

California Transparency in Supply Chain Act Disclosure

(December 2025)

I. Verification

Hikma is firmly committed to conducting our business operations with the highest ethical standards and in compliance with applicable national and international laws, regulations, and codes. As a long-standing signatory and member of the United Nations Global Compact since 2007, we report annually on our progress. We have also been constituents of the FTSE4Good Index since 2014, reflecting our continued alignment with recognized environmental, social, and governance standards. In addition, we support the United Nations Guiding Principles on Business and Human Rights and are dedicated to upholding these standards across all our operations, regardless of jurisdiction. In line with these commitments, we have implemented policies and processes to ensure our operations adhere to human rights' standards and effectively prevent and address any potential abuses.

We have established controls to prevent and address modern slavery risks within our business operations and supply chains and continue to strengthen our measures to ensure that modern slavery—in all its forms, including involuntary servitude, forced or compulsory labor, exploitation (such as coercion, threats, deception, and child labor), and human trafficking—does not occur within our business. We also require our partners, suppliers and other third-parties to adhere to the same requirements.

As part of that effort, we also initiated a comprehensive review of our risk assessment criteria to better evaluate potential risks within our supply chains. We are enhancing our focus on the assessments of risks related to exploitative, unsafe, or abusive work conditions, which are often indicative of forced and child labor. This evaluation process considers various factors, including the geographic location of prospective suppliers, the nature of products or services involved, and the supplier's internal controls and standards. Additionally, we scrutinize each supplier's enforcement history, existing sanctions, and any related adverse information during the pre-qualification phase.

II. Audits

While the Company does not currently conduct audits of suppliers to evaluate compliance with standards for preventing trafficking and slavery in our supply chains, certain audits are conducted on suppliers who manufacture active pharmaceutical ingredients. Such audits are conducted to ensure compliance with regulatory requirements that are applicable to our operations. This approach helps us identify and address potential risks effectively, safeguarding against unethical practices across our supply chain. Audits specifically relating to modern slavery issues and exploitative labor practices are planned areas for enhanced due diligence. We also request and review SMETA audit information from Tier 1 and Tier 2 suppliers that agree to disclose this information.

III. Certification

Our Company Code of Conduct is supplemented by our Supplier Code of Conduct, which reinforces our commitment to integrity and emphasizes our values and the importance of human rights, equitable labor, and the protection of the health and safety of workers and employees. Our Supplier



Code of Conduct applies to all our vendors, partners, and other third-parties providing goods and services to or working with us. Through the Supplier Code, we require all our suppliers to operate in line with internationally recognized human rights principles and promote and maintain a culture that reflects our values. Our Supplier Code of Conduct also imposes a responsibility on our suppliers to ensure that their own suppliers and contractors are subject to the same standards, restrictions, and expectations. Additionally, it requires our suppliers to demonstrate that they have undertaken reasonable enquiry into, and are not aware of, any instances of modern slavery directly or indirectly linked to their business operations, products, or services. In addition to employee access, our Speak-Up Line also enables suppliers or third parties to report instances of abusive working conditions, modern slavery concerns, or forced labor conditions of which they may become aware.

We have also implemented ways to improve our visibility beyond our direct supply chain. As part of this effort, our enhanced modern slavery questionnaire includes targeted questions aimed at assessing the extent to which suppliers identified as high-risk for modern slavery have visibility and adequate management over their own supply chains. These questions focus on determining whether our direct suppliers are actively screening for modern slavery risks within their own operations and across their extended supply chains. They also assess whether any such risks have been identified, and whether suppliers have implemented measures, such as contractual obligations to ensure their own suppliers comply with applicable laws and regulations, including those related to modern slavery. This approach is intended to promote transparency and encourage responsible practices throughout the broader supply chain.

We have also successfully assessed suppliers who make up around sixty percent (60%) of our procurement spend for 2024 against labor and human rights (including sub-topics related to anti-exploitation and anti-slavery), ethics, environment and sustainability areas, either through our collaboration with EcoVadis or through leveraging our own sustainability questionnaire.

Our sustainability questionnaire was developed in 2024 to ensure accessibility for suppliers not registered on EcoVadis, and to enable a consistent assessment across all relevant areas. This questionnaire evaluates suppliers against key criteria, including human and labor rights, health and safety standards, environmental practices, and ethical conduct. We also produce internal sustainability reports on a biannual basis, which include information on suppliers identified as having lower theme scores or specific concerns. These supplier profiles are regularly monitored to ensure that any risks are appropriately addressed. The reports are shared with senior leadership to support informed decision-making and oversight.

IV. Training

Human Rights violations including human trafficking and forced labor are prohibited in our policies and such issues are covered in our annual Code of Conduct training. Additionally, this year we conducted comprehensive training sessions on supplier risk assessments and due diligence processes for all employees. This initiative was part of our transition to a new tool, aimed at ensuring complete compliance with our supplier onboarding processes and requirements. We are continuously working to enhance the effectiveness of our processes to identify and address forced and child labor and human trafficking.

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