



Human Rights Policy

I. Commitment

At Ultragenyx Pharmaceutical Inc. (the “Company”), values of ethics, integrity, and corporate responsibility are foundational to the Company’s commitment to delivering novel, disease-modifying treatments with speed and urgency to rare disease communities with limited or no treatment options. The Company believes that recognizing human rights is intrinsic to these values and commitment. As such, the Company is committed to conducting business based on the principles of the *United Nations’ Universal Declaration of Human Rights* and in alignment with *the United Nations’ Guiding Principles for Business and Human Rights*.

The Company’s Global Code of Conduct (the “Code”) directs all directors, officers and employees of the Company to act ethically and to comply with all applicable laws, rules and regulations. In 2022, the Company introduced the Global Standard for Suppliers (the “Standard”), which applies to all suppliers, manufacturers, distributors, vendors, contractors, subcontractors, agents, consultants and providers of goods and services and their employees, or anyone working on behalf of the Company (collectively referred to as “Suppliers”). This Human Rights Policy (this “Policy”) builds on the Code, expands the Standard and is designed to specifically address potential human rights issues.

II. Labor Practices

The Company is committed to protecting the rights of all employees and to fostering a workplace that respects human rights. The Company is committed to actively comply with all applicable wage and labor laws in its jurisdictions of operation. It strives to provide all employees with competitive wages and to provide a safe environment that upholds equitable labor practices. Training sessions on Company policies are routinely conducted, emphasizing equal employment opportunities and a zero-tolerance approach to discrimination or harassment. The Company regularly solicits and receives feedback from employees regarding their satisfaction and engagement through engagement surveys, which helps in identifying areas for workplace enhancements. The Company firmly opposes child labor, forced labor, slavery, human trafficking, and unfair compensation, and prioritizes the confidentiality of personal information.

III. Clinical Trials

The Company is dedicated to serving clinical trial participants with commitment and humanity. The Company follows the *International Council for Harmonisation (ICH) of Technical Requirements for Pharmaceuticals for Human Use E6 Guideline for Good Clinical Practice (GCP)* and national and local regulations in designing and conducting clinical trials, keeping participant safety and quality standards front and center. The Company registers its clinical trials on publicly accessible clinical trial registries, as applicable. All protocols must be approved by national and local bodies prior to any participants entering the study. Similarly, all participants (or legally acceptable representative) must provide their consent to participate through a thorough and documented informed consent process before any study related procedures are performed. The Company continuously monitors patient safety throughout the course of the study to protect their health, prevent harm and ensure the products maintain a positive benefit-risk profile and discusses the findings in a timely manner with participating investigators. The Company partners with contract research organizations (“CROs”) and other vendors to support clinical trial efforts, and all such are required to undergo a vendor qualification audit and adhere to the company policies. The Company works closely with all partners with the goal of ensuring that study conduct is consistent with the clinical trial protocol and that the rights, safety, and well-being of the of trial participants are protected, consistent with ethical standards and regulatory requirements.

The Company acknowledges the benefits of timely disclosure of clinical-trial findings for both patients and the scientific community. To this end, the Company publicly discloses the results of the clinical trials it sponsors,



regardless of their outcome. Information regarding the protocol, status and results of clinical trials is available on publicly accessible registries and platforms, including international conferences and scientific journals.

IV. Product Governance and Ethical Marketing

The Company maintains stringent safety and quality standards, overseen by both its Chief of Quality Operations and its Chief Medical Officer. The Company emphasizes quality from raw materials to final product distribution and has policies in place to govern those activities. The Company's commitment to continuous refinement of quality systems, coupled with pharmacovigilance and surveillance systems, facilitates monitoring of adverse medicine reactions and combating counterfeit medicines. The Company conducts regular internal audits with the goals of ensuring compliance with GxP practices (Manufacturing - GMP, Pharmacovigilance - GVP and Distribution - GDP), and verifying the legitimacy of the distributors.

The Company is dedicated to ethical product governance and is committed to adhering to principled marketing practices and interactions with healthcare professionals. This commitment encompasses rigorous compliance monitoring, adherence to strict fraud and abuse laws, the prevention of illicit remunerations, ethical review of promotional materials, incident investigation, and managerial accountability for responsible drug marketing. Operating under clear guidelines, the Company conducts regular risk assessments and provides ongoing training and awareness programs for sales representatives.

V. Supply Chain

The Company believes that the actions of its Suppliers should reflect the ethics of the Company. Suppliers are expected to uphold the same high ethical and human rights standards as the Company. Should the Company become aware of any suppliers, vendors, or business partners engaging in illegal or unethical human rights practices that contravene these standards, including the use of child labor, forced labor, or human trafficking, the relationship with those entities will be critically re-evaluated.

VI. Implementation

The Company's management has appointed a Compliance Officer to oversee the implementation of and provide guidance on all Company policies. This includes the commitment to stakeholder involvement and the ongoing assessment of the effectiveness of the Comprehensive Compliance Program. Any individual acting for or on behalf of the Company—including directors, employees, and independent contractors or consultants—is encouraged to seek guidance and raise questions, especially in areas like impacts on local communities. Such individuals should also report any suspected policy violations or legal concerns. Training will be provided on this policy, emphasizing the importance of reporting human rights concerns, whether within the Company or its Suppliers. Concerns can be reported to supervisors, the Compliance Officer, or via an anonymous third-party hotline. Retaliation against anyone reporting in good faith is strictly prohibited.

VII. Questions

Questions about this Policy should be directed to compliance@ultragenyx.com.

VIII. Additional sources:

- a. [Ultragenyx's Global Code of Conduct](#)
- b. [Ultragenyx's Standard for Suppliers](#)
- c. [Ultragenyx's Clinical Trial Transparency Commitment](#)
- d. [Ultragenyx's Patient Philosophy Document](#)
- e. [Ultragenyx's Statement of Disclosure and Compliance with the Transparency in Supply Chain Act \(CA\) and the Modern Slavery Act \(UK\)](#)
- f. Ultragenyx Compliance Hotline: www.openboard.info/RARE, RARE@openboard.info, (866) 862-3064