

**Boehringer Ingelheim  
Joint Statement 2024**

# **Modern Slavery and Child Labour**







# Contents

## Joint Modern Slavery and Child Labour Act Statement 2024 (Australia, Canada and UK)

Introduction	03	Grievance mechanism and remediation	13
Our Purpose	04	Assessing Effectiveness	14
Organisation structure and operations	04	Australia specific actions	14
Supply chains	06	Canada specific disclosure	14
Identifying Human Rights Risks	08	Attestation	15
Governance and policies	09	Australia	15
		Canada	15
		UK	15
Training	11	Annex	16
Supplier Risk Management	12		



# Introduction

This statement has been made in accordance with the United Kingdom’s Modern Slavery Act (2015), the Australian Modern Slavery Act (2018) and Canada’s Fighting Against Forced Labour and Child Labour in Supply Chains Act (2023). It covers the reporting period 1 January 2024 to 31 December 2024.

The reporting entities from the Boehringer Ingelheim group of companies (“Boehringer Ingelheim”) listed in the Annex are issuing this joint statement. Unless expressly stated otherwise, references to “we”, “us” and “our” refer to those reporting entities listed in the annex. We have consolidated our statement into one joint document, reflecting that we utilise the same global policies, procedures, processes, and systems for addressing human rights risks including modern slavery and child labour risks in the supply chain across all entities.

Boehringer Ingelheim’s core values of respect, trust, empathy, integrity and passion are at the heart of everything we do. As part of Boehringer Ingelheim, we are committed to respecting internationally recognised human rights. Contributing to their realisation is fundamental to Boehringer Ingelheim’s long-term corporate success and an expression of Boehringer Ingelheim’s core values.





# Our Purpose

Transforming Lives for Generations.

Our work at Boehringer Ingelheim is motivated by the desire to not only improve, but ‘transform’ lives for the better by improving both human and animal health.

Transforming ‘lives’ refers to the broad impact that our work has on health, in the healthcare sector and beyond it.

‘For generations’ reflects the long-term thinking which guides us, and highlights our commitment not only to the present, but to future generations and the vital importance of sustainability. It mirrors the impact we have not only on individuals, but across generations.

# Organisation structure and operations

Family-owned since it was established in 1885, Boehringer Ingelheim is one of the pharmaceutical industry’s top 20 company groups. More than 54,000 employees create value through innovation daily for the business areas Human Pharma and Animal Health.

The Human Pharma business is underpinned by an innovative portfolio and its products are important and in many cases life-saving treatments in medicine. Boehringer Ingelheim’s research focuses on cardiovascular and metabolic diseases, oncology, respiratory diseases, immunology, diseases of the central nervous system (CNS), and retinal health.

In the Animal Health business, the Boehringer Ingelheim Group is a leading provider of vaccines, parasiticides and therapeutics. Boehringer Ingelheim’s portfolio includes products for pets and horses as well as livestock: swine, ruminants and poultry.

In 2024, Boehringer Ingelheim realised net sales of ~26.8 billion EUR. Investments of ~6.2 billion EUR in R&D drive innovation, enabling the next generation of medicines that save lives and improve quality of life. Further information on Boehringer Ingelheim’s business can be found in the company group **Annual Report**.

**From the United Kingdom (UK)**, we distribute Human Pharma and Animal Health products across the United Kingdom, Ireland, Malta, Gibraltar, the Isle of Man and the Channel Islands. In the UK, we employ approximately 740 people.

**In Australia**, Boehringer Ingelheim has established local subsidiaries that are reporting entities hereunder. Each Boehringer Australia reporting entity is incorporated as an Australian proprietary company limited by shares. Together, Boehringer Australia employs approximately 340 people. The Boehringer Australia entities market and distribute Boehringer Ingelheim’s Human Pharma and Animal Health products within Australia.



**In Canada,** the reporting entities listed in the Annex are both incorporated under the Canada Business Corporations Act, RSC 1985, c C-44, and are headquartered in Burlington Ontario. Both entities meet the reporting categorise under the Fighting Against Forced Labour and Child Labour in Supply Chains Act (2023), and together the Canadian entities employ approximately 480 people. The Canadian reporting entities import, sell and distribute the Boehringer group’s human pharma and animal health products within Canada.







# Supply chains

Our supply chains include manufacturers of finished products and manufacturers of raw materials which are incorporated in finished products. The raw materials of finished pharmaceutical products are active pharmaceutical ingredients (substances which cause the therapeutic effect of a product), excipients (substances which stabilise or balance the active pharmaceutical ingredients) and other components such as packaging materials. Our pharmaceutical products as well as the necessary raw materials may be manufactured by manufacturers within Boehringer Ingelheim as well as by third party contract manufacturers, and we use freight forwarders to transport products.

Boehringer Ingelheim’s global supply chain for its Human Pharma products includes manufacturing sites located in Austria, Brazil, China, France, Germany, Greece, Indonesia, Italy, Japan, Mexico, Spain and the United States of America (USA).

Boehringer Ingelheim’s global supply chain for its Animal Health products includes manufacturing sites located in Australia, Belgium, Brazil, Canada, China, Denmark, France, Germany, Hungary, Italy, Mexico, New Zealand, Puerto Rico, Spain, Switzerland, Thailand, the UK and the USA.

**For the UK** reporting entities, our supply chain involves the manufacturing of products and the importation of these products into the UK and Ireland via air or seaports. Following the importation of products, freight forwarders transport the products from our manufacturing network to a third-party central warehouse facility in the UK. Our Human Pharma products are then distributed to wholesalers, hospitals and pharmacies in the UK, including Gibraltar, the Isle of Man and the Channel Islands. Products shipped to Ireland and Malta travel from Germany. Our Animal Health products are primarily distributed to wholesalers, who in turn distribute the products to vet clinics, pharmacies and retail stores. Animal Health products shipped to Ireland travel from Germany. Certain Animal Health products are supplied directly to resellers and producers.



**In Australia,** our supply chain involves the manufacturing of products and the importation of these products into Australia via air or seaports. Following the importation of products, freight forwarders transport the products by road to third party warehouses in Australia. Our Human Pharma products are then distributed to wholesalers, who in turn distribute the products to hospitals, pharmacies and retailers throughout Australia. Our Animal Health products are primarily distributed to wholesalers, who in turn distribute the products to retail stores and vet clinics. Certain Animal Health products are supplied to resellers and producers directly.

**In Canada,** our supply chain involves the manufacturing of products and the importation of these products into Canada via air, truck or seaports. Following the importation of products, freight forwarders transport the products by road or rail to third party warehouses in Canada. Our Human Pharma products are then distributed to wholesalers, who in turn distribute the products to hospitals, pharmacies and retailers throughout Canada. Our Animal Health products are distributed through veterinarian wholesalers who supply the products to veterinarians and farms. Certain Animal Health products are supplied directly to farms, layer and broiler hatcheries, large multi-site veterinarian practices and farm tack stores.

The supply of pharmaceutical products is also subject to Good Distribution Practice principles internationally which we as a pharmaceutical company also adhere to.





# Identifying Human Rights Risks

Boehringer Ingelheim’s risk management’s goal for human rights is to create transparency for our global supply chains. This enables Boehringer Ingelheim to continuously monitor and manage risks that arise in the areas of human and environmental rights, including modern slavery and child labour risks.

In 2020, Boehringer Ingelheim identified risk areas in Boehringer Ingelheim’s own supply chain (own business area) and the external supply chain as part of an initial analysis. In 2022, Boehringer Ingelheim conducted a more in-depth risk analysis including supply chain mapping to identify human rights and environmental risks. Building on this, Boehringer Ingelheim carried out a human rights risk analysis in 2023. As a result, Boehringer Ingelheim identified priority topic areas based on their potential severity and Boehringer Ingelheim’s ability to influence them.

Since 2023, we completed our 2024 annual Human Rights Analysis and improved our third-party risk management process to address Human Rights in the supply chain more effectively.

The greatest risks were identified in Boehringer Ingelheim’s external supply chains, particularly in the following areas:

- non-compliance with occupational health and safety,
- withholding adequate wages,
- and soil, water and air pollution.

Additional risks identified in Boehringer Ingelheim’s own business areas are:

- environmental protection and occupational safety issues,
- social standards and
- non-compliance with adequate wages.

Based on Boehringer Ingelheim’s analyses, the assessment concluded that the risk of modern slavery and child labour in Boehringer Ingelheim’s own business area is low due to the nature of our specialised industry, and the risk increases in Boehringer Ingelheim’s external supply chains.

The risk analysis to identify human rights and environmental risks will be continued annually at a minimum, continuously developed, and the results are shared with Boehringer Ingelheim’s global management.







# Governance and policies

Integrity is the foundation of our cultural framework, our values, and our Code of Conduct. Our Code of Conduct sets the ethical standards that guides all our business activities. In 2024, we revised it further to highlight the responsibilities of our managers and our three pillared approach, which includes “How we change lives”, “Together we excel” and “Our speak-up culture.” We act with honesty, adhering to regulations and corporate principles, ensuring we make the right choices. Accountability, respect, and mutual support guide us in making ethical decisions every day.

Reporting potential misconduct is crucial to maintaining our integrity. We provide multiple reporting channels, including through line managers, Compliance Officers, HR, or the Speak Up Portal, accessible both internally and externally. In 2024, processes have been updated in accordance with the German Supply Chain Due Diligence Act.

The overarching governance of human rights due diligence at Boehringer Ingelheim lies within its global Compliance & Integrity function. To enhance Boehringer Ingelheim’s oversight and governance of human rights compliance, Boehringer Ingelheim appointed a Human Rights Officer in 2023, who oversees Boehringer Ingelheim’s human rights approach, coordinates the global human rights governance and regularly informs the Board of Managing Directors of the Boehringer Ingelheim group.





An internal task force was established for the implementation and further development of the human rights strategy. The aim is to have a steady exchange between departments responsible for managing or affected by specific human and environmental rights aspects.

Boehringer Ingelheim is guided by the following internationally recognised standards for corporate responsibility to respect human rights (please also see our **Human Rights Policy Statement**):

- UN Guiding Principles on Business and Human Rights
- UN Universal Declaration of Human Rights
- International Labour Organisation (ILO) Declaration on Fundamental Principles and Rights at Work
- Prohibition of child labour
- Prohibition of forced labour & all forms of slavery
- Prohibition of discrimination
- Strengthening the freedom of association
- Compliance with occupational health and safety
- Payment of adequate wages
- Prohibition of unlawful eviction
- Prohibition of violation of human rights through the use of security forces
- Minamata Convention on Mercury
- Stockholm Convention on Persistent Organic Pollutants (POPs Convention)
- Basel Convention on the Export of Hazardous Waste

Boehringer Ingelheim’s commitment is reflected in other corporate documents, such as its **Code of Conduct**, **Supplier Code of Conduct**, EHS Policy and in the global **Boehringer Ingelheim** standards regarding risk assessment and audits of suppliers.

Boehringer Ingelheim requires its suppliers to acknowledge and adhere to the principles embodied in the Supplier Code of Conduct. This also includes the responsibility to pass on this expectation to their respective suppliers and, if requested, provide information on how the stated principles are complied with.

Boehringer Ingelheim’s Supplier Code of Conduct is based on international standards, including the UN Global Compact’s 10 Principles, and aligns with the pharmaceutical supply chain initiative (PSCI) principles. This underpins our supplier relationships and makes our expectations for ethical, professional and sustainable conduct transparent. Upholding human rights is a key priority and requires suppliers in scope to ensure that:

- No Forced, bonded or indentured labour or involuntary prison labour or other kind of forced labour is used.
- No Child labour is used. Besides, the employment of workers below the age of 18 shall only occur in non-hazardous work and when young workers are above a country’s legal age for employment.
- Working environments are free from harassment and discrimination.
- Working environments are free from harsh and inhumane treatment.
- Workers are paid according to applicable wage laws, including minimum wages, overtime hours and mandated benefits.
- Suppliers respect the rights of workers, as set forth in local laws, to associate freely, join or not join labour unions.
- Workers are able to communicate openly concerns regarding working conditions with management without threat of reprisal, intimidation or harassment.



# Training

The Boehringer Ingelheim Code of Conduct guides our employees to act in accordance with the law and our ethical principles. This includes respecting human rights. All employees receive regular training on the Code of Conduct.

To monitor supplier risk management, a dedicated team was established and trained within the purchasing organisation. This team is being regularly trained on human rights, including modern slavery and child labour.

In 2024, we enhanced our global speak up program and increased internal awareness on Human Rights through targeted due diligence trainings for Members of the Board of Managing Directors of the Boehringer Ingelheim group, other top executives, risk experts and the corporate compliance function, as well as general information sessions for all employees.

To further strengthen our Human Rights approach, we have developed a comprehensive strategy and ambition, which will be made public in 2025.





# Supplier Risk Management

Boehringer Ingelheim's global Third-Party Risk Management framework is designed to identify and mitigate risks associated with suppliers. This program ensures we uphold our sustainability commitments by applying sustainability criteria throughout our procurement process. A holistic risk management approach addresses sustainability-related risks along the entire value chain, including human rights, environment, and biodiversity. The management of supplier risks is being addressed in two existing global processes:

- A process that involves continuous risk monitoring of both new and existing suppliers through supplier screening databases supported by a dedicated tool.
- A process under which regular risk-based audits of suppliers are conducted.

In addition, Boehringer Ingelheim has introduced a new process which aims to manage supplier risks consistently, considering factors such as human rights risks including modern slavery and child labour risks, and their relationships with other supplier risks. This new approach is currently in the pilot phase, with United Kingdom/Ireland being part of the pilot. In 2024, the scope of the pilot program was expanded to additional countries.



# Grievance mechanism and remediation

Boehringer Ingelheim promotes a 'speak up' culture, which is explicitly endorsed by the company's management. Potential compliance violations, including human rights can be reported by employees as well as by external parties via our independent 'speak up' portal. The name of the reporting person, unless reported anonymously, and the information provided will be treated confidentially.

Boehringer Ingelheim does not tolerate any adverse action against anyone who in good faith speak up and voice their concerns. Any retaliation against those who have reported or participated in an investigation is prohibited and will lead to appropriate disciplinary action.



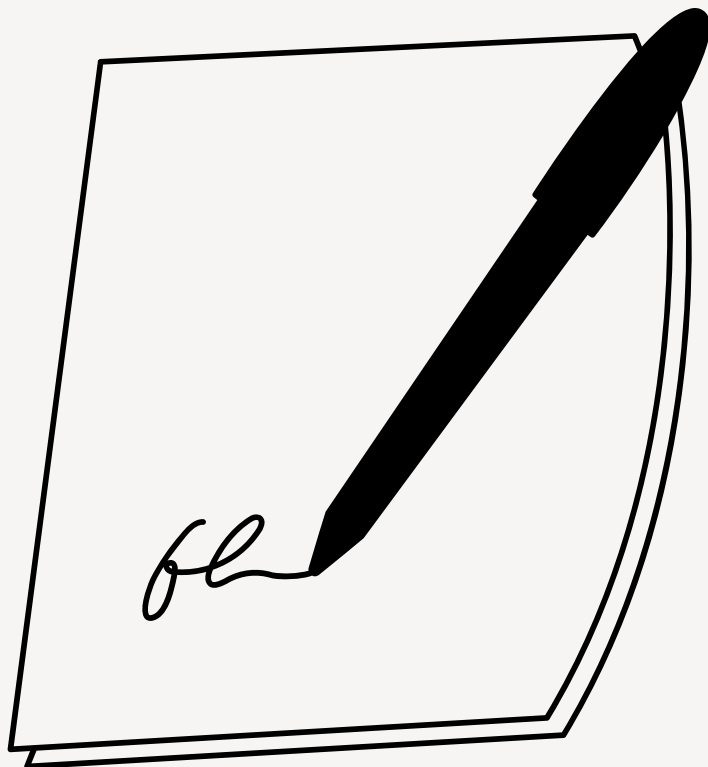


# Assessing Effectiveness

Boehringer Ingelheim will review the effectiveness of due diligence measures both in its own business area as well as in its external supply chains on an annual and ad hoc basis. In 2024, Boehringer Ingelheim launched a pilot project to further enhance the effectiveness review of our due diligence measures and developed initial concepts. This enhancement is done by considering international best practice standards. The pilot will be continued in 2025 to verify the most suitable concept with relevant stakeholders. Boehringer Ingelheim is committed to continuously refining its effectiveness measurements. The insights gained from these measurements are used to constantly improve our approach to respecting human rights.

# Australia specific disclosure

Boehringer Ingelheim developed this joint statement in consultation with the Australian reporting entities listed in the Annex. Boehringer Ingelheim consulted with each reporting entity through a group-wide modern slavery working group that included representatives from relevant functions at Boehringer Ingelheim Corporate level as well as local reporting entity level. The modern slavery working group met on a monthly basis during the period September 2024 to March 2025. Consultation and review in the preparation of this statement was a collective effort.



# Canada specific disclosure

During the reporting period, the reporting entities have taken actions to prevent forced labour and child labour and associated harms from occurring or reoccurring in our supply chains.



# Attestation

*Gabriele Harttung*

**Name:** Gabriele Harttung  
**Title:** Head of CoE Compliance Risk Areas & Human Rights Officer

## Australia

This Statement was approved on 15 April 2025 by the Board of Directors of each of the three Boehringer Australia companies listed in the Annex.

*Xiomara Sandoval*

**Name:** Xiomara Sandoval  
**Title:** Director: Boehringer Ingelheim Pty Ltd; Boehringer Ingelheim Animal Health Australia Holding Pty Ltd; and Boehringer Ingelheim Animal Health Australia Pty Ltd.

## Canada

This statement made under Canada’s Fighting Against Forced Labour and Child Labour in Supply Chains Act was approved by the Board of Directors of each of the Canadian legal entities Boehringer Ingelheim (Canada) Ltd/ltée and Boehringer Ingelheim Animal Health Inc. listed in the Annex.

*Mark John Lewis*

**Name:** Mark John Lewis  
**Title:** President, CEO Boehringer Ingelheim (Canada) Ltd/ltée; Boehringer Ingelheim Animal Health Canada Inc

## UK

This Statement was approved by the board of directors on behalf of each of the two UK MSA reporting entities listed in the Annex.

*Vani Manja*

**Name:** Vani Manja  
**Title:** Managing Director  
Boehringer Ingelheim Limited and  
Boehringer Ingelheim Animal Health UK Limited

*Benjamin Moynihan*

**Name:** Benjamin Moynihan  
**Title:** Finance & Administration Director  
Boehringer Ingelheim Limited and  
Boehringer Ingelheim Animal Health UK Limited





# Annex

In accordance with the UK Modern Slavery Act 2015, the following UK reporting entities are included in this statement:

- **Boehringer Ingelheim Limited**
- **Boehringer Ingelheim Animal Health UK Limited**

In accordance with Canada’s *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (2023), the following Canadian reporting entities are included in this statement:

- **Boehringer Ingelheim (Canada) Ltd/ltée**
- **Boehringer Ingelheim Animal Health Canada Inc./Boehringer Ingelheim Santé Animale Canada inc.**

In accordance with the Australian Modern Slavery Act 2018, the following Australian reporting entities (collectively referred to as “Boehringer Australia”) are included in this statement:

- **Boehringer Ingelheim Pty Ltd (ACN 000 452 308)**
- **Boehringer Ingelheim Animal Health Australia Holding Pty Ltd (ACN 623 185 311)**
- **Boehringer Ingelheim Animal Health Australia Pty Ltd (ACN 071 187 285)**



