and Healthcare Distributors Standard have been used.

Reference to the paragraphs of the applied SASB standards

Standard	Reference of the applied paragraph(s)
SASB Drug Retailers Standard	HC-DR-230a.1 HC-DR-230a.2
SASB Biotechnology and Pharmaceuticals Standard	HC-BP-240b.2 HC-BP-240b.3 HC-BP-250a.1 HC-BP-510a.2.
SASB Healthcare Distributors Standard	HC-DI-250a.2 HC-DI-260a.1

For a comprehensive list of referenced information, please refer to Appendix 4.

Application of phase-in provisions

Celltrion Europe entities have the option to omit all disclosure requirements related to ESRS E4, ESRS S1, ESRS S2, ESRS S3, and ESRS S4 applying the phase-in provisions corresponding with appendix C of ESRS 1, as the average number employees does not exceed 750 on Celltrion Europe entities' consolidated balance sheet during the 2024 financial year. However, since the social topics outlined in ESRS S1, ESRS S2, ESRS S3, and ESRS S4 are material to Celltrion Europe entities, it has chosen to report on the disclosure requirements that pertain to identified material impacts, risks, and opportunities. This description of the requirements will provide valuable insights into the sustainability matters that are considered material for the organization.

1.2 Strategy

Strategy and business model

SBM-1

Global Presence

Celltrion Healthcare Hungary and its subsidiaries form part of the broader Celltrion Group, led by Celltrion Inc. - a globally recognized South Korean pharmaceutical company active in research and development, production, and distribution of biopharmaceutical antibodies and small molecules. Celltrion focuses on the sales of biopharmaceutical products, specifically antibody drugs used to treat tumors and autoimmune diseases, leveraging biotechnology.

Europe as a significant market

The significance of the European market and the European entities is underscored by the fact that the European Medicines Agency (EMA) was the first regulatory authority to grant approval for Celltrion's products outside of South Korea. Until 2020, Celltrion Europe entities primarily relied on indirect sales methodologies, leveraging strong partnerships with global pharmaceutical companies as local partners that distribute products to hospitals and patients. However, to align with long-term growth objectives and the need to strengthen the market presence, a transition to direct sales was initiated. In 2020, Celltrion Europe entities were first to transition into direct sales market, with Remsima being the first product sold directly to customers. Currently, Celltrion Europe entities are among the highest revenue generating regions for Celltrion Inc., reflecting significant market penetration. In the third quarter of 2024, market share recorded at 62% for Remsima, 31% for Truxima ,29% for Herzuma and 29% for Vegzelma.

Local markets

Celltrion European entities have been experiencing remarkable growth over the past few years, a trend that is anticipated to continue, leading to enhanced accessibility of healthcare products for patients. This expansion, while beneficial for patient care, is also expected to increase the environmental impact associated with production and distribution. In response to these challenges, the entities are committed to continuously developing comprehensive strategic approaches and internal processes that address environmental concerns. By prioritizing eco-friendly practices and innovative solutions, the organization aims to responsibly balance its growth.

Value chain

Value chain of Celltrion Europe entities

Upstream value chain

The value chain of Celltrion Europe entities is strategically oriented towards expanding access to innovative and affordable treatments throughout the region. To achieve this objective, a close collaborative relationship is maintained between Celltrion Europe entities and the parent undertaking. Celltrion Inc. is responsible for manufacturing and supplying the essential raw materials, while Celltrion Europe entities focus on distributing and selling products adapting to local needs.

Other upstream business partners are responsible for the transportation of products. They play a crucial role in ensuring that products are delivered efficiently and on time, maintaining the integrity of the supply chain. Celltrion Europe entities are positioned to streamline and effectively manage the upstream supply chain of the products and secure their inventory.

Own operation

Celltrion Healthcare Hungary, as the Marketing Authorizations Holder (MAH) for the products, plays a central role in the distribution of products by the European entities, as all products must be routed through it prior to further distribution within Europe. This position enables Celltrion Healthcare Hungary to ensure compliance with stringent regulatory standards while facilitating the efficient movement of products across the European regions. Celltrion Healthcare Hungary engages contract manufacturing organizations (CMOs) that provide fill-finish services. CMOs transfer bulk drug substances into containers, sealed, labeled, and packaged for distribution. This process includes rigorous quality control measures.

To guarantee that products are delivered to both the entities and consumers effectively, Celltrion Europe entities collaborate closely with third-party logistics providers (3PLs) and logistics partners. These partnerships ensure that the supply chain operates smoothly, maintaining the integrity and quality of the products throughout the distribution process. By leveraging these relationships, Celltrion Europe entities are well-positioned to meet the demands of the market and enhance customer satisfaction.

Sales personnel maintain close relationships with hospitals and other healthcare providers, providing essential product information, support, and training. This direct engagement helps Celltrion understand market needs and adapt its offerings, accordingly, enhancing customer satisfaction and loyalty.

Downstream value chain

Logistics partners are essential for providing warehousing services and facilitating the distribution of products across Europe. These partners ensure that products are stored under optimal conditions and delivered to customers in a timely manner. Direct customers of Celltrion

Europe entities are primarily wholesalers, who purchase products in bulk and distribute them to healthcare providers.

Products

SBM-1

Celltrion Inc. has a global presence with significant operations across Europe, its products are available in more than 19 markets across the continent. The products have achieved significant market penetration in Europe, making the region one of the largest revenue-generating areas for the company. Celltrion is dedicated to advancing biopharmaceutical innovation and holds a prominent position in research, development, production and distribution of pharmaceuticals. The company is recognized for its pioneering efforts in developing the world's first biosimilar monoclonal antibody, which has established a new paradigm in the global biopharmaceutical market. Celltrion focuses on providing therapeutic solutions for oncology, autoimmune and infectious diseases, with the below products introduced to the European market.

Overview on products sold by Celltrion Europe entities

Products listed, below, are based on the EU EMA 'marketing authorization approval as of the end of December 2024

1. Immunology Products

Product Name	Remsima	Remsima SC
	Remsima Infliximab	Remsima Infliximab SUBCUTANEOUS
Project	CT-P13	CT-P13 SC
Common Name	Infliximab	
Indications	Rheumatoid arthritis, inflammatory bowel disease	

Product Name	Yuflyma	Steqeyma
	Yuflyma adalimumab	SteQeyma ustekinumab
Project	CT-P17	CT-P43
Common Name	Adalimumab	Ustekinumab
Indications	Rheumatoid arthritis, inflammatory bowel disease	Psoriasis, inflammatory bowel disease

Product Name	Omlyclo
	Omlyclo omalizumab
Project	CT-P39
Common Name	Omalizumab
Indications	Asthma, urticaria

2. Oncology Products

Product Name	Truxima	Herzuma
	Truxima® Rituximab	Herzuma™ Trastuzumab
Project	CT-P10	CT-P6
Common Name	Rituximab	Trastuzumab
Indications	Non-Hodgkin's lymphoma, chronic lymphocytic leukemia	Metastatic breast cancer, metastatic gastric cancer

Product Name	Vegzelma
	Vegzelma™ bevacizumab
Project	CT-P16
Common Name	Bevacizumab
Indications	Metastatic colorectal cancer, non-small cell lung cancer

The primary product categories include biosimilars (such as Remsima, Remsima SC and Yuflyma) for autoimmune diseases as rheumatoid arthritis and inflammatory bowel disease. The primary products accounted for more than 80% of revenue across European entities in 2024. Remsima's market penetration for the third quarter of 2024 reached 62% in Europe[2]. Notably, there was a substantial increase in sales for Yuflyma, which saw a significant rise in various markets, reflecting its growing importance in the product portfolio.

The company is also engaged in selling medication to treat various forms of cancer such as Truxima for non-Hodgkin's lymphoma and chronic lymphocytic leukemia, Heruma for breast and gastric cancer and Vegzelma for colorectal and non-small cell lung cancer. These products reached around 30% market share.

In 2024, Celltrion introduced Steqeyma, a new product approved for treating moderate to severe plaque psoriasis and active psoriatic arthritis, generating a significant expansion in the company's offerings.

Celltrion Europe entities operate in the highly regulated pharmaceutical industry, where the sale of products is contingent upon obtaining authorization from EMA. The entities remain aligned with EMA approvals, ensuring that all products meet regulatory requirements before entering the market. There are several products waiting for approval by authorities in the European market.

[2] Source: IQVIA

Interests and views of stakeholders

SBM-2

Key stakeholders

Key stakeholders	Purpose of engagement
Celltrion Inc.	Celltrion Inc. is the sole provider of the products for Celltrion Europe entities. Continuous cooperation is essential, as Celltrion Inc., is responsible for the supply of pharmaceuticals that are being distributed by the European entities, being a key component of Celltrion Europe entities' value chain.
Customers	Cooperating with hospitals and health organizations to provide information regarding product safety, product demand and efficacy.
Warehouses	Contact is maintained to track product stocks and orders on a weekly basis, meanwhile conducting regular audits to ensure product safety.
Distributors	Continuous tracking and follow-up on deliveries.
Contractual manufacturing organizations (CMOs)	Ensuring the quality and efficiency of the fill& finish and labelling process. Collaboration is maintained to facilitate timely delivery of products and to address any production-related issues that may arise
Patient/industry organizations	Promoting the adoption of biosimilars, improving patient outcomes, and ensuring a sustainable healthcare ecosystem.

By involving stakeholders in the double materiality assessment, the Celltrion Europe entities gained valuable insights through a direct questionnaire into how stakeholders perceived its European operations. Recognizing the importance of direct feedback, Celltrion Hungary and its subsidiaries plan to engage an increasing number of stakeholders in future annual surveys. For a detailed overview of the stakeholder engagement process and its outcome, please see chapter "*Material impacts, risks and opportunities and their interaction with strategy and business model*.".

Celltrion Europe entities acknowledge that with commercial growth comes an increasing demand from customers for enhanced sustainability performance. As Celltrion expands its direct sales relationships, especially with government health organizations, the need for sustainability-related initiatives becomes even more pronounced. This rising demand requires a comprehensive review of sustainability practices, as it is also likely that environmental and social impacts associated with production and distribution will also need to be examined.

In response to evolving sustainability expectations and customer needs, Celltrion is committed to developing a strategic approach that addresses environmental concerns such as by implementing a carbon reduction plan, comprehensive sustainability policies and due diligence processes. To enhance the overall ESG management framework, a Global ESG Management Team was newly established in 2024 to focus specifically on managing ESG matters for Celltrion Inc.'s overseas entities. By proactively addressing sustainability concerns, Celltrion Europe entities aim to satisfy customers and maintain strong cooperation with national authorities, ultimately expecting to strengthen relationships with stakeholders in the long term and balance growth with a responsibility to environmental and social matters.

1.3 Governance

Governance structure of Celltrion Europe entities

GOV-1

The ultimate head of Celltrion Europe entities is the CEO, supported by two Vice Presidents, seated in South Korea, representing the highest-level of decision making.

The administrative and management bodies are present both locally in Europe as well as in South Korea. The department for Global Sales Business Group oversees the centrally established functional departments (such as HR and finance) that fall under the Global Business Management Unit and the Europe Divisions forming four regional headquarters (RHQ). The RHQs and countries included within are included in the table below.

Designation of regional headquarter	Countries within the regional headquarter
RHQ 1	Germany, Switzerland, Austria, Norway, Finland, Sweden, Denmark
RHQ 2	Ireland, UK, France
RHQ 3	Benelux, Czech Republic, Poland, Hungary, Italy
RHQ 4	Portugal and Spain

The four RHQs are led by the appointed regional managers, as local CEOs. They provide expertise in regional matters and report directly to the global CEO and Vice Presidents and the global functional departments. Respective leaders of the RHQs can be found in table "*The composition of administrative, management and supervisory bodies"* below. The global functional departments are in close collaboration with the regional headquarters. They are responsible for global coordination, decision making and strategy, considering global circumstances. The operation is complemented by a dedicated business unit for supply chain management under the control of the Global Business Support Division.

Currently, Celltrion Europe entities do not have representation of employees and other workers within the administrative, management and supervisory bodies.[3] However, employees can report their concerns, opinions through the grievance channel (Speak-up[4]), which – if needed - can be reported to the administrative, management and supervisory bodies.

Sustainability governance and competence of top management

GOV-1

With wide expertise and experience in pharmaceutical industry, value chain and geographic regions, the top management provides a strong foundation for guiding our sustainability actions. The CEO offers insights into social responsibility, governance risks, and environmental challenges from leading international operations. The Head of the Global Business Management Unit has experience in finance, compliance, and ESG, enabling effective risk management. The

[3] Percentage of independent board members is 0%.

[4] See more information about the Speak-up Channel in chapter 3.1.1 Working conditions - Processes for addressing employee concerns

Head of the Europe Division focuses on social and governance aspects in the European market, leveraging insights into sales activities to understand relevant risks and environmental trends. Global ESG Management Team is tasked with overseeing sustainability related impacts, risks and opportunities.

Expertise and competence of top management

Led by: Hyoungki Kim (CEO)	
Global Sales Business Group The unit is responsible for the oversight and strategic management of all international subsidiaries, including those located in Europe. They ensure operational alignment with corporate objectives, manage risks associated with environmental, social, and governance (ESG) factors.	Competence: • Holds an MBA degree from 'University of Michigan • Currently serves as CEO of Celltrion Inc. and leads Global Sales Business Group

Led by: Hangi Lee	
Global Business Management Unit Lead by the Senior Executive Vice President of Celltrion Inc., the Unit is situated in the South Korean Headquarters and houses global departments, also known as administrative bodies, supervising the ESG, finance, compliance, HR and internal control related activities on a global level. If necessary, the departments can fulfil operational tasks on behalf of the European Celltrion entities.	Competence: • Holds a Korean Institute of Chartered Public Accountants (KICPA) license • Currently serves as head of Global Business Management Unit

Led by: Taehun Ha	
Europe Division[5] Under the Global Sales Business Group, the Vice President is seated in Europe and specifically oversees sales and marketing of the European entities. Regional Headquarters and general managers are administrative bodies under the Europe Division, the Vice President also serves as Regional General Manager for RHQ 4 (Portugal & Spain).	Competence: • Holds an MBA degree from Yonsei University • Currently serves as the head of Europe Division

Composition and diversity of the administrative, management and supervisory bodies

GOV-1

Information about members of administrative, management and supervisory bodies by gender

Percentage of members of administrative, management and supervisory bodies by gender	
Percentage of men (%)	91%
Percentage of women (%)	9%
Board's gender diversity ratio (%)[6]	9%

The composition of administrative, management and supervisory bodies

Name	Position		Gender
Supervisory body			
Hyoungki Kim	CEO (Head of Global Sales Business Group)	Executive	Male

[5] Europe Division is part of the Global Sales Business Group of Celltrion Inc. covering Celltrion Europe entities

[6] The Board's gender diversity is calculated as an average ratio of female to male board members.

Hangi Lee	Senior Executive Vice President (Head of Global Business Management Unit)	Non-executive	Male
Taehun Ha	Vice President (Head of Europe Division) Regional General Manager for RHQ 4	Non-executive	Male
Administrative and management body			
Minhyeok Yoo	Regional General Manager for RHQ 1	Non-executive	Male
Dongsik Kim	Regional General Manager for RHQ 2	Non-executive	Male
Wonsik Yoo	Regional General Manager for RHQ 3	Non-executive	Male
Changwan Park	Head of Global HR Department	Non-executive	Male
Hyunsub Jeong	Head of Global SOX Department	Non-executive	Male
Joochul Park	Head of Global Finance Department	Non-executive	Male
Jonghoon (Scottie) Kim	Head of Global Compliance & ESG Department	Non-executive	Male
Jungho Bak	Head of Business Support Division & SCM Department	Non-executive	Female

Sustainability-related performance in incentive schemes of top management

E1.GOV-3

Administrative, management and supervisory bodies listed in the table above had no sustainability-related considerations factored into their remuneration in the financial year ending at 31.12.2024.

Sustainability management

GOV-1, GOV-5

The Global ESG Management Team plays a crucial role in overseeing the sustainability-related governance processes in Europe. The team ensures that environmental, social, and governance matters are effectively managed across all countries. On behalf of the top management, the team supports Celltrion Europe entities in setting targets, establishing policies and implementing actions. They are under the Head of Global Compliance and ESG department and ultimately reports to the Global Management Unit, led by the Senior Executive Vice President.

When managing environmental, social and governance matters the Global ESG Management Team consults and engages with the relevant parties (i.e. operations managers, human resources, supply chain managers, sales managers). Any significant findings are reported to the supervisory bodies and consultations are held with the relevant parties to appropriately address the situation.

The Global ESG Management Team's tasks include conducting an annual ESG-related regulatory screening and a supply chain sustainability risk assessment. In 2024, the assessment was limited to the Hungary office, however, plans are in place to extend it to all other European entities in the next year.

In addition, the Global ESG Management Team also performs an annual double materiality assessment (DMA) to identify material risks, opportunities, and impacts. The main goal is to develop the coherence of ESG related targets, actions, and strategy amongst the European entities. The results of the DMA are reviewed by the administrative, management and supervisory bodies, which gives them insights into the material sustainability matters within the European operation. These inputs are considered in strategic decision making and risk management decisions. Furthermore, the Global ESG Management Team ensures that the impacts, risks and opportunities identified are aligned with internal policies and processes. The team establishes sustainability targets through a bottom-up process, involving consultations with each country to

set realistic objectives. These targets are then confirmed by the heads of the relevant entities and final approval is given by the Head of the Global Business Management Unit.

In conclusion, the result of the DMA is used as a basis for creating adequate internal processes, including risk management and operational activities to manage the aforementioned sustainability matters.

The list of material impacts, risks and opportunities and applied internal controls addressed by the companies during the reporting period are disclosed in chapter *1.4.1 Material impacts, risks and opportunities and their interaction with strategy and business model* of this document.

Risk management and internal controls over sustainability reporting

GOV-2, GOV-5

Internal controls are vital for effectively overseeing, managing, and reporting on sustainability issues within an organization. Risks related to data integrity, accuracy, and information availability are reduced by these controls, ensuring that operations are conducted in a transparent, reliable manner and in compliance with regulations.

To mitigate risks associated with sustainability reporting, Celltrion Europe entities implement the following actions:

- The Global ESG Management Team provides guidance on data collection. To minimize reporting errors, screenings are conducted by the team for any discrepancies. If any errors are suspected, the team promptly reaches out to the data-providing entity to address the issues.
- The reviewed and corrected data, together with the final sustainability report, are submitted for approval by the head of the Global Compliance & ESG department.
- Before the final publication of the report, it undergoes a final check by the General Managers of each Europe entity as well.

This year's data collection marks the first year of collecting comprehensive ESG data applicable to all European entities. While data is currently collected on an annual basis, the development of a formalized reporting process presents an opportunity to enhance data accuracy, strengthen risk management, and further improve the consistency and reliability of future disclosures.

Over time, Celltrion Europe entities plan to increase the frequency of data collection to quarterly intervals, ensuring there is adequate time to address any risks and identify potential issues early on. In the future they also intend to have the material data assured by a third party.

1.4 Impact, risk and opportunity management

1.4.1 Material impacts, risks and opportunities (IROs) and their interaction with strategy and business model

SBM-3

This chapter provides an overview of the material risks, opportunities, and impacts associated with the activities of Celltrion Europe entities, as identified through the first double materiality assessment. The IROs primarily arise from the downstream value chain resulting from their operation such as interaction with customers and suppliers mainly on the medium-term/long-term.

With reference to the principle of faithful representation[7] defined in ESRS 1, the companies disclose both negative and positive dimensions of current and potential impacts. Sector specific requirements such as regulatory environment was reflected in the assessment of the IROs. A comprehensive list of all material IROs is included in the table below.

[7] Faithful representation requires information to be (i) complete, (ii) neutral and (iii) free from error

List of material impacts, risks and opportunities identified by Celltrion Europe entities

Material sustainability topic	Occurring impact, risk or opportunity	Description of the impact, risk opportunity	Business model & value chain	Time horizon
ESRS E1 Climate change				
Climate change mitigation	Positive impact	Celltrion Europe entities can monitor their GHG emissions (Scope 1&2) and set up appropriate goals to reduce the emissions to mitigate climate impact.	Own operation	Short/Long-term
	Opportunity	Optimization efforts made in their ground transportation activities result in cost reductions for Celltrion Europe entities. (Overall reducing greenhouse gas emissions can also help save electricity cost, fuel cost, etc)		Short/Medium-term
ESRS E5 Circular economy				
Resource outflows related to products and services	Opportunity	Customers' requests regarding environmentally friendly packaging is constantly growing, transitioning to sustainable packaging, thereby reducing their environmental impact, can enhance the reputation of Celltrion Europe entities and act as a plus factor in bidding.		Short term
Waste management	Opportunity	Customers' requests regarding environmentally friendly packaging is constantly growing. Transitioning to sustainable packaging, thereby reducing their environmental impact, can enhance the reputation of Celltrion Europe entities and act as a plus factor in bidding.		Short term
ESRS S1 Own workforce				
Equal treatment and opportunities for all	Positive impact	Celltrion Europe entities could set up a transparent system to measure the performance of employees to ensure that all employees are granted a fair opportunity for compensation and promotion.	Own operation	Short/Long-term
Working conditions	Positive impact	Celltrion Europe entities have a proper and well-built system to compensate their employees through differentiating compensation and other additional benefits.	Own operation	Short/Long-term
	Opportunity	Celltrion Europe entities well-built system to ensure working conditions in compliance with the regulations can prevent the firm from being fined or sued and the attractive compensations can maintain the workforce and reduce the costs of recruitment.		Long-term
ESRS S2 Workers in the value chain				
Working conditions	Risk	Due to the upcoming legal requirements (such as the Corporate Sustainability Due Diligence Directive), Celltrion Europe entities can face fines if they fail to comply with relevant monitoring and reporting measures in its value chain.		Medium-term
ESRS S3 Affected communities				
Communities' economic, social and cultural rights	Opportunity	Positive company perception can increase sales.		Medium/Long-term
	Positive impact	Selecting suppliers who have goals on ESG matters, especially for environment and society, can help Celltrion Europe entities to have indirect positive impact to the society and environment.	Upstream	Short/Medium-term
	Risk	With CSDDD to come into effect, Celltrion Europe entities may get regulatory fine for not properly managing their supply chain activities regarding community rights.		Medium-term
ESRS S4 Consumers and end-users				
Information-related impacts for consumers and/or end-users	Positive impact	Compliance with the responsible marketing-act can avoid the misinformation of customers.	Downstream	Short/Long-term
	Positive impact	Conducting programs that aim to provide more detailed information on proper usage of products.	Downstream	Short/Medium-term
	Opportunity	Proper description about Celltrion Europe entities products enhance customer understanding on safety usage and increase sales volume.		Medium-term
	Positive impact	Providing trainings and adequate information on products for sales employees could help transmit proper information to pharmaceuticals professionals and end-users.	Own operation	Short/Long-term
Personal safety of consumers and/or end-users,	Positive impact	Communication with patients and healthcare professionals to collect relevant information regarding drug safety.	Downstream	Short/Long-term
	Positive impact	Creating studies and worldwide collection of patient safety data to identify risks and reduce the possibility of the unsafety.	Downstream	Medium/Long-term

including drug safety	Positive impact	Well-controlled, regularly tested and monitored procedures are in place to ensure product safety and compliance with relevant regulations.	Upstream	Medium/Long-term
	Risk	Miscommunication might damage Celltrion Europe entities reputation and the relationship with their customers which might lead to loss of market share and decrease in sales volume due to the highly competitive market environment.		Long-term
	Opportunity	Robust quality controls can lead to higher product quality, which in turn can increase consumer trust resulting in repeat purchases.		Medium-term
Social inclusion of consumers and/or end-users	Positive impact	Enabling better access to medication in remote places, where healthcare is less accessible.	Downstream	Medium-term
	Positive impact	Providing sample distribution programs to enhance social inclusion by giving access to as many people as its possible.	Downstream impact	Short-term
	Opportunity	If the drugs are affordable, it can increase number of consumers who gain access to treatments, resulting in an increase in sales volume for Celltrion Europe entities. (A regulation or policy that promotes social inclusion of pharmaceutical products can lead to increase in sales of biosimilar (Celltrion's products)		Medium/Long-term
ESRS G1 Business conduct				
Corporate culture	Positive impact	Communicating clear company vison and focusing on ethical values such as fairness, integrity within Celltrion Europe entities can attract talent.	Own impact	Short/Long-term
Corruption and bribery	Positive impact	Strict anti-corruption measures and employee training can prevent unethical behaviour.	Own impact	Short/Long-term
	Positive impact	Past experience, memberships of industry organizations can positively influence anti-corruption practices of Celltrion Europe entities.	Own impact	Short/Long-term
	Positive impact	Requiring suppliers to follow anti-corruption policies can maintain integrity and compliance.	Downstream impact	Medium/Long-term
	Opportunity	Commitment against and prohibition of corruption and bribery across the value chain improves business practices and helps avoid prosecution.		Short term
Political engagement and lobbying	Positive impact	Industry associations, of which Celltrion Europe entities are a member, play an active political role in, has several positive effects on end-users and the entire supply chain.	Own impact	Medium-term
	Neg. impact	The lack of professional qualifications related to political engagement or lobbying activities can pose a risk to maintaining compliance.	Own impact	Medium/Long-term
	Risk	Failure to adequately monitor and counteract the political commitments and lobbying activities of competitors can result in a competitive disadvantage and loss of market share.		Short/Medium-term
	Risk	The lack of appropriate professional qualifications to engage with political parties or lobbying could pose as a potential financial risk for Celltrion Europe entities.		Short/Medium-term
	Opportunity	Participation in industry associations and compliant lobbying activities can create additional market opportunities.		Short-term
	Opportunity	Positive market influence through active, ethical political engagement and lobbying activities.		Short-term
Protection of whistle-blowers	Positive impact	Providing strong whistleblower safeguards and related training opportunities for employees can foster ethical conduct.	Own impact	Long-term
	Opportunity	Whistleblowers can often reveal information that indicates serious financial and legal risks. Addressing such abuses in a timely manner can reduce potential associated fines and litigation costs.		Long-term
Industry specific				
Affordability and pricing[8]	Positive impact	The products of Celltrion Europe entities are always priced lower to make them affordable and accessible worldwide.	Downstream impact	Short-term
	Positive impact	Fostering competitive dynamics in the markets through the sale of biosimilars leads to lower prices and improved access to the market.	Downstream impact	Short-term
	Opportunity	The trust between Celltrion Europe entities and their customers can lead to increased volumes and higher market penetration.		Short-term
	Risk	Thin margins, low product differentiation and additional competitors can potentially cause financial risk in the future.		Short-term

[8] Industry specific material topic, disclosed under ESRS S4

Counterfeit drugs[9]	Opportunity	Celltrion Europe entities can avoid legal prosecution and fines by proper supplier evaluation and internal counterfeit drugs' control mechanisms.		Long-term
	Positive impact	Celltrion Europe entities collaborate with the appropriate teams at Celltrion Inc. to guarantee engagement with only GDP-certified distributors, thereby preventing counterfeit drugs from entering the distribution network and harming consumers.	Upstream impact	Long-term
	Positive impact	Celltrion Europe entities and their subsidiaries only engage with distributors that have GDP license to ensure the prevention of counterfeit drugs entering the distribution network.	Downstream impact	Long-term
	Positive impact	Through a serialization system, Celltrion Europe entities ensure that counterfeit drugs do not enter the supply chain system (regulatory requirement by the EMA).	Upstream impact	Long-term
Privacy and data security[10]	Positive impact	Celltrion Europe entities comply with the EU GDPR and other relevant regulations, resulting in positive impact on the employees and patients' data protection.	Own impact	Medium/Long-term

[9] Industry specific material topic, disclosed under ESRS S4
[10] Industry specific material topic, disclosed under ESRS G1

During the materiality assessment Celltrion Europe entities identified material risks and opportunities that could significantly affect the financial performance of the entities. Key financial risks identified, include:

- Compliance with stringent regulations is critical, as non-compliance could lead to fines of up to 10% of global turnover.
- Maintaining robust quality control is essential to avoid significant fines related to product safety and counterfeit drugs. Failure in quality control can result in significant penalties, with financial fines between or potentially exceeding €500,000 - €1 million.
- The competitive pharmaceutical landscape necessitates ongoing monitoring of competitors to safeguard market share amidst thin margins.
- Regulatory non-compliance concerning own workforce can result in substantial financial penalties varying widely by local regulations.
- The Corporate Sustainability Due Diligence Directive (CSDDD) and the Corporate Sustainability Reporting Directive (CSRD) pose risks to future anticipated financial impacts. Failure to adhere to CSDDD regulations could result in fines of up to 5% of global turnover.

Financial opportunities include:

- Continuous sales growth is driven by increasing trust from European customers, supported by growing engagement with patient organizations and industry participation, which has been one of the top contributing factors to Celltrion's success over the last years and will be kept as a strategic focal point in the future.
- Ongoing transportation optimization efforts, which are expected to yield substantial cost reductions, such as projected savings of €16 million from switching to pallet shipments in Hungary.
- Use of environmentally friendly packaging is an increasing requirement during bidding processes. Although the financial impact is difficult to quantify, by increasing the rate of sustainable packaging, Celltrion Europe entities can enhance their competitiveness in tenders.
- By transitioning to sustainable packaging, the company can not only reduce its environmental impact but also enhance its reputation in the market as customer demand grows for environmentally friendly packaging. This improved reputation can serve as a competitive advantage potentially leading to increased sales and customer loyalty.

To address material impacts, risks and opportunities Celltrion Europe entities acknowledge the importance of strengthening the internal systems for quality control and to address changes in the regulatory environment. By establishing Due Diligence Policy and Supplier Code of Conduct effective from 2025, Celltrion Europe entities plan to actively manage impacts risks and opportunities arising from the downstream value chain.

In order to gain deeper understanding on how impacts, risks and opportunities interact with the business model, Celltrion Europe entities are in the process of enhancing data collection methods to better assess and understand the actual financial impact of risks and opportunities on their financial position, performance, and cash flows. Additionally, the company plans to prepare a comprehensive resilience analysis. The resilience analysis will be conducted once material physical or transitional risks are identified within Celltrion Europe entities.

1.4.2 Description of the process to identify and assess material impacts, risks and opportunities

IRO-1, IRO-2

Double materiality assessment

For the first time in 2024, Celltrion Europe entities conducted a double materiality assessment in line with the requirements of ESRS 1 and 2. The main goal of the assessment was to identify and evaluate the potential and actual, positive and negative impacts that the companies have on the environment and society (impact materiality), as well as the risks and opportunities that affect the entities (financial materiality). The assessment covered all entities to be included in the CSRD report: Celltrion Healthcare Hungary, its subsidiaries, as well as Celltrion Healthcare Netherlands, considering the entire value chain including and the upstream and downstream activities. The assessment was performed through the following steps:

Preparation of sustainability context

As the first step of the double materiality assessment process, a so-called long (expanded) topic list was compiled, which included subtopics defined in the table corresponding to Application Requirement 16 of the ESRS 1 'General Requirements' standard. The preparation of the long list focused on mapping the potential sustainability topics that could be relevant for Celltrion European entities during the DMA. The long list was enhanced with sustainability topics from industry specific benchmarks, the examination of Celltrion's own business model, and industry recommendations (for example SASB, GRI).

Based on the long list, a relevance analysis was conducted by internal stakeholders using an online questionnaire. As a result, the shortlist of sustainability topics that served as the basis for the double materiality assessment was created.

1.4.3 Identification of impacts, risks and opportunities (IROs)

During the materiality assessment internal stakeholders (Europe office employees and management, HQ employees and management, etc.) were involved through a series of workshops to discuss and identify actual and potential impacts, risks, and opportunities derived from the shortlist of topics, leveraging the expertise and insights of those with in-depth knowledge of the organization's operations and sustainability challenges.

The IROs were identified across the upstream, downstream value chains and own operation considering different time-horizons.

The time-horizons applied were:

- Short-term: under 1 year
- Medium-term: 1-5 years
- Long-term: over 5 years

1.4.4 Evaluation of impacts, risk and opportunities

IRO-1

Internal stakeholders evaluated impacts by scale, scope and likelihood as well as irreversibility[11] in case of negative impacts. Risks and opportunities were reviewed in terms of scale and likelihood. The Global ESG Management team also participated in the evaluation of topics since the team has a comprehensive view on the potential and actual ESG-related expectations on EU operation of Celltrion.

External stakeholders whose interests are positively or negatively affected, or may be affected, by the activities of Celltrion and its (in)direct business relationships throughout the entire value chain were also consulted during the impact materiality assessment process. Their opinion was provided through an online questionnaire, where they were asked to assess relevant ESRS sub-topics and industry specific topics. Participants were invited to score sustainability topics based on the scale (severity) of potential positive or negative impacts related to the listed sustainability topics.

Consolidation of results

The scoring of scale, scope, likelihood and irreversibility impacts were averaged providing a quantitative final score. The results of the external stakeholder questionnaire were incorporated into the scale dimension of the impacts with weighted average method.

Similarly scoring of scale and likelihood of risks and opportunities were averaged again providing a quantitative final score.

Defining thresholds for impact and financial materiality

IRO-2

Following the impact and financial materiality assessments thresholds were set to differentiate between topics of varying significance, ensuring that only those exceeding a certain level of materiality threshold would be considered relevant to the companies. To determine the materiality threshold, a statistical approach was used as a primary tool, reducing the square variance among the sustainability topics. This method involved a quantitative analysis to identify a cut-off point that reduces the dispersion of scores ensuring a more uniform distribution of materiality across the topics.

To validate thresholds, the identified material topics were cross-referenced with the material sustainability topics of benchmarked companies and sector-specific standards. This comparative analysis ensured that the topics were in line with industry norms and best practices.

By utilizing both an approximative method and benchmark validation, Celltrion Europe entities aimed to create a robust and defensible framework for scoring which reflects both their focus areas and best market practices. The thresholds for impact and financial materiality were the following:

- Impact materiality threshold: 2,5 on a scale of 5
- Financial materiality threshold: 1,5 on a scale of 3

[11] Material topics were evaluated based on ESRS 1 AR10.

Validation of results

According to the ESRS, any sustainability issue that exceeds the established threshold value in terms of impact or financial materiality, or both, must be considered significant. Thus, by applying the threshold values, a list of material topics was generated. Internal experts further evaluated and confirmed that the selected material topics accurately represented the sustainability context of Celltrion Europe entities.

The Global ESG Management Team validated and approved the material topics before submitting them to the executive management. The list of material topics was approved by the Managing Directors of Celltrion Healthcare Hungary, their signature validating the completeness of material topics and finalizing the DMA process.

Material topics of Celltrion Europe entities in 2024

Material topics	Basis of materiality			
	Impact materiality		Financial materiality	
	Positive	Negative	Risk	Opportunity
Climate change mitigation	X			X
Resource outflows related to products and services				X
Waste management				X
Equal treatment and opportunities for all	X			
Working conditions of own workforce	X			X
Working conditions of workers in the value chain			X	
Communities' economic, social and cultural rights	X		X	X
Information-related impacts for consumers and/or end-users	X			X
Personal safety of consumers and/or end-users, including drug safety	X		X	X
Social inclusion of consumers and/or end-users	X			X
Corporate culture	X			
Corruption and bribery	X			X
Political engagement and lobbying	X	X	X	X
Protection of whistle-blowers	X			X
Affordability and pricing	X		X	X
Counterfeit drugs	X			
Privacy and data security	X			

Disclosure Requirements in ESRS omitted from the undertaking's sustainability statement

Topics below the applied materiality threshold were deemed not relevant for the company and are not covered by the sustainability report. The following ESRS topical standards were determined to be not material and were therefore omitted from the report.

- E2 – Pollution
- E3 – Water and marine resources
- E4 – Biodiversity

Celltrion European offices, being sales offices located in business hubs of large cities, have minor impact on pollution, water and marine sources and biodiversity. The potential negative impacts regarding pharmaceutical production are considered limited for Celltrion Europe entities, as manufacturing activities are fully managed by the parent company, Celltrion Inc.

2. Environmental Information

Celltrion Europe entities recognize that natural resources are finite and that human activities have a significant impact on the environment. The entities are committed to making a positive contribution beyond healthcare by actively addressing key environmental challenges, including climate change and sustainable resource management. Acknowledging the close interconnection between environmental sustainability and human actions, Celltrion embraces a shared responsibility to work alongside the international community in tackling global environmental issues. Through these efforts, Celltrion European entities aim to drive meaningful progress toward a more sustainable future.

2.1 ESRS E1 - Climate change

Celltrion Europe entities acknowledge the profound and far-reaching impacts of climate change on public health, global economies, and the pharmaceutical industry. As part of their corporate responsibility, the entities are committed to understanding and addressing climate-related risks and opportunities across the operations and value chain. This includes a strategic focus on building climate resilience, enhancing data transparency, and aligning with evolving regulatory expectations and stakeholder demands. By laying the foundation for science-based approaches to emissions quantification and sustainability integration, Celltrion Europe entities aim to contribute meaningfully to the global transition toward a low-carbon, climate-resilient future.

2.1.1 Climate Change Mitigation

Material impact, risk and opportunity management related to climate change mitigation

ESRS 2 IRO-1

Material sustainability topic	Identified IRO	Description	Value chain	Time horizon
Climate change mitigation	Positive impact	Celltrion Europe entities can monitor their GHG emissions (Scope 1&2) and set up appropriate goals to reduce the emissions to mitigate climate impact.	Own operation	Short/Long-term
	Opportunity	Optimization efforts made in their ground transportation activities result in cost reductions for Celltrion Europe entities. (Overall reducing greenhouse gas emissions can also help save electricity cost, fuel cost, etc)		Short/Medium-term

The double materiality assessment evaluated climate and environmental impacts, risks, and opportunities by analysing emissions deriving from both the own operation and the value chain. Celltrion Europe entities have impacts related to climate change mitigation from two primary aspects: they focus on reducing their emissions related to offices and decreasing Scope 3 emissions through the optimization of their transportation activities.

Climate change mitigation through a comprehensive greenhouse gas (GHG) emission monitoring

Accounting for GHG emissions is the fundamental step in mitigating climate change as it allows companies to properly assess where emissions occur. In addition, requests from the customer on Celltrion Europe entities' GHG emissions are increasing as the customers set goals to achieve carbon neutrality. To proactively mitigate climate change impact from own operation and satisfy with the customer's request, Celltrion Europe entities began to monitor and assess GHG emissions in 2024. Tracking emissions not only enhances transparency and accountability but also aligns with broader industry trends toward sustainability, enabling the company to effectively mitigate its climate impact.

Cost reduction through optimization of product distribution, leading to reduced Scope 3 emissions

Celltrion Europe entities arrange and organize transport and logistics solutions for the distribution of pharmaceuticals, which are executed by third-party operators. Consequently, most CO_2 emissions are classified as indirect transportation emissions, falling under the Scope 3 emission category. The optimization of ground transportation activities offers a significant opportunity for Celltrion Europe entities to reduce costs while enhancing sustainability. By adopting innovative logistics strategies that prioritize low- and zero-emission solutions, such as monthly forecasts for product mix orders and the utilization of temperature-controlled vehicles (TCV-s) that allow for larger product volume transportation, the organization can lower greenhouse gas emissions and decrease expenses related to fuel and electricity. This approach not only supports the company's medium-term sustainability objectives but also aligns with the growing market demand for environmentally responsible practices.

The company is committed to aligning its anticipated future business growth in the European market with efforts to reduce emissions, ensuring that rapid expansion does not lead to a corresponding increase in greenhouse gas emissions.

Physical and transitional climate risks

E1.IRO-1, E1.SBM-3

Celltrion Europe entities have not yet conducted an overall evaluation of physical and transitional climate risks related to their operations. The companies acknowledge several risks categories that might influence their operations. Physical climate risks are driven by acute and chronic climate events. Acute physical risks arise from hazards, especially weather-related events such as storms, floods, fires or heatwaves. Chronic physical risks arise from long-term changes in the climate, such as temperature changes. Transition risks are related to the shift to a low-carbon economy, typically include policy, legal, technology, market and reputational risks.

During the double materiality assessment, internal stakeholders identified potential physical and transition risks with possible impact on business operation along the value chain. When doing so Celltrion Europe entities have relied on professional experience, existing data, industry trends and knowledge to inform their understanding of climate-related risks and opportunities over the short, medium, and long-term. Among physical risks, Celltrion Europe entities are impacted by extreme changes of temperature, as their pharmaceuticals are temperature-sensitive and must be maintained at specific temperatures during storage and transportation. Transitional risks have been also identified, including global regulatory and policy developments related to emission mandates and reporting, shifts in consumer preferences, reputational concerns, and changes in investment focus.

Celltrion's European entities currently assess climate-related physical and transition risks through direct evaluations of their operations and value chain emissions. Based on the current assessment, exposure to transitional climate risks is considered low. While formal scientific analysis and climate scenario modelling have not yet been incorporated, the entities are committed to progressively advancing their climate risk management approach by integrating more comprehensive methodologies, including scenario-based assessments, as part of their ongoing sustainability strategy.

Resilience analysis

E1.SBM-3

As of now climate-related risks do not pose significant concern for the organization based on the understanding of the leadership team. For this reason, Celltrion Europe entities have not yet conducted a resilience analysis concerning climate-related risks and their impact on the business strategy. The organization has not identified any material climate-related risks so the use of climate scenarios and a classification to physical and transitional climate related risk is not yet applicable.

Transition Plan

E1-1

Celltrion Europe entities, other than Celltrion Healthcare UK, do not have a transition plan in place. The company plans to adopt a comprehensive transition plan in financial year 2025. This plan will outline the strategies and actions necessary to address climate-related risks and opportunities, aligning with the organization's sustainability goals and commitments to reducing its environmental impact.

Policies related to climate change mitigation

E1-2

Currently Celltrion Europe entities do not have policies that address climate change impacts and include mitigation strategies. An environmental policy will be available from 2025 onwards for the companies. On a subsidiary-level, Celltrion Healthcare UK has a publicly available decarbonisation plan, meanwhile Celltrion Healthcare Sweden has prepared an environmental policy.

The carbon reduction plan adopted by the UK office includes a commitment to achieve net-zero emissions by 2045. To reach this goal the company has set carbon reduction targets aligned with the Science Based Targets initiative (SBTi) 1.5 °C pathway. *Please see the quantitative targets in the Targets related to climate change mitigation* chapter. The targets and actions described in the policy only applies to Celltrion Healthcare UK and the regional general manager of RHQ2 (discussed in chapter *1.3 Governance*) is responsible for ensuring that the entity meets these targets.

Celltrion Sweden has an internal Environmental Policy in effect from 2024. As per the policy, the company exercises environmental due diligence across its supply chain, monitors environmental risks identified and addresses them within the supply chain. Currently, the entity does not have a net-zero target. However, the policy obliges the entity to set its net-zero target by 2026. The head of Global Compliance and ESG department oversees this Environmental Policy.

Actions related to climate change mitigation

E1-3

A significant portion of the carbon emissions result from transportation of products from South Korea to Hungary and from distribution of products within the European Union via subcontractors. Therefore, the success of utilizing decarbonization levers is heavily reliant on engaging and collaborating with partners throughout the value chain to enhance energy efficiency and promote the use of renewable energy.

Celltrion Europe entities key strategies for reducing emissions from the downstream value chain include optimization of container allocation, improving efficiency in route planning and prioritizing suppliers with proven carbon mitigating practices. Pursuing greener logistics, the organization monitors its key logistic provider's actions through due diligence schemes. Additionally, the company is committed to implementing energy-efficient operations in leased logistics centres, particularly in areas where temperature-sensitive pharmaceuticals are stored, to further reduce overall energy consumption and emissions.

Following the key strategies the organization prepares monthly forecasts of biosimilar orders securing a streamlined order schedule each week. The schedules are further refined at weekly management meetings to optimize the quantity and product mix before orders are sent to the suppliers. After ensuring there is no surplus order, the Celltrion Europe entities optimize the containers and vehicles required for transportation, whereby switching from insulated containers to TCV-s that can carry larger volume of products in a single shipment. Through optimizing its transportation routes and solutions Celltrion Europe entities expect a significant decrease in Scope 3 emissions.

In addition to the group-level actions, there are actions implemented at a local level from each entity to minimize the impact regarding climate change.

Celltrion Healthcare UK has disclosed a long-term goal of achieving net zero emissions by 2045, by reducing Scope 1,2 and 3 emissions by 42%. As part of this goal Celltrion Healthcare UK has launched Project Iceland in July 2024. The program is expected to be completed by June 2027 and aims to increase ground transportation efficiency and optimization. In light of this, the company has improved the efficiency of its distribution model by reducing unnecessary intermediaries in the supply chain.

In addition, Celltrion UK introduced a cycle to work program that allows employees to purchase bicycles at a lower price, promoting an environmentally friendly alternative to employee commuting, which ultimately contributes to the reduction of Scope 3 emissions of Celltrion UK.

Initiatives successfully completed during 2024 resulted in a 14% decrease in overall Scope 3 emission compared to 2023 and forecast significant savings in warehousing and distribution costs for Celltrion Healthcare UK.

To ensure that net zero carbon reduction targets are met by 2045, Celltrion Healthcare UK has future carbon reduction initiatives planned for the upcoming years, such as:

- Implementing a business travel booking system for more efficient business trips and enhanced GHG emission monitoring.
- Switching all petrol/diesel company vehicles to Hybrid/EVs.
- Engaging with transportation suppliers with climate action goal (i.e. setting up selection criteria that investigates supplier climate action).
- Organizing office campaigns to limit unneeded and unnecessary lighting, cooling, and heating.

- Ensuring where possible that purchased energy originates from renewable sources.
- Collecting more detailed GHG data and increasing transparency through reporting.

Celltrion Healthcare Netherlands, Portugal and Spain have actions to be implemented short or medium-term, in the upcoming 1-3 years. The entities plan to implement automation solutions such as AI-driven forecasting and reporting tools for supply chain visibility and efficiency. The advanced analytics and AI-powered automation tools will feature transportation tracking, shipment demand predictions and supplier risk assessment evaluation resulting in the optimization of transportation routes thereby reducing the Scope 3 emissions of these entities. Some of these entities have already started implementation by purchasing Power BI and data automation tools, with lower investment costs. The future investments for AI driven tools are to be considered in the upcoming financial planning cycles.

Celltrion Europe entities do not measure effectiveness of their actions yet in reducing GHG emissions. To do so they first intend to develop global policies and consolidate subsidiary-level actions from 2024 onwards.

Targets related to climate change mitigation

E1-4

The organization has not yet established group-level targets to reduce its overall GHG emissions. While Celltrion Europe entities recognize the importance of setting measurable goals to guide their sustainability efforts, the focus is currently placed on assessing the overall emissions profile and identifying key areas for improvement.

In 2024, an overall Scope 1,2 and 3 emissions[12] calculation took place in all European entities to be able to set emission reduction targets. Based on which Celltrion Europe entities plan to develop carbon reduction targets from 2025 and a system to track effectiveness of actions related to emission reductions.

As a forerunner, Celltrion Healthcare UK has already established its carbon reduction plan. The company has disclosed a long-term goal of achieving zero emissions by 2045 and set its baseline value for GHG emissions for 2022. These targets have been developed using the calculation tool provided by SBTi, but have not been verified by an external assurance provider

Celltrion Healthcare UK's carbon reduction targets

	2022 (baseline)	2024 (actual)	2030 (target)	Reduction in current year (%)	Overall reduction target (%)
Scope 1,2 (tCO2e)	6,75	12,04	3,90	+78,3%	-42%
Scope 3 (tCO2e, Category 4,5,6,7,9)	92,96	85,15	53,92	-8,4%	-42%

The operational control approach defined by the GHG Protocol has been applied in calculating the emissions, using UK Government GHG Conversion Factors for Company Reporting along with a small proportion of data using emission factors provided by service providers. Scope 1 encompasses mobile combustion from company-owned or leased cars. Scope 2 encompasses

[12] In 2024, Scope 3 calculations included categories 4 and 9 only.

purchased electricity. In Scope 3 calculations the following categories have been accounted for: 4. Upstream transportation and transportation, 5. Waste generated in operations, 6. Business travel, 7. Employee commuting, 9. Downstream transportation and distribution.

As of now, no changes have been made regarding the targets, corresponding metrics or methodologies. As Celltrion Healthcare UK expects its sales volumes and operation to grow, the company predicts that GHG emissions will increase proportionally. If needed, corrections will be made to the emission calculations and targets according to the company's inspection of the data.

Metrics related to climate change mitigation (GHG Emissions)

E1-6

Celltrion Europe entities' GHG emissions are categorized into three scopes as defined by the GHG Protocol. In this assessment, emissions stemming from Celltrion Europe entities were calculated based on the operational control approach of the Protocol. When calculating the GHG emissions, the reporting entities applied several assumptions and simplifications. Approach of the calculation is detailed in the GHG Accounting Policies chapter.

Celltrion Europe entities obtain limited information on any other assets or entities that could be included in the balance sheet of the consolidated accounting group but not under operational control. Celltrion Europe entities are not engaged in associates, joint ventures, unconsolidated subsidiaries or contractual arrangements, therefore, emissions from these assets are not included in the calculation. Celltrion Europe entities acknowledge that, to be in alignment with ESRS expectations, it is essential to broaden the calculations to incorporate the abovementioned factors in the coming years.

Gross scope 1, 2, 3 and total GHG

Year 2024	
Gross Scope 1 GHG emissions (tCO2eq)	**661,71**
Mobile combustion	*661,71*
Stationary combustion	*0*
Fugitive emissions	*0*
GHG emissions from regulated emission trading schemes (%)	*0%*
Gross location-based Scope 2 GHG emissions (tCO2eq)	**25,9**
Purchased electricity	*25,9*
Purchased heat	*0*
Gross market-based Scope 2 GHG emissions (tCO2eq)	**N/A**
Total Gross indirect (Scope 3) GHG emissions (tCO2eq)	**13 279,70**
4. Upstream transportation and distribution	*13 273,40*
9. Downstream transportation	*6,3*
Total GHG emissions (location-based) (tCO2eq)	**13967,28**
Total GHG emissions (market-based) (tCO2eq)	**N/A**

Year 2024	
GHG intensity	**7,37**
Net revenue used to calculate energy intensity (million EUR)	*1 895,81*
Net revenue (other, million EUR)	*1,29*
Total net revenue (Financial statements, million EUR))	*1 897,10*

GHG intensity ratio presents the tCO_2eq emissions of Celltrion Europe entities per million Euros. In case of Celltrion Healthcare Denmark and iQone Healthcare Switzerland, only Scope 3[13] emissions were calculated and thus included in the GHG intensity calculation.

There is a difference between the total net revenue of Celltrion Europe entities and the net revenue used to calculate GHG intensity. The reason behind the discrepancy lies in the scope of GHG emission calculations. Celltrion Healthcare Spain, Portugal, Norway were excluded from the calculation; however, the revenue generated in these countries is included in the Financial Statements of the organization.

GHG Accounting Policy

Due to lack of information, Celltrion European entities were unable to determine biogenic CO_2 emissions, as well as emissions of other types of GHG (such as CH_4, N_2O, HFC).

Scope 1 GHG emissions

Scope 1 emissions consist of mobile combustion that occurs at company owned vehicles. Under Scope 1 emissions Celltrion Europe entities disclosed greenhouse gases that they emit from sources they own or control directly. The organization did not account for stationary and fugitive combustion as there were no such sources in its premises.

Generally, emissions were calculated using fuel charge amounts obtained through fuel card invoices or distance-based method, where no invoices were available. In case of Celltrion Healthcare Romania, Scope 1 emissions were calculated based on average monthly distances driven and fuel consumed, while odometer readings were utilized to determine fuel consumption for Celltrion Healthcare Poland.

Relevant emission factors[14] were sourced from National Inventory Reports (NIR) and Common Reporting tables[15] specific to each country. NIR is a report published by each country to the United Nations Framework Convention on Climate Change (UNFCCC) including the emission calculation methodology and emission factors.

Operating sites in Spain, Portugal, Sweden and Switzerland have been excluded from data collection, as they are newly established offices with no available data. Celltrion Healthcare Norway, Austria and Denmark do not have a leased car fleet leaving them out from Scope 1 calculation.

Scope 2 GHG emissions

Celltrion Europe entities calculated indirect emission from purchase of electricity, excluding steam heat and cooling related purchase as no relevant purchase occurred at the entities' sites. As Celltrion Europe entities did not purchase renewable energy certificates and were not engaged in market-based mechanisms for renewable energy, the entities used location-based methods for the GHG accounting.

The purchased electricity amounts were captured through invoices that the local utility providers have issued directly to the offices or came indirectly from the landlords. In case of Belgium,

[13] In 2024, Scope 3 calculations included categories 4 and 9 only.
[14] Emission factor is a coefficient that represents the average amount of greenhouse gases (GHG) emitted through specific activities.
[15] Included within the NIR. Standardized tables used for environmental reporting, particularly in the context of greenhouse gas inventories.

electricity consumption was based on the average monthly electricity consumption per square meter of the previous office location as the entity has relocated during the calculation period. Ireland, Romania, Poland have shared offices with size less than 35m2, which were assumed to have minimal impact on the overall building's electricity use. Therefore, these offices were omitted from the Scope 2 emission calculation.

The applied emission factors for electricity were sourced from publicly available data for each location and are the average emission factors of the regional grid. These emission factors can vary across geographic regions as they depend to how electricity is produced in each country and region.

Being newly established offices with no available data, operating sites in Spain, Portugal, Sweden and Celltrion Healthcare iQone have been excluded from Scope 2 accounting. Celltrion Healthcare Switzerland and Austria are non-operational offices and have also been excluded from the accounting.

Scope 3 GHG emissions

Scope 3 emissions are those that arise from across the value chain, both upstream and downstream. In the first year of Scope 3 emissions calculation, Celltrion's European entities focused on emissions related to transportation and distribution (categories 4 and 9), reflecting the organization's primary role in the distribution and sale of biosimilars in Europe, without direct involvement in manufacturing activities.

For Scope 3 emissions two main calculation methodologies were used, depending on the availability of data. For most entities, distance-based calculation was utilized, which relies on primary data that derives from measuring transportation distance and freight weight multiplied by the relevant emission factors. Where distance-based data was unavailable, a spend-based approach was used, relying on transportation related expenditures.

During the calculation of Scope 3 emissions the following assumptions were made:

1. All land transportations to wholesalers used heavy goods vehicles (HGV) with a capacity of 30-40 tons and urban truck with capacity of 3.5 to 7.5 tons was used for the transportation to final clients.
2. All land transportation operates under temperature-controlled conditions, with the fuel type remaining unspecified.
3. All sea transportation utilized 'sea refrigerated bulk' with 0 to 1000 DWT with temperature controlled, using marine fuel oil
4. All air transportation was calculated using an unspecified vehicle type with temperature controlled

For emission factors, the Global Logistics Emission Council (GLEC) was applied for transportation and emission factors data from Fraunhofer IML's GILA report was applied for warehousing. In the case of Celltrion Healthcare UK and iQone, the entities' suppliers provided emission factors calculated based on activity data of the entities within the scope of suppliers' service

Due to limited data available regarding transportation routes, Scope 3 emission calculation will be under further refinement for Celltrion Healthcare Deutschland, Finland and iQone once the data becomes available.

2.2 ESRS E5 - Resource use & circular economy

Celltrion Europe entities are committed to responsible resource management and advancing circular economy principles across their operations. Recognizing the environmental impact associated with resource outflows—such as packaging materials, medical waste, and ancillary supplies—the entities are working to minimize waste generation and improve waste segregation, recycling, and disposal practices. Celltrion Europe entities acknowledge the growing relevance of sustainable resource use and circular economy and are beginning to identify practical opportunities for more responsible resource use.

2.2.1 Resource outflows related to products and services and waste management

Material impact, risk and opportunity management related to resource use and circular economy

E5.IRO-1

Material sustainability topic	Identified IRO	Description	Value chain	Time horizon
Resource outflows related to products and services and waste management	Opportunity	Customers' requests regarding environmentally friendly packaging is constantly growing, transitioning to sustainable packaging, thereby reducing their environmental impact, can enhance the reputation of Celltrion Europe entities and act as a plus factor in bidding.		Short term

Celltrion Europe entities' product and service sales are rapidly increasing across Europe, which inevitably leads to generating more waste. The entities are committed to identifying and managing material impacts, risks, and opportunities associated with resource use and the principles of a circular economy. This process encompasses a thorough examination of resource inflows, outflows, and waste management within the organization's operations and its upstream and downstream value chain.

The assessment involved evaluation of both operational practices and supply chain dynamics, particularly in the context of importing goods from South Korea and distributing them across Europe to multiple customers.

Celltrion conducts consultations with various stakeholders, including suppliers, customers and authorities. The organization is increasingly aware of the growing stakeholder's demand for environmentally friendly packaging. In response, Celltrion Europe entities are making efforts to transition to sustainable packaging solutions, which not only reduce environmental impact but also strengthen brand reputation and support competitiveness in the market.

Policies related to resource outflows in relation to products and services

E5-1

Celltrion Europe entities are committed to decreasing the environmental footprint of their product packaging as part of a broader sustainability strategy. Improvements in packaging practices are influenced by decisions made by the parent company, Celltrion Inc., which sets the strategic direction for sustainability initiatives.

In the upcoming years Celltrion Europe Hungary and its subsidiaries will review their waste management processes and practices regarding circular economy and will start setting up internal policies to manage the material topic.

Actions related to resource outflows in relation to products and services

E5-2

In the pharmaceutical industry, it is imperative for companies to implement actions regarding the management of outflows of resources and by-products to ensure compliance with environmental regulations and sustainability goals. Efficient handling of these substances not only mitigates potential environmental impacts but also enhances the company's reputation and stakeholder trust. Furthermore, relevant actions minimize the entities' ecological footprint and contribute to circular economy initiative.

To effectively tackle the sustainability challenges of resource outflows, Celltrion Europe entities are committed to replacing cartons, leaflets, blisters, tertiary packaging, and buffer materials with environmentally friendly alternatives. Specifically, outer packaging boxes of all products will be transitioned to responsibly sourced FSC-certified paper [16] materials, thereby promoting the practice of sustainable forestry.

In addition, acknowledging the adverse effects of plastic in the environment, Celltrion is in the process of switching plastic packing buffer materials to paper or biodegradable plastic materials (LDPE, PCR film). By the end of 2024, 62% of contracted producers of secondary buffer packaging switched to paper or bio-degradable plastic materials. By the end of 2025, Celltrion aims to have all contracted producers switch to such products. Additionally, within 2025, Celltrion will switch conventional plastic blisters to GRS certified materials, ensuring eco-friendliness through resource efficiency at the raw material sourcing stage of packaging materials.

Complementing these group-level actions, in 2023 Celltrion Healthcare France conducted a Life Cycle Assessment of 5 products to recognize the environmental effects of these products. The following products were tested:

- Remsima 100 mg IV
- Truxima 100 mg
- Truxima 500 mg
- Vegzelma 100 mg 25mgml-4ml
- Vegzelma 400 mg 25mgml-16ml

This study covered the aspects of raw material, production and transport. With the help of the assessment Celltrion Healthcare France was able to determine if these products are not only effective but also user-friendly and environmentally conscious as well.

The entities will conduct further investigations in the future to determine the necessity of group-level actions for waste management.

Targets related to resource outflows in relation to products and services

E5-3

Celltrion Europe entities are committed to ensuring responsible sourcing of paper, wood, and other forest-based products by requiring suppliers to adhere to recognized certification standards,

[16]Certified by Forest Stewardship Council

such as the Forest Stewardship Council (FSC) and the Programme for the Endorsement of Forest Certification (PEFC). This commitment is closely aligned with the entities' targets related to responsible sourcing and the principles of a circular economy. By sourcing raw materials in line with FSC standards, Celltrion European entities ensure that products are obtained responsibly, thereby avoiding the exploitation of nature and promoting ethical practices, such as preventing forced labour.

In addition to responsible sourcing, Celltrion Europe entities require suppliers to implement systematic management practices for the responsible handling, storage, treatment, and disposal of all wastewater and emissions, including active pharmaceutical ingredients (APIs). This comprehensive approach ensures that Celltrion Europe entities maintain up-to-date records of all waste and emissions generated, allowing them to manage their waste output effectively. Ultimately, the waste management objectives promote efficient resource utilization by minimizing waste generation.

This strategy not only enhances the recycling of products and materials but also reduces the likelihood of disposal. Celltrion Europe entities aim to manage waste pursuant to the waste hierarchy steps: prevent, reduce, reuse, recycle, recover, and dispose, thereby contributing to a more sustainable future.

Metrics related to resource outflows in relation to products and services

E5-5

Celltrion Europe entities have not yet established group-level metrics to track and evaluate performance and effectiveness related to opportunities regarding resource use and circular economy, however it is panned to be established by the end of 2027.

3. Social Information

Celltrion Europe entities are committed to promoting the well-being of employees, patients and communities. As global players with significant influence, the entities recognize their critical role in driving positive social impact. Through responsible business practices, the entities promote access to healthcare, uphold strong workplace ethics, and engage with local communities and stakeholders

3.1 ESRS S1 - Own workforce

As part of the materiality analysis, Celltrion Europe entities assessed impacts, risks, and opportunities related to own workforce, focusing on working conditions, equal treatment and opportunities for all employees. Recognizing that employees are central in driving the company's success, the entities prioritize fostering a supportive work environment.

The following employees are included in the scope of reporting for "own workforce" at Celltrion:

- Employees of European entities: all individuals, including part-time staff, who hold employment contracts with Celltrion's European entities. In certain cases, personnel such as nurses and Key Account Managers (KAMs) may also be dispatched by third-party service providers under subcontracting agreements.
- HQ dispatched employees: employees working within Celltrion's European entities who have employment contracts with Celltrion Inc., typically in sales functions or serving as General Managers.

Celltrion does not consider employees of contracting entities, such as distribution suppliers, and GDP contractors, as part of its workforce. Additionally, these individuals are not affected by the material IROs. Material impacts, risks and opportunities identified in relation to own workforce are not arising from or limited to specific groups or geographies.

3.1.1 Working conditions

Material impacts, risks and opportunities related to working conditions

S1.SBM-3

Material sustainability topic	Identified IRO	Description	Value chain	Time horizon
Working conditions	Positive impact	Celltrion Europe entities have a proper and well-built system to compensate the employees through differentiating compensation and other additional benefits.	Own operation	Short/Long-term
	Opportunity	Celltrion Europe entities well-built system to ensure working conditions in compliance with the regulations can prevent the firm from being fined or sued and the attractive compensations can maintain the workforce and reduce the costs of recruitment.		Long-term

Given that Celltrion Europe entities are non-manufacturing companies, when discussing working conditions, the focus is on responsible employment. The emphasis on working conditions

encompasses not only fair compensation but also strict adherence to employment practices. The organization has implemented a comprehensive compensation framework that not only differentiates pay but also offers a range of additional benefits to all employees. This strategic approach fosters greater workforce satisfaction while significantly enhancing employee morale and engagement, leading to a more productive work environment.

Moreover, this compensation system serves as a vital mechanism for maintaining a stable workforce, which is essential for the long-term success and sustainability of the organization.

Policies related to working conditions

S1-1

Global Code of Conduct

The Global Code of Conduct is a vital document that underscores Celltrion's commitment of upholding an ethical culture and fair employment. It establishes the basic standard in creating a supportive work environment for all stakeholders within the company. It serves as the foundation for other policies, procedures, and guidelines that outline specific expectations.

Celltrion Europe entities are committed to creating a work environment that safeguards employee safety and upholds their fundamental human rights. In line with the commitment to international human rights standards, the Global Code of Conduct strictly prohibits child labour, illegal work, workplace abuse, and forced labour. Through the Code of Conduct, Celltrion Europe entities comply with laws and standard procedures related to health, safety and security of all employees and expect suppliers and business partners to maintain the same standards.

All employees are entitled to equal opportunities based on their merits, the employee evaluation system is fair, and is based on performance. In line with the Global Code of Conduct, Celltrion Europe entities maintain non-discriminatory employment policies, ensuring that factors such as race, nationality, ethnicity, religion, gender, family ties, political orientation, marital status, or disabilities do not influence decisions related to employment, promotion or compensation. In accordance with the Global Code of Conduct, the organization monitors compliance with these policies and provides regular training, as well as implements improvement measures as needed. For further information please refer to chapter 4.1.1 Corporate culture and Corruption and bribery.

Monitoring compliance with the Global Code of Conduct

Employees and the leadership are encouraged to familiarize themselves with the Global Code of Conduct through the company’s compliance training. The policy is also accessible for all employees though the intranet of Celltrion Europe entities.

Any suspected non-compliance with the Global Code of Conduct can be reported through the Speak-Up channel operated by the Global Compliance team. For further information on the Speak Up channel, please refer to chapter 4.1.2 Protection of whistleblowers.

Overs*eas Subsidiaries Basic Work Rules, Rules of Employment and Policy Handbooks*

Celltrion Europe entities manage material impacts related to own workforce with the help of the global Overseas Subsidiaries Basic Work Rules policy. Local Rules of Employment and Policy Handbooks are also in place, delineating and supporting the Overseas Subsidiaries Basic Work Rules. The content of Local Rules of Employment and Policy Handbooks can vary by country as the policies address local regulations related to employment.

The Overseas Subsidiaries Basic Work Rules policy determines a ground rule which requires all employees to comply with the country specific labour laws and rules of employment, and to treat each other with respect. The policy states the prohibition of forced labour and abuse of power or authority and discrimination based on gender, nationality or religion.

The local Rules of Employment and Policy Handbooks apply to all employees within the given entity. Both the global Overseas Subsidiaries Basic Work Rules and local Rules of Employment and Policy Handbooks are made available to employees at the time of joining the organization.

Overseas Subsidiaries Wage Policy

The purpose of the Oversees Subsidiaries Wage Policy is to manage wage related matters in overseas subsidiaries. Since this policy shall be applied to all employees at Celltrion Europe entities, it also enables equal treatment and opportunities related to monetary compensation of the employees. For South Korean expatriates, terms of Celltrion Inc. apply, regarding wage.

General processes for workforce engagement

S1-2

At Celltrion Europe offices, there is a strong commitment to foster a collaborative approach to workforce engagement. Employees are recognized as a vital stakeholder in shaping sustainability practices. To ensure that employee perspectives are integrated into decisions regarding working conditions, equal treatment, and opportunities for all, the entities maintain a continuous dialogue with their employees. HR interviews are held on an ad hoc basis with the HR manager and the staff individually. On-site meetings are also held between the general managers and the office personnel, which take place quarterly or every six months, varying by country. While the company does not operate specific channels for employee engagement, this open communication framework ensures that any issues raised are directed to Global Human Resources (GHR) or the General Managers of individual entities.

When issues arise within the workforce, the GHR Team, along with the local and regional General Managers, convenes to discuss appropriate remediation measures. The effectiveness of these measures is assessed based on several criteria: first, whether the issue has been resolved, as indicated by feedback from the employee who raised the concern; second, compliance with relevant policies and local regulations; and third, the time required to implement the remediation measures and fully resolve the issue. This structured approach guarantees that employee concerns are addressed effectively and in a timely manner.

Celltrion Europe entities employ various methods to engage with their workforce, tailored to the legal and cultural context of each operating country. In many of these countries, there are no collective bargaining agreements, trade unions, works councils, or other employee representative bodies, resulting in limited employee representation. Consequently, the Managing Director directly exercises employer rights, and these entities do not have agreements related to the respect of workers' human rights. In contrast, Celltrion Healthcare France has established mechanisms for employee representation through trade unions, as outlined in the Internal Rules of Procedure. This framework allows trade unions to take legal action on behalf of employees, provided there is written consent from the employee involved.

Processes for addressing employee concerns

S1-3

Celltrion Europe entities operate an integrated hotline, that enables reporting of cases of discrimination or any non-compliance with law and regulations, in alignment with the Global Whistleblowing Policy, called Speak-up channel.

Celltrion encourages employees to utilize the Speak-up channel as the primary reporting mechanism for any concerns related to ethics, business integrity, environmental issues, and human rights. The Speak-up channel provides a direct and reliable means for employees to communicate their concerns to the relevant departments. The Global Compliance & ESG Department manages the channel and keeps in contact with every department, ensuring that all incoming reports are forwarded, reviewed and addressed promptly and comprehensively by the functions concerned. Celltrion Europe offices are committed to supporting the availability of the Speak-up channel, which operates continuously and provides multilingual support to accommodate employees across various locations. This accessibility ensures that all employees can conveniently raise their concerns, regardless of time or geographical location, even anonymously. The Speak-up channel is prominently featured on each entity's local Celltrion Healthcare webpage under the 'Contact Us' section, making it easily accessible to the entire workforce. This commitment to accessibility reinforces Celltrion Europe entities' dedication to fostering an open and transparent environment where employees feel empowered to voice their concerns.

Besides the Speak-up channel, other reporting options - such as speaking with an immediate supervisor or a local compliance - are also available. The whistleblowing process is established in the Global Whistleblowing Policy and in the Global Speak-up Policy as well.

For further details about the Global Whistleblowing Policy please see chapter 4.1.2 Policies related to the protection of whistleblowers.

The primary distinction between concerns reported through the Speak-up channel and those reported to an immediate supervisor is the anonymity of the former. When a report is made to a supervisor, manager, or Local Compliance Officer, the recipient must inform the Chief Compliance Officer (CCO) within 24 hours to initiate the initial review process. Otherwise, the procedure follows the same process in both cases:

- Acknowledgement and initial review phase: plausibility check by the dedicated investigation team/or Chief Compliance Officer to assess the report's authenticity and evidence sufficiency
- Investigation process: collecting further evidence and additional supporting information (must be completed in 30 days)
- Verification: evaluation of the truthfulness of the report
- Findings and decision: communicating findings and proposing corrective action

In addition to the global whistleblowing mechanisms, Celltrion Europe entities can maintain individual reporting mechanisms. Celltrion Healthcare France operates a separate whistleblowing channel for employees to report harassment, abuse and similar issues that they deem hard to report to their managers. This mechanism is overseen and managed by employee representatives of the France Office.

To prevent recurrence, the company enhances its preventive measures through regular monitoring, auditing, and systematic training. Relevant departments or business units are actively engaged in the reporting process and may participate in the design, implementation and

monitoring of remediation plans. Additionally, the entities strictly prohibit retaliation against whistleblowers through its Whistleblowing Policy and Global Speak-up Channel Policy. For further information regarding protection against retaliation, please refer to chapter 4.1.2 Policies related to protection of whistleblowers.

Currently, Celltrion Europe entities do not have established measures to assess workforce awareness and trust regarding the Speak-up channel. However, the entities recognize the importance of such evaluation and are committed to developing appropriate mechanisms in the near future.

Actions related to working conditions

S1-4

Ensuring compliance with regulations and policies to maintain adequate working conditions

To ensure that policies related to own workforce are up-to-date and compliant with local regulations, they are developed with the assistance of local legal advisors, covering critical areas such as the hiring process and occupational health and safety. With their support, Celltrion European entities can promptly revise any policies that become outdated or fail to comply with country specific regulations. To enhance the accessibility of such policies the company plans to unify the distribution channel through Workday HR Information System (HRIS), providing a single platform for all documents.

The Chief Compliance Officer (CCO) and an independent Compliance Division oversee ethical management and ensure adherence to legal requirements. The CCO is responsible for investigating regulatory non-compliance events, reporting updates to the CEO and the board of directors, while local compliance officers manage risks and provide trainings within subsidiaries.

Competitive compensation and benefits

To provide competitive monetary and non-monetary benefits, and to ensure that employees are compensated fairly, Celltrion Europe entities consult with external experts to gather insights on industry specific compensation and benefits trends. A competitive salary range has been established in each country, reflecting local market conditions. Wages are assessed by calculating a ratio of each salary bracket and the market median to evaluate whether the salaries are competitive in comparison to the market rates. For a comprehensive benchmark, the company utilizes tools that allow access to industry salary increase rates to have a complete understanding when reviewing annual salaries. This data-driven approach allows the organization to make informed decisions about compensation. The salary review process ensures that merit-based salary increases are aligned with inflation rates, thereby maintaining competitive compensation in each operating location. In addition to base salaries, Celltrion Europe entities offers monetary (i.e. meal allowance) as well as non-monetary benefits to enhance the overall compensation package.

The non-monetary compensation package includes a pension plan and health insurance. These benefits are designed to enhance employee health and work-life balance, which are essential to maintaining motivation and productivity. While the specifics of insurance policies and coverage may vary by country, the organization aims to position itself in the upper quarter in terms of overall compensation, compared to the local compensation benchmarks to ensure its offerings are competitive. Additionally, to foster loyalty and recognize employee commitment, Celltrion Europe entities have established a long-term compensation system that rewards employees with

monetary bonuses and gifts for every five years of service, emphasizing the value of employee dedication. To track employee satisfaction related to compensation, an engagement survey will be conducted in the first half of 2025 to gather feedback from employees.

For a continuous improvement in employee satisfaction regarding compensation, regular communication with General Managers and country HR teams is conducted to identify areas for review and ensure alignment with local expectations and market standards. Additionally, upon termination of an employee's contract, exit interviews are conducted to understand the employee's reasons for leaving. This practice serves as a valuable tool for evaluating whether any compensation – related factors contributed to employee dissatisfaction and the subsequent decision to leave. If such factors are identified, appropriate adjustments will be made to address these concerns. These proactive approaches are designed to enhance compensation practices, and ultimately to foster greater employee satisfaction and improve retention rates. By prioritizing these initiatives, Celltrion Europe entities aim to create a more supportive and rewarding work environment for its employees.

Targets related to working conditions

S1-5

Celltrion Europe entities have not yet established specific targets to assess employee satisfaction concerning fair compensation and adequate working conditions. This area requires further investigation to define the most relevant metrics for the organization.

Metrics related to working conditions [17]

S1-6, S1-8, S1-11

Below table shows the total number of employees. The data is broken down by countries and gender. Only countries with more than 50 employees or at least 10% of the total workforce are highlighted separately. In each country, employees are employed solely under one legal entity. Therefore, the total number of employees of an entity per country reflects the total workforce for that specific location. Employees of countries where the number of employees does not exceed 50 or does not represent at least 10% of the total workforce, are included in the other category.

Employee distribution

Entity	Women (count)	Men (count)	Total (count)
Celltrion Healthcare Deutschland	33	31	64
Celltrion Healthcare France	30	14	44
Celltrion Healthcare Italy	24	17	41
Other	88	60	148
Celltrion Europe offices	**175**	**122**	**297**

[17] Unless stated otherwise, Celltrion reports employee-related figures as headcount, with data provided at the end of the reporting period. Employees are defined as individuals who work directly for and have a contractual relationship with one of the Celltrion Europe entities.

Employees by contract type[18] [19]

Type of employment	Women (count)	Men (count)	Total (count)
Permanent employees	172	118	290
Temporary employees	3	4	7
Employees with non-guaranteed hours	0	0	0
Celltrion Europe offices	**175**	**122**	**297**

Employees in the table are categorized according to contract type, which is primarily determined by the hours and duration of their employment. Permanent employees are typically defined as those who hold contracts for an indefinite period. On the other hand, temporary employees have a defined, limited engagement with the company, which is usually specified in terms of a specific number of months or years. Additionally, employees with non-guaranteed hours are engaged by Celltrion Europe entities without a commitment to a minimum or fixed number of working hours.

It is important to note that Celltrion entities operate in multiple countries, which can influence the classification of contract types. In such cases, Celltrion Europe entities adhere to the definitions established by the national laws of the respective countries where the employees are based. This approach allows for calculation of country-level data.

Employee turnover[20]

Entity	2024
Employee turnover (%)	13%
Number of employees that left the organization (count)	39

In 2024 the employee turnover rate was 13% which is considered low. Initiatives listed above demonstrate Celltrion's commitment to fostering a healthy work environment, enhancing job satisfaction, and ultimately contributing to employee retention. By prioritizing the well-being of its workforce, Celltrion aims to cultivate a culture that values and supports employees, thereby reducing turnover and promoting long-term organizational success.

Collective bargaining and employee representation
S1-8

Celltrion Europe entities acknowledge the significance of workers' rights and are committed to upholding these principles. However, the extent of coverage provided by collective bargaining agreements and the presence of workers representatives depends on local regulations and customary law of each country. Employees of Celltrion Healthcare Belgium, Celltrion Healthcare France, Celltrion Healthcare Finland and Celltrion Healthcare Spain benefit from collective bargaining agreements, with a 100% coverage rate. When considering all employees of Celltrion Europe entities, approximately 24% are covered by such agreements. Since Celltrion Europe

[18] Values in the table represent the Celltrion Europe entities' group-level numbers.
[19] The figure for describing total number of employees in the financial statement is included in Appendix 4. .
[20] Values in the table represent Celltrion Europe entities' group-level results.

entities do not operate in any non-EEA country, collective bargaining agreements applicable outside the European Economic Area (EEA) are not in place.

Currently, there is no established agreement concerning employee representation within the framework of the European Works Council (EWC), the Societas Europaea (SE) Works Council, or the Societas Cooperativa Europaea (SCE). However, Celltrion Healthcare France's employees are covered by worker representative within Le Corps européen de solidarité (CES) and Négociation Annuelle Obligatoire (NAO). The company's objective is to continue strengthening employee representation and to strive for the ongoing improvement of working conditions and employment relations.

Social Protection
S1-11

All employees at Celltrion Europe entities are covered by social protection against loss of income caused by sickness, unemployment, work-related injuries or disability, parental leave and retirement through public programs.

3.1.2 Equal treatment and opportunities for all

Material impacts, risks and opportunity management related to equal treatment and opportunities for all

S1.SBM-3

Material sustainability topic	Identified IRO	Description	Value chain	Time horizon
Equal treatment and opportunities for all	Positive impact	Celltrion Europe entities could set up a transparent system to measure the performance of employees to ensure that all employees are granted a fair opportunity for compensation and promotion.	Own operation	Short/Long-term

Celltrion Europe entities are committed to establishing a transparent performance measurement system that operates effectively in both the short and long term. This system is designed to provide equal opportunities for compensation and promotion for all employees, reinforcing the organization's commitment to fairness and inclusiveness at the workplace.

Policies related to equal treatment and opportunities for all

Please see *chapter 3.1.1 Policies related to own workforce* for the description of the policies related to equal treatment.

Actions related to equal treatment and opportunities for all

S1-4

Annual performance appraisal

At Celltrion Europe, a fair evaluation and compensation process is designed to ensure equitable opportunities for promotion and advancement. Each entity conducts an annual performance appraisal (APA). Performance assessments consider yearly job performance, competency development and engagement performance. Competency development and engagement performance are evaluated based on detailed criteria aligned with the role and the corporate's

core value. Job performance is self-assessed with the supervisor conducting a final assessment. The evaluation also incorporates secondary assessments from direct managers, department leads and relevant departments, when the employee has collaborated with other business areas. Based on the outcomes of the APA, the organization determines wage increase rates and incentives, ensuring fair evaluation and compensation practices.

After the Annual Performance Appraisal cycle is concluded, feedback is collected from the General Managers and country HR teams. This feedback is analyzed to identify areas for improvement, which are then reported to governance bodies. If changes to the APA process are necessary, the information is communicated to the General Managers two months prior to the next APA, allowing time for additional feedback.

In addition, the Workday HR system will be introduced to enable a fair performance evaluation process. This system improves transparency in HR evaluations by enabling individual employee assessments, evaluations by top management, calibration, and the announcement of results, all of which are documented and stored within the system.

Targets related to equal treatment and opportunities for all

S1-5

Maximizing the performance review completion rate

Celltrion Europe entities aim to enhance equal treatment and opportunities by maximizing standardized performance evaluations through the annual performance appraisal (APA). The completion rate is calculated by dividing the number of completed APAs by the total number of employees eligible for APA, excluding those who leave the company during the evaluation process. Local HR and Management monitor completion status in Workday and encourage employees to complete the assessment. Positive feedback can also positively influence salaries, which could be an additional motivating factor to complete the reviews. In 2024, this initiative was successful, achieving a 100% performance review completion rate.

Metrics related to equal treatment and opportunities for all[21]

S1-9, S1-15, S1-16, S1-17

Gender distribution at top management

Management level	Women (count)	Women (%)	Men (count)	Men (%)	Total
One level below the administrative and supervisory bodies	2	*11%*	16	*89%*	18
Two levels below the administrative and supervisory bodies	10	*36%*	18	*64%*	28
Total	**12**	***26%***	**34**	***64%***	**46**

Celltrion Europe entities define the senior management positions, corresponding the ESRS requirements, as those located one or two levels below the executive bodies. One level below the administrative and supervisory bodies are the General Managers. In case of some entities, members of the administrative and supervisory bodies serve as General Managers and certain General Managers oversee multiple entities simultaneously. Two levels below the administrative

[21] Unless stated otherwise, Celltrion reports employee-related figures as headcount, with data provided at the end of the reporting period. Employees are defined as individuals who work directly for and have a contractual relationship with one of the Celltrion Europe entities.

and supervisory bodies are the Department Heads of the entities, who are responsible for managing specific functions within the organization.

Distribution of employees by age group

	Age <30 (count)	Age 30-50 (count)	Age 50< (count)	Total (count)
Total	29	180	88	297

The percentage and a breakdown by gender of employees taking family-related leave in management level

Management level	2024 (%)
Total employees entitled to family-related leave	**100%**
Total entitled employees that took family-related leave	**1%**
Female	1%
Male	0%
Other	-
Not reported	-

All employees are entitled to take the following family-related leaves: maternity leave[22], paternity leave[23], parental leave[24] or carers' leave[25] at Celltrion Europe entities as such leaves are ensured by national law. In the reporting year 1%-of employees took maternity leave.

Remuneration metrics (pay gap and total remuneration)

	2024
Gender pay gap (%)	**6%**
Total remuneration ratio	**3,02**[26]

The gender pay gap is defined as the difference of average pay levels between female and male employees, presented as percentage of the average pay level of male employees. The percentage of gender pay gap for employees within Celltrion Europe entities in 2024 was 6% in favour of male employees. While a slight gender pay gap exists, Celltrion Europe entities remain committed to adhere to policy guidelines on equal pay and keeps monitoring its payment practices.

Incidents and complaints related to severe human rights incidents

S1-17

During the reporting period, there were no reported complaints related to severe human rights issues and incidents. As a result, there were no instances of non-compliance of the UN Guiding

[22] Employment-protected absence for woman around the time of childbirth or in some countries around time of adoption.
[23] Available to fathers or in some countries for parent equivalents for the same period as maternity leave for.
[24] Parental leave refers to time off from work granted to parents following the birth or adoption of a child.
[25] Available for personal care or support to a relative, or a person living in the same household.
[26] Calculation methodology: Excluding the HQ dispatched employees, Celltrion Europe entities applied average 2024 exchange rate provided by the European Central Bank to calculate the total remuneration and those of its highest paid individuals.

Principles on Business and Human Rights, ILO Declaration on Fundamental Principles and Rights at Work or OECD Guidelines for Multinational Enterprises.

3.2 ESRS S2 - Workers in the value chain

Celltrion Europe entities recognize that many individuals involved in the delivery of healthcare products work outside of direct employment—such as those employed by suppliers, contractors, and service providers. There is a clear responsibility to encourage fair treatment, safe working conditions, and respect for human rights for all workers involved in the broader value chain. Expectations around labour practices continue to grow, highlighting the importance of recognizing and supporting the rights and well-being of all workers involved throughout the value chain.

3.2.1 Working Conditions (workers in the value chain)

Material impact, risk and opportunity management related to workers in the value chain

S2.SBM-3

Material sustainability topic	Identified IRO	Description	Value chain	Time horizon
Working Conditions (Workers in the value chain)	Risk	Due to the upcoming legal requirements (such as the Corporate Sustainability Due Diligence Directive), Celltrion Europe entities can face fines if they fail to comply with relevant monitoring and reporting measures in the value chain.		Medium-term

Celltrion Europe entities depend significantly on the capabilities of contracted warehouses, providing essential infrastructure and expertise for handling pharmaceutical products, and contract manufacturing organizations (CMOs), that provide the service for fill, finish and label products.

Given the high dependency on the value chain, it is essential to continuously monitor the value chain to ensure sustainability and mitigate associated risks. This is particularly important in light of emerging legal requirements, such as the Corporate Sustainability Due Diligence Directive (CSDDD), which may introduce financial and compliance risks if not adequately addressed. This regulatory pressure necessitates a proactive approach to sustainability risk management, encouraging Celltrion Europe entities to enhance compliance frameworks and reporting practices. Failure to meet these obligations not only jeopardizes financial stability but could also damage reputation and stakeholder trust. As such, it is imperative for Celltrion Europe entities to prioritize adherence to these upcoming regulations to mitigate potential legal and financial impacts.

In response, Celltrion Europe entities have begun structuring due diligence measures across the supply chain, aimed at identifying, assessing, and addressing actual and potential adverse impacts in alignment with emerging regulatory expectations. Among the entities, the Hungary entity has already conducted such measures for the financial year of 2024.

Policies related to workers in the value chain

S2-1

Celltrion Europe entities have embedded internationally recognized human rights standards into their policies as part of a broader effort to address material impacts. In managing and remedying human rights risks across the value chain, the company has established the following policies and actions. These efforts reflect a broader commitment to responsible business conduct and proactive risk mitigation across global operations.

Celltrion Supplier Code of Conduct

Celltrion Europe entities apply a Supplier Code of Conduct that addresses various issues, including trafficking, forced labor, child labor, non-discrimination and health and safety among others, ensuring that suppliers provide adequate working conditions. The Code is in line with applicable ILO standards, underscoring the company's commitment to ethical sourcing practices. Additionally, it complies with relevant internationally recognized frameworks, such as the UN Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises. For more information about the Celltrion Supplier Code of Conduct please refer to chapter *3.3 Policies related to affected communities*.

Global Due Diligence Policy

The Global Due Diligence Policy of Celltrion Europe entities reaffirm commitments to promoting human rights and conducting environmental due diligence across global operations and supply chain. This policy ensures that due diligence principles are consistently applied across all overseas operations, aligning both internal and external parties with Celltrion's commitment to responsible business practices. It requires strict compliance with internal codes, policies, and all relevant laws and regulations, covering all individuals, groups, and entities within the supply chain, including employees, subsidiaries, and both direct and indirect business partners. For more information about the Global Due Diligence Policy please refer to chapter *3.3 Policies related to Affected Communities*.

Actions related to value chain workers

S2-4

Due diligence process

Celltrion has developed a due diligence process to address regulatory risks associated with its value chain, as outlined in its Due Diligence Policy and Supplier Code of Conduct. This thorough process involves analyzing financial, legal, operational, and market factors to ensure informed decision-making and mitigate unforeseen liabilities.

Within the due diligence framework, the organization has preventive and corrective action plans to address potential and actual risks affecting workers in the value chain. If any violations of regulations or policies occur, they are treated as actual risks, prompting the implementation of corrective action plans that require suppliers to outline the strategies for risk mitigation. These plans must include qualitative and quantitative indicators for measuring improvement, along with targeted completion dates.

The due diligence process also includes measures to ensure that small and medium-sized enterprises (SMEs) with limited capacity are not negatively affected by compliance requests related to the Corporate Sustainability Due Diligence Directive or other relevant regulations. Celltrion is committed to engaging constructive dialogue with SMEs to develop a customized Supplier Code of Conduct that meets the specific needs. These initiatives help mitigate the risk of non-compliance with applicable regulations for Celltrion European entities.

Additionally, to strengthen accountability, Celltrion Europe entities have enhanced the whistleblowing mechanism, allowing suppliers to report any suspected sustainability risks through this channel.

Celltrion conducts periodic assessments of its operations, subsidiaries, and value chain to monitor and evaluate the effectiveness of these actions. These include annual regulatory analyses, double materiality assessments, and ad hoc reviews triggered by reports submitted

through the Speak-up channel. Based on the outcomes of these assessments and feedback from stakeholders, including management insights, the policies and measures will be updated to ensure they remain relevant and effective.

Targets related to workers in the value chain

S2-5

Celltrion Europe entities have not yet established measurable targets related to working conditions of workers in the value chain, however plan to further investigate the topic to develop targets that are in alignment with their business strategy and values in the future.

Metrics related to workers in the value chain

Although there are currently no group-level qualitative key performance indicators or processes in place for tracking value chain impacts, self-assessment questionnaires are already being monitored, and the performance of suppliers is being evaluated through them. In 2024 assessments involved five suppliers in Hungary selected based on their sustainability importance and financial materiality. Celltrion Europe entities aim to extend the assessment to more suppliers in the future.

3.3 ESRS S3 - Affected communities

Celltrion Europe entities recognize that business activities affect local communities, particularly where operations or partnerships are present. Being attentive to potential effects on health, safety, and surrounding environment is an important aspect of responsible business conduct. Celltrion Europe entities remain committed to minimizing negative impact and supporting the well-being of communities connected to the value chain.

3.3.1 Communities' economic, social and cultural rights

Material impact, risk and opportunity management related to affected communities

S3.SBM-3

Material sustainability topic	Identified IRO	Description	Value chain	Time horizon
Communities' economic, social and cultural rights	Opportunity	Positive company perception can increase sales.		Medium/Long-term
	Positive impact	Selecting suppliers who have goals on ESG matters, especially for environment and society, can help Celltrion Europe entities to have indirect positive impact to the society and environment.	Upstream	Short/Medium-term
	Risk	With CSDDD to come into effect, Celltrion Europe entities may get regulatory fine for not properly managing the supply chain activities regarding community rights.		Medium-term

Celltrion Europe entities recognize that building a positive company reputation can enhance sales in the medium to long term, particularly as customers increasingly value corporate responsibility. Celltrion Europe entities can create an indirect positive impact on society and the environment, fostering goodwill and trust within the communities they serve. This reputational strength also supports long-term stakeholder relationships and business resilience.

While reputational benefits are significant, the impending implementation of the Corporate Sustainability Due Diligence Directive also introduces heightened regulatory risks. Failure to adequately manage supply chain impacts, particularly on community rights, could result in fines for Celltrion Europe entities over the medium term. As such, proactive supply chain oversight is not only a matter of compliance, but also a strategic priority for sustaining long-term stakeholder trust and business continuity.

In this context, communities connected to Celltrion Europe entities' supply chain – such as supplier employees in high-risk working environments and residents living near supplier operations—are particularly vulnerable to adverse impacts. Strengthening supplier selection and monitoring processes to address environmental risks and uphold safety and ethical standards not only mitigates these impacts but also reinforces the company's social responsibility and commitment to sustainable business practices.

Celltrion has not identified any communities currently affected by its own operations. Although a detailed assessment of affected community types has not yet been conducted, the company plans to assess sustainability risks based on the geographic regions and industry sectors of its suppliers as part of the rollout of its new due diligence framework in the coming years. Celltrion

remains committed to enhancing its risk identification and management processes to further strengthen the protection of community rights across its global value chain.

Policies related to affected communities

S3-1

Celltrion Supplier Code of Conduct

Celltrion is committed to upholding human rights standards through its Supplier Code of Conduct which aligns with global frameworks such as the United Nations Guiding Principles on Business and Human Rights (UNGPs), the United Nations Global Compact (UNGC), the OECD Guidelines for Multinational Enterprises and the Pharmaceutical Supply Chain Initiative (PSCI), as well as other applicable laws and regulations. The Code lays down expectations for suppliers in terms of human rights, labour practices, health and safety, environmental stewardship, ethics, and governance in line with Celltrion's values. It also addresses local communities' rights. Celltrion monitors compliance with these rights by performing regular audits on suppliers, assessing adherence to the Global Supplier Code of Conduct. In instances of non-compliance, corrective action plans are collaboratively developed. The company actively engages with communities through consultations, providing them with opportunities to voice their concerns and report violations via grievance mechanism channels. The policy applies to all suppliers and their subcontractors, establishing minimum standards required for compliance to maintain eligibility as a supplier. During the financial year, no cases of non-compliance with international frameworks involving affected communities were reported.

Global Due Diligence Policy

Celltrion's Global Due Diligence Policy highlights the company's commitment to sustainability, human rights, and environmental responsibility throughout its operations and supply chain. It establishes a comprehensive framework for identifying, assessing, and addressing potential adverse impacts, ensuring compliance with various legal frameworks, such as the EU Directive on Corporate Sustainability Due Diligence. The policy applies to all stakeholders involved in or affected by the company's activities, including employees and business partners, and emphasizes the importance of stakeholder engagement throughout the due diligence process. The policy also declares the steps of the due diligence process, which are the following:

- Identify: Collecting key information about chains of business activities
- Assess: Evaluate the potential impacts and risks across a chain of activities
- Analyse: Identify specific risks by individual business unit level
- Prioritise: Prioritize risks based on severity, likelihood in order to direct the resources and efforts towards the most essential aspects
- Preventative and corrective measures: Implement appropriate measures to prevent, eliminate or minimize adverse impacts that have been prioritized

The Global Compliance & ESG Department is responsible for overseeing and implementation of the policy, which includes provisions for public disclosure of the due diligence process and its outcomes, thereby ensuring transparency and accountability. Stakeholder interests are considered in the policy-making process, with a focus on engaging with affected communities to inform decision-making. Celltrion ensures that the due diligence process and the outcomes are made publicly available on an annual basis in the CSRD aligned sustainability report, ensuring that its stakeholders are informed.

Engagement with affected communities

S3-2

To effectively manage actual and potential impacts, Celltrion Europe entities actively incorporate the perspectives of affected communities into its decision-making processes:

- The company has established a whistleblowing mechanism that enables external stakeholders, including community members, to express their concerns or comments regarding Celltrion's operations. For further details on whistleblowing, please see chapter *4.1.2 Protection of whistleblowers*
- The double materiality assessment includes gathering external inputs through surveys distributed to customers, suppliers, and other stakeholders. The questionnaire includes a list of impacts affecting stakeholders, allowing them to evaluate these impacts, providing the organization with a comprehensive overview of their effects. For further information about the Double Materiality Assessment please see chapter *1.4 Impact, risk and opportunity management*
- Individual Celltrion Europe entities engage in their own activities, through industry and patient associations, that help to gain insight into community perspectives indirectly. For further information about engagement with consumers please see chapter *3.4 Engagement with consumers and end users*. .

At company level, the Head of Global Compliance & ESG Department is responsible for overseeing engagement activities related to affected communities and ensuring alignment with corporate policies. In each active subsidiary, various functions are designated to represent the company in these engagement efforts, aiding local interactions and relationships with patient organizations and community stakeholders. While there is no formal tracking of outcomes linked to engagement with communities, the company's goal is to ensure that its engagement efforts result in meaningful improvements in community relations.

Actions related to affected communities

S3-4

Celltrion Europe entities are dedicated to supporting responsible business practices that positively impact the relevant communities. By implementing a comprehensive Supplier Code of Conduct, enhancing risk management strategies, and maintaining effective communication with stakeholders, the company aims to create a positive impact on communities. The following actions outline the key initiatives being taken.

Setting up a compliance framework

Celltrion Europe entities are committed to supporting responsible business practices by distributing the Supplier Code of Conduct to the suppliers. This initiative includes seeking commitment from suppliers in the form of signing the document, to ensure alignment with the company's mission of positively impacting communities. In the coming years, each entity will carefully select suppliers based on materiality, to assess their compliance with the Supplier Code of Conduct. Additionally, a due diligence policy focused on sustainability risk management will be implemented in 2025, reinforcing the commitment to ethical practices throughout the supply chain.

Risk management

As part of its sustainability initiative, Celltrion Europe entities will conduct comprehensive supplier risk assessments that emphasize social and environmental aspects. This proactive approach aims to identify potential risks and ensure that suppliers adhere to the highest ethical standards. Celltrion is in the process of renewing its whistleblowing mechanism to include stronger third-party participation, allowing stakeholders to report concerns and violations more effectively. This mechanism will aid transparent communication and accountability within the supply chain which will in turn enhance the entities' positive impact to the community.

Communication

Effective communication is essential for building trust and elevating the company's reputation in the market. Celltrion engages with stakeholders through an omnichannel communication strategy that includes social media, professional events, direct mailing, journal ads, webinars, and satellite symposia. At a group-level, the Head of Global Compliance & ESG Department oversees these efforts to ensure compliance with local regulations. Additionally, a newly established, dedicated Global ESG Management team reviews ESG related materials to be shared on social networking sites. At the local level, various functions—including medical, marketing, and general management—have been designated to support community engagement initiatives. The marketing and medical teams, in particular, play a key role in communicating corporate values and impact stories via social media, responding to public inquiries, and promoting medical events.

As part of strengthening these efforts, Celltrion Europe entities will begin publishing an annual sustainability report in 2025. This report will further demonstrate their commitment to sustainability and provide stakeholders with transparent insight into the company's sustainability performance and achievements. It is also intended to enhance accountability across operations and foster stronger relationships with key stakeholders.

Targets related to affected communities

S3-5

Celltrion Europe entities are committed to tracking the effectiveness of its policies and actions through regular supplier risk assessments, audits and stakeholder management. These assessments will focus on social and environmental aspects, ensuring that the suppliers' sustainability-related impacts, risks, and opportunities are effectively monitored. The start of the implementation of the above actions will serve as a reference point for establishing baseline for future assessments and tracking progress of sustainability-related impacts and compliance.

Metrics related to affected communities

Currently there are no group-level qualitative KPIs to evaluate performance and effectiveness of policies and actions related to engagement with affected communities.

3.4 ESRS S4 - Consumers & end users

Celltrion Europe entities serve as the regional biopharmaceutical arm of the global Celltrion Group, supporting the delivery of biopharmaceutical products across European healthcare systems and helping to ensure that patients with conditions such as inflammatory bowel disease (IBD), rheumatoid arthritis, and malignant tumors have access to essential treatments. In doing so, they are fundamentally committed to safeguarding the health and well-being of end users by ensuring the availability of high-quality, accessible treatments that address a range of serious and chronic conditions.

This commitment necessitates full compliance with all relevant laws and regulations, particularly those governing product safety and marketing communications. The sustained success of Celltrion Europe entities is closely tied to the trust of customers and end users. Accordingly, the organization places strong emphasis on maintaining high standards of drug safety and delivering accurate, transparent product information, recognizing that any miscommunication could compromise both reputation and stakeholder confidence.

Aligned with this commitment to trust and responsibility, Celltrion Europe entities also recognize that patients from low-income groups may face greater barriers to accessing healthcare products. In response, the entities actively participate in public tenders, enabling the provision of high-quality treatments at more accessible price points. Furthermore, as a leading developer and distributor of biosimilars, Celltrion plays a central role in expanding access to these therapies across Europe. The introduction and widespread availability of biosimilars has been instrumental in fostering a more balanced and competitive pricing environment, enhancing affordability for patients and healthcare systems, and supporting the long-term sustainability of healthcare system.

Channels in place for consumers and end-users to raise concerns

S4-1, S4-3

Being committed to transparency and stakeholder engagement, Celltrion Europe entities established robust reporting systems for product quality complaints and consumer feedback across its regions. Through its whistleblowing mechanism external stakeholders, including consumers, can voice their concerns or comments about the business. For further information about the whistleblowing mechanism of the company please see chapter 3.1.1 Processes for addressing employee concerns.

Other than the whistleblowing mechanism, a publicly accessible website and call center allow individuals to submit their concerns, which are monitored by qualified personnel who liaise with health authorities as required by law. Complaints are typically reported through pharmacies to wholesalers, who then communicate with the entities for investigation. Additionally, dedicated email channels are available for reporting complaints, with processes managed by third-party service providers responsible for monitoring and tracking the effectiveness of the service. In some regions, external companies are engaged to handle complaints, ensuring a professional response to consumer grievances. This comprehensive approach highlights Celltrion Europe entities' dedication to ethical business practices and the continuous improvement of product safety and quality.

Celltrion Europe entities are committed to protecting individuals from retaliation when reporting product-related information. For example, in Hungary, the office restricts data access based on job roles to ensure confidentiality and safeguard the identities of reporters. Similarly, in Belgium

and the Netherlands, access to submissions received through designated email channels is limited exclusively to the medical team, further reinforcing the protection of those who raise concerns. This approach fosters a safe environment for individuals to report issues without fear of repercussions.

The reporting channels are also available for reporting human rights – related concerns for consumers and end users. In 2024, there were no human rights related issues reported or any identified severe human rights issues and incidents connected to drug safety, patient information or product management. The general requirements regarding human rights and its legal implications are set out in the Global Code of Conduct, which determines zero-tolerance for human rights violations, even though the Global Code of Conduct is not aligned with the UN Guiding Principles on Business and Human Rights, ILO Declaration on Fundamental Principles and Rights at Work or the OECD Guidelines for Multinational Enterprises.

Engagement with consumers and end-users

S4-2

As described in chapter *3.3 Engagement with affected communities,* Celltrion Europe entities utilize three approaches to interact with stakeholders, including consumers and end-users:

- By providing a whistleblowing channel (further information about whistleblowing can be found in chapter *4.1.2 Protection of whistleblowers)*
- By conducting surveys among stakeholders as part of the Double Materiality Assessment (for further details on the Double Materiality Assessment process can be found in chapter *1.4 Impact, risk and opportunity management)*
- *Participating in industry and patient associations:*
    - *Celltrion Europe entities cooperate* with local patient and industry associations, such as association for generic and biosimilar medicine or organization for Gastroenterology, to gain a comprehensive understanding of patient situations. It must be noted that the organization views every patient vulnerable in relation to its impacts since they have been diagnosed with severe diseases.

Celltrion Healthcare Belgium, for instance is a board member of Medaxes, an industry association for generic and biosimilar medicine. Celltrion Healthcare Denmark is an active member of ENLI (Ethical Committee for the Pharmaceutical Industry), which underscores its commitment to ethical practices within the sector. The Italian entity engages with patient associations, such as APMARR (Italian National Association of People with Rheumatological and Rare Diseases) and AMICI (National Association for Inflammatory Bowel Diseases), the Celltrion Germany with Rheuma-Liga for Rheumatology, meanwhile the Dutch entity is actively engaged in Crohn & Colitis organization for Gastroenterology. All these participations included regular meetings throughout the *year. For further information please see chapter 4.1.3 Political engagement and lobbying*.

3.4.1 Information-related impacts of consumers and/or end-users – Product information

Material impact, risk and opportunity management related to product information

S4.SBM-3

Material sustainability topic	Identified IRO	Description	Value chain	Time horizon
Information-related impacts for consumers and/or end-users	Positive impact	Compliance with the responsible marketing-act can avoid the misinformation of customers.	Downstream	Short/Long-term
	Positive impact	Conducting programs that aim to provide more detailed information on proper usage of products.	Downstream	Short/Medium-term
	Opportunity	Proper description about Celltrion Europe entities products enhance customer understanding on safety usage and increase sales volume.		Medium-term
	Positive impact	Providing trainings and adequate information on products for sales employees could help transmit proper information to pharmaceuticals professionals and end-users.	Own operation	Short/Long-term

Effective and accurate communication is essential for Celltrion Europe entities, as it strengthens stakeholder trust through increased transparency, reinforces brand reputation, supports customer loyalty and ultimately contributes to a sustainable business growth. A key aspect of this communication is the provision of product information that complies with applicable laws and regulations, such as the Responsible Marketing Act. Ensuring regulatory alignment not only helps avoid potential fines from miscommunication but also safeguards long-term business continuity. To support this, Celltrion Europe entities provide comprehensive product training and resources to sales teams, enabling them to deliver clear, accurate information to healthcare professionals—and by extension, to patients.

Policies related to product information

S4-1

Good Marketing Practice Policy

Global Policy for Good Marketing Practices is designed to ensure that Celltrion Europe entities establish compliance standards or marketing activities related to the company's products on a global scale. This policy outlines the necessary interactions with healthcare professionals. All marketing efforts must adhere to relevant laws, regulations, industry codes, and the stipulations detailed in the policy.

The policy applies uniformly to the Company officers, directors, employees, agents, contractors, and other third parties involved in activities on behalf of the company. Employees who engage third parties must ensure that these parties are informed of the policy's requirements and agree to comply with them.

The policy mandates that any information disclosed in promotional materials to be consistent with the approved product information as dictated by national laws and regulations of each

country, which govern the format and content of product information presented on labelling, packaging, leaflets, datasheets, and in all promotional material. A key principle of the policy is that all promotional materials must convey a clear and non-misleading message. Additionally, the policy outlines the procedures for creating both promotional and non-promotional materials. Ultimately, the Chief Compliance Officer oversees all requirements outlined in the policy.

Besides the Global Policy for Good Marketing Practices the entities have different internal control procedures to ensure compliance and adequate product information.

- In Belgium and the Netherlands for some brands, Risk Management Plans (and activities) apply (post EMA-Approval [27] at the start of commercialization). Meanwhile other patient materials are subject to RIP Approval (Medical Legal Person Responsible of Information).
- In Portugal, a review process is in place for marketing materials to filter out misinformation and secure compliance, to which end, materials are reviewed by the marketing and medical regulatory departments.

In addition to the Good Marketing Policy, the Global Code of Conduct has a separate section for 'Communication with Media' and demands that all marketing activities are reviewed by the Global Compliance Team to ensure compliance with relevant laws and guidelines.

Actions related to product information

S4-4, HC-BP-510a 2

Celltrion is dedicated to ensuring that comprehensive and accessible information is provided about its products for consumers, reflecting a commitment to transparency and safety. To this end, several proactive measures are taken by the company to educate both healthcare professionals and end-users about products.

Celltrion's product packages always include a leaflet written in local languages, containing information on proper usage, dosage, contra-indications and adverse events, qualitative and quantitative composition of the active substances and any other warnings. The content of the patient information leaflets is determined and distributed by the HQ to ensure accurate and consistent information is provided to the end-users across Europe. Furthermore, product materials are continuously reviewed and updated to reflect the latest regulatory requirements, clinical guidance and safety information, ensuring ongoing relevance and usefulness for patients and healthcare professionals alike.

Sales employees maintain close contact with healthcare professionals (HCPs), who, in turn, have direct interactions with customers and patients. To ensure consistency in the exchange of information, Celltrion Europe entities provide HCPs with relevant support materials and guidance. All interaction between sales employees and HCPs must adhere to the Global Code of Conduct, which requires employees to be thoroughly familiar with applicable regulations and internal compliance procedures. This ensures that all communications are conducted ethically, transparently and in full alignment with regulatory expectations.

To ensure that HCPs provide accurate information about Celltrion's products to customers and to prevent any risks associated with misuse, the organization places significant emphasis on trainings. Product training sessions and product presentations are conducted, through conferences, to equip them with the necessary information regarding the usage and

[27] European Medicines Agency (EMA): A decentralized agency of the European Union responsible for the evaluation, supervision and safety monitoring of medicines.

characteristics of the products. These training sessions are jointly facilitated by a dedicated pharmacovigilance team from both the HQ and the local offices.

In relation to product information Celltrion Europe entities have identified no issues related to human rights in the current financial year.

Targets related to product information

S4-5

Each year, the sales, marketing, and medical departments of Celltrion Europe entities set objectives for the development of new materials, supporting activities such as field visits, product presentations, conferences, symposia, advisory board meetings, and patient outreach initiatives. While there are no separate group-level targets specifically focused on product information, all activities are conducted in alignment with applicable regulatory requirements to ensure the accuracy, transparency, and ethical communication of product information.

Celltrion Europe entities are actively engaged in establishing individual targets focusing on the alignment of marketing content with the latest therapeutic guidelines and safety information. For instance, 100% of the available marketing materials are shared with partners, which enhances compliance and transparency. Targets are to ensure compliance with all applicable regulations concerning patient communication, reinforcing the importance of accurate and transparent messaging.

Metrics related to product information

HC-BP-270a.1.1

Compliant engagement

Celltrion places a strong emphasis on compliance monitoring, measuring all occurring cases. The organization conducts annual compliance training sessions for all employees across its European entities, covering essential topics related to ethical practices and regulatory requirements. The number of training participants is monitored.

Proper labelling

As a result of the efforts made by Celltrion Europe entities, no monetary losses incurred during the reporting period due to legal proceedings related to false marketing claims.

3.4.2 Personal safety of consumers and/or end-users – Product safety

Material impact, risk and opportunity management related to product safety

S4.SBM-3

Material sustainability topic	Identified IRO	Description	Value chain	Time horizon
Personal safety of consumers and/or end-users, including drug safety	Positive impact	Communication with patients and healthcare professionals to collect relevant information regarding drug safety.	Downstream	Short/Long-term
	Positive impact	Creating studies and worldwide collection of patient safety data to identify risks and reduce the possibility of the unsafety.	Downstream	Medium/Long-term
	Positive impact	Well-controlled, regularly tested and monitored procedures are in place to ensure product safety and compliance with relevant regulations.	Upstream	Medium/Long-term
	Risk	Miscommunication might damage Celltrion Europe entities reputation and the relationship with their customers which might lead to loss of market share and decrease in sales volume due to the highly competitive market environment.		Long-term
	Opportunity	Robust quality controls can lead to higher product quality, which in turn can increase consumer trust resulting in repeat purchases.		Medium-term

Ensuring patient safety is a core priority in the pharmaceutical industry, particularly with regard to the safe use of medications by end users. For Celltrion Europe entities, maintaining robust communication channels between healthcare professionals and patients plays a critical role in monitoring drug safety. These interactions support the collection of real-world safety data and enable the early identification and mitigation of potential risks. This collaborative approach not only enhances pharmacovigilance efforts but also empowers patients and contributes to improved treatment outcomes.

Celltrion Europe entities prioritize patient safety through strong communication, effective data collection and compliance measures to systematically identify and mitigate risks associated with drug safety. The entities conduct comprehensive studies and maintain global repository for patient safety data. Through clinical trials and pharmacovigilance, the organization ensures that side effects of biosimilars are minimized, thereby meeting safety standards and complying with regulatory requirements. In addition, patients undergoing treatment are provided with reminder cards containing important information about the safety of their medication, further supporting informed patient engagement and a safer healthcare environment.

Policies related to product safety

S4-1

Global Code of Conduct

In line with the Global Code of Conduct, products must meet local laws, regulations, and internationally recognized standards. Similarly, all business partners are expected to uphold these standards throughout the upstream and downstream value chains. Ensuring a high level of product quality is a crucial factor in improving patient safety and is one of the core values that the organization strives to achieve.

Standard Operating Procedure (SOP), Good Distribution Practice (GDP) and Good Manufacturing Practice (GMP)

To uphold product safety and quality, Celltrion Europe entities implement Standard Operating Procedures (SOPs) for supplier qualification across all European locations. These SOPs ensure that potential suppliers and subcontractors meet GxP[28] guidelines and regulations including GDP and GMP, which are essential for maintaining the integrity of and safety of pharmaceutical products. As part of the qualification process, suppliers undergo a preliminary assessment through a structured questionnaire, evaluating their operational control and quality management systems. Local offices are responsible for verifying the effectiveness and technical adequacy of these systems, with the process overseen by distribution and quality teams at each location.

Before finalizing contracts with suppliers, local offices conduct remote or, if necessary, on-site audits to provide a higher level of assurance regarding product safety and regulatory compliance. These audits verify that the supplier maintains qualified and properly trained personnel, appropriate facilities, suitable equipment, approved procedures, and compliant storage and transport practices. The evaluation also covers the adequacy of materials, services, containers, and labeling, ensuring full alignment with Good Distribution Practice (GDP) and Good Manufacturing Practice (GMP) requirements.

Actions related to product safety

S4-4

Celltrion Europe entities are committed to ensuring product safety through a diverse array of actions that span across the value chain. These actions include rigorous supply chain audits, robust quality control measures and collaboration with GxP-compliant business partners. By implementing regularly tested procedures and working exclusively with qualified suppliers Celltrion Europe entities maintain high standards of product quality and ensure the safety and integrity of the products throughout the whole value chain. Pharmacovigilance activities are actively conducted to gather valuable insights on drug safety from patients and healthcare professionals, ensuring timely responses to any safety concerns. The adherence to GMP and the execution of Product Quality Reviews (PQR) further reinforce the commitment to regulatory compliance and continuous improvement. Through these varied efforts, Celltrion Europe aims to enhance product safety, build trust with stakeholders, and uphold the well-being of consumers.

Supply chain audits

Robust quality control measures are implemented throughout the value chain along with regularly tested procedures to monitor and ensure compliance with relevant regulations. This approach safeguards product quality during transportation and storage.

Working with GxP compliant business partners

[28] A general abbreviation for good practice quality guidelines and regulations. (Generally stands for Good Manufacturing Practice, Good Distribution Practices, Good Marketing Practices and etc)

Celltrion Europe entities exclusively work with GxP-qualified suppliers. GxP is a framework for maintaining consistent quality throughout the product lifecycle, which ensures that all processes related to the development, manufacturing, and distribution of products adhere to the highest standards of quality and safety. Within this framework the GDP specifically ensures that contracted wholesalers maintain the integrity and quality of products during transportation and storage. Contracted wholesalers are regularly audited by the relevant health authorities, to ensure that they comply with GDP regulations, thereby maintaining robust quality control. For further details on supplier qualification, please see chapter *3.4.2 Policies related to product safety*. Outcomes of the audits performed on suppliers are routinely monitored and addressed through reminders sent to the third parties in question, ensuring that suppliers take those seriously and manage or follow-up on any issues identified during the audit.

Pharmacovigilance

Celltrion Europe entities actively engage with stakeholders to gather relevant information regarding drug safety through pharmacovigilance activities, which ensure product safety by systematically monitoring and evaluating the effects of pharmaceutical products after they have been approved for use. This process involves collecting data on adverse drug reactions and other safety concerns. By analysing this information, pharmacovigilance helps identify potential risks associated with medications, allowing for timely interventions such as updating safety information, issuing warnings, or even withdrawing products from the market if necessary.

The entities have both local and outsourced pharmacovigilance (PV) personnel responsible for reporting safety cases to the global safety data centre. The local PV teams at Celltrion Europe entities play a vital role in ensuring drug safety and compliance with regulatory requirements. These teams consist of dedicated personnel who collaborate closely with the headquarters' pharmacovigilance team to oversee drug safety and patient information security.

Pharmacovigilance activities executed in cooperation with external parties are outlined in Safety Data Exchange Agreements (SDEAs). SDEAs are formal agreements required by the European Union that outline the pharmacovigilance responsibilities between Celltrion Europe entities, and third parties involved in the development, commercialization, and distribution of pharmaceutical products. These agreements play an important role in pharmacovigilance systems by clearly defining the roles and responsibilities of various partners in meeting regulatory obligations. They require business partners to timely exchange safety data related to adverse events, serious risks, and safety signals related to medical products. This collaborative approach not only facilitates timely communication of critical safety information but also helps prevent the submission of duplicate reports to regulatory authorities. SDEA documents are regularly updated to define pharmacovigilance obligations, designate responsible personnel, and ensure Celltrion Europe entities have access to drug safety-related information.

Safety data from patients and/or investigators, covering both investigational (in clinical trial phase) and commercial drugs, is continuously monitored to ensure timely and appropriate actions are taken. Furthermore, medicinal inquiries or safety issues can be reported through the grievance mechanisms, as outlined in chapter 3.3 Channels in place for consumers and end-users to raise concerns.

Regular trainings are provided to keep employees up to date on any changes in procedures and regulatory requirements related to pharmacovigilance. Training materials cover the latest updates on EU and national regulations related to pharmacovigilance and best practices, fostering a culture of safety awareness and compliance.

Good Manufacturing Practices (GMP) and Product Quality Reviews (PQR)

All products sold in Europe are certified in accordance with the GMP standards, which are a set of guidelines and regulations that ensure products are consistently produced and controlled according to internationally recognised quality requirements. These practices cover all aspects of production, including raw materials, facilities, equipment, and personnel with the ultimate goal of ensuring product safety.

A critical GMP related activity, the Product Quality Review is required by European regulation. A PQR process involves systematic evaluation of a product's quality over a specific period. The PQR assesses various aspects of the manufacturing process, including the consistency of production, adherence to quality standards, and the effectiveness of quality control measures. The purpose of the PQR is to identify areas for improvement, ensure compliance with regulatory requirements, and enhance overall product quality and safety.

As the designated Marketing Authorization Holder (MAH) in Europe, Celltrion Healthcare Hungary is responsible for leading the PQR evaluation annually, in close collaboration with other Celltrion Europe entities. PQR reports are compiled by regional offices and submitted to the Hungarian entity for centralized review, with Celltrion Inc. also participating in the evaluation process to maintain oversight and ensure alignment with global quality standards.

In addition, Celltrion Healthcare Hungary performs the role of the Qualified Person (QP), a regulatory function required in Europe, responsible for certifying each finished product batch. This certification—based on a review of all manufacturing and testing documentation—serves as formal confirmation that the batch complies fully with GMP requirements and is safe for release to the market.

Studies and knowledge-sharing for enhanced drug safety

Celltrion Europe entities conduct comprehensive studies and collect global patient safety data. This strategy not only enhances product safety but also reinforces commitment to consumer well-being and regulatory compliance.

Simultaneously, the organization implements training programs to ensure that employees and healthcare professionals are well-equipped to manage drug safety, privacy risks and legal obligations while performing monitoring of publications and clinical trials. These training sessions are conducted jointly by dedicated personnel from the headquarters' pharmacovigilance team and the local pharmacovigilance team, ensuring they remain up to date with EU and national requirements each year. Monitoring of publications involves systematic screening of scientific journals and new information from clinical and non-clinical studies relevant to drug safety.

Clinical trials, on the other hand, are evaluations conducted in human subjects, whether patients or non-patient volunteers, to discover or verify the effects of investigational products and/or identify any adverse reactions. The primary goal of Celltrion Europe entities is to gather the necessary data for obtaining or modifying marketing authorization for biosimilars while mitigating and reducing any adverse effects identified during the research.

By gathering data from monitoring of publications and clinical trials, the companies ensure that they obtain relevant research information about biosimilars, thereby reducing the likelihood of product safety issues and enhancing the quality in the medium to long term.

Targets related to product safety

S4-5

In accordance with GDP, all European entities are committed to achieving a 100% compliance rate with global pharmacovigilance regulations, minimizing serious adverse drug reactions through proactive safety measures and tracking the performance against this target through pharmacovigilance activities.

Metrics related to product safety

HC-BP-250a 1, HC-DI-250a 2, HC-DR-250a 1, HC-DR-250a 3, HC-DR-250a 4

Celltrion Europe entities distribute the following products in the EU:

(As of end of the year (2024))

Name of product	Date of marketing authorization issued
Remsima IV	10/09/2013
Remsima SC	26/11/2019[29]
Yuflyma	11/02/2021
Truxima	17/02/2017
Herzuma	09/02/2018
Vegzelma	17/08/2022
Steqeyma	22/08/2024
Omlyclo	16/05/2024

These products are approved for sale by the European Medicines Agency (EMA). Group-level medical product safety and adverse event information for each product is accessible on the EMA website and the EduraVigilance database managed by the EU. In the cases of Switzerland and Italy, information on adverse effects is also provided by the respective National Health Authorities. To minimize health and safety risks associated with the products it distributes, the organization implements pharmacovigilance processes and conducts supplier evaluation. For further details, please refer to chapter 3.4.2 Actions related to product safety.

As a result of the efforts to ensure product safety, Celltrion Europe entities experienced zero product recalls and incurred no monetary losses in the current financial year. In the event of product recalls, inspected recalled products are not reintroduced to the market.

3.4.3 Counterfeit drugs

Material impacts, risks and opportunity management related to counterfeit drugs

S4.SBM-3

Material sustainability topic	Identified IRO	Description	Value chain	Time horizon
Counterfeit drugs[30]	Opportunity	Celltrion Europe entities can avoid legal prosecution and fines by proper supplier evaluation and internal		Long-term

[29] Remsima SC recieved its initial European Commission marketing authorisation on 26 November 2019 for the treatment of rheumatoid arthritis. On 29 July 2020, the European Commission approved it for additional indications.

[30] Industry specific material topic, disclosed under ESRS S4

		counterfeit drugs' control mechanisms.		
	Positive impact	Celltrion Europe entities collaborate with the appropriate teams at Celltrion Inc. to guarantee engagement with only GDP-certified distributors, thereby preventing counterfeit drugs from entering the distribution network and harming consumers.	Upstream impact	Long-term
	Positive impact	Celltrion Europe entities and their subsidiaries only engage with distributors that have GDP license to ensure the prevention of counterfeit drugs entering the distribution network.	Downstream impact	Long-term
	Positive impact	Through a serialization system, Celltrion Europe entities ensure that counterfeit drugs do not enter the supply chain system (regulatory requirement by the EMA).	Upstream impact	Long-term

As part of the commitment to sustainability and ethical business practices, Celltrion's Europe entities prioritize the integrity and safety of the pharmaceutical supply chain. Recognizing the serious risks posed by counterfeit drugs to patient health and public trust, the entities have implemented rigorous supplier evaluation protocols and robust internal control systems. These measures are designed not only to ensure compliance with regulatory standards but also to reinforce product authenticity and traceability across all markets. The entities ensure that partnerships maintained are exclusively with GDP-certified distributors, thereby safeguarding distribution network and protecting consumers from the risks associated with counterfeit medications. This proactive approach not only helps them avoid legal prosecution and fines but also reinforces the long-term sustainability goals.

Additionally, the implementation of a serialization system aligns with regulatory requirements set by the EMA, further solidifying the commitment to maintaining a secure and reliable supply chain. Through these initiatives, Celltrion Europe entities prioritize patient safety and uphold the highest standards of quality in the biosimilar product distribution sector.

Policies related to counterfeit drugs

S4-1

Good Distribution Practice (GDP), Good Manufacturing Practice (GMP)

Celltrion Europe entities manage counterfeit drugs through a comprehensive set of policies that ensure compliance with Good Distribution Practice (GDP), Good Manufacturing Practice (GMP)[31] and other relevant local regulations.

GDP establishes guidelines and regulations that ensure the quality and integrity of pharmaceutical products throughout the distribution process. GMP influences the upstream value chain of Celltrion Europe entities, as this regulation applies to manufacturing sites. Celltrion Healthcare Hungary holds GMP certification as it plays a crucial role in overseeing key processes

[31] 2013/C 343/01 Guidelines on Good Distribution Practice of medicinal products for human use.

such as import of products, certification, and packaging. Consequently, compliance with GMP is primarily managed by Celltrion Healthcare Hungary.

This control environment ensures that pharmaceutical products are consistently stored, transported and handled in a manner that maintains quality and integrity, preventing falsified products from entering the supply chain. These guidelines define procedures for identifying, handling, and reporting suspected counterfeit drugs. The processes also include internal protocols for verifying product authenticity. These policies are implemented across the value chain, covering all relevant geographical regions and stakeholders, including suppliers, logistics partners, and customers. .

Accountability for these policies resides in the supply chain management and quality departments. Engagement with key stakeholders, including Celltrion Inc., authorities and contracted partners, is an integral part of the process, allowing the company to consider interests and insights in its procedures.

To facilitate transparency and compliance, these policies are made available to affected stakeholders and those involved in the implementation. The SOPs and Global Code of Conduct is accessible to all employees and training is provided for relevant colleagues.

Actions related to counterfeit drugs

S4-4

Celltrion Europe entities have implemented a series of actions to combat counterfeit drugs and ensure compliance with relevant policies and regulations.

License checks

Celltrion Europe entities meticulously verify that all contracted parties possess the necessary licenses, reinforcing the commitment to maintaining high standards in pharmaceutical distribution and protecting public health. A strong emphasis is placed on engaging GDP-licensed (or equivalent) suppliers within the organization's distribution network. To become a contracted party of Celltrion Europe entities, suppliers must meet the following criteria:

- Wholesale distributors must obtain their supplies of medicinal products only from individuals or entities that possess a wholesale distribution authorization or a manufacturing authorization that covers the specific product in question.
- Wholesale distributors receiving medicinal products from third countries for the purpose of importing, i.e., to the European market, must hold a manufacturing authorization.
- When medicinal products are obtained from another wholesale distributor, the receiving wholesale distributor must verify that the supplier complies with the principles and guidelines of GDP and holds the necessary authorization.

Celltrion Healthcare Hungary's contract with manufacturing organizations (CMO) are 100% GMP certified and all wholesalers are GDP certified and covered by marketing authorization.

Supply chain integrity

To uphold product integrity and prevent the distribution of counterfeit medicines, Celltrion Healthcare Hungary, as the EU Marketing Authorization Holder (MAH), maintains a comprehensive quality management framework across the supply chain. Celltrion Healthcare Hungary is contractually aligned with Celltrion Inc., which holds primary responsibility for auditing and qualifying Contracted Manufacturing Organizations (CMOs). As previously mentioned, these

CMOS are evaluated against stringent Good Manufacturing Practice (GMP) to ensure product safety and compliance.

A robust product complaint and recall procedures are in place, governed by formal Quality Agreements established with both Celltrion Inc. and direct customers. These agreements clearly define roles and responsibilities for managing product quality, complaints, deviations, and potential counterfeit issues. All complaints – including damages occurring during manufacturing, transport, or storage-are documented, investigated and escalated through an integrated system. As MAH, Celltrion Healthcare Hungary acknowledges and records each complaint, compiles all relevant information, and forwards cases to Celltrion Inc. for further investigation. Where necessary, CMOs are engaged to conduct root cause analyses. Complaint handling and Product Quality Complaint evaluations form part of the Product Quality Review, a critical GMP requirement

Through the above coordinated efforts, Celltrion Europe entities ensure continuous oversight of product quality and safety – effectively reducing the risk of counterfeit drugs entering the supply chain and reinforcing trust in the healthcare ecosystem.

Three-tiered audit structure

Celltrion Europe entities' audit framework is structured across three hierarchical levels to ensure compliance with GDP and regulations concerning falsified medicines. At the top level, Celltrion Inc. establishes global policies and provides oversight to all local entities. The second level, represented by the Hungarian entity, is responsible for implementing these standards within its operations. The entity conducts regular internal audits, maintaining an updated list of customers and suppliers, and performing bi-annual self-inspections to ensure adherence to quality requirements. At the third level, local entities across various regions follow the expectations set by the headquarters and local regulations, conducting supplier audits while collaborating with the Hungarian entity to share best practices.

Supply chain audits are conducted regularly to verify compliance with quality agreements, GMP, GDP, and regulations regarding falsified medicines, covering both upstream and downstream suppliers as well as the entities' own operations. These audits are essential for maintaining the integrity of the supply chain and preventing counterfeit drugs from entering it.

Customers also maintain individual quality criteria to prevent the purchase of counterfeit drugs and ensure product quality. These customer criteria are assessed during audits performed at Celltrion Europe entities.

Serialization of products

Serialization of products is a critical component of Celltrion Europe offices' practices aimed at enhancing traceability and combating counterfeit drugs within the pharmaceutical supply chain. Actions taken by wholesale distributors ensure that the identity of the medicinal product is preserved and that the wholesale distribution of products is conducted in accordance with the information on the packaging. The existing drug traceability control system, SAP ATTP (Advanced Track and Trace for Pharmaceuticals), is designed to monitor drug movements and ensure the alignment with data reported to national authorities. This software specifically assists in complying with serialization and track-and-trace requirements throughout the supply chain, as a unique 13-digit numeric serial number is assigned to every product. The serial number serves as an ID that refers to the location, warehouse, type of biosimilar, or other properties of a product batch. Serialization facilitates efficient recalls and inventory management, ensuring that any

issues can be quickly identified and addressed while maintaining the integrity of the product. The entities conduct periodic reviews of product batches to prevent errors in product tracking and to detect potential counterfeit drugs.

Targets related to counterfeit drugs

S4-5

Celltrion Europe entities have established a group-level target to work exclusively with GDP- and GMP-certified service providers and subcontractors. This target applies to partners throughout the upstream and downstream value chain and must be fully implemented within one year, with the goal of maintaining 100% compliance from 2024 onwards. As part of these efforts, Celltrion Healthcare Hungary and the UK have taken the lead in setting an additional goal to audit 100% of their suppliers, further reinforcing supply chain integrity. This target was set in coordination with the HQ Supply Chain Management Department, ensuring alignment with GDP requirements, local SOPs, and counterfeit drug prevention measures, thereby protecting consumers from the risks associated with falsified medications.

Metrics related to counterfeit drugs

HC-DI-260a 1

Celltrion Europe entities address the risk of falsified products by maintaining the traceability and serialization of products. These actions are detailed in chapter *3.4.3 Actions related to counterfeit drugs*.

3.4.4 Social inclusion of consumers and/or end-users – Affordability and Accessibility

Material impact, risk and opportunity management related to affordability and accessibility

S4.SBM-3

Material sustainability topic	Identified IRO	Description	Value chain	Time horizon
Social inclusion of consumers and/or end-users	Positive impact	Enabling better access to medication in remote places, where healthcare is less accessible.	Downstream	Medium-term
	Positive impact	Providing sample distribution programs to enhance social inclusion by giving access to as many people as its possible.	Downstream impact	Short-term
	Opportunity	If the drugs are affordable, it can increase number of consumers who gain access to treatments, resulting in an increase in sales volume for Celltrion Europe entities. (A regulation or policy that promotes social inclusion of pharmaceutical products can lead to increase in sales of biosimilar (Celltrion's products)		Medium/Long-term
Affordability and pricing	Positive impact	The products of Celltrion Europe entities are always priced lower to make them affordable and accessible worldwide.	Downstream impact	Short-term
	Positive impact	Fostering competitive dynamics in the markets through the sale of biosimilars leads to lower prices and improved access to the market.	Downstream impact	Short-term
	Opportunity	The trust between Celltrion Europe entities and their customers can lead to increased volumes and higher market penetration.		Short-term
	Risk	Thin margins, low product differentiation and additional competitors can potentially cause financial risk in the future.		Short-term

Celltrion Europe entities have significantly contributed to the affordability of biologic treatments by introducing the world's first monoclonal antibody biosimilar. This notable achievement not only sets a precedent in the industry but also plays a vital role in reducing treatment costs for patients. By leveraging Celltrion's global leadership in biosimilars, the European operations ensure that high-quality, cost-effective therapies are available to healthcare systems and patients throughout the region. Through the oversight of critical functions such as batch release, regulatory compliance, and efficient distribution, Celltrion Europe entities facilitate the delivery of essential therapies while supporting the long-term sustainability of national healthcare. This

commitment to affordability not only improves patient access to necessary treatments but also strengthens the overall healthcare landscape in Europe.

Celltrion Europe entities aim to improve access to medication in remote areas where healthcare services are limited, addressing the needs of underserved populations. One example is Remsima SC, an innovative product developed by Celltrion that allows patients to receive treatment at home. By expanding access to this subcutaneous formulation, Celltrion Europe entities contribute to more flexible treatment options and support healthcare accessibility across the region.

Policies related to affordability and accessibility

S4-1

Celltrion Europe entities do not implement a standardized pricing policy across the EU. The offices maintain similar, yet distinct biosimilar portfolios and operate within different legal environments; therefore, they negotiate with the relevant authorities in each European country.

Actions related to affordability and accessibility

S4-4

Product affordability and accessibility are currently managed at the entity level, as no group-wide initiatives have been established to date. By actively participating in public tenders, Celltrion Europe entities help ensure that hospitals, pharmacies, and healthcare professionals can procure biosimilars more efficiently, thereby improving patient access to essential treatments. In certain countries, entities have also established agreements with local stakeholders to introduce biosimilars at prices significantly lower than those of reference medicines, further advancing affordability. The renewal and monitoring of these agreements are overseen by local management to ensure continued compliance and effectiveness.

Celltrion has also established itself as a product innovator with the introduction of Remsima SC, the world's first subcutaneous version of infliximab. This innovative product significantly enhances patient convenience and flexibility, as it allows individuals to self-administer treatment in a home setting, eliminating the need for traditional intravenous (IV) infusions that require hours of lying in a hospital. By offering Remsima SC, Celltrion Europe entities not only expand the sales portfolio in Europe but also improve accessibility for patients, reduce administration costs, and enhances care for those with mobility challenges.

Celltrion Europe entities plan to improve data collection processes and initiate group-level actions to further enhance product affordability and accessibility in the coming years.

Targets related to affordability and accessibility

S4-5

Currently, there are no group-level targets related to the affordability and accessibility of products. The accessibility of products is evaluated based on market penetration levels within the European Union. Although there is no formal target in place, Celltrion's European offices are on a growth trajectory, aiming to increase the market share in the coming years.

Metrics related to affordability and accessibility

HC-BP-240b.3 1, HC-BP-240b.3 2

As a result of Celltrion European entities' efforts to make biosimilar products more affordable over the years, the following decrease in product prices have been achieved:

Annualised percentage change in the revenue-weighted average list and net price[32]

Subsidiary	Total (all products)
	Annualised percentage change across the product portfolio in the revenue-weighted average net price
Celltrion Healthcare Hungary	-16%
Celltrion Healthcare UK	-7%
Celltrion Healthcare Ireland	-10%
Celltrion Healthcare Italy	-35%
Celltrion Healthcare France	1%
Celltrion Healthcare Finland	49%
Celltrion Healthcare Netherland	4%

The annualized percentage change in list and net price of the product with the largest increase[33]

Subsidiary	Total (all products)
	Annualized percentage change in net price of the product with the largest increase
Celltrion Healthcare Hungary	-32%
Celltrion Healthcare UK	19%
Celltrion Healthcare Ireland	-28%
Celltrion Healthcare Italy	-60%
Celltrion Healthcare France	-19%
Celltrion Healthcare Finland	-23%
Celltrion Healthcare Netherland	-58%

Celltrion Europe entities acknowledge that tracking and communicating changes in list prices is a meaningful indicator of product affordability and stakeholder accountability. While Celltrion Europe entities maintain internal visibility into pricing metrics – including the annualized percentage change in the revenue-weighted average list price across the product portfolio and the product with the largest increase – this information is not being disclosed at this time. As part of its ongoing efforts to enhance data governance and reporting alignment with industry

[32] Due to lack of information or no sales activity during the financial year, the annualized percentage change across the product portfolio in the revenue-weighted average net price is not disclosed for the following entities: Celltrion Healthcare Austria, Belgium, Norway, Czech Republic, Romania, Poland, Switzerland, Spain, Denmark, Deutschland, Portugal and Sweden.

[33] Due to lack of information or no sales activity during the financial year, annualized percentage change in net price of the product with the largest increase is not disclosed for the following entities: Celltrion Healthcare Denmark, Austria, Deutschland, Belgium, Norway, Czech Republic, Romania, Poland, Spain, Portugal, Sweden, Switzerland.

expectations, Celltrion Europe is actively strengthening internal systems and aims to incorporate these indicators into future disclosures.

Through its evolving pricing transparency approach, Celltrion Europe entities seek to support informed stakeholder dialogue, contribute to healthcare system sustainability, and reinforce its long-term commitment to equitable access across the region.

4. Governance Information

Celltrion Europe entities are committed to upholding the highest standards of corporate governance, fostering a culture of integrity, accountability, and ethical business conduct. Guided by a strong corporate culture, the entities actively work to prevent corruption and bribery across all operation and supply chain. Political engagement and lobbying are carried out in a transparent and legally compliant manner, aligned with internal policies. To safeguard ethical practices and reinforce trust, Celltrion Europe entities have also established secure and anonymous whistleblower mechanism that protects individuals who report concerns in good faith.

4.1 ESRS G1 - Business conduct

Celltrion Europe entities are committed to conducting business with integrity, accountability, and respect for ethical standards. Operating in a highly regulated industry, maintaining trust with stakeholders—including patients, healthcare professionals, partners, and authorities—is essential. A consistent focus on transparency, compliance, and responsible decision-making guides daily operations and supports long-term business sustainability.

4.1.1 Corporate culture and corruption and bribery

Material impacts, risks and opportunities related to corporate culture and corruption and bribery

Corporate culture is fundamentally linked to compliance; therefore, the topic is addressed alongside the corruption and bribery material topic. These topics are presented in the same chapter, reflecting the interrelated nature.

Material sustainability topic	Identified IRO	Description	Value chain	Time horizon
Corporate culture	Positive impact	Communicating clear company vison and focusing on ethical values such as fairness, integrity within Celltrion Europe entities can attract talent.	Own impact	Short/Long-term
Corruption and bribery	Positive impact	Strict anti-corruption measures and employee training can prevent unethical behaviour.	Own impact	Short/Long-term
	Positive impact	Past experience, memberships of industry organizations can positively influence anti-corruption practices of Celltrion Europe entities.	Own impact	Short/Long-term
	Positive impact	Requiring suppliers to follow anti-corruption policies can maintain integrity and compliance.	Downstream impact	Medium/Long-term
	Opportunity	Commitment against and prohibition of corruption and bribery across the value chain improves business practices and helps avoid prosecution.		Short term

Attractive corporate culture

In today's competitive environment, organizations must continuously evolve to meet changing expectations—not only from customers and regulators but also from employees. Recognizing

this, Celltrion Europe entities are committed to building a corporate culture grounded in fairness, transparency, and integrity. By clearly communicating this vision, the entities strengthen internal alignment, foster a sense of purpose among employees, and build long-term trust. This strong cultural foundation enhances the ability to attract and retain top talent, reinforces the company's reputation, and promotes accountability at all levels of the organization.

To further cultivate an attractive and future-ready workplace culture, Celltrion Europe entities embrace four core values: creativity, compliance with principles, the spirit of challenge, and the ambition to become Global No.1. Creativity is encouraged through a culture of innovation and unconventional thinking, enabling teams to develop forward-looking solutions. Adherence to principles ensures trust and reliability across all operations, reinforcing the organization's ethical foundation. The spirit of challenge inspires employees to pursue bold goals and overcome obstacles with resilience. Finally, the drive to become a global leader in the biopharmaceutical industry reflects the entities' ambition to continuously raise standards and lead in both innovation and impact.

Corruption and bribery

Celltrion Europe entities are firmly committed to upholding the highest standards of ethical conduct by adhering to group-level guidelines on anti-corruption and anti-bribery. These principles are embedded in daily operations and supported by a comprehensive compliance framework. To reinforce this culture of integrity, employees undergo regular training on ethical business practices, and a dedicated whistleblowing hotline is in place to report potential misconduct anonymously and without retaliation.

Recognizing that corruption risks can extend beyond internal operations, Celltrion Europe entities also apply these standards throughout their value chain. Business partners and suppliers are required to comply with anti-corruption policies as part of contractual agreements. This proactive approach not only promotes ethical conduct but also safeguards the company from legal risks and enhances transparency across all business relationships. By fostering accountability both within and beyond the organization, Celltrion Europe entities contribute to a responsible and resilient operating environment.

Policies related to corporate culture and corruption and bribery

G1-1

Global Code of Conduct

Celltrion Europe entities' Global Code of Conduct is the fundamental policy for pursuing the companies' vision and values. It establishes the basic requirements for the conduct of every member within the group and serves as the basis for other policies, procedures, and guidelines. The Global Code of Conduct applies to all Members, as well as the Company's overseas offices and subsidiaries.

The Global Code of Conduct comprises four fundamental principles that apply to all employees:

1. Corporate Integrity
   Celltrion entities strive to maximize profits for shareholders. To achieve this, the entities aim to establish an industry-leading ethical management system by transparently disclosing information about the operations and performance while protecting assets and resources. The organization recognizes that sustainability and stable growth can only be ensured through transparent and ethical management. Therefore, entities take every measure to integrate ethics into all segments of its operation.

2. Commitment to Customers
   Celltrion entities always act honestly and ethically when interacting with healthcare professionals, patients, consumers, healthcare organizations, and patient organizations. Celltrion Europe entities seek to provide the highest product quality and service, instilling a top level of trust in consumers around the world.
3. Commitment to Members
   Celltrion entities respect the dignity and values of every member of the group, providing fair treatment in personnel and welfare matters and offering equal opportunities to all job applicants. Additionally, the entities do not tolerate any form of workplace harassment or bullying.
4. Compliance
   Celltrion entities have a Chief Compliance Officer (CCO) and an independent Compliance Division dedicated to maintaining the highest level of ethical management at group-level in Korea. The CCO is responsible for assisting the company in complying with the legal and regulatory requirements necessary for conducting business. In the event of an incident, the CCO investigates and reports any updates to the CEO and board of directors.
5. Sustainability
   Celltrion entities recognize that healthier future requires more than scientific medical innovation. The entities are fully aware that a healthier future depends on the well-being of our shared planet and society.

To support the establishment of a strong corporate culture, all new recruits are required to sign an ethics pledge, confirming their understanding and commitment to the Global Code of Conduct.

Anti-Corruption Policy

In alignment with the Global Code of Conduct, the Global Anti-Corruption Compliance Policy was established by the Global Compliance & ESG Department. The policy is designed following the leading international anti-corruption frameworks, including the U.S. Foreign Corrupt Practices Act (FCPA) and the U.K. Bribery Act (UKBA), and reflects key principles promoted by the United Nations Convention against Corruption. The policy outlines general processes and guidelines to follow in specific circumstances to avoid and prevent corruption and bribery. These guidelines cover various topics, including company standards, investigation procedures, third-party payments, gifts, relationships, permissible support for government officials and healthcare professionals, and procedures applicable to mergers and acquisitions (M&A).

At Celltrion Europe entities, the sales and commercial functions are recognized as areas with potential exposure to corruption and bribery risks. To mitigate these risks, Celltrion Europe entities uphold a strong ethical framework guided by the Global Code of Conduct, which sets clear standards for integrity and responsible business conduct. Additionally, the Supplier Code of Conduct explicitly prohibits bribery and corruption among business partners along the value chain, requiring suppliers to implement appropriate controls to prevent unlawful practices. Any concerns related to corruption or bribery are reported to the Chief Compliance Officer (CCO), whose team is responsible for investigating, documenting, and resolving potential violations in accordance with established procedures.

Good Marketing Practices

The policy explicitly prohibits the offering or giving of anything of value to healthcare professionals (HCPs) as a reward for influencing the decisions regarding the use or prescription of the company's products, thereby preventing any form of bribery or improper advantage. It also establishes guidelines for organizing events, sponsorships, and providing hospitality, ensuring that these activities are conducted transparently and ethically, without creating incentives for HCPs to act inappropriately. By enforcing these standards, the policy aims to maintain integrity in marketing practices and uphold compliance with anti-corruption laws. For further details, please refer to chapters 3.4.1 Information-related impacts for consumers and/or end-users and 4.1.3 Political engagement and lobbying.

Actions related to corporate culture and corruption and bribery

G1-1, G1-2, G1-3, G1-4

Anti-corruption training

To promote a consistent understanding of ethical expectations and business conduct standards, Celltrion Europe entities provide standardized training across all business lines to ensure all employees are properly informed and aligned. The completion rate of the training is monitored, and additional sessions are conducted for employees who have not completed it. The training requirements extend beyond the internal workforce to part-time employees and expats as well.

Employees covered by anti-corruption training

Training coverage	All employees
Employees covered by anti-corruption training	100%
Training completion rate	97%
Delivery method, duration and frequency	
Classroom training	-
Computer-based training	1 hour
Voluntary computer- training-based	-
Frequency of trainings	Annual
Topics covered	
Definition of corruption	Covered
Policy	Covered
Procedures on suspicion/detection	Covered

Responsible supplier management

G1-2

Responsible supplier management is a critical component of maintaining ethical business practices and upholding Celltrion Europe entities' standards for compliance, product safety and sustainability. The supplier relationships of the entities are managed through Standard Operating Procedures (For further information please see chapter *3.4.2 Policies related to product safety)* and an annual due diligence process is conducted to ensure alignment with the Global Code of Conduct and relevant legal frameworks. This process is guided by the Global Due Diligence Policy

(for further information, please see chapters *3.2 ESRS S3 - Workers in the value chain* and *3.3 ESRS S3 – Affected communities*).

As part of this process, suppliers are required to complete a questionnaire assessing the robustness of their quality systems and technical capabilities in relation to both internal standards and regulatory expectations. The questionnaire also includes a sustainability section, which evaluates climate-related practices, human rights protections, data security measures, and anti-bribery policies and procedures. When potential adverse impacts are identified, Celltrion Europe entities collaborate with suppliers to implement corrective action plans. If the issues are not adequately resolved, despite collaborative efforts, suspension or termination of the contractual relationship may be considered as a last resort.

The role of the administrative, management and supervisory bodies related to business conduct

G1.GOV-1

Celltrion Europe entities are committed to ethical business conduct through a clear delineation of roles and responsibilities among its administrative, management, and supervisory bodies. Every member of the leadership team is responsible for the application and enforcement of ethical behavior within their respective areas. The leaders are expected to serve as role models, demonstrating exemplary behavior that aligns with Celltrion Europe entities' ethical standards.

By integrating ethical practices into their operations and decision-making processes, the organization aims to foster a culture of integrity and compliance across all levels.

At the top management level, the head of the Global Sales Business Group and the Head of Europe division not only represents overseas entities in administrative and management bodies but also facilitates collaboration among various business groups to ensure that sales strategies align with ethical standards. The head of the Global Business Management Unit receives weekly reports on business conduct issues from European entities, allowing for timely intervention and guidance on compliance matters. Similarly, the Head of the Europe Division ensures that all Europe entities adhere to ethical business practices, actively monitoring operations to mitigate risks of corruption and mismanagement.

At the regional level, the Heads of the Regional Headquarters, responsible for specific geographical areas, conduct regular inspections and manage business conduct matters to protect the interests of respective entities. These efforts are coordinated under the broader oversight of the Head of the Global Compliance & ESG Department, who ensures that all entities operate in accordance with applicable local regulations and global standards.

For further details on the expertise and competence of top management and their respective business areas, please refer to chapter *1.3 Sustainability governance and competence of top management*.

Metrics related to corporate culture and corruption and bribery

G1-4

As a result of all efforts put into ethical operations and the avoidance of any cases of corruption and bribery, none of the Celltrion Europe entities have faced legal consequences or monetary fines for violations of anti-corruption and anti-bribery laws.

4.1.2 Protection of whistleblowers

Material impacts, risks and opportunities related to protection of whistleblowers

Material sustainability topic	Identified IRO	Description	Value chain	Time horizon
Protection of whistleblowers	Positive Impact	Providing strong whistleblower safeguards and related training opportunities for employees can foster ethical conduct.	Own impact	Long-term
	Opportunity	Whistleblowers can often reveal information that indicates serious financial and legal risks. Addressing such abuses in a timely manner can reduce potential associated fines and litigation costs.		Long-term

Whistleblowers can often reveal critical information that indicates serious financial and legal risks. Celltrion Europe entities aim to foster a culture where these violations are addressed in a timely manner, thereby reducing potential fines and litigation costs. Celltrion Europe entities strive to create an environment where employees feel safe to report unethical behaviour. In support of this initiative, the entities focus on providing strong whistleblower safeguards and related training opportunities for the employees. This proactive approach not only protects the integrity of the organization but also empowers employees to contribute to a more ethical workplace.

Policies related to protection of whistleblowers

G1-1

Celltrion Europe entities established two global policies to manage the impacts related to protection of whistleblowers. Global Speak-up Policy is disclosed to the public, while Global Whistleblowing Policy is intended for internal use. As the core values and main context of these policies align, the two will be explained together.

Global Whistleblowing Policy and Global Speak-up Policy

As stated in the Global Code of Conduct, Celltrion Europe entities strive to conduct business with honesty and integrity. To take appropriate measures to identify situations of malpractice and remedy those harmed, the Global Whistleblowing Policy and the Global Speak-up Policy mandate employees to operate lawfully and report any suspicions of wrongdoing.

The Global Whistleblowing Policy and Global Speak-up Policy apply to all internal and external stakeholders, promoting transparency and accountability throughout the supply chain. Celltrion Europe entities are committed to fostering a culture where concerns related to ethics, business integrity, the environment, and human rights and labour practices can be reported anonymously and without fear of retaliation. The policies outline the roles and responsibilities of all parties involved in the Speak-up process, detailing the procedures for reporting concerns, conducting investigations, and implementing follow-up actions as necessary.

The policies emphasize the protection of those who raise concerns about misconduct. They ensure strict confidentiality, meaning that a reporter's identity will only be shared with authorized personnel involved in the investigation. Furthermore, the policies strictly prohibit retaliation or harassment against individuals who report in good faith, stating that any form of victimization,

such as discrimination or unfair treatment, will not be tolerated and may lead to disciplinary actions against the perpetrator, including formal proceedings or employment termination.

Both policies state that the Speak-up channel is accessible to all stakeholders, including current, former, or prospective employees. Reports can concern the entities' own operations, the operations of its subsidiaries, or business partners within the entities' supply chain. After processing and managing concerns, the Global Compliance & ESG Department documents and retains all information received through the Speak-up channel and subsequent investigation records for five years.

Actions related to protection of whistleblowers

G1-3

The Speak-Up channel is a confidential, 24/7 reporting system that offers multilingual support, enabling stakeholders to report concerns anonymously and securely. This platform serves as a direct and reliable communication channel to the Global Compliance & ESG Department, which is responsible for reviewing and addressing reports promptly and thoroughly. To safeguard anonymity, the Global Compliance team manages all submissions and ensures that no individuals implicated in the report can access the information—unless explicitly named by the reporter. These safeguards are essential to protecting whistleblowers from any form of retaliation.

Employees are strongly encouraged to use the Speak-Up channel as the primary avenue for reporting misconduct or ethical concerns. In addition, independent and anonymous local-level whistleblowing mechanisms are available for instances where reporting through a direct supervisor may not be appropriate.

For more details, please refer to chapter 3.1.1 Processes for addressing employee concerns.

Metrics related to protection of whistleblowers

For metrics, please see chapters *4.1.1 Metrics related to corporate culture* and *4.1.4. Metrics related to privacy and data security*.

4.1.3 Political engagement and lobbying

Material impacts, risks and opportunities related to political engagement and lobbying

Material sustainability topic	Identified IRO	Description	Value chain	Time horizon
Political engagement and lobbying	Positive Impact	Industry associations, of which Celltrion Europe entities are a member, play an active political role in, has several positive effects on end-users and the entire supply chain.	Own impact	Medium-term
	Negative Impact	The lack of professional qualifications related to political engagement or lobbying activities can pose a risk to maintaining compliance.	Own impact	Medium/Long-term
	Risk	Failure to adequately monitor and counteract the political commitments and lobbying activities of competitors can result in a competitive disadvantage and loss of market share.		Short/Medium-term
	Risk	The lack of appropriate professional qualifications to engage with political parties or lobbying could pose as a potential financial risk for Celltrion Europe entities.		Short/Medium-term
	Opportunity	Participation in industry associations and compliant lobbying activities can create additional market opportunities.		Short-term
	Opportunity	Positive market influence through active, ethical political engagement and lobbying activities.		Short-term

The healthcare industry operates within a strict, but ever-changing regulatory environment. The introduction of new legislation or modifications to existing laws can significantly impact the approval process and distribution of healthcare products. Failure to proactively monitor and respond to shifts in the policy landscape may result in strategic blind spots, regulatory delays, and potential loss of market access for Celltrion Europe entities. Active engagement in industry associations and compliant lobbying efforts allows Celltrion Europe entities to help shape relevant policy discussions and seize market opportunities, ultimately supporting the delivery of high-quality care to patients through their products.

Furthermore, the absence of appropriate professional qualifications for lobbying could pose a significant financial risk for healthcare companies, jeopardizing their market position.

By addressing risks and opportunities related to political engagement and lobbying in a timely manner, Celltrion can influence financial outcomes - i.e. potential losses from competitive disadvantage and fines for inappropriate lobbying activities - and ultimately strengthen stakeholder perception.

Policies related to political engagement and lobbying

G1-1

While Celltrion Europe entities do not have a specific document that regulates the lobbying activities, it is embedded in several other policies that refer to expected behaviour and conduct when engaging in lobbying.

Global Anti-corruption Policy

The Global Anti-Corruption Policy at Celltrion Healthcare regulates political engagement and lobbying, including the provision of gifts, by establishing clear guidelines to ensure compliance with anti-corruption laws. The policy prohibits any employee from offering or authorizing payments or gifts to government officials [34]to influence the actions or gain improper advantages. Political contributions are permitted only when compliant with local laws and must support industry-relevant policies without creating improper benefits for officials. All support provided to government officials requires pre-clearance, and detailed documentation is maintained in a "gift log" for transparency.

Global Code of Conduct, Supplier Code of Conduct

The Global Code of Conduct provides general guidelines on expected ethical behaviour for all employees. For further details, please see *Chapters 3.1, Policies Related to Own Workforce,* and *4.1.1, Corporate Culture*.

In line with these principles, Celltrion Europe entities also expect their suppliers to engage in responsible and legally compliant lobbying activities, as outlined in the Supplier Code of Conduct. Suppliers must ensure that their political activities and related funding comply with local laws and regulations, including proper documentation and transparency. They are also expected to respect employees' rights to participate in political and civic processes without interference.

Actions related to political engagement and lobbying

G1-5

During the 2024 financial year, Celltrion Europe entities engaged in responsible lobbying activities to support the broader adoption of biosimilars and promote equitable access to affordable medicines across Europe.

Celltrion Europe entities provided funding to industry organizations to enhance awareness of biosimilars and build credible, long-term partnerships that support improved patient access to treatment. Furthermore, Celltrion Europe entities-maintained memberships in local industry associations to support efforts aimed at improving affordability and availability of medications, while promoting the role of generics and biosimilars in sustainable healthcare.

These lobbying activities are overseen by the regional General Manager of the respective countries. There are no entities within the organization where individuals taking part in lobbying activities held positions in public administration within two years prior to this report.

Metrics related to political engagement and lobbying

G1-5

Financial contributions made for lobbying purposes

Financial contributions often include payment of membership fees to industry associations and other scientific organisations. However, it is important to note that no financial contributions are made towards any political office. In countries, where Celltrion Europe entities are a member of certain industry organisations, these associations sometimes made donations independently in observation of the respective statutory regulations, particularly laws concerning political parties.

[34] Encompassing not only government employees but also political party officials and candidates

4.1.4 Privacy and data security

Material impacts, risks and opportunities related to privacy and data security

Material sustainability topic	Identified IRO	Description	Value chain	Time horizon
Privacy and data security	Positive Impact	Celltrion Europe entities comply with the EU GDPR and other relevant regulations, resulting in positive impact on the employees and patients' data protection.	Own impact	Medium/Long-term

Celltrion Europe entities are dedicated to upholding the highest standards of privacy and data security, particularly in the handling of sensitive patient data. In compliance with the EU General Data Protection Regulation (GDPR) and other relevant regulations, the organization ensures robust protection of this critical information. By prioritizing data security, the entities reinforce trust and confidence in their biosimilar pharmaceutical products, contributing to a secure environment for all stakeholders in the medium to long-term.

Policies related to privacy and data security

G1-1

Data Protection Policy

The Data Protection Policy aims to ensure compliance with applicable data protection laws and regulations, including GDPR and other relevant national legislation in EU countries. The policy governs the lawful, fair, and transparent processing of personal data related to employees, customers, suppliers, and other contacts. It defines personal data and outlines the responsibilities of Celltrion Europe entities as a data controller in managing this information. The policy emphasizes the importance of protecting personal data through proper collection, use, retention, transfer, disclosure, and disposal practices. It applies to all employees of Celltrion Europe entities and third parties who handle sensitive information. In cases where local laws or regulations are stricter than this policy, the local rules should be followed. Ensuring compliance with the relevant data protection regulations and the implementation of the Data Protection Policy is the responsibility of the Data Protection Officer (DPO).

Data Breach Management Policy

The Data Breach Management Policy outlines the processes and procedures for handling suspected security breaches involving personal data, ensuring a consistent and effective approach to managing data breaches and information security incidents across the organization. This policy aligns with the GDPR, similar to the previously mentioned Data Protection Policy. The Data Breach Management Policy applies to all employees within Celltrion Europe entities, as well as partners, suppliers, contractors, and representatives who may process personal data for which the company is either the data controller or has an interest in the affected personal data. The key elements of breach management include the discovery and identification of the breach, assessment, investigation, reporting, and finally, the lessons learned. This approach allows the company to explore takeaways, develop its data protection system, and ensure the effectiveness of its processes.

Speak-up channel Privacy Notice

The Speak-up Channel Privacy Notice outlines how Celltrion Europe entities process personal data within the Speak-up Channel, designed for stakeholders to report misconduct or concerns.

The notice applies to all individuals who may report incidents, including employees, former employees, contractors, and suppliers. Implementation responsibilities lie with the investigation team, which has direct access to the data, while compliance with GDPR and local laws is ensured. The notice emphasizes that personal data will be processed based on the reporter's consent and will be stored only for the duration necessary for investigations. For any inquiries or to exercise data rights, individuals can contact the Data Protection Officer, with specific contacts provided for various countries.

Actions related to privacy and data security

Data protection training

All employees within Celltrion Europe entities who have access to personal data are responsible for complying with the requirements of the Data Protection Policy. Expectations regarding data management are clearly outlined during the onboarding process, which includes appropriate data protection training. Celltrion provides regular data protection training and guidance to employees, focusing on key aspects such as internal data management principles, authorized use of personal data, and the correct use of forms and procedures. Employees will also learn about IT security measures, including the importance of limiting access to personal data and secure methods for storing manual files and electronic media. Additionally, the training will emphasize the need for authorization and safeguards when transferring personal data outside the internal network, proper disposal methods, and awareness of any special risks associated with specific departmental activities.

Metrics related to privacy and data security

As a result of Celltrion Europe entities' efforts no monetary losses or data breaches incurred during the reporting period resulting from legal proceedings associated with data security and privacy.

Appendices

Appendix 1: List of the disclosure requirements defined by on the outcome of the materiality assessment that has been included in this sustainability statement. The table below illustrates the datapoints in ESRS 2 and topical ESRS that derive from other EU legislation.

Disclosure Requirement	Page
ESRS 2 GENERAL DISCLOSURES	
BP-1 – General basis for preparation	3-5
BP-2 – Disclosures in relation to specific circumstances	5-6
GOV-1 – The role of the administrative, management and supervisory bodies	12-14
GOV-2 – Information provided to and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies	15
GOV-3 - Integration of sustainability-related performance in incentive schemes	14
GOV-5 - Risk management and internal controls over sustainability reporting	15
SBM-1 – Strategy, business model and value chain	8-10
SBM-2 – Interests and views of stakeholders	10-11

SBM-3 - Material impacts, risks and opportunities and their interaction with strategy and business model	15-19
IRO-1 - Description of the process to identify and assess material impacts, risks and opportunities	21-22
IRO-2 – Disclosure requirements in ESRS covered by the undertaking's sustainability statement	21-23
ESRS E1 CLIMATE CHANGE	
ESRS 2 IRO-1 – Description of the processes to identify and assess material climate-related impacts, risks and opportunities	25-26
ESRS 2 SBM-3 – Material impacts, risks and opportunities and their interaction with strategy and business model	26-27
E1-1 – Transition plan for climate change mitigation	27
E1-2 – Policies related to climate change mitigation and adaptation	27
E1-3 – Actions and resources in relation to climate change policies	27-29
E1-4 – Targets related to climate change mitigation and adaptation	29
E1-6 – Gross Scopes 1, 2, 3 and Total GHG emissions	30-32
ESRS E5 RESOUCE USE AND CIRCULAR ECONOMY	
ESRS 2 IRO-1 – Description of the processes to identify and assess material resource use and circular economy-related impacts, risks and opportunities	33
E5-1 – Policies related to resource use and circular economy	33
E5-2 – Actions and resources related to resource use and circular economy	34
E5-3 – Targets related to resource use and circular economy	34-35
E5-5 – Resource outflows	35
ESRS S1 OWN WORKFORCE	
ESRS 2 SBM-3 – Material impacts, risks and opportunities and their interaction with strategy and business model	36-37
S1-1 – Policies related to own workforce	37-38
S1-2 – Processes for engaging with own workforce and workers' representatives about impacts	38
S1-3 – Processes to remediate negative impacts and channels for own workforce to raise concerns	38-40
S1-4 – Taking action on material impacts on own workforce, and approaches to managing material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions	40-41;43-44
S1-5 – Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	41;44
S1-6 – Characteristics of the undertaking's employees	41-42
S1-8 – Collective bargaining coverage and social dialogue	41-43
S1-9 – Diversity metrics	41-42; 44-45
S1-11 – Social protection	41;43

S1-15 – Work-life balance metrics	44-45
S1-16 – Remuneration metrics (pay gap and total remuneration)	44-45
S1-17 – Incidents, complaints and severe human rights impacts	44-46
ESRS S2 WORKERS IN THE VALUE CHAIN	
ESRS 2 SBM-3 Material impacts, risks and opportunities and their interaction with strategy and business model	47
S2-1 – Policies related to value chain workers	47-48
S2-4 – Taking action on material impacts on value chain workers, and approaches to managing material risks and pursuing material opportunities related to value chain workers, and effectiveness of those action	48-49
S2-5 – Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	49
ESRS S3 AFFECTED COMMUNITIES	
ESRS 2 SBM-3 - Material impacts, risks and opportunities and their interaction with strategy and business model	50
S3-1 – Policies related to affected communities	51
S3-2 – Processes for engaging with affected communities about impacts	52
S3-4 – Taking action on material impacts on affected communities, and approaches to managing material risks and pursuing material opportunities related to affected communities, and effectiveness of those actions	52-53
S3-5 – Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	53
ESRS S4 CONSUMERS AND END-USERS	
ESRS 2 SBM-3 – Material impacts, risks and opportunities and their interaction with strategy and business model	56; 59; 63-64; 68-69
S4-1 – Policies related to consumers and end-users	54-55; 59-60; 64-65; 69
S4-2 – Processes for engaging with consumers and end-users about impacts	55
S4-3 – Processes to remediate negative impacts and channels for consumers and end-users to raise concerns	53-54
S4-4 – Taking action on material impacts on consumers and end-users, and approaches to managing material risks and pursuing material opportunities related to consumers and end-users, and effectiveness of those actions	57-58; 60-62; 65-67; 69
S4-5 – Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	58; 62-63; 67; 69
ESRS G1 BUSINESS CONDUCT	
ESRS 2 GOV-1 – The role of the administrative, supervisory and management bodies	76
G1-1– Business conduct policies and corporate culture	73-75; 77-78; 79-80; 81-82
G1-2 – Management of relationships with suppliers	75-76

G1-3 – Prevention and detection of corruption and bribery	78
G1-4 – Incidents of corruption or bribery	76
G1-5 – Political influence and lobbying activities	80

Appendix 2: List of datapoints in cross-cutting and topical standards that derive from other EU legislation. The table below illustrates the datapoints in ESRS 2 and topical ESRS that derive from other EU legislation and their location within the sustainability statement. A datapoint is considered „not relevant" if it does not apply to Celltrion Europe entities' business model. Datapoints, that omitted from reporting because they are voluntary, phase-ins or not reported due to another reason, are categorized as „not reported /phase-in".

Disclosure Requirement and Related Datapoint	Materiality	Section	Page
ESRS 2 GOV-1: Board's gender diversity (Paragraph 21(d))	Material	1.3 Governance	13
ESRS 2 GOV-1: Percentage of board members who are independent (Paragraph 21(e))	Material	1.3 Governance	12
ESRS 2 GOV-4: Statement on due diligence (Paragraph 30)	Material	Appendicies	89
ESRS 2 SBM-1: Involvement in activities related to fossil fuel activities (Paragraph 40(d)i)	Not relevant	-	-
ESRS 2 SBM-1: Involvement in activities related to chemical production (Paragraph 40(d)ii)	Not relevant	-	-
ESRS 2 SBM-1: Involvement in activities related to controversial weapons (Paragraph 40(d)iii)	Not relevant	-	-
ESRS 2 SBM-1: Involvement in activities related to cultivation and production of tobacco (Paragraph 40(d)iv)	Not relevant	-	-
ESRS E1-1: Transition plan to reach climate neutrality by 2050 (Paragraph 14)	Not reported / phase-in	-	-
ESRS E1-1: Undertakings excluded from Paris-aligned Benchmarks (Paragraph 16(g))	Not reported / phase-in	-	-
ESRS E1-4: GHG emission reduction targets (Paragraph 34)	Material	2.1.1 Climate Change Mitigation	28
ESRS E1-5: Energy consumption from fossil sources disaggregated by sources (Paragraph 38)	Not relevant	-	-
ESRS E1-5: Energy consumption and mix (Paragraph 37)	Not relevant	-	-
ESRS E1-5: Energy intensity associated with activities in high climate impact sectors (Paragraphs 40 to 43)	Not relevant	-	-
ESRS E1-6: Gross Scope 1, 2, 3 and Total GHG emissions (Paragraph 44)	Material	2.1.1 Climate Change Mitigation	29-30
ESRS E1-6: Gross GHG emissions intensity (Paragraphs 53 to 55)	Material	2.1.1 Climate Change Mitigation	29-30

ESRS E1-7: GHG removals and carbon credits (Paragraph 56)	Not relevant	-	-
ESRS E1-9: Exposure of the benchmark portfolio to climate-related physical risks (Paragraph 66)	Not reported / phase-in	-	-
ESRS E1-9: Disaggregation of monetary amounts by acute and chronic physical risk (Paragraph 66(a))	Not reported / phase-in	-	-
ESRS E1-9: Location of significant assets at material physical risk (Paragraph 66(c))	Not reported / phase-in	-	-
ESRS E1-9: Breakdown of the carrying value of its real estate assets by energy-efficiency classes (Paragraph 67(c))	Not reported / phase-in	-	-
ESRS E1-9: Degree of exposure of the portfolio to climate-related opportunities (Paragraph 69)	Not reported / phase-in	-	-
ESRS E2-4: Amount of each pollutant listed in Annex II of the E-PRTR Regulation (Paragraph 28)	Not material	-	-
ESRS E3-1: Water and marine resources (Paragraph 9)	Not material	-	-
ESRS E3-1: Dedicated policy (Paragraph 13)	Not material	-	-
ESRS E3-1: Sustainable oceans and seas (Paragraph 14)	Not material	-	-
ESRS E3-4: Total water recycled and reused (Paragraph 28(c))	Not material	-	-
ESRS E3-4: Total water consumption in m^3 per net revenue on own operations (Paragraph 29)	Not material	-	-
ESRS 2- SBM 3 - E4 paragraph 16 (a) i	Not material	-	-
ESRS 2- SBM 3 - E4 paragraph 16 (b)	Not material	-	-
ESRS 2- SBM 3 - E4 paragraph 16 (c)	Not material	-	-
ESRS E4-2: Sustainable land/agriculture practices or policies (Paragraph 24(b))	Not material	-	-
ESRS E4-2: Sustainable oceans/seas practices or policies (Paragraph 24(c))	Not material	-	-
ESRS E4-2: Policies to address deforestation (Paragraph 24(d))	Not material	-	-

ESRS E5-5: Non-recycled waste (Paragraph 37(d))	Not relevant	-	-
ESRS E5-5: Hazardous waste and radioactive waste (Paragraph 39)	Not relevant	-	-
ESRS 2- SBM3 - S1: Risk of incidents of forced labour (Paragraph 14(f))	Not relevant	-	-
ESRS 2- SBM3 - S1: Risk of incidents of child labour (Paragraph 14(g))	Not relevant	-	-
ESRS S1-1: Human rights policy commitments (Paragraph 20)	Material	3.1.1 Working conditions	37-38
ESRS S1-1: Due diligence policies on issues addressed by the fundamental International Labor Organisation Conventions 1 to 8 (Paragraph 21)	Material	3.1.1 Working conditions	37-38
ESRS S1-1: Processes and measures for preventing trafficking in human beings (Paragraph 22)	Material	3.1.1 Working conditions	37-38
ESRS S1-1: Workplace accident prevention policy or management system (Paragraph 23)	Not relevant	-	-
ESRS S1-3: Grievance/complaints handling mechanisms (Paragraph 32(c))	Material	3.1.1 Working conditions	38-40
ESRS S1-14: Number of fatalities and number and rate of work-related accidents (Paragraph 88(b) and (c))	Not relevant	-	-
ESRS S1-14: Number of days lost to injuries, accidents, fatalities or illness (Paragraph 88(e))	Not relevant	-	-
ESRS S1-16: Unadjusted gender pay gap (Paragraph 97(a))	Material	3.1.2 Equal treatment and opportunities for all	44
ESRS S1-16: Excessive CEO pay ratio (Paragraph 97(b))	Material	3.1.2 Equal treatment and opportunities for all	44
ESRS S1-17: Incidents of discrimination (Paragraph 103(a))	Not relevant	-	-
ESRS S1-17: Non-respect of UNGPs on Business and Human Rights and OECD Guidelines (Paragraph 104(a))	Material	3.1.2 Equal treatment and opportunities for all	45-46
ESRS 2- SBM3 – S2: Significant risk of child labour or forced labour in the value chain (Paragraph 11(b))	Material	3.2.1 Working Conditions	47
ESRS S2-1: Human rights policy commitments (Paragraph 17)	Material	3.2.1 Working Conditions	47-48
ESRS S2-1: Policies related to value chain workers (Paragraph 18)	Material	3.2.1 Working Conditions	47-48

ESRS S2-1: Non-respect of UNGPs on Business and Human Rights principles and OECD guidelines (Paragraph 19)	Material	3.2.1 Working Conditions	47-48
ESRS S2-1: Due diligence policies on issues addressed by the fundamental International Labor Organisation Conventions 1 to 8 (Paragraph 19)	Material	3.2.1 Working Conditions	48
ESRS S2-4: Human rights issues and incidents connected to its upstream and downstream value chain (Paragraph 36)	Not reported / phase-in	-	-
ESRS S3-1: Human rights policy commitments (Paragraph 16)	Material	3.3.1 Communities' economic, social and cultural rights	51
ESRS S3-1: Non-respect of UNGPs on Business and Human Rights, ILO principles or OECD guidelines (Paragraph 17)	Material	3.3.1 Communities' economic, social and cultural rights	51
ESRS S3-4: Human rights issues and incidents (Paragraph 36)	Not reported / phase-in	-	-
ESRS S4-1: Policies related to consumers and end-users (Paragraph 16)	Material	3.4.1 Information-related impacts of consumers and/or end-users – Product information 3.4.2 Personal safety of consumers and/or end-user – Product safety 3.4.3 Counterfeit drugs 3.4.4 Social inclusion of consumer and/or end users – Affordability and Accessibility	56-57; 59-60; 64-65; 69
ESRS S4-1: Non-respect of UNGPs on Business and Human Rights and OECD guidelines (Paragraph 17)	Material	3.4 ESRS S4 – Consumers & end users	54-55
ESRS S4-4: Human rights issues and incidents (Paragraph 35)	Material	3.4.1 Information – related impacts of consumers and/or end- users – Product information	57-58
ESRS G1-1: United Nations Convention against Corruption (Paragraph 10(b))	Material	4.1.2 Protection of whistleblowers	77-78
ESRS G1-1: Protection of whistleblowers (Paragraph 10(d))	Not relevant	-	-
ESRS G1-4: Fines for violation of anti-corruption and anti-bribery laws (Paragraph 24(a))	Material	4.1.1 Corporate culture and Corruption and bribery	76
ESRS G1-4: Standards of anti-corruption and anti-bribery (Paragraph 24(b))	Not reported / phase-in	-	-

Appendix 3: Statement on due diligence
GOV-4

Core elements of due diligence	Paragraphs in the sustainability statement
a) Embedding due diligence in governance, strategy and business model	3.2 ESRS S2 - Workers in the value chain 3.3 ESRS S3 – Affected communities
b) Engaging with affected stakeholders in all key steps of the due diligence	3.2 ESRS S2 - Workers in the value chain 3.3 ESRS S3 – Affected communities 1.4 Impact, risk and opportunity management
c) Identifying and assessing adverse impacts	1.4 Impact, risk and opportunity management
d) Taking actions to address those adverse impacts	2.1 ESRS E1 - Climate change mitigation 2.2 ESRS E5 - Resource use & circular economy 3.1.1 Working conditions 3.1.2 Equal treatment and opportunities for all 3.2 ESRS S2 - Workers in the value chain 3.3 ESRS S3 - Affected Communities 3.4.1 Product information 3.4.2 Product safety 3.4.3 Affordability and Accessibility 3.4.4 Counterfeit drugs 4.1.1 Corporate culture and corruption and bribery 4.1.2 Protection of whistleblowers 4.1.3 Political engagement and lobbying 4.1.4 Privacy and data security
e) Tracking the effectiveness of these efforts and communicating	3.1.1 Working conditions 3.2 ESRS S2 - Workers in the value chain 3.3 ESRS S3 - Affected Communities 3.4.1 Product information 3.4.2 Product safety 3.4.3 Affordability and Accessibility 4.1.1 Corporate culture and corruption and bribery 4.1.4 Privacy and data security

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This report includes forward looking statements related Celltrion Healthcare Hungary, Celltrion Europe entities and Celltrion Inc. sustainability goals, plans and expectations. These statements reflect current views and assumptions and are subject to change based on future developments. Actual outcomes may differ due to various uncertainties or external factors.

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This report focuses on the activities and sustainability performances of Celltrion Europe entities for the fiscal year of 2024. It does not represent the operations or sustainability performance of other Celltrion Group companies or Celltrion Inc.

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