

Regeneron Position Statement on Human Rights

Regeneron recognizes the inherent dignity and equal and inalienable rights of every human being. Our commitment to respect and support for human rights extends to all employees, third-party contractors, vendors, suppliers and partners and is based on the key tenets outlined in the United Nation's (U.N.) International Bill of Human Rights, the U.N.'s Universal Declaration of Human Rights and the U.N.'s Guiding Principles on Business and Human Rights.

At Regeneron, we believe that operating responsibly and ethically is essential to our business. We respect human rights and are committed to preventing, mitigating and remedying adverse human rights impacts across our value chain. We also recognize governments' duty to respect, protect and fulfill human rights and fundamental freedoms.

Policies and procedures

Our corporate policies and procedures support and formalize our commitment to human rights.

Our Code of Business Conduct and Ethics sets forth our expectations for all employees to ensure that we are always acting in accordance with applicable laws, rules, and regulations. The Code covers human rights issues, including but not limited to discrimination or harassment, workplace health and safety and ethical research and development, and applies to 100 percent of employees.

Our Vendor Code reflects the biopharmaceutical industry's expectations for sustainable performance and is aligned both with Regeneron's standards and with the Pharmaceutical Industry Principles for Responsible Supply Chain Management. The Vendor Code sets out expectations for ethical practices on human rights issues such as forced and child labor, non-discrimination, freedom of association, fair treatment and fair pay and workplace health and safety. We require that vendors uphold the human rights of workers and all applicable laws, treating them with dignity and respect.

Due Diligence

We are committed to fostering a culture of openness, integrity, and individual accountability. We have put oversight and accountability structures in place to help identify, mitigate, and remedy potential adverse human rights impacts.

To ensure compliance, all employees are trained on the Code of Business Conduct and Ethics when they are hired and thereafter on an annual basis. Employees are required

to certify that they have read, understood and will abide by the Code when they complete the training.

All employees have a duty to speak up and promptly report known or potential violations of law or policy, or other valid concerns and questions. We are committed to a culture where employees feel comfortable raising human rights concerns without fear of retaliation. We have an open-door policy, and we encourage people to raise any concerns or questions they may have with their supervisor or manager, or by contacting the Head of Human Resources Officer or Chief Compliance Officer. People can make anonymous reports through our EthicsPoint hotline (877-RGN-ETHX) or [website](#). We have nonretaliation policies, confidentiality policies and mechanisms to ensure anonymity to the extent possible, which protect Regeneron employees who report concerns in good faith.

Regeneron has adopted a zero-tolerance policy against human trafficking and takes key steps to prevent trafficking and to ensure compliance with the applicable laws and regulations. All employees are required to report any suspected trafficking-relating activities, including the activities of relevant subcontractors, to Regeneron or the Global Trafficking Hotline. Employees are also required to fully cooperate in any internal or external investigation of suspected wrongdoing. Regeneron will not take any adverse action against employees for making an honest report of suspected trafficking-related activities, and employees should not threaten or retaliate against any employee that makes an honest report of a suspected violation

We hold our suppliers, contract manufacturers and business collaborators to our same high in-house standards, and we leverage existing policies to ensure adherence. Our business functions regularly monitor suppliers' financial and operational stability by assessing various criteria including safety compliance, conflict mineral traceability, and compliance with applicable laws and regulations. Given the nature of our business, many supplier assessments concentrate on meeting or exceeding applicable good practices along with complying with other federal, state and local regulatory requirements.

We encourage vendors to report any concerns they have or any suspicion of illegal activities connected to their work with our business through our EthicsPoint website or the Regeneron Hotline (877-RGN-ETHX).

We also include clauses in all our contracts requiring that suppliers adhere to all local and international laws. Regeneron may, at its sole discretion, take appropriate actions against employees, third-party contractors, suppliers, vendors and partners who violate our policies and contracts, including but not limited to removal from a contract, reduction in benefits, and termination of employment.

Culture of Integrity

At Regeneron, we recognize protecting human rights is more than just rules and is about more than a few senior people. Preventing and mitigating human rights impacts is about sustaining a culture where each of us is responsible for conducting business ethically. We act with integrity and pride ourselves on doing the right thing — by each other, our communities, our patients and the world around us.

Engagement and Transparency

We proactively engage Regeneron stakeholders, including investors, colleagues, non-profit organizations, patient advocacy groups and our communities, in a two-way dialogue about responsible business practices, including human rights impacts.

Regeneron is committed to transparency and reports on our human rights risks, due diligence and impacts in our annual Responsibility Report.