



Sustainability Statements

General Disclosures

General basis for preparation of the sustainability statement (BP-1)

Galapagos NV is a limited liability company incorporated in Belgium with its registered office at Generaal De Wittelaan L11 A3, 2800 Mechelen, Belgium. In the notes to the consolidated sustainability statements, references to “we”, “us”, “the group” or “Galapagos” include Galapagos NV together with its subsidiaries. The scope of this report and the subsequent financial and sustainability statements are identical to and consolidated at the level of Galapagos NV, which means that the information is exclusively related to us and – where available – our value chain. No subsidiary undertakings are exempt from consolidated sustainability reporting pursuant to Article 29a of Directive 2013/34/EU. We refer to **note 34** of the financial statements for a list of consolidated companies.

The sustainability statement provides an overview of our approach on how we identify and report on our material sustainability topics for the financial year 2025. In preparing the sustainability statement, we have considered the expectations of our stakeholders to ensure that it addresses the topics identified as material to them. We conducted a double materiality assessment covering the entire value chain. As a consequence, this sustainability statement covers both upstream and downstream Impacts, Risks and Opportunities (IROs). The mapping of Our Value Chain can be found [here](#).

No relevant material information was omitted from the statement, except information related to intellectual property due to its classified and sensitive information, in accordance with ESRS 1 section 7.7.

The inclusion of information and data in the sustainability statements is not an indication that such information or data, or the subject matter of such information or data, is material to us for purposes of applicable securities laws or otherwise. The principles used to determine whether to include information or data in this report do not correspond to the principles of materiality or disclosure contained in the United States (U.S.) securities laws used to determine whether disclosures are required to be made in filings with the U.S. Securities and Exchange Commission (SEC), or principles applicable to the inclusion of information in financial statements.

Disclosures in Relation to Specific Circumstances (BP - 2)

Strategic reorganisation

During FY25, we underwent significant organizational change. Firstly, on January 8, 2025 we announced that we would discontinue our small molecule discovery programs and reorganize our business to focus on long-term value creation in cell therapy in oncology. Thereafter, on October 21, 2025, we announced that we intended to wind down our cell therapy activities following a comprehensive strategic review to evaluate the long-term sustainability of our business model and R&D portfolio. This assessment concluded that a strategic repositioning was required to secure a more resilient and sustainable path for future value creation. Based on this assessment, the Board decided, implemented as of 2026, to wind down our cell therapy activities and reorient the business towards transformative business development opportunities, supported by disciplined capital allocation aimed at building a pipeline of novel therapeutics that can deliver meaningful benefits for patients and long-term value for shareholders. The wind-down affects approximately 365 employees across Europe, the U.S. and China and results in the closure of the sites in Leiden (the Netherlands), Basel (Switzerland), Princeton and Pittsburgh (U.S.), and Shanghai (China). These developments were taken into account in the 2025 update of our double materiality assessment, including the updated materiality of the S1 “**Secure employment**” sub-topic and the review of topic relevance in light of the year’s organizational changes.

Use of estimates, assumptions and data sources

Most of the quantitative data included in this report have been directly sourced from our systems. Any data obtained through alternative methods, such as estimations or extrapolations within our value chain, are clearly identified as such and include a degree of estimation uncertainty. For the categories where estimation was involved, the level of management uncertainty is all together low, resulting in a high level of accuracy. The basis of preparation, accuracy levels, estimation of outcome uncertainty, and, where applicable, planned actions to improve the accuracy and reduce uncertainty in future annual reports are disclosed for each material topic in the topical reporting sections of this report.

Changes in preparation or presentation of sustainability information

Regarding our carbon footprint calculations, we incorporated additional data sources to improve accuracy. As a result the following restatements have been made in respect of 2024 data:

- The FY2024 gross Scope 1 emissions have been restated due to an error in the mobile combustion calculation. Additionally, the calculation method for mobile combustion was further refined in FY2025 due to more accurate data available and applied retrospectively to the FY2024 data. The difference between the figures reported in prior year and the restated comparative data is an increase by 401 tCO₂e.
- The FY2024 “Processing of sold products” in Scope 3 emissions was adapted for 2024 to include the API sale related to Jyseleca(r) to Alfasigma. This restatement results in a 239 tCO₂e increase compared to the figures reported in the prior year.
- The FY2024 “Fuel consumption from crude oil and petroleum products” has been restated to correct an error in the mobile combustion calculation in FY24 and to reflect a refined the calculation methodology for mobile combustion resulting from more accurate data becoming available. We applied this refined approach retrospectively to FY24. The difference between the reported in prior year and the restated comparative data is an increase by 1,692 MWh.

For our EU Taxonomy disclosures, we applied a revised approach in line with the amended rules as stated in the Commission Delegated regulation (EU) 2026/73. The FY2024 OpEx was restated to ensure comparability with the more stringent definition applied this year (a reduction of €169m). Further details of these updates are provided in the [EU Taxonomy section](#) of this report.

Time horizons applied in the double materiality assessment

In relation to time horizons used in the double materiality assessment, we apply the following definitions:

- short-term: < 3 years
- medium-term: 3 – 5 years
- long-term: > 5 years

These time horizons differ from those set out in ESRS 1 section 6.4. They were established during our 2022 materiality assessment and, for reasons of continuity and comparability, have been retained in subsequent updates in 2023, 2024, and 2025. We will consider aligning with the ESRS time-horizon structure in future assessments.

Disclosures stemming from other legislation and sustainability frameworks

This sustainability statement includes information required under other EU legislation, specifically the EU Taxonomy disclosures, and also incorporates voluntary content referencing the United Nations Sustainable Development Goals (SDGs) and the Ten Principles of the United Nations Global Compact (UNGC), to which we became a signatory in 2023. These elements are included in an annex and are intended to complement the ESRS disclosures by illustrating how our material topics relate to selected SDGs.

Use of phase-in provisions

In accordance with Appendix C of ESRS 1 and the European Commission’s “Quick Fix” amendment, and because the average number of employees during the financial year did not exceed 750, we continued to apply the phase-in provisions, for ESRS S1 (Own Workforce) and ESRS S4 (Consumers and End-Users). The specific phase-in provisions applied are listed in [Disclosure requirements in ESRS covered by the sustainability statement](#).

The role of the administrative, management, and supervisory bodies (GOV-1), and information provided to, and sustainability matters addressed by the undertaking's administrative, management, and supervisory bodies (GOV-2)

During the reporting period, we had a cross-functional Sustainability Steering Committee, composed of different employees and leaders to ensure appropriate representation from across the entire organization. The Sustainability Steering Committee ensured that Environmental, Social, and Governance (ESG) considerations, including related impacts, risks, and opportunities, were integrated into our decision-making and monitoring processes, including those related to business strategy, key investments, and performance. The Committee consisted of senior management members and subject matter experts from key areas of our operations and sustainability topics, including Compliance, Legal, Finance & Procurement, Human Resources, Operations, Investor Relations, and Communications. The Sustainability Steering Committee met four times in the reporting period, focusing primarily on oversight of the double materiality assessment and validating its outcomes. During the reporting period, no sustainability-related targets were in place due to the strategic reorganization, as announced in January 2025, and the following comprehensive review of strategic alternatives for our cell therapy activities, and therefore the Committee did not oversee target-setting activities.

The Executive Committee, informed regularly by the Sustainability Steering Committee, maintained delegated oversight of sustainability-related impacts, risks, and opportunities during the reporting period, consistent with its responsibility under the Corporate Governance Charter for maintaining systems to identify, assess, manage, and monitor financial and other risks. Sustainability initiatives were scaled down as part of the comprehensive review of strategic alternatives as announced in May 2025. In addition, our Board of Directors, supported by the Audit Committee, supervised the sustainability oversight structure as well as the strategy for public disclosure with respect to ESG matters in accordance with our **Corporate Governance Charter**.

As the majority of our sustainability material topics were inherently aligned with our core business, the impacts, risks, and related opportunities, as well as the controls and procedures to manage these, were embedded in our existing governance infrastructure, as described in the **Committees section** of our Corporate Governance section. Furthermore, the members of the Sustainability Steering Committee, Executive Committee, Audit Committee, and Board of Directors (i.e., our administrative, management, and supervisory bodies) collectively bring extensive expertise relevant to our sustainability-related material topics. This includes expertise in scientific R&D, product portfolio strategy, patient safety, and commercial (Access & Affordability) functions, all of which are central to developing, approving, and bringing medicines to market.

This deep integration ensured that sustainability considerations were embedded in our governance and decision-making processes during the reporting period. Additionally, to enhance oversight capabilities, we had access to external experts for specific areas, such as carbon accounting and sustainability reporting, enabling us to supplement our in-house knowledge with specialized insights. This combination of internal expertise and external advisory support enabled us to manage our material impacts, risks, and opportunities effectively during the reporting period.

Quantitative information on the number of executive and non-executive members of our administrative, management, and supervisory bodies, including the percentage by gender and independence, is provided in the **Committees** of the **Corporate Governance** chapter.

Remuneration linked to sustainability performance (GOV-3)

In 2025, the approach to sustainability-linked remuneration remained unchanged from the previous reporting year. The ESG-related corporate objective introduced in 2024 continued to apply across the organization, including members of the Executive Committee (see **Remuneration Report**). No specific proportion of variable remuneration linked to sustainability-related targets has been set or disclosed for 2025.

Sustainability due diligence (GOV-4)

We are committed to responsible business conduct (as set out in **G1-Business Conduct**) throughout our value chain, which is clearly aligned with our membership of the UN Global Compact. We have embedded due diligence into our governance, strategy, and business model. We take steps to identify and mitigate any potential or actual impacts within our own workforce, and these can be found in section **S1-Own workforce**. We also have in place the overarching elements of our compliance program, which are set out in the **Governance** section, and further strengthen our overall sustainability due diligence. Through engaging with affected stakeholders, we are working to ensure that all key steps of the due diligence process reflect their input, which was captured in our double materiality assessment process. Our sustainability due diligence approach is primarily focused on the activities of third parties in our supply chain.

Our more targeted approach to due diligence within our supply chain results from our double materiality assessment process, where we identified and assessed that our third parties pose the biggest potential risk and adverse impacts for us from both an environmental and social perspective. As such, we have taken actions to address those adverse impacts by establishing a number of processes which make up our supplier due diligence activities. We maintain a list of preferred vendors with whom we have established relationships and expectations and also a further list of Qualified Vendors who are approved to provide Good Practice (GXP)-related goods and services to us.

We undertake a third-party risk assessment process which is proportionate to the identified risk of the working relationship, based on elements that include the nature of the goods and services provided and the location in which the activities take place.

Our due diligence then considers questions of environmental sustainability, ethical business conduct, compliance with legislation including GDPR, Anti-Bribery laws, and also specific GXPs that are applicable throughout our business. This helps us to appoint third parties who will operate in line with our expectations.

Once our suppliers and vendors are on board, we require that they comply with our Supplier Code of Conduct which sets out all the expected standards. During the ongoing relationship, and where relevant, regular audits and/or monitoring activities are established to track the effectiveness of these efforts.

The table below maps out the core elements of our sustainability due diligence process, cross-referenced within the relevant disclosures in the sustainability statements.

Core elements of due diligence	Paragraphs in the sustainability statement
a) Embedding due diligence in governance, strategy and business model	Sustainability Governance S1 – Own Workforce – Policies S4 – Consumers and end-users – Policies G1 – Business conduct – Policies
b) Engaging with affected stakeholders in all key steps of the due diligence	Double Materiality assessment – Engaging with our stakeholders S1 – Own Workforce – Mitigating, Preventing and Remediating Actions S4 – Consumers and end-users – Mitigating, Preventing and Remediating Actions G1 – Business conduct – Management of relationship with suppliers
c) Identifying and assessing adverse impacts	Double Materiality assessment S1 – Own Workforce – Mitigating, Preventing and Remediating Actions S4 – Consumers and end-users G1 – Business conduct – Management of relationship with suppliers
d) Taking actions to address those adverse impacts	S1 – Own workforce – Mitigating, Preventing and Remediating Actions S4 – Consumers and end-users G1 – Business conduct – Management of relationship with suppliers
e) Tracking the effectiveness of these efforts and communicating	S1 – Own workforce – Mitigating, Preventing and Remediating Actions S4 – Consumers and end-users G1 – Business conduct – Management of relationship with suppliers

Risk management and internal controls over sustainability reporting (GOV-5)

Our overarching risk management framework is set out in the **Risk Management and Internal Control** section of this report. Many elements of sustainability risk were already included in this framework, which is designed to identify, analyze and monitor risks on an ongoing basis, supported by defined risk tolerance considerations such as compliance with applicable regulations, operational performance, reputation and longer-term business continuity. We have evolved our existing risk management activities to reflect new regulatory expectations. At this stage, the internal control framework for sustainability information does not yet have the same level of maturity as the framework applied to financial reporting, due to ongoing strategic reorganizations. This has included identifying the functions accountable for the reportable data and ensuring a robust approach to data governance to support accurate reporting.

The governance of sustainability-related risks during the reporting period was supported through the Sustainability Steering Committee, a sub-group of our Management Committee, and through regular reporting to our Audit Committee. This ensures that significant risks were escalated for appropriate resolution.

Strategy, business model and value chain (SBM-1)

A description of our strategy including our current priorities, business model, value chain, products, and customers in relation to sustainability is provided in the following sections:

- **A New Strategic Direction**
- **R&D Pipeline**
- **Value Chain**
- **Consolidated Financial Statements**

Information on our headcount by geographical area is provided in **Section S1**.

Our revenue-generating activities and key customer categories are described in **Note 7** in the consolidated financial statements. As we do not operate in any ESRS-defined sensitive sectors (e.g., fossil fuels, chemicals production, controversial weapons or tobacco), no such sector disclosures are applicable.

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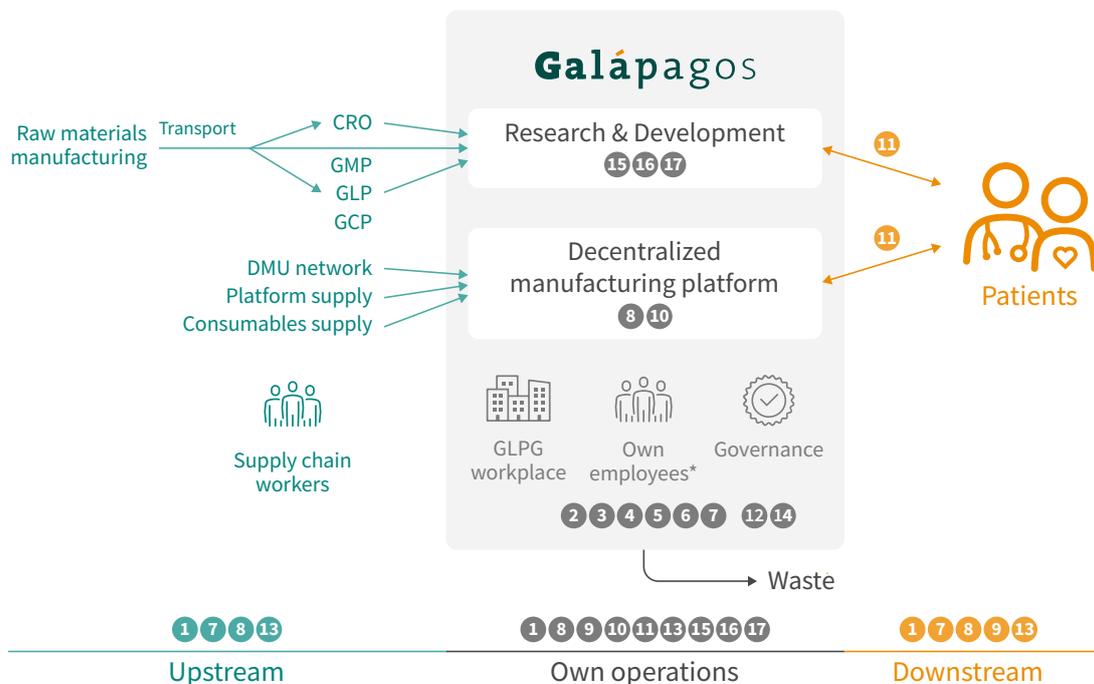
SUSTAINABILITY STATEMENTS

No sustainability-related goals were in place during the reporting period due to strategic reorganization, as announced in January 2025, and the following comprehensive review of strategic alternatives for our cell therapy activities, and therefore no such goals are disclosed.

Our Global Value chain

Assessing our value chain is a key element to our materiality assessment process and helps us better understand the broader impacts of both our upstream and downstream operations (see picture below). By identifying and collaborating with our value chain stakeholders (i.e., suppliers, partners, and other entities), we have gained valuable insights into key environmental, social, and economic impacts associated with our global operations. This collaborative approach enables us to identify areas where we can work together to reduce risks and identify opportunities. Additionally, monitoring our value chain helped us align more closely with stakeholder expectations and support responsible sourcing and transparency, while developing a clearer picture of the supply chain supporting our oncology R&D activities. This integrated perspective enabled us to make meaningful progress toward shared sustainability goals that extend beyond our own, immediate operations.

Our value chain map provides a foundation for better identifying and assessing our material impacts, risks, and opportunities within the global value chain.



Environmental topics

1 Climate change mitigation

Social topics

* Secure employment (own employees)

2 Adequate wages

3 Work life

4 Gender equality and equal pay for work of equal value

5 Employment of person with disabilities

6 Diversity

7 Data privacy and information security

8 Patient safety (incl. Product quality)

9 Social inclusion (non-discrimination)

10 Access and affordability of medicines

11 Patient engagement

Governance topics

12 Corporate culture and business conduct

13 Protection of whistle blower

14 Management of relationships with suppliers

Entity-specific topics

15 (Scientific) Innovation

16 Intellectual property

17 Product portfolio and R&D

Interests and views of stakeholders (SBM-2)

We engaged with a broad range of stakeholders, including patient organizations, health care providers, R&D organizations, employees, suppliers, and investors, to understand and take account of their perspectives in the development of our strategy and business model. Below we summarize key elements of our stakeholder engagement during the reporting period:

Stakeholder	Engagement	Purpose	Outcomes
Patient organizations	Engagement continued through our Patient Engagement Council and Patient Partnership Charter, complemented by ongoing dialogue with patient groups through traditional feedback and advisory interactions. Activities were scaled back from Q2 onwards.	To understand patient needs and perspectives, in line with the Patient Partnership Charter.	Engagement continued until Q2 2025 and was subsequently scaled back as part of the reorganization.
Health care providers	Scientific exchange, advisory interactions, and research-related collaboration; presentations at medical and research conferences.	To obtain clinical insights and strengthen scientific understanding on treatment approaches and patient needs.	Continued knowledge-sharing and scientific dialogue.
Employees	Engagement through Works Councils in Belgium, and the Netherlands in the context of the restructuring.	To ensure transparent dialogue with employee representatives, and to act responsibly and respectfully toward employees.	Formal Works Council consultation completed.
Suppliers	Ongoing engagement through Third-Party Risk Assessments (TPRA).	To ensure a secure and reliable supply chain.	Completion of supplier risk assessments.
Investors	Regular ESG-related engagement throughout the year.	To provide transparency.	Constructive dialogue maintained.

In addition to the surveys and interviews conducted as part of our double materiality assessment, we maintain an ongoing dialogue with our stakeholders through our sustainability and function leads. Our Board of Directors, Executive Committee, and Management Committee receive regular comprehensive updates on stakeholder expectations around sustainability topics, including ethical business conduct, social and environmental responsibility, ensuring that stakeholder concerns are considered in decision-making at all levels and reinforcing our commitment to sustainability.

The feedback we receive from our stakeholders through both the double materiality assessment and on an ongoing basis serves as critical input to our sustainability strategy. Additionally, in all other elements of our governance and sustainability program, particularly as part of our ongoing due diligence enable us to better align with our priority areas, such as patient engagement and employee-related topics.

Process to identify and assess material impacts, risks and opportunities (IRO-1)

In 2025, we refreshed our double materiality assessment (DMA) through an internal panel of subject matter experts to reflect the business changes arising from the strategic reorganization as announced on January 8, 2025, which impacted the materiality thresholds with regard to our number of employees and financial position and performance. This update built on our earlier work: an EFRAG-aligned DMA completed in 2023, followed by a targeted refresh in 2024. The 2023 assessment marked our first full application of the European Corporate Sustainability Reporting Directive (CSRD) requirements, adding a financial materiality assessment to the impact materiality assessment initially undertaken in 2022. The DMA was carried out prior to the announcement of the intention to wind down the cell therapy activities, as such the DMA is to a large extent based on these activities. The DMA output was reviewed during 2025 to assess relevance for the 2025 Sustainability Statement, in the context of these changes to the business.

Identifying Topics and Impacts, Risks, and Opportunities

For the impact materiality assessment, our stakeholder engagement process formed the basis for identifying actual and potential impacts across our value chain. A team of internal subject-matter experts assessed these impacts. Each topic was evaluated for whether the impact was actual or potential, positive or negative, and then scored on a 1–5 scale based on

severity (scale, scope, and irremediability) and likelihood. Likelihood was scored from 1 (very unlikely) to 4 (very likely). The severity of the impact has been considered in terms of:

- Scale: How grave or beneficial our impact is, from 1 (low) to 5 (high);
- Scope: How widespread our impact is, from 1 (affecting only internal stakeholders) to 5 (affecting communities at country level or beyond); and
- Irremediability: For negative impacts, whether and to what extent the impact could be remediated, from 1 (harm easily rectified) to 5 (harm long-lasting and difficult to remedy)

Input from the stakeholder engagement process conducted in the 2022 materiality assessment was used to support the evaluation of impact pathways and expectations. The impact materiality threshold was set at 9, and the completeness of the assessment was validated by internal experts.

For the financial materiality aspect of the double materiality assessment, we assessed the financial risks and opportunities associated with each sustainability topic, including potential financial effects reflected in our financial statements. Thresholds for assessing financial materiality were based on expected effects on financial position and performance, cash flows, and access to and cost of capital. Each risk and opportunity was evaluated for both its likelihood and potential magnitude of financial effect, using a scoring scale from 1 (very unlikely) to 4 (very likely) for likelihood and from 1 (negligible) to 5 (extreme) for severity. These assessments considered the predefined short, medium and long-term time horizons. Identified sustainability-related risks and opportunities were aligned with our internal Risk Register, and the materiality threshold was set at 8. This methodology was applied to all sustainability topics, including climate-related ones; however as mentioned in E1-Climate change, we did not perform a detailed climate risk analysis.

The 2025 re-assessment was reviewed and validated by internal functions:

- HR
- Legal
- Finance/internal controls
- Head of GxP Quality Systems and Compliance
- Sustainability ESG lead
- Animal Welfare Officer
- Data Privacy
- Information Security and Risk management
- Head of EHS
- Global Head Quality Risk Management

Assessing Our Results

The outputs of our 2025 double materiality assessment were reviewed by internal subject-matter experts to validate completeness, consistency, and relevance. Building on the stakeholder insights that informed the impact materiality assessment and the financial analyses aligned with our risk register, we confirmed the final list of material topics for inclusion in the 2025 Sustainability Statement. For the impact materiality portion of the assessment, a team of internal experts reviewed the topics identified by stakeholders and the associated scoring outcomes. For the financial materiality aspect, we validated the financial risks and opportunities identified, including potential financial effects incorporated in our financial statements. This review covered all sustainability topics.

Disclosure requirements in ESRS covered by the sustainability statement

Following the outcome of our 2025 double materiality assessment, we compiled a list of the Disclosure Requirements that are included in this Sustainability Statement, together with paragraph references to where each disclosure can be found (see [Disclosure requirements in ESRS covered by the sustainability statement](#)). We mapped ESRS mandatory disclosure requirements and data points to the material IROs to assess information materiality within the topical standards. The material IROs map to the following topics, which forms the basis of preparation for this sustainability statement: E1 – Climate Change, S1 – Own Workforce, S4 – Consumers and End-users, G1 – Business Conduct and entity-specific topics including scientific innovation, intellectual property, and product portfolio & R&D. Where no link to a material IRO was identified, the relevant disclosures were omitted. This is presented in the ESRS Content Index at the end of this report, which indicates where we have applied phased-in provisions, disclosures incorporated by reference or where a disclosure requirement is not applicable.

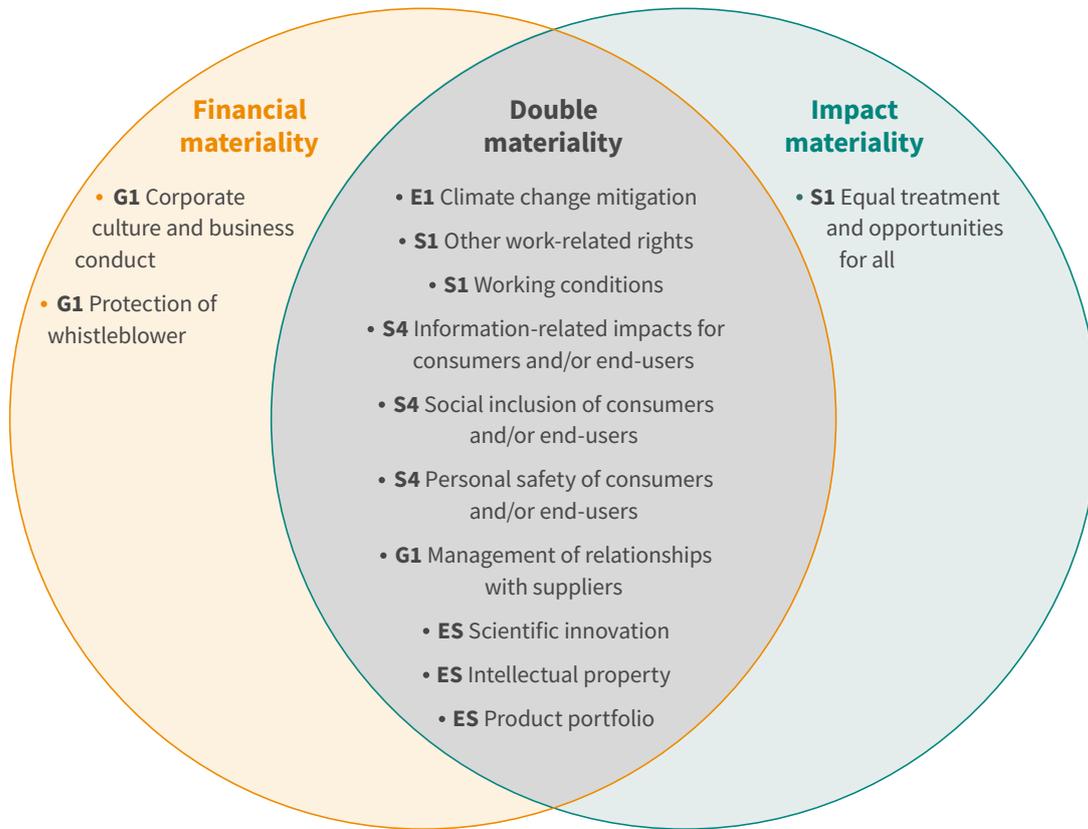
Material impacts, risks, and opportunities and how they interact with our strategy and business model (SBM-3)

The material topics identified through our 2025 double materiality assessment refresh are summarized in the matrix below. These reflect the outcomes of the refresh carried out with internal subject-matter experts following the announcement on October 21, 2025 of the intention to wind down the cell therapy activities and the initiation of implementation in early 2026. For detailed descriptions of our material impacts, risks, and opportunities, including the expected time horizons, whether impacts are positive or negative, and where in our value chain these occur, see the relevant topical sections. While the substance of our IROs remains largely consistent with the prior year, several descriptions were updated to improve clarity and ensure closer alignment with ESRS terminology and structure. There, we also describe our responses to the material impacts, risks, and opportunities identified, as well as how these topics connect to our strategy and business model.

Four ESRS topical standards were determined to be material for the reporting year: E1 Climate Change, S1 Own Workforce, S4 Consumers and End-Users, and G1 Business Conduct. In addition, three entity-specific material topics were identified during the reporting period: Scientific Innovation, Intellectual Property, and Product Portfolio and R&D.

In 2025, compared with the previous reporting period, the S1 sub-topic Secure Employment was newly identified as material from both an impact and financial materiality perspective, resulting in two new material IROs that were not considered material in 2024. The topic of patient engagement, previously treated as an entity-specific topic in the prior reporting period, was reassigned to ESRS S4 – Consumers and End-Users this year, as it more closely aligns with the scope and definitions of the standard.

The graphic below presents an overview of all the sub-topics that have been determined to be material for us:



Given the wind-down of operating activities and resulting change in long-term strategic direction of the business, no resilience analysis has been carried out in 2025 regarding our capacity to address its material impacts and risks and to take advantage of its material opportunities.

a) Identifying and assessing adverse impacts	<p>Double Materiality assessment</p> <p>S1 – Own Workforce – Mitigating, Preventing and Remediating Actions</p> <p>S4 – Consumers and end-users</p> <p>G1 – Business conduct – Management of relationship with suppliers</p> <p>Entity-specific Information – Patient Engagement</p>
b) Taking actions to address those adverse impacts	<p>S1 – Own workforce – Mitigating, Preventing and Remediating Actions</p> <p>S4 – Consumers and end-users</p> <p>G1 – Business conduct – Management of relationship with suppliers</p> <p>Entity-specific Information – Patient Engagement</p>
c) Tracking the effectiveness of these efforts and communicating	<p>S1 – Own workforce – Mitigating, Preventing and Remediating Actions</p> <p>S4 – Consumers and end-users</p> <p>G1 – Business conduct – Management of relationship with suppliers</p> <p>Entity-specific Information – Patient Engagement</p>

Environmental Information

Climate Change

ESRS E1 – Climate Change

E1-1 – Transition plan for climate change mitigation

Following the organizational review completed in 2025, which resulted in the termination of our small-molecule portfolio and associated research activities, our operational footprint has already been materially reduced. This reduction will be further impacted by the implementation of the wind-down of our cell therapy activities, as described in section “**A New Strategic Direction**”. Together, these changes significantly alter the business activities on which previously disclosed climate targets and the prior transition plan were based. Given these significant organizational and operational changes, the climate transition plan disclosed in prior years, including the 2030 and 2040 GHG reduction targets, is not currently reflective of the undertaking’s operating circumstances. These targets were developed for a materially different operational perimeter and may no longer be considered relevant to the strategic direction of the business.

We are currently being repositioned for long-term growth through transformational business development, and the future operating model, value chain configuration and investment priorities remain under review. In this context, we do not consider it appropriate to publish revised climate targets, decarbonization pathways or forward-looking climate-related commitments at this time, consistent with ESRS expectations of comparability, practicality and conditions of uncertainty (ESRS 1).

At present, no climate change mitigation transition plan is in place for the post-wind-down undertaking, and no decision has yet been taken on whether, and if so when, a new transition plan will be adopted. The relevance of previously set targets and decarbonization actions is currently under review, and their applicability will depend on the outcome of the strategic review once the future business model becomes clearer.

We remain not excluded from EU Paris-aligned benchmarks, in accordance with Articles 12(1)(d)–(g) and 12(2) of Commission Delegated Regulation (EU) 2020/1818.

Material impacts, risks and opportunities and their interaction with strategy and business model (SBM-3)

Climate change mitigation was assessed as a material topic for us in 2025, based on the greenhouse gas (GHG) emissions associated with our operations and value chain during the reporting period. Climate-related impacts were identified through our double materiality assessment process, drawing on our full Scope 1, 2 and 3 GHG inventory, which was calculated by an external consultant in accordance with the GHG Protocol, and assessed against ESRS severity and likelihood criteria. This process confirmed that the GHG emissions associated with our operations and value chain constitute a material negative impact with high scale and likelihood. Our climate-related impacts and opportunities were considered within a broader “One Health” perspective, recognizing the interconnected wellbeing of people (including patients and employees) and the planet. Addressing environmental matters, including climate change, formed part of our wider sustainability considerations. We recognized the importance of addressing GHG emissions and the potential benefits associated with lower-carbon operational practices, while also considering potential transitional risks, including reputational risks and stakeholder expectations.

Although climate change mitigation was considered material, our double materiality assessment did not identify material climate-related physical or transitional risks for us. Given our reduced operational footprint and limited GHG emissions in 2025, a detailed climate-related risk assessment, climate-scenario analysis and resilience analysis were not performed for this reporting period. The omission of these disclosures reflects the outcome of our materiality assessment and the limited exposure of our current operating model to climate-related physical risks. As a consequence, no statement on our resilience to climate change can be made. As the strategic review progresses, the relevance of climate-related impacts, risks and opportunities will continue to be monitored in the context of the evolving business model.

The table below summarizes the material impacts, risks and opportunities (IROs) identified for FY25 in accordance with ESRS 2 (SBM 3 and IRO 1), reflecting the outcome of our FY25 double materiality assessment.

Material Topic	Description	IRO Type	Value Chain
Environment ■ Climate Change Mitigation	GHG emissions generated by our operations and value chain contribute to climate change.	Actual negative impact	Entire

All material IROs identified under ESRS E1 fall within the short-term time horizon (i.e., <3 years).

E1-2 – Policies related to climate change mitigation

In the reporting year we maintained an Environmental, Health and Safety policy, for which the Chief Operating Officer (COO) was accountable. The policy sets out our commitment to sustainable operations, focusing on minimizing our carbon footprint and reducing the consumption of natural resources across our operations and entire value chain. As the policy continued to be relevant and applicable to our business activities during 2025, it was re-signed by the COO and CFO to reconfirm executive-level endorsement.

Our policy includes commitments to:

- Minimize GHG emissions by implementing sustainable operational practices;
- Enhance energy efficiency through technology upgrades and resource optimization;
- Reduce pollution and waste across our value chain; and
- Optimize natural resource consumption, ensuring the use of sustainable materials where possible.

The Environmental, Health and Safety policy remained the primary framework guiding our climate-related approach in 2025. As we enter a new strategic phase, as explained in section “**A New Strategic Direction**”, the policy will be reviewed and updated as needed to reflect any future changes to our organizational structure or operating model.

E1-3 – Actions and resources in relation to climate change policies

In 2025, we continued to implement actions to support our climate change mitigation policies. Our focus remained on managing operational emissions, improving energy performance across our facilities, and managing the environmental impacts associated with changes to our operational footprint.

Due to the strategic reorganisations during FY25, we did not perform an analysis that isolates the carbon-reduction impact of individual decarbonisation actions. While the disclosed actions primarily affect our Scope 1 emissions, our overall emissions profile continues to be dominated by Scope 3 sources. Additionally, there is no current intention to make significant Opex or Capex allocation in 2026.

Key actions and resources in 2025:

- Transition to Renewable Energy: 42% of our total energy consumption was sourced from renewable energy, and is disclosed in the table presented under E1-5.
- Energy Management Activities: We continued to manage energy use across our facilities by maintaining the instruments and systems used to measure, regulate, and control building energy performance, working closely with landlords.
- Asset repurposing during site wind-downs: Usable equipment and furniture were repurposed and donated to local schools and community organizations. This approach helped extend the lifecycle of existing assets and avoid the embodied-carbon impacts associated with manufacturing new products.
- Fleet Electrification: During the wind-down period, workforce reductions resulted in a smaller company fleet. We used this transition as an opportunity to reduce fleet-related emissions by prioritizing the retention of electric vehicles (EVs) where contracts ended, as disclosed in the table under E1-6. While the increase in the proportion of electric vehicles supported lower fleet-related emissions, the associated GHG reduction cannot be quantified in isolation, as the change occurred alongside a broader reduction in fleet size and related activity data.
 - In January 2025, EVs accounted for 46.7% of the full 225-vehicle fleet.
 - By December 2025, EVs represented 88% of the reduced 119-vehicle fleet.

Our EU Taxonomy aligned CapEx related to climate change mitigation was €90,000, resulting in 0.6% of our total CapEx. None of the OpEx was aligned in 2025. Further details can be found in the [EU Taxonomy 2025 statement](#). Other investments are an integrated part of our capital cost allocations and/or operating expenditure (such as switching to green electricity) and are therefore not reported here, but in general CapEx and OpEx.

Metrics and targets

E1-4 – Targets related to climate change mitigation and adaptation

The greenhouse gas (GHG) emission reduction targets disclosed in prior reporting periods were developed for a materially different operational perimeter and business model. These included 2030 absolute reduction targets for scopes 1, 2 and 3 and a longer-term ambition to achieve net-zero emissions by 2040, in alignment with the Science Based Targets initiative (SBTi).

In the context of the significant organizational changes initiated with the termination of our small-molecule portfolio and related research activities in early 2025, followed by the subsequent strategic review that led to the wind-down of our cell therapy activities announced in January 2026, as described in section “[A New Strategic Direction](#)”, and the ongoing strategic review, these previously communicated targets are not currently considered applicable to the post-wind-down undertaking.

As a result, at the reporting date, we do not have measurable climate-change-mitigation or adaptation targets in place. As the future operating model, value chain configuration and strategic priorities have not yet been fully defined, management does not consider it appropriate to establish revised climate mitigation or adaptation targets at this stage.

In the absence of active targets, we continue to monitor and report actual GHG emissions in accordance with ESRS E1-6 and tracks year-on-year changes in emissions as the primary indicator of performance during this transitional period. Any future decision regarding the establishment of new climate-related targets will be informed by the outcome of the strategic review and the definition of our long-term operating footprint.

E1-5 Energy consumption and mix

		2024	2025
Fuel consumption from coal and coal products	MWh	0	0
Fuel consumption from crude oil and petroleum products (*)(**)	MWh	2,198	2,092
Fuel consumption from natural gas	MWh	2,793	2,497
Fuel consumption from other fossil sources	MWh	0	0
Consumption of purchased or acquired electricity, heat, steam, and cooling from fossil sources	MWh	269	168
Total fossil energy consumption	MWh	5,260	4,757
Share of fossil sources in total energy consumption	%	48	57
Consumption from nuclear products	MWh	231	108
Share of consumption from nuclear sources in total energy consumption	%	2	1
Fuel consumption from renewable sources, including biomass (also comprising industrial and municipal waste of biologic origin, biogas, renewable hydrogen, etc.)	MWh	0	0
Consumption of purchased or acquired electricity, heat, steam, and cooling from renewable sources	MWh	5,282	3,425
The consumption of self-generated non-fuel renewable energy	MWh	108	108
Total renewable energy consumption	MWh	5,390	3,533
Share of renewable sources in total energy consumption	%	50	42
Total energy consumption	MWh	10,881	8,397

(*) Includes the energy consumed in Galapagos' buildings, by stationary diesel consumption (used by back-up generators and by Galapagos' car fleet). The latter is based on estimated distance travelled and estimated fuel consumption.

(**) The FY2024 Fuel consumption from crude oil and petroleum products data has been restated due to an error in the mobile combustion calculation and refinement in the calculation methodology. Further details on this restatements can be found in ESRS 2 BP-2.

2022 energy consumption and energy mix have been removed from the E1-5 table as we no longer maintain a climate target that calls for historic trend comparison. 2024 figures continue to be presented as the prior-year reference; however, due to data limitations, they cannot be restated to isolate the impact of the 2025 small molecule discovery program wind-down. Accordingly, 2024 represents the full organizational energy consumption before the restructuring, while 2025 reflects the reduced energy consumption following the strategic transition.

E1-6 – Gross Scopes 1, 2, 3 and Total GHG emissions

For the calculation of our GHG emissions, we use the GHG Protocol. For the organizational boundary we apply the operational control approach. This includes our offices and labs.

Our Scope 1 contains energy/heat generation at our facilities, company vehicles, and fugitive emissions. In our Scope 2 emissions, purchased electricity and district heating is included. For scope 1 and 2 calculations, direct data was used.

Scope 3 consists of both up and downstream activities as included in the table below. The emissions for Purchased goods and services, Capital goods, and Upstream leased assets are calculated based on spend data. Commuting and Downstream transport data was estimated.

The calculations are based on activity data multiplied by emission factor. Both supplier specific emission factor, as average emission factor (average values by industry and country from several databases) were used.

We continue to work on improving the quality of our data and the consistency of our calculation methods. For the 2025 reporting year, we expanded the completeness of our Scope 3 inventory by broadening the coverage of relevant categories. This included the integration of hotel data into Category 6 (Business Travel) and the inclusion of Category 15 (Investments). Improving internal processes for GHG data collection and control remains an area for continued focus, and further development of these processes will be considered as we move forward and continue our evolution. Based on the nature of our operations, we have assessed that no other Scope 3 categories are material or relevant for reporting.

2022 GHG emissions have been removed from the E1 -6 table as we no longer maintain a climate target that calls for historic trend comparison. 2024 figures continue to be presented as the prior-year reference; however, due to data limitations, they cannot be restated to isolate the impact of the 2025 small molecule discovery program wind-down. Accordingly, 2024 represents the full organizational footprint before the restructuring, while 2025 reflects the reduced footprint following the strategic transition.

We report a further reduction in Scope 1, Scope 2 and Scope 3 emissions in 2025 compared to 2024 emissions. However, these reductions cannot be interpreted as progress against the previously disclosed climate targets that were set for 2030 in 2024 or transition plan. The reported decline in emissions in 2025 is primarily attributable to our strategic reorganization as explained in section “**A New Strategic Direction**”, and only to a smaller extent linked to our efforts to execute on decarbonization measures.

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		2024	2025
Scope 1 GHG Emissions			
Gross Scope 1 GHG emissions (****)	TCO ₂ e	1,053	964
Percentage of Scope 1 GHG emissions from regulated ETS	%	0	0
Scope 2 GHG Emissions			
Gross location-based Scope 2 GHG emissions	TCO ₂ e	1,188	749
Gross market-based Scope 2 GHG emissions	TCO ₂ e	114	88
Significant Scope 3 GHG Emissions			
Total Gross indirect (Scope 3) GHG emissions	TCO ₂ e	48,128	33,450
Purchased goods and services (*)	TCO ₂ e	39,116	26,581
Capital Goods (*)	TCO ₂ e	6,133	3,362
Fuel and energy-related activities (*)	TCO ₂ e	350	329
Upstream leased assets (*)	TCO ₂ e	366	42
Waste generated in operations (*)	TCO ₂ e	212	168
Processing of sold products (*****)	TCO ₂ e	239	1,100
Use of sold products	TCO ₂ e	N/A	N/A
End-of-life treatment of sold products (*)	TCO ₂ e	3	0.43
Downstream leased assets	TCO ₂ e	N/A	42
Franchises	TCO ₂ e	N/A	N/A
Upstream transportation and distribution (*)	TCO ₂ e	2	N/A
Downstream transportation and distribution (**)	TCO ₂ e	1	0.07
Business travels (*)	TCO ₂ e	1,450	1,461
Employee commuting (**)	TCO ₂ e	255	225
Financial investments	TCO ₂ e	N/A	140
Total GHG emissions			
Total GHG emissions (location-based)	TCO ₂ e	50,369	35,214
Total GHG emissions (market-based)	TCO ₂ e	49,295	34,501
Total GHG emissions (location-based) per net revenue (***)	TCO ₂ e per €000	0.183	0.0317
Total GHG emissions (market-based) per net revenue (***)	TCO ₂ e per €000	0.179	0.0310

(*) 96% of our scope 3 carbon footprint is calculated using actual data

(**) 4% of our scope 3 carbon footprint is calculated using estimated data

(***) Net revenue for FY25 amounted to €1,112,248 thousand, as presented in the Consolidated Income Statement of the Annual Report. GHG intensity per net revenue has been calculated by dividing total GHG emissions by net revenue expressed in thousands of euro (€000).

(****) The FY2024 gross Scope 1 emissions have been restated due to an error in the mobile combustion calculation and refinement in the calculation methodology. Further details on this restatements can be found in ESRS 2 BP-2.

(*****) Data has been reported for Processing of sold products for the first time. Further details can be found in ESRS 2 BP-2.

EU Taxonomy 2025 Statement

The European Commission's action plan on financing sustainable growth led to the creation of an EU classification system for sustainable activities, also known as the EU taxonomy. The EU Taxonomy introduces a classification system for environmentally sustainable activities, and an activity is deemed environmentally sustainable if it meets all of the following overarching criteria:

- substantially contributing to at least one of the six environmental objectives of the EU Taxonomy Regulation: (i) climate change mitigation;(ii) climate change adaptation;(iii) sustainable use and protection of water and marine resources;(iv) transition to a circular economy, (v) pollution prevention and control; and (vi) protection and restoration of biodiversity and ecosystems;
- not significantly harming any of these environmental objectives;
- complying with minimum safeguards.

As indicated in the Delegated Regulation of (EU) 2021/2178, non-financial undertakings shall disclose the proportion of Taxonomy-eligible and aligned economic activities in their total turnover, capital expenditure (CapEx) and operational expenditure (OpEx).

Our approach

Changes from previous reporting period

We have closely followed the development of the Omnibus Delegated Act, which streamlines the EU Taxonomy Regulation and came into force on 28 January 2026. The Act applies retrospectively from 1 January 2026, and accordingly, we have updated our EU Taxonomy reporting approach to align with the amended rules.

Key updates introduced this year include the use of the revised EU Taxonomy reporting templates, the omission of dedicated templates for performance and exposures related to fossil gas and nuclear activities, and the application of the new materiality threshold, which allows entities to omit the assessment of activities that are not financially material. The methodology applied for the eligibility and alignment assessments and the calculation of the related KPIs has remained largely unchanged compared to the previous year, apart from an adjustment to the approach for calculating the OpEx KPI. Further details are provided in the Accounting Policy section.

Materiality

The amended Delegated Act allows non-financial undertakings to omit assessing whether some of their economic activities are taxonomy-eligible or taxonomy-aligned where the cumulative value of those economic activities is below 10%. In line with this provision, we have assessed materiality separately for each KPI by identifying economic activities and their corresponding values of the KPI. Those activities that cumulatively fall below the 10% threshold have been classified as non-material and excluded from further eligibility and alignment assessment.

Non-material activities were identified under CapEx and OpEx. For CapEx they included investments in software and databases (NACE 62.01 Computer programming activities) and leased, right-of-use vehicles (77.11 Renting and leasing of cars and light motor vehicles). These activities cumulatively represent approximately 4% of the total CapEx.

Under OpEx, non-material activities consisted of expenses related to maintenance of property, plant and equipment (NACE 81.1 Combined facilities support activities) and short-term leases of heat pumps (NACE 77.3 Renting and leasing of other machinery, equipment and tangible goods), accounting for approximately 0.5%. These non-material activities are not part of Galapagos' core business operations but relate to supporting functions and therefore account for only a minor proportion of the KPIs.

Eligibility

Following a thorough review of the EU Taxonomy legal framework, beginning with an assessment of our core activities and NACE codes against the activities identified under the EU Taxonomy, we do not consider our core business activities of discovering and developing innovative medicines to be in scope of the Delegated Acts. As a result, no eligibility has been reported for turnover.

For CapEx, we have identified activity 7.3. Installation, maintenance and repair of energy efficiency equipment as eligible. This relates to expenses for installation of heating, ventilation and air-conditioning (HVAC) in Galapagos-owned building in the Netherlands.

Most of our OpEx under EU Taxonomy definition consists of R&D expenses associated with developing medicinal products, which is currently not covered by the EU Taxonomy and deemed not eligible.

Alignment

Alignment assessment has been conducted for the eligible activity 7.3. Installation, maintenance and repair of energy efficiency equipment. The assessment covers the Substantial Contribution, Do No Significant Harm (DNSH), and Minimum Safeguards criteria.

The substantial contribution criteria are met as the heating, ventilation and air-conditioning (HVAC) systems use highly efficient technologies. The DNSH criteria for activity 7.3 require compliance with the generic criteria for DNSH to climate change adaptation and pollution prevention and control. The criteria are met as Galapagos has screened physical climate risks for the relevant location and the activity does not lead to the manufacturing, placing on the market or use of substances specified in the criteria.

In line with our sustainability commitments, we comply with the minimum safeguards. We take a holistic approach to ensure that achieving environmental objectives does not compromise human rights, fair competition, or compliance with anti-bribery, anti-corruption, and taxation laws. We have a Code of Conduct covering human rights, fair competition, and corruption and bribery, as well as an Anti-Bribery and an Anti-Corruption Policy and Global Tax Policy in place and we have not violated any of the minimum safeguards.

Accounting policy

For the determination of turnover, CapEx and OpEx, we use the reported data in the **2025 consolidated financial statements** included in this report:

Turnover comprises the net turnover derived from products or services. Turnover covers all continuing activities of Galapagos as of December 31, 2025 and the denominator can be reconciled with the 2025 IFRS total net revenues of €1.1 billion as disclosed in **note 7**, which comprise collaboration revenues and supply revenues. The numerator is 0 as activities related to R&D of medicinal products are currently not covered in EU Taxonomy.

CapEx consists of additions to tangible and intangible assets during the financial year 2025 considered before depreciation, amortization and any re-measurements recognized by Galapagos pursuant to IAS 38. The denominator (total CapEx) can be reconciled with the sum of the lines "Additions" disclosed in **notes 14** and **15** (total €15.2 million) of the consolidated financial statements. Most of the CapEx is associated with installation of machinery and lab equipment, and property, plant and equipment (covering fully owned and right-of-use assets). The numerator consists of expenses related to installation of heating, ventilation and air-conditioning (HVAC) systems in Galapagos-owned building.

OpEx, according to the EU Taxonomy, covers direct non-capitalized costs of research and development, building renovation measures, short-term leases, maintenance and repair and any other direct expenditure relating to the day-to-day servicing of assets of property, plant and equipment by Galapagos or third-parties that are necessary to ensure the continued and effective functioning of such assets. Following further assessment of the regulation, we have reviewed our process for reporting OpEx under the EU Taxonomy and have strictly included R&D costs, maintenance expenses and short-term leases in the denominator, which results in a more stringent approach compared with prior year. R&D expenditure amounts to €459.4 million, as disclosed in **note 8**, with maintenance and short-term lease expenses amounting to €4 million, resulting in a total of €461.7 million (€335 million in the previous year, restated for comparability). The numerator is 0 as activities related to R&D of medicinal products are currently not covered in EU Taxonomy.

Based on our assessment and the available data, we report 0% Taxonomy eligible and aligned turnover. We report 0.6% Taxonomy eligible and aligned CapEx, and 0% Taxonomy eligible and aligned OpEx (as presented in the EU Taxonomy 2025 Tables).

Please refer to the **EU Taxonomy 2025** tables for the disclosure on KPIs of non-financial undertakings as required by Commission Delegated regulation (EU) 2026/73. The eligibility figures reflect the fact that our core activities remain outside the scope of the economic activities for which Technical Screening Criteria (TSC) have been established under the Delegated Acts.

EU Taxonomy Tables

Table 1: Proportion of turnover, CapEx, OpEx from products or services associated with Taxonomy-eligible or Taxonomy-aligned economic activities – disclosure covering year (2025) (summary KPIs)

Financial year 2025

KPI	Proportion of Total Taxonomy eligible activities	Proportion of Taxonomy aligned activities	Proportion of Taxonomy aligned activities	Breakdown by environmental objectives of Taxonomy-aligned activities							Proportion of enabling activities	Proportion of transitional activities	Proportion of considered non-material activities	Proportion of Taxonomy activities	
				Climate Change Mitigation	Climate Change Adaptation	Circular Water Economy	Pollution	Bio-diversity	Not assessed activities in previous financial year 2024	Taxonomy aligned activities in previous financial year 2024					
														%	%
Turnover	1,082,324	0.00%	0	0.00%	0%	0%	0%	0%	0%	0%	0%	0%	0.00%	0	0.00%
CapEx	15,272	0.60%	90	0.60%	0%	0%	0%	0%	0%	0%	0%	0%	4.00%	2,772	3.03%
OpEx	461,659	0.00%	0	0.00%	0%	0%	0%	0%	0%	0%	0%	0%	0.40%	3,470	0.00%

Table 2: Proportion of CapEx from products or services associated with Taxonomy-eligible or Taxonomy-aligned economic activities – disclosure covering year 2025 (activity breakdown)

CapEx

Financial year 2025

Economic Activities	Code	Taxonomy-eligible KPI (Proportion of Taxonomy-eligible CapEx)	Taxonomy-aligned KPI (Proportion of Taxonomy-aligned CapEx)	Taxonomy-aligned KPI (Proportion of Taxonomy-aligned CapEx)	Environmental objective of Taxonomy-aligned activities							Enabling activity	Transitional activity	Proportion of Taxonomy aligned in Taxonomy-eligible
					Climate Change Mitigation	Climate Change Adaptation	Circular Water Economy	Pollution	Bio-diversity	(E where applicable)	(T where applicable)			
Installation, maintenance and repair of energy efficiency equipment	CCM 7.3	0.60%	90	0.60%	0%	0%	0%	0%	0%	0%	0%			100%
Sum of alignment per objective					0%	0%	0%	0%	0%	0%				
Total KPI (CapEx)		0.60%	90	0.60%	0%	0%	0%	0%	0%	0%				100%

Social Information

Own Workforce

ESRS S1 - Own Workforce

Our people play a critical role in enabling our R&D activities, even as we underwent significant change during FY25. This section covers our own workforce, which on average consisted of 540 employees during FY25, including 441 in Europe, 98 in the U.S. and one in China. As of December 31, 2025, we had 416 employees in total, reflecting the impact of the organizational restructuring during the reporting year. An overview of FTEs in our financial statements can be consulted in [note 9](#).

During FY25, we underwent significant organizational change. These shifts had important implications for our workforce. On January 8, 2025 it was announced that Galapagos would discontinue its small molecule discovery programs and reorganize its business to focus on long-term value creation in cell therapy in oncology.

Thereafter, on October 21, 2025, it was announced that Galapagos intended to wind down its cell therapy activities following a comprehensive strategic review. Following this, the Company commenced the consultations in the Netherlands and Belgium, in line with applicable legal frameworks. The consultation process followed the phases of information, consultation and negotiation. The works council consultation process regarding the intended wind-down of our cell therapy activities was concluded. The wind-down affects approximately 365 employees across Europe, the U.S. and China and results in the closure of the sites in Leiden (the Netherlands), Basel (Switzerland), Princeton and Pittsburgh (U.S.), and Shanghai (China).

Throughout the process, the Company engaged transparently with employee representative bodies in line with applicable legal requirements, ensuring that employee perspectives were considered and that appropriate support measures were identified. The dedication shown by colleagues during this period of uncertainty supported the orderly preparation and execution of the transition. Throughout the process, we maintained principles intended to support affected employees and ensure the transition was managed responsibly.

On January 5, 2026, Galapagos announced that the works council consultation process regarding the wind-down of cell therapy activities had been completed and that its Board of Directors decided to initiate the wind-down of the Company's cell therapy activities. In the context of this transition, workforce-related topics remain materially relevant due to their connection to organizational continuity and capability.

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The table below summarizes the nine material impacts, risks and opportunities (IROs) identified for our own workforce in our double materiality assessment.

Material Topic	Description	IRO Type	Value Chain
Working conditions	Uncertainty and reorganizations may impact employee motivation and engagement.	Actual negative impact	Own operations
■ Secure employment	The risk of strategic reorganizations on our workforce relates to potential declines in employee motivation and engagement, loss of talent due to uncertainty, impacts on overall performance, and possible harm to our reputation as an employer.	Risk	Own operations
Working conditions	By providing fair and competitive compensation, we contribute to supporting the financial wellbeing of employees and helping to ensure that work is appropriately valued and rewarded.	Actual positive impact	Own operations
■ Adequate wages			
Working conditions	Providing our employees with good work/life balance supports wellbeing and mental health, and enables employees to perform at their best.	Actual positive impact	Own operations
■ Work-life			
Equal treatment and opportunities for all	Unequal representation of women and minority groups in different roles and levels of seniority may affect employee wellbeing, workplace culture, and our ability to attract diverse talent.	Actual negative impact	Own operations
■ Gender equality and equal pay for work of equal value			
Equal treatment and opportunities for all	We contribute to inclusive employment opportunities and support equal participation in the workforce.	Actual positive impact	Own operations
■ Employment of persons with disabilities			
Equal treatment and opportunities for all	By providing equal opportunities within our workforce, we contribute to a more inclusive and diverse working environment, which can support employee engagement and foster different perspectives and enhance organizational resilience.	Actual positive impact	Own operations
■ Diversity			
Other work-related rights	Cybersecurity or security breaches, including personal data breaches risk the confidentiality of our employees' information.	Potential negative impact	Own operations
■ Privacy	A privacy breach could have a financial or legal impact on us if the integrity, confidentiality or accessibility of employees' personal data were compromised.	Risk	Own operations

All material IROs identified under ESRS S1 fall within the short-term time horizon (i.e., <3 years).

Overview of how material impacts, risks and opportunities interact with our strategy and business model (SBM-3)

While the organizational changes in FY25 resulted in secure employment being assessed as material in FY25, the other S1 topics continue to reflect routine and ongoing areas of importance such as working conditions, equal treatment and privacy.

Secure employment and working conditions

Secure employment is a material IRO due to the organizational changes during FY25. Job security was affected by the restructuring activities and the consultation process regarding the intended wind-down of our cell therapy activities. These developments were associated with impacts on engagement and wellbeing. Within this context, secure employment remains relevant to organizational continuity, the retention of institutional knowledge, and the ability to support remaining activities during a period of transition.

Supporting our talented employees by providing fair and equitable compensation across the organization remains a priority. Adequate wages and established compensation practices continued to play a role in supporting internal equity and maintaining engagement. Promoting work-life balance also remained relevant to employee well-being and the sustainability of working practices during this period.

Equal treatment and opportunities for all

During the year, we maintained our established practices to support fairness and equal pay for work of equal value, including the use of internal benchmarking activities and structured pay frameworks that uphold equity across roles. These practices supported consistency and transparency in compensation during FY25 and remained relevant as we navigated a period of transition.

Inclusive hiring practices also contributed to supporting a fair and inclusive working environment and helped maintain access to a broad range of skills and perspectives within the workforce. Diversity contributed positively to the working environment by fostering different viewpoints and supporting employee engagement.

Privacy

Privacy and data security are critical areas of risk, particularly in the short term, as we must manage challenges related to cybersecurity, potential data breaches, and regulatory compliance, such as GDPR. To mitigate these risks, we are investing in robust cybersecurity systems, conduct third-party assessments, and maintain rigorous compliance measures. These initiatives are designed to safeguard sensitive and personal data, protect employees' information, and uphold stakeholder trust.

Impact, risk and opportunity management

Policies

We maintain policies and practices designed to support fair, safe and respectful working conditions for all employees. Throughout FY25, we maintained policies aligned with the UN Guiding Principles on Business and Human Rights, the International Labour Organization Declaration on Fundamental Principles and Rights at Work and the OECD Guidelines for Multinational Enterprises.

ESRS sub-topics	Policy	Description
	Code of Conduct	This sets out the essential standards of business conduct that Galapagos and its employees are expected to apply at all times. Responsibility for the Code of Conduct and compliance oversight rests with the General Counsel, who is a member of the Executive Committee. The Board of Directors approves the Code of Conduct.
	Anti-Discrimination & Anti-Harassment Policy	This prohibits discrimination and/or harassment as per the definitions of the UN Global Compact. The Chief Human Resources Officer and General Counsel are accountable for this policy.
	Speak-Up Policy	This sets out the way in which any concern that employees have can be managed in a consistent and appropriate way. The General Counsel is accountable for this policy.
Working Conditions and Equal Treatment & Opportunities	Reward Policy	This defines the framework for how salaries are structured and managed, including the use of established salary ranges informed by our bi-annual benchmarking exercise.
	Remuneration Policy	This outlines the framework used to determine compensation across the organization, including benchmarking against relevant peer groups, linking variable pay to defined corporate and individual performance measures, and applying differentiation in pay only on the basis of performance and other established criteria.
	Corporate Framework on Hybrid Working	This outlines the basic guidelines for hybrid working across the organization, including flexibility in work location and working hours in line with local legislation and team arrangements. The policy sets out principles for balancing individual needs with those of the team and wider business, maintaining availability during country-specific core hours, and supporting healthy work-life boundaries.
Privacy	Data Protection Policy	This describes how personal data must be processed within the Galapagos group of companies and is aligned with the requirements of GDPR. The General Counsel is accountable for this policy.

Actions

During FY25, we maintained principles intended to support affected employees and implemented enhanced measures that went beyond minimum legal requirements. This included extended notice arrangements and transition support and recognizing the performance of employees leaving the business in line with established reward cycles.

Working Conditions and Equal Treatment & Opportunities

In recognizing local legislation, we have established Works Councils in countries where this is required to support employee representation in relation to their rights, including establishing collective bargaining where necessary. During the workforce reduction activities in FY25, all employees were offered six one-to-one coaching sessions with an external provider. Further, we continued to apply established compensation practices supported by internal benchmarking and structured pay frameworks, which promoted fairness and transparency across roles. Employees were provided access to family leave policies and mental health initiatives, which supported wellbeing during a period of organizational change.

During FY25, we maintained practices to support fairness and equal pay for work of equal value. Inclusive hiring practices supported access to a broad range of skills and perspectives within the workforce. Diversity, Equity, Inclusion and Belonging (DEIB) workstreams were in place at the beginning of the year and guided inclusive practices. These activities were impacted by the organizational restructuring and subsequently scaled back as organizational resources were reduced during the year; Underlying practices supporting equitable treatment, however, remained in place throughout FY25.

Employee Privacy

With regard to Data Privacy, we performed an in-depth assessment of the different personal data and information we collect and we refined our internal inventory of personal data and information to further enhance our Data Privacy strategy. We regularly monitor compliance with our data policies and continue to evolve our risk management policies to address the evolving risks.

Application of Phase-in Relief

For FY25, we are applying the phase-in relief as available for S1 – Own Workforce. In line with ESRS 2 BP-2 (17), we provide only the required brief narrative summary of its workforce for this reporting period. Galapagos has not set or disclosed any S1-related targets for this period, as these are not yet required under the phase-in provisions.

Patients, Consumers and End-Users

ESRS S4 - Patients, Consumers and End-Users

Although we are currently an R&D-focused organization with no commercialized products, we identified elements of ESRS S4 as material to our business model and value chain. As patients constitute the end users of our candidate medicines, including those in clinical development, the impacts, risks and opportunities (IROs) relate to how we manage patient data, generate safety evidence and conduct research in an inclusive manner.

The table below summarizes the nine material IROs identified for patients, consumers and end-users in our double materiality assessment.

Material Topic	Description	IRO Type	Value Chain
Information-related impacts for consumers and/or end-users ■ Privacy	The processing of patient and end-user data during clinical development and related operations may create negative impacts if personal information is exposed, misused or accessed without authorization. The involvement of multiple third-party vendors who require access to sensitive data can increase the potential for privacy breaches, which may compromise individuals' rights to data protection and confidentiality.	Potential negative impact	Entire
	We are subject to extensive legislative, regulatory, and other requirements during preclinical and clinical development, as well as transparency, privacy and data protection and other requirements.	Risk	Entire
Personal safety of consumers and/or end-users ■ Health and Safety	Providing insufficient, unclear or non-compliant information on product risks and side effects can lead to inappropriate use, adverse outcomes and harm to patients.	Actual negative impact	Entire
	Issues with patient safety or product quality within our clinical trials may limit our ability to bring our product to market. Not obtaining access would have a financial impact exceeding our financial materiality threshold.	Risk	Entire
Social inclusion of consumers and/or end-users ■ Non-discrimination	Insufficient diversity and inadequate representation of patient groups in clinical trials may lead to biased clinical evidence and medicines that do not meet the needs of all patient populations.	Potential negative impact	Downstream
Social inclusion of consumers and/or end-users ■ Access to products and services ■ Patient engagement	As a biotech company, it is our responsibility to ensure our medicines and knowledge are accessible. Patient engagement helps ensure our medicines reach the populations that need them, creating a positive societal impact by improving health outcomes and strengthening trust.	Actual positive impact	Downstream
	By sharing knowledge transparently and engaging with patient organizations, we can generate positive impacts by helping identify non-clinical unmet needs and supporting improvements in patients' quality of life.	Actual positive impact	Own operations
	Our commitment to ensuring access and affordability for patients may lead to financial impacts for us. Pricing decisions and access initiatives or affordability commitments may generate costs or limit revenue in ways that could exceed our financial materiality threshold.	Risk	Own operations
	Improved access to, and greater affordability of, our medicines may lead to growth in specific markets.	Opportunity	Own operations

All material IROs identified under ESRS S4 fall within the short-term time horizon (i.e., <3 years).

Overview of how material impacts, risks and opportunities relate to our strategy and business model (SBM-3)

Privacy

Privacy is material to our business model as we collect and process sensitive personal data throughout clinical research. Protecting patient data is essential for maintaining ethical standards in clinical development, meeting regulatory expectations and sustaining trust among clinical trial participants. Privacy considerations influence how we design clinical operations, work with partners and ensure that data handling practices support compliance and safeguard patient rights.

Patient safety and product quality

Patient safety and the quality of our investigational therapies are central to our R&D activities. They are fundamental to maintaining regulatory trust, securing timely market access, and supporting long term value creation. This materiality informs our strategy and business model, which prioritize generating robust safety evidence, transparent communication with regulators, and a strong quality culture throughout our development programs. At the same time, material risks arise if safety concerns or quality issues emerge during clinical studies, as these may delay or prevent regulatory approval and limit our ability to bring new therapies to patients.

Social inclusion of consumers

Access to products and services

Social inclusion is material to our business model because the relevance of clinical evidence depends on diverse and representative patient populations. Ensuring that clinical research reflects the needs of such populations can generate positive impacts by improving access to medicines, supporting patient understanding, and helping ensure that the investigational therapies we develop have the potential to benefit a broad range of patient groups, including those with high unmet medical needs.

Patient engagement

Patient engagement remained material to our business model in FY25 because the relevance and usability of clinical development activities depend on incorporating patient and caregiver perspectives, for example through engagement with patient organizations, the collection of patient and caregiver insights, and consideration of these insights in clinical design and communication to support transparent and health-literate information. The decision to pursue an intention to wind down our cell therapy activities, as described in section “**A New Strategic Direction**”, impacted delivery in this area.

Impact, risk and opportunity management

Policies

We maintain a set of specific policies and standards to appropriately manage the risks in the development of new medicines. These include:

ESRS sub-topics	Policy	Description
Information-related impacts for consumers and/or end-users	Data Protection Policy	Our Data Protection Policy, aligned with the requirements of GDPR, defines how personal data must be processed within the Galapagos group. The General Counsel is accountable for this policy.
	Quality Manual	Our Quality Manual sets out the structure and operation of our Quality Management System (QMS) to ensure that all activities are of the highest quality and comply with applicable regulatory expectations including Good Clinical Practice (GCP) and Good Manufacturing Practice (GMP), and with a strong focus on patient safety. In 2025, the manual underwent minor updates, primarily to reflect revised references and current documentation. The Global Head of Quality is accountable for this policy.
	Clinical Trial Oversight Policy	Our Clinical Trial Oversight Policy ensures that we maintain appropriate oversight and governance of Galapagos-sponsored clinical studies. The Head of R&D is accountable for this policy.
Personal safety of consumers and/or end-users	GxP Risk Management Policy	The GxP Risk Management Policy forms a core component of our QMS, and ensures risks are managed or eliminated across GxP processes and activities. The Global Head of Quality is accountable for this policy.
	Business Continuity & Crisis Management	Business Continuity & Crisis Management sets out the mechanisms required to prevent, mitigate and respond to high-impact incidents. Its purpose is to minimize disruption to critical operations, protect our employees, preserve our reputation and ensure continuity of our license to operate. The Global Head of Quality is accountable for this policy.
Social inclusion of consumers and/or end-users	Issues & Escalation Management	Defines the governance structure and processes required to ensure that critical and major issues are escalated to senior management in a timely and transparent manner. The Global Head of Quality is accountable for this policy.
	Medical Safety Policy	In 2025, our previous Pharmacovigilance Policy was replaced by a Medical Safety Policy supported by a comprehensive framework of Standard Operating Procedures (SOP). This updated policy strengthens our governance, monitoring and management of patient safety across the lifecycle of our investigational therapies and marketed products. The Head of Medical Safety is accountable for this policy.
	Principles for Patient and Patient Organization Interactions	This sets out the ethical and compliance framework within which we engage with patients and patient organizations. It covers what and how to communicate and what sort of activities are appropriate to conduct in conjunction with these stakeholders. Overall accountability for interactions with patients and patient organizations resides with the Patient Advocacy Team. The General Counsel as Head of Compliance & Ethics is accountable for this policy.

Actions

Privacy

We have taken steps to minimize the risk of potential data breaches and established controls to limit the likelihood of data breaches relating to patient data. We maintain GDPR-aligned data protection practices, including applying structured oversight of third party data processors, and operating cybersecurity controls to protect sensitive information throughout the value chain. These measures are designed to safeguard clinical study data, protect patient information, and uphold our ethical and regulatory commitments.

Patient safety and engagement, product quality, and access to products and services

We apply processes to ensure that safety and quality considerations are integrated into our clinical development activities. It is critical that we implement an appropriate risk-benefit approach throughout the entire drug development lifecycle to ensure we bring safe and effective medicines to the market and ultimately the broadest patient population, while monitoring, assessing, and managing side effects, including adverse events that may pose an unacceptable risk.

We operate an Independent Data Monitoring Committee composed of independent medical, scientific, and biostatistics experts, which conducts ongoing benefit-risk assessments of safety and efficacy data at regular intervals throughout our clinical studies. We implement comprehensive risk management plans and conduct formalized Quality audits to identify potential issues and drive continuous improvement. We also collect data across the lifecycle of our medicines, including the collection and analysis of Phase 4 real-world evidence studies, to identify emerging safety signals and maintain an appropriate benefit-risk balance from a regulatory and patient-protection perspective. In addition, we work to strengthen our interactions with patients and patient organizations, which could enhance quality of life and help identify the non-clinical unmet needs.

Together, these measures support our ability to progress R&D activities responsibly and to develop innovative medicines that bring value to patients and healthcare systems.

Regarding patient engagement, our **Patient Partnership Charter** remained in place throughout FY25, setting out our ambition, underpinned by our values and principles, to pioneer for patients and work in partnership with patients and patient organizations. The Charter continued to guide how we considered patient perspectives in our research activities and stakeholder interactions. During the reporting year, no further structured patient-engagement activities were carried out, and the Patient Engagement Council (PEC) was discontinued as part of the 2025 organizational restructuring. While dedicated activities concluded, the principles within the Charter continued to support transparent, respectful and health-literate interactions with patients and caregivers.

Application of Phase-in Relief

In accordance with ESRS 1 Appendix C, we are making use of the phase-in relief for ESRS S4. As a result, we are not disclosing S4-related metrics or targets for this reporting year. Given the organizational restructuring underway, it would not be appropriate to define meaningful or consistent S4 targets at this time.

Governance Information

Business Conduct

ESRS G1 – Business Conduct

Material impacts, risks and opportunities and their interaction with strategy and business model (SBM-3)

Business conduct and corporate integrity underpinned our operations during the reporting year. We operated in accordance with applicable laws, regulations and internal standards, maintaining a corporate culture based on ethical behavior, accountability and transparency.

As a biotechnology company operating in a highly regulated environment, compliance, effective internal controls, and responsible supply chain management were integral to the execution of our business model. Established governance structures and control mechanisms remained in place throughout the reporting period.

The table below summarizes the five material impacts, risks and opportunities (IROs) identified for our business and our governance structures in accordance with ESRS 2 (SBM 3 and IRO 1), reflecting the outcome of our FY25 double materiality assessment.

Material Topic	Description	IRO Type	Value Chain
Corporate Culture and business conduct	Inappropriate corporate culture and business conduct could affect the long-term reputation and success of our organization and have an impact on e.g., the attraction and retention of talent or the interaction with customers, regulators, partners and suppliers.	Risk	Entire
Protection of whistleblower	Failure to appropriately hear, investigate or protect whistleblower reports could result in financial penalties and reputational damage, particularly in light of expanded operations in the United States.	Risk	Entire
Management of relationships with suppliers	Our success relies on supply chain partnerships, underpinned by our ability to build a trusted supply chain and maintain sound relations to mitigate potential supply chain risks.	Risk	Entire
	By maintaining effective supplier relationship management, we help safeguard the continuity of operations and support ethical practices across our value chain.	Actual positive impact	Entire
	If suppliers are unable to provide the therapy needed for patients or do not meet required ethical standards, this could affect patient access to treatment and contribute to non-compliant practices in the value chain.	Potential negative impact	Entire

All material IROs identified under ESRS G1 fall within the short-term time horizon (i.e., <3 years).

The material G1 IROs were linked to the execution of our business model through their relevance to corporate conduct, whistleblower mechanisms, and the management of supplier relationships. Risks relating to corporate culture and whistleblower protection were associated with our ability to identify and address potential misconduct in a timely manner. Non-compliance with applicable whistleblower protection legislation, including EU requirements, could have resulted in financial penalties and reputational damage. Supplier-related IROs were connected to our reliance on specialized external partners for key operational activities. Effective management of supplier relationships supported continuity of operations and adherence to required ethical standards within the value chain. If suppliers were unable to meet contractual or ethical requirements, this could have affected operational continuity and contributed to non-compliant practices within the value chain.

Governance oversight of business conduct matters is described in ESRS 2 (GOV-1), and the process for identifying material impacts, risks and opportunities is set out in ESRS 2 (IRO-1).

Business conduct policies and corporate culture (G1-1)

To address the material G1 impacts and risks described above, we maintained policies and procedures governing corporate conduct, whistleblower protection and supplier-related business practices during the reporting year. These policies define expected standards of behavior, establish reporting and investigation mechanisms, and support compliance with applicable legal and regulatory requirements.

We maintained a suite of policies and processes to manage business conduct and corporate culture. These policies were supported by internal processes designed to promote awareness and consistent application across the organization. New members of the Audit Committee were provided with onboarding of the Code of Conduct and Speak-Up Policy. Compliance with the Code of Conduct formed a mandatory element of onboarding new employees and external staff (including, but not limited to, consultants). In 2025, 97% of the new employees and external staff completed the related training, and this percentage is measured against all new employees and external staff.

Detailed information regarding our Code of Conduct, compliance standards and related procedures is provided below.

Code of Conduct

Our Code of Conduct sets out the overarching business conduct expectations for all employees and external staff (including, but not limited to, consultants) working on our behalf. Responsibility for the Code of Conduct and compliance oversight rests with the General Counsel, who is a member of the Executive Committee. The Board of Directors approves the Code of Conduct.

During the reporting year, the Code of Conduct was reviewed to ensure it remained up to date and aligned with current operations. Minor updates were made where appropriate, including administrative updates. No substantive changes were introduced.

Further information about our **Code of Conduct** is provided in the Corporate Governance chapter of this report.

The principles of the Code of Conduct are focused on:

- Patients as our foremost consideration in decision making
- Acting in an ethical, honest and transparent manner
- Being responsible corporate citizens
- Speaking up to address issues that may arise
- Not tolerating harassment or discriminatory behavior
- Complying with the UN Global Compact
- Holding ourselves accountable

Policies and compliance standards

In addition to the Code of Conduct, we have established a rigorous compliance program that is built on guidelines and standards through group-wide policies, standards and procedures. This program includes:

- A Speak-Up Policy which provides mechanisms for employees and third parties to raise concerns in relation to business conduct in line with the EU Whistleblowing Directive (see detailed description below).
- An Anti-Bribery & Anti-Corruption Policy which prohibits all forms of bribery in the course of Galapagos business.
- Guidance on Identifying and Declaring Personal Interests which provides guidance on how to prevent certain situations where a personal interest is involved and establishes rules for identifying, disclosing, and handling of potential risks that may occur in certain (specific) situations with personal interests.
- A procurement policy outlining how we purchase goods and services based on their type, budget, risk, and importance to operations.

Through the Audit Committee Complaints Procedure Policy, complaints can be made regarding (1) accounting, internal accounting controls or auditing matters, including the confidential, anonymous submission by employees of concerns regarding questionable accounting or auditing matters, or (2) potential violations of any applicable law, including the relevant federal securities laws and including any rules and regulations thereunder, or the U.S. Foreign Corrupt Practices Act. While we have not yet defined specific functions that may be most exposed to corruption or bribery risks, all employees are required to complete Code of Conduct training as part of their onboarding.

Whistleblower Policies

We maintain a Speak-Up Policy designed to support the reporting of concerns and protect individuals from retaliation.

The general investigation principles of the Speak-Up policy are:

- Confidentiality
- Objectivity
- Timeliness
- Consistency
- Integrity
- Documentation
- Transparency

While it is possible for individuals to raise concerns anonymously (where permissible), our Speak-Up Policy includes a non-retaliation principle and describes how escalation and reporting should take place.

We prevent and protect against retaliation by:

- Always acting proactively (e.g., through analytics tracking and monitoring of pay rises, bonus, relocation, promotions, etc.);
- Remaining in contact (after consent) with the reporter to discuss the outcome;
- Fully investigating all allegations of retaliation;
- Taking the appropriate disciplinary actions; and
- Openly communicating about cases of retaliation, where possible.

These measures help to build trust in the system and to encourage others to come forward. In addition, regular mandatory training is provided to new and current employees.

The Speak-Up Policy sets out steps to investigate business conduct incidents promptly and objectively. Incidents are recorded and tracked using an independent reporting platform. We have a clear process for reporting concerns and take all reports seriously. For substantiated or partially substantiated compliance concerns, corrective and preventative action is taken in collaboration with relevant functions. We also oversee activities in our supply chain and aim to resolve any issues responsibly.

Management of relationships with suppliers (G1-2)

During the reporting year, new vendors were subject to a Third Party Risk Assessment (TPRA) process, and we maintained a Supplier Code of Conduct setting out expected standards of behavior.

As set out in our procurement policy, our standard payment terms for regular suppliers are 45 days. For healthcare suppliers, our payment term is 30 days. For governmental bodies, personnel insurances and patients, we have 0 days immediate payment. To prevent late payments, we are using an ERP (Enterprise Resource Planning) system which integrates invoice processing. Some deviations and exceptions from this policy exist but all best efforts are made to uphold these terms.

Third Party Risk Assessment (TPRA)

The TPRA applies to all new vendors and is initiated in the early stages of the vendor selection process. While contract negotiations may begin once the TPRA process has started, contract execution does not proceed until the TPRA assessment has been completed.

The TPRA process includes assessment of areas such as quality, IT security, compliance and ethics, data privacy and sustainability. As part of the process, vendors complete a preliminary questionnaire (PLQ), which includes questions relating to social and environmental matters. These may include, for example:

- Whether the vendor is a signatory to the UN Global Compact
- Existence of a Code of Conduct or Business Ethics policy
- Whether the vendor has defined a carbon footprint or carbon reduction targets
- Whether the vendor is certified against recognized environmental, health and safety standards (e.g., ISO 14001, ISO 45001 or similar)

The TPRA framework remained in place during the reporting year.

Code of Conduct

In addition to the TPRA process, we maintained a Code of Conduct setting out expectations by which we expect our suppliers to comply. The Supplier Code of Conduct reflects the specific needs of the industry we operate in, taking into account various stakeholders such as patients and healthcare professionals. Suppliers and other stakeholders are aware of the Code of Conduct, and it may be included in legal agreements when necessary.

Payment practices (G1-6)

We are using an ERP (Enterprise Resource Planning) system with an integrated invoicing processing system. In 2025, we paid invoices on average within 30 days after the start date of the contractual or statutory term, with 77.33% of our payments aligned with the standard payment terms as described above. On December 31, 2025, we had no legal proceedings outstanding for late payments.

Entity Specific Information

This section presents our entity-specific disclosures relevant for the reporting year. The table below summarizes the seven entity-specific material impacts, risks and opportunities (IROs) identified in our double materiality assessment.

Material Topic	Description	IRO Type	Value Chain
	Scientific innovation supported work directed at enabling therapeutic advances that address unmet medical needs and improve patient outcomes, consistent with the role of innovation in delivering safer and more effective treatments.	Actual positive impact	Own operations
Scientific Innovation	Scientific innovation is financially material for a biotech company because it directly influences long-term value creation and competitiveness. Risks include high R&D costs, long development timelines, regulatory hurdles, and potential failure of clinical trials, which can result in sunk costs, delayed product launches, and volatility in share price.	Risk/Opportunity	Own operations
	Intellectual Property is critical because it protects scientific discoveries and ensures that innovative therapies can reach patients without disruption. Robust Intellectual Property rights enable sustained investment in R&D, fostering breakthroughs that address unmet medical needs. By safeguarding innovation, Intellectual Property ultimately accelerates patient access to life-changing treatments and reinforces trust in our ability to deliver long-term health impact.	Actual positive impact	Own operations
Intellectual Property	Intellectual Property could be considered a risk in case we would breach any existing Intellectual Property claims. We will however not report on this aspect as we consider it to contain specific market sensitive information.	Risk	Own operations
	An opportunity to create additional value for patients and for the organization. We will however not report on this aspect as we consider it to contain specific market sensitive information.	Opportunity	Own operations
Product Portfolio and R&D	A strong product portfolio and robust R&D capabilities are material because they determine the ability to deliver innovative therapies that improve patient outcomes. Together, they ensure a continuous pipeline of treatments across therapeutic areas, reducing dependency on single products and addressing unmet medical needs. By investing in R&D and maintaining a balanced portfolio, we are accelerating access to life-changing medicines and drives long-term health impact for patients.	Potential positive impact	Own operations

All material IROs identified as entity-specific fall within the short-term time horizon (i.e., <3 years). Where a dedicated policy does not exist for a material entity-specific IRO, the Company confirms that no such policy has been adopted, in line with ESRS 2 MDR-P. In this instance, policies have not been adopted due to the strategic reorganisations during FY25.

Overview of how material impacts, risks and opportunities relate to our strategy and business model (SBM-3)

Scientific Innovation

Scientific innovation remained a relevant topic in the reporting year, as the scientific work undertaken in 2025 supported progress in areas of unmet medical need. In line with the principle that scientific innovation enables advancements in therapies and technologies that improve patient outcomes, activities during the year supported ongoing research in oncology, and the development of our clinical and early-stage programs. These achievements reflect the scientific output delivered in 2025. In January 2026, we announced that our Board of Directors decided to initiate the wind-down of our cell therapy activities, including the early-stage programs.

Intellectual Property

Protecting intellectual property (IP) is both a critical risk and an opportunity to maintain our competitive edge. Safeguarding proprietary technologies is essential to ensuring continued innovation and differentiation in the biotech sector, while also mitigating risks from third-party challenges. IP considerations shaped operational decision making in 2025, particularly in employing robust IP protection strategies, including patents, trade secrets, and confidentiality agreements with employees and partners. These measures influenced how we maintained control over proprietary knowledge and preserved the value of ongoing scientific work during the reporting period.

Product Portfolio and R&D

The success of our organization is intrinsically linked to the depth and competitive strength of our product portfolio and the advancement of our candidate products. This presents both risks and opportunities in the short term. Challenges include ensuring the successful progression of our early-stage programs, while opportunities lie in strengthening our impact through strategic focus. Our R&D efforts in 2025 were centered around the therapeutic area of oncology, with significant investments in R&D to drive innovation in areas of high unmet need. These initiatives aim to deliver impactful therapies that align with our mission and sustainability goals.

Impact, risk and opportunity management

Scientific Innovation

Scientific innovation was a material topic for us in FY25, as progress across our CAR-T programs demonstrated meaningful scientific advancement and supported the management of risks inherent to early-stage R&D. During the reporting year, we achieved important milestones in our CD19 and BCMA CAR-T clinical studies. These activities occurred before the subsequent decision to wind down our cell therapy operations, as described in “**A New Strategic Direction**”.

Intellectual Property

As a biotechnology company, protecting proprietary technology and information is crucial for success. We have established an Intellectual Property Policy to help us consistently protect our intellectual property and trade secrets from third-party challenges and this is supported by robust patents and confidentiality agreements with employees, vendors and, partners. The General Counsel is accountable for this policy. Please see the **Risk Management section** for more information.

Product Portfolio and R&D

Our product portfolio and R&D capabilities were important to our business model in FY25, as our strategic focus on oncology and investments in early-stage drug development were designed to maximize the likelihood of success and appropriately manage the inherent risks in the drug development lifecycle. The reporting year reflected scientific progress across our oncology cell therapy and early-stage programs, consistent with the achievements presented in the “**R&D Pipeline**” section of this report. Further detail on the subsequent wind-down of our cell therapy activities is provided there.

Annexes

Advancing the United Nations (UN) Sustainable Development Goals (SDGs)

In 2023, we signed up for the Ten Principles of the United Nations Global Compact in the areas of Human Rights, Labour, Environment, and Anti-Corruption. In the annual Communication on Progress, which can be found on our participation profile on the UN Global Compact website, we disclose our continuous efforts to integrate the Ten Principles into our business strategy, culture, and daily operations, and contribute to United Nations goals, particularly the Sustainable Development Goals (SDG).

We identified two core SDG goals where we believe we can make a difference, as well as six enabling SDG goals. Together they will help us to execute on our commitment to our four Sustainability pillars.

The table below links our material aspects and engagement areas to select components of the SDG framework:

CORE SDG



Good health and well-being

Our vision is to transform patient outcomes through accelerating life changing science and innovation for more years of life and quality of life. This is at the core of what we do.



Partnerships for the goals

We embrace internal and external partnerships to work towards our ambition of bringing much needed innovation to the broadest patient population possible.

ENABLING SDG



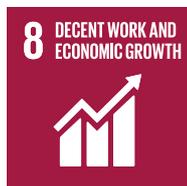
Quality education

We invest in our employees and offer trainings and coaching across our locations in Europe and the U.S.



Gender equality

We foster an inclusive and open work environment and cultivate a corporate culture where we strive for gender equality.



Decent work and economic growth

We are a global biotechnology company with operations in Europe and the U.S. with the goal to drive sustainable value and growth for all our stakeholders.



Industry, innovation and infrastructure

Our mission is to accelerate transformational innovation through the relentless pursuit of groundbreaking science, our entrepreneurial spirit, and a collaborative mindset.



Reduced inequalities

We aim to develop a balanced workforce across a number of criteria, including gender, nationality, ethnicity, experience, and disability.



Climate action

We value our planet and take initiatives to safeguard the environment and incorporate greener practices across our organization.

Disclosure requirements in ESRS covered by the Sustainability Statement

The table below presents the progress made on implementing the provisions of the European Sustainability Reporting Standards as published by the European Commission on July 31, 2023.

We also identified the topical ESRS standards assessed as not material during the reporting period: E2 Pollution, E3 Water and Marine Resources, E4 Biodiversity and Ecosystems, E5 Resource Use and Circular Economy, S2 Workers in the Value Chain, and S3 Affected Communities. As these topics were assessed as not material, the corresponding Disclosure Requirements were omitted and marked as “Not material” in the ESRS Content Index. Climate change (ESRS E1) was assessed as material, therefore, E1 Disclosure Requirements were included in this report.

#	Description	Reference	Explanation
BP-1	General basis for preparation of the sustainability statements	Sustainability Statements: General Disclosures	
BP-2	Disclosure in relation to specific circumstances	Sustainability Statements: General Disclosures	
GOV-1	The role of the administrative, management and supervisory bodies	Corporate Governance: Committees; Sustainability Statements: General Disclosures	
GOV-2	Information provided to and sustainability matters addressed by the undertaking’s administrative, management and supervisory bodies	Corporate Governance: Committees; Sustainability Statements: General Disclosures	
GOV-3	Integration of sustainability-related performance in incentive schemes	Corporate Governance: Remuneration Policy; Remuneration Report: Executive Committee	
GOV-4	Statement on due diligence	Sustainability Statements: General Disclosures	
GOV-5	Risk management and internal controls over sustainability reporting	Risk Management: Risk Management and Internal Control; Sustainability Statements: General Disclosures	
SBM-1	Strategy, business model and value chain	A New Strategic Direction; Portfolio; Sustainability Statements: General Disclosure; S1-Own Workforce; Financial Statements: Note 7	
SBM-2	Interests and views of stakeholders	Sustainability Statements: General Disclosures	
SBM-3	Material impacts, risks and opportunities and their interactions with strategy and business model	A New Strategic Direction, Sustainability Statements: Environmental Information, Social Information, Governance Information, Entity-Specific Information	Phased-in option to omit the information prescribed by ESRS 2 SBM-3 paragraph 48(e) (anticipated financial effects) for the first year of preparation of the sustainability statement.
IRO-1	Description of the processes to identify and assess material impacts, risks and opportunities	Sustainability Statements: General Disclosures	
IRO-2	Disclosure requirements in ESRS covered by the undertaking’s sustainability statement	Disclosure requirements in ESRS covered by the Sustainability Statement; List of Datapoints that derive from Other EU Legislation	

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SUSTAINABILITY STATEMENTS

#	Description	Reference	Explanation
Environmental information			
E1-1	Transition plan for climate change mitigation	E1-Climate Change	
ESRS 2 SBM-3	Material impacts, risks and opportunities and their interaction with strategy and business mode	E1-Climate Change	
ESRS 2 IRO-1	Description of the processes to identify and assess material climate-related impacts, risks and opportunities	Sustainability Statements: General Disclosures	
E1-2	Policies related to climate change mitigation and adaptation	E1-Climate Change	
E1-3	Actions and resources in relation to climate change policies	E1-Climate Change	
E1-4	Targets related to climate change mitigation and adaptation	E1-Climate Change	
E1-5	Energy consumption and mix	E1-Climate Change	
E1-6	Gross scopes 1, 2, 3 and total GHG emissions	E1-Climate Change	
E1-9	Anticipated financial effects from material physical and transition risks and potential climate-related opportunities		Phased-in option used in line with ESRS 1 Appendix C: List of phased-in Disclosure Requirements.
Social information			
ESRS 2 SBM-2	Interests and views of stakeholders	Sustainability Statements: General Disclosures	
ESRS 2 SBM-3	Material impacts, risks and opportunities and their interaction with strategy and business model	S1-Own Workforce, S4-Patients, Consumers and End-Users	
S1		S1-Own Workforce	Phased-in option used for all disclosure requirements of ESRS S1, as Galapagos not exceeded on balance sheet date the average number of 750 employees during the financial year on consolidated basis
S4		S4-Patients, Consumers and End-Users	Phased-in option used for all disclosure requirements of ESRS S4, as Galapagos not exceeded on balance sheet date the average number of 750 employees during the financial year on consolidated basis

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#	Description	Reference	Explanation
Governance information			
ESRS 2 GOV1	The role of the administrative, supervisory and management bodies	Corporate Governance: Committees; Sustainability Statements: General Disclosures	
ESRS 2 IRO-1	Description of the processes to identify and assess material impacts, risks and opportunities	G1-Business Conduct	
G1-1	Business conduct policies and corporate culture	Corporate Governance: Code of Conduct; Sustainability Statements: G1-Business Conduct	
G1-2	Management of relationships with suppliers	G1-Business Conduct	
G1-6	Payment practices	G1-Business Conduct	
Entity Specific Information			
ESRS 2 SBM-3	Material impacts, risks and opportunities and their interaction with strategy and business mode	Entity Specific Information	
ESRS 2 IRO-1	Description of the processes to identify and assess material climate-related impacts, risks and opportunities	Sustainability Statements: General Disclosures	

List of Datapoints that derive from Other EU Legislation

Disclosure Requirement and related datapoint	SFDR reference	Pillar 3 reference	Benchmark Regulation reference	EU Climate Law reference	Section
ESRS 2 GOV-1 Board's gender diversity paragraph 21 (d)	x		x		Corporate Governance: Board of Directors
ESRS 2 GOV-1 Percentage of board members who are independent paragraph 21 (e)			x		Corporate Governance: Board of Directors
ESRS 2 GOV-4 Statement on due diligence paragraph 30	x				Sustainability statements: due diligence
ESRS 2 SBM-1 Involvement in activities related to fossil fuel activities paragraph 40 (d) i	x	x	x		Not applicable
ESRS 2 SBM-1 Involvement in activities related to chemical production paragraph 40 (d) ii	x		x		Not applicable
ESRS 2 SBM-1 Involvement in activities related to controversial weapons paragraph 40 (d) iii	x		x		Not applicable
ESRS 2 SBM-1 Involvement in activities related to cultivation and production of tobacco paragraph 40 (d) iv			x		Not applicable
ESRS E1-1 Transition plan to reach climate neutrality by 2050 paragraph 14				x	Sustainability statements: E1-1
ESRS E1-1 Undertakings excluded from Paris-aligned Benchmarks paragraph 16 (g)		x	x		Not applicable
ESRS E1-4 GHG emission reduction targets paragraph 34	x	x	x		Sustainability statements: E1-1
ESRS E1-5 Energy consumption from fossil sources disaggregated by sources (only high climate impact sectors) paragraph 38	x				Not applicable
ESRS E1-5 Energy consumption and mix paragraph 37	x				Sustainability Statements: E1-5
ESRS E1-5 Energy intensity associated with activities in high climate impact sectors paragraphs 40 to 43	x				Not applicable
ESRS E1-6 Gross Scope 1, 2, 3 and Total GHG emissions paragraph 44	x	x	x		Sustainability Statements: E1-6
ESRS E1-6 Gross GHG emissions intensity paragraphs 53 to 55	x	x	x		Not stated
ESRS E1-7 GHG removals and carbon credits paragraph 56				x	Not applicable

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Disclosure Requirement and related datapoint	SFDR reference	Pillar 3 reference	Benchmark Regulation reference	EU Climate Law reference	Section
ESRS E1-9 Exposure of the benchmark portfolio to climate-related physical risks paragraph 66			x		Not stated
ESRS E1-9 Disaggregation of monetary amounts by acute and chronic physical risk paragraph 66 (a)		x			Not stated
ESRS E1-9 Location of significant assets at material physical risk paragraph 66 (c).					
ESRS E1-9 Breakdown of the carrying value of its real estate assets by energy-efficiency classes paragraph 67 (c).		x			Not stated
ESRS E1-9 Degree of exposure of the portfolio to climate-related opportunities paragraph 69			x		Not stated
ESRS E2-4 Amount of each pollutant listed in Annex II of the E-PRTR Regulation (European Pollutant Release and Transfer Register) emitted to air, water and soil, paragraph 28	x				Not material
ESRS E3-1 Water and marine resources paragraph 9	x				Not material
ESRS E3-1 Dedicated policy paragraph 13	x				Not material
ESRS E3-1 Sustainable oceans and seas paragraph 14	x				Not material
ESRS E3-4 Total water recycled and reused paragraph 28 (c)	x				Not material
ESRS E3-4 Total water consumption in m3 per net revenue on own operations paragraph 29	x				Not material
ESRS 2 – IRO 1 – E4 paragraph 16 (a) i	x				Not material
ESRS 2 – IRO 1 – E4 paragraph 16 (b)	x				Not material
ESRS 2 – IRO 1 – E4 paragraph 16 (c)	x				Not material
ESRS E4-2 Sustainable land/agriculture practices or policies paragraph 24 (b)	x				Not material
ESRS E4-2 Sustainable oceans/seas practices or policies paragraph 24 (c)	x				Not material
ESRS E4-2 Policies to address deforestation paragraph 24 (d)	x				Not material

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Disclosure Requirement and related datapoint	SFDR reference	Pillar 3 reference	Benchmark Regulation reference	EU Climate Law reference	Section
ESRS E5-5 Non-recycled waste paragraph 37 (d)	x				Not material
ESRS E5-5 Hazardous waste and radioactive waste paragraph 39	x				Not material
ESRS 2 – SBM3 – S1 Risk of incidents of forced labour paragraph 14 (f)	x				Not stated
ESRS 2 – SBM3 – S1 Risk of incidents of child labour paragraph 14 (g)	x				Not stated
ESRS S1-1 Human rights policy commitments paragraph 20	x				Not stated
ESRS S1-1 Due diligence policies on issues addressed by the fundamental International Labor Organisation Conventions 1 to 8, paragraph 21			x		Sustainability statements: S1
ESRS S1-1 processes and measures for preventing trafficking in human beings paragraph 22	x				Not stated
ESRS S1-1 workplace accident prevention policy or management system paragraph 23	x				Not material
ESRS S1-3 grievance/complaints handling mechanisms paragraph 32 (c)	x				Not stated
ESRS S1-14 Number of fatalities and number and rate of work-related accidents paragraph 88 (b) and (c)	x		x		Not material
ESRS S1-14 Number of days lost to injuries, accidents, fatalities or illness paragraph 88 (e)	x				Not material
ESRS S1-16 Unadjusted gender pay gap paragraph 97 (a)	x		x		Not stated
ESRS S1-16 Excessive CEO pay ratio paragraph 97 (b)	x				Not stated
ESRS S1-17 Incidents of discrimination paragraph 103 (a)	x				Not stated
ESRS S1-17 Non-respect of UNGPs on Business and Human Rights and OECD paragraph 104 (a)	x		x		Not stated

Galápagos

SUSTAINABILITY STATEMENTS

Disclosure Requirement and related datapoint	SFDR reference	Pillar 3 reference	Benchmark Regulation reference	EU Climate Law reference	Section
ESRS 2- SBM3 – S2 Significant risk of child labour or forced labour in the value chain paragraph 11 (b)	x				Not material
ESRS S2-1 Human rights policy commitments paragraph 17	x				Not material
ESRS S2-1 Policies related to value chain workers paragraph 18	x				Not material
ESRS S2-1 Non-respect of UNGPs on Business and Human Rights principles and OECD guidelines paragraph 19	x		x		Not material
ESRS S2-1 Due diligence policies on issues addressed by the fundamental International Labor Organisation Conventions 1 to 8, paragraph 19			x		Not material
ESRS S2-4 Human rights issues and incidents connected to its upstream and downstream value chain paragraph 36	x				Not material
ESRS S3-1 Human rights policy commitments paragraph 16	x				Not material
ESRS S3-1 non-respect of UNGPs on Business and Human Rights, ILO principles or and OECD guidelines paragraph 17	x		x		Not material
ESRS S3-4 Human rights issues and incidents paragraph 36	x				Not material
ESRS S4-1 Policies related to consumers and end-users paragraph 16	x				Sustainability statements: S4
ESRS S4-1 Non-respect of UNGPs on Business and Human Rights and OECD guidelines paragraph 17	x		x		Not stated
ESRS S4-4 Human rights issues and incidents paragraph 35	x				Not stated
ESRS G1-1 United Nations Convention against Corruption paragraph 10 (b)	x				Not applicable
ESRS G1-1 Protection of whistle- blowers paragraph 10 (d)	x				Sustainability statements: G1-1
ESRS G1-4 Fines for violation of anti-corruption and anti-bribery laws paragraph 24 (a)	x		x		Not material
ESRS G1-4 Standards of anti- corruption and anti-bribery paragraph 24 (b)	x				Not material