

Regeneron Pharmaceuticals, Inc. Supplier Code of Conduct

Regeneron Pharmaceuticals, Inc. Supplier Code of Conduct prior to February 16, 2026, known as the “Regeneron Pharmaceuticals, Inc.’s Vendor Code”.

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I. Introduction

On February 16, 2026, “Regeneron Pharmaceuticals, Inc.’s Vendor Code” was renamed to be “Regeneron Pharmaceuticals Inc.’s Supplier Code of Conduct”. Regeneron Pharmaceuticals, Inc., and its controlled affiliates and directly or indirectly wholly-owned subsidiaries (collectively, “Regeneron”) are committed to conducting their business in accordance with all applicable laws and with the highest ethical standards.

This Supplier Code of Conduct (“Code”) is aligned with Regeneron’s standards and the [Pharmaceutical Industry Principles for Responsible Supply Chain Management](#). It outlines our expectations for sustainable performance within the biopharmaceutical industry. The Code applies to all Regeneron suppliers, defined as any organization or individual engaged in commercial dealings with Regeneron, including those providing products or services to, or on behalf of Regeneron (“Suppliers”). While Suppliers operate as independent entities, the business practices and actions of a Supplier may significantly impact and/or reflect upon Regeneron’s reputation. Therefore, we expect all Suppliers and their employees, agents and subcontractors to understand and adhere to this Code when they are conducting business with and/or on behalf of Regeneron.

In the event of any inconsistency or conflict between this Code and any applicable agreement governing the relationship between Regeneron and any Supplier (the “Agreement”), the terms, conditions and provisions of the Agreement shall govern and control.

We recognize the vital role of our Suppliers in providing quality products and services. Regeneron thanks all of its Suppliers for their shared commitment to doing the right thing.

II. Ethics

All Suppliers are expected to maintain the highest standards of integrity and conduct their business ethically, in full compliance with all applicable laws and in accordance with the principles of this Supplier Code. Regeneron expects Suppliers to comply with all legal and regulatory ethics requirements, including those relating to the following areas:

Business Integrity and Fair Competition

All corruption, extortion and embezzlement are prohibited. Suppliers shall not pay or accept bribes or participate in other illegal inducements in business or government relationships. All Suppliers are required to fully comply with all applicable anti-corruption and anti-bribery laws, including, but not limited to, the U.S. Foreign Corrupt Practices Act and the UK Bribery Act.

Suppliers shall conduct their business in a manner consistent with fair and vigorous competition and in compliance with all applicable anti-trust laws. Suppliers shall employ

fair business practices, including accurate and truthful advertising.

Ineligible Suppliers

Regeneron will not conduct business with any Supplier if any of the Supplier's officers, directors, or employees are or becomes excluded from, debarred by, or ineligible to participate in any United States governmental contracting program or is listed on any U.S. Department of the Treasury, Office of Foreign Assets Control Sanctions Program, including any Specially Designated Nationals or Blocked Persons.

Identification of Concerns

Suppliers are encouraged to report concerns or suspected illegal activities in connection with their relationship with Regeneron. Regeneron will review the concerns and respond to them appropriately.

Suppliers may raise compliance concerns through Regeneron's compliance hotlines available at [EthicsPoint](#) or by [phone](#).

Animal Welfare

Animals shall be treated humanely, minimizing pain and suffering. Animal testing should only be conducted after thoroughly exploring alternative methods, with the aim of replacing animal use, reducing the number of animals involved, or refining procedures to minimize pain and suffering. Alternatives should be used wherever scientifically appropriate and acceptable to regulators.

Data Protection and Privacy

Suppliers handling Regeneron's personal and confidential data must adhere to and comply with relevant privacy and data protection laws. All information related to Regeneron operations and personal data must be kept strictly confidential. Suppliers are prohibited from sharing or disclosing this data to third parties. Additionally, Regeneron data must not be used for purposes outside the agreed business arrangement without prior authorization.

Conflict of Interest

Suppliers must avoid transactions or relationships that are or appear to be conflicts of interest. Regeneron shall be notified immediately in the event of a potential or actual conflict of interest.

Product Quality

Suppliers involved in the supply, manufacturing, packaging, re-packaging, testing, storage, and distribution of materials/products to Regeneron or on behalf of Regeneron will ensure compliance with applicable quality regulations and Good Manufacturing Practice (GMP), Good Distribution Practice (GDP) and Good Laboratory Practice (GLP) requirements for the markets in which the products are manufactured, registered, and

distributed, and in accordance with all applicable laws and regulations.

Clinical Trials

If conducting clinical trials, Suppliers are expected to do so in accordance with all applicable international guidelines, national and local laws and regulations, as well as the strictest medical, scientific and ethical principles.

Adverse Event and Product Complaint Reporting

An Adverse Event (AE), Special Situation, or Product Complaint (PC) associated with the use of a Regeneron Product can be reported to Regeneron via [email](#) or phone at 1-844-REGN-MID (1-844-743-6643). Alternatively, our regional contact information for AE-PC reporting can be found here: [LINK](#). Contractors should refer to obligations as set forth in their respective contracts.

Gift Giving Guidelines

Acceptable gifts/entertainment from external suppliers:

Token gifts of food (cookies, fruit, candy, etc.) that can be shared with others in the office. Gifts of nominal value (e.g., pens, notepads, calendars), reasonable meals, and entertainment in the course of a bona fide business relationship.

Unacceptable gifts/entertainment from external suppliers:

Gifts that are illegal or would result in a violation of the law. A “quid pro quo” (“this for that”) agreement requiring or implying something in return for a gift or entertainment. Any gifts in cash or cash equivalents of any amount. Lavish gifts intended to influence a business decision, such as Super Bowl tickets or travel tickets. Entertainment or gifts that might compromise the Company if they were to receive public scrutiny (visits to casinos, etc.).

III. Human Rights

Suppliers are required to uphold human rights and treat workers with dignity and respect, complying with laws regarding fair and equitable treatment. Suppliers must adhere to all legal and regulatory requirements regarding fair and equitable treatment of employees, including:

Freely Chosen Employment

Suppliers shall not use forced, bonded or indentured labor, involuntary prison labor, or take part in human trafficking or any form of modern slavery. No worker shall pay for a job or be denied freedom of movement

Child Labor and Young Workers

Suppliers shall not use child labor. The employment of young workers below the age of 18 shall only occur in non-hazardous work and when young workers are above the

applicable country's legal age for employment or the age established for completing compulsory education. Employee files should be maintained with adequate data to verify ages of employees.

Non-Discrimination

Suppliers shall provide a workplace free of harassment and discrimination. Harassment or discrimination for reasons such as race, color, creed, age, gender, gender identity, sexual orientation, familial status, national origin, citizenship status, military or veteran status, genetic information, ethnicity, disability, physical characteristics, pregnancy, religion, political affiliation, union membership, or marital status is not to be condoned or tolerated.

Regeneron expects Suppliers to share its commitment to equal opportunity in employment.

Fair Treatment

Suppliers shall provide a work environment free of harassment, harsh and inhumane treatment, including any sexual harassment, sexual abuse, corporal punishment, mental or physical coercion, or verbal abuse of workers, and no threat of any such treatment.

Wages, Benefits and Working Hours

Suppliers shall pay workers according to applicable wage laws and agreed employment contracts, including minimum wages, overtime hours and mandated benefits. Suppliers shall communicate with the worker the basis on which they are being compensated in a timely manner. Overtime work shall be voluntary, as well as consistent with applicable national and international standards. Suppliers are expected to communicate with the worker whether overtime is required and the wages to be paid for such overtime.

Freedom of Association and the Right of Collective Bargaining

Suppliers shall respect the rights of workers, as set forth in local laws, to associate freely, join or not join labor unions, seek representation and join workers' councils, as well as to bargain collectively. Where the right to freedom of association and collective bargaining is restricted under law, the employer facilitates, and does not hinder, the development of parallel means for independent and free association and bargaining. Workers shall be able to communicate openly with management regarding working conditions without fear of retaliation.

Local Communities

Suppliers shall respect the rights of the local communities around their sites including the right to a clean and healthy environment.

IV. Health and Safety

Suppliers shall provide a safe and healthy working environment for all employees, including contractors and subcontractors, working at their sites. Suppliers must comply with all legal and regulatory requirements regarding employee health and safety, including:

Worker Protection

Suppliers shall protect workers from over exposure to chemical, biological, and physical hazards in the workplace. Suppliers shall operate in compliance with all applicable health, safety and public health regulations and ensure safety management systems are in place to prevent work-related personal injuries.

Process Safety

Suppliers shall have programs in place to prevent or mitigate these risks (including catastrophic releases of chemicals, fumes, and dust). Suppliers' actions shall be commensurate with the risks associated with the potential impact.

Emergency Preparedness and Response

Suppliers shall identify and assess emergency situations in the workplace and in the community and minimize their impact by implementing emergency plans to response procedures. Suppliers shall review and, if appropriate, update such plans and procedures annually or more frequently as necessary.

Hazard Information

Safety information relating to hazardous materials – including pharmaceutical compounds and pharmaceutical intermediate materials – shall be available to educate, train, and protect workers from hazards.

V. Environment

Suppliers shall operate in an environmentally responsible and efficient manner to minimize adverse impacts on the environment, and expect their own suppliers to do the same. Suppliers must comply with all legal and regulatory requirements regarding environment, including:

Environmental Authorizations

Suppliers shall have processes and systems to conform with applicable environmental laws and regulations. Required environmental permits, licenses, information registrations and restrictions shall be obtained, and their operational and reporting requirements followed.

Waste and Emissions

Suppliers shall have processes and systems in place to ensure the safe handling, movement, storage, recycling, reuse, or management of waste. Any generation and disposal of waste, emissions to air and discharges to water, with the potential to adversely impact human health or the environment shall be appropriately minimized, properly managed, controlled, and/or treated prior to release into the environment, this includes managing releases of active pharmaceuticals into the environment (PiE).

Spills and Releases

Suppliers shall have processes and systems in place to prevent and mitigate accidental and diffusive spills and releases to the environment.

Sustainability and Efficiency of Resources

Suppliers shall have processes and systems in place to optimize the use of all relevant resources sustainably, such as energy, water and materials.

Carbon Emissions

Suppliers shall monitor and calculate their greenhouse gas (GHG) emissions and make reduction efforts, including developing abatement plans, improving carbon data accuracy, and engaging their supply chain on emissions reduction.

Biodiversity and Nature Conservation

Suppliers shall make best efforts in understanding their biodiversity and nature impacts and finding ways to reduce and mitigate their footprint wherever possible.

VI. Management Systems

Suppliers shall use Management Systems to facilitate continual improvement and compliance with these principles and expectations. Elements of the Management Systems include:

Business Continuity

Suppliers are responsible for the development and implementation of appropriate business continuity plans for operations supporting Regeneron's business.

Commitment and Accountability

Suppliers are encouraged to fulfill the requirements described in this Code by allocating appropriate resources, including but not limited to training their employees on the expectations set forth in this Code.

Risk Management

Suppliers shall have mechanisms in place to identify and adequately manage risks in all areas addressed by this Code.

Documentation

Suppliers shall maintain documentation necessary to demonstrate conformance with these expectations and compliance with applicable laws, regulations, standards, and Regeneron's explicit requirements.

Training and Competency

Suppliers shall have a training program that achieves an appropriate level of knowledge, skills, and abilities in management and workers to address the expectations set forth in this Code.

Continual Improvement

Suppliers are expected to continually improve by setting performance objectives, executing implementation plans, and taking necessary corrective actions for deficiencies identified by internal or external assessments, inspections, and management reviews.