



Pfizer Australia Modern Slavery Statement FY 2020

Breakthroughs that change patients' lives



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Introduction

This statement is for the period from 1 December 2019 to 30 November 2020 (**FY20 or Reporting Period**) and has been prepared pursuant to the Modern Slavery Act 2018 (Cth) (**the Act**) in consultation with all reporting entities named below (**Reporting Entities**):

Reporting Entities	ABN
Pfizer Australia Pty Ltd	50 008 422 348
Pfizer (Perth) Pty Ltd	32 051 824 956
Pfizer PFE Australia Pty Ltd	17 169 276 920
Pfizer Australia Investments Pty Ltd	86 146 429 138
Hospira Australia Pty Ltd	58 097 064 330
Hospira Adelaide Pty Ltd	60 007 988 767
Hospira Holdings (S.A.) Pty Ltd	14 121 147 019
Pfizer Australia Holdings Pty Ltd	91 108 292 799

* Upjohn Australia Pty Ltd was included in the supply chain mapping but ceased to be part of the Pfizer group of companies prior to the financial year end. Pfizer Australia had non-trading subsidiaries.

In this Statement, "Pfizer Australia" refers to the reporting entities named above and their owned or controlled entities, collectively. "Pfizer" refers to the global group of companies owned by Pfizer Inc. Terms such as "our", "we" refer to either Pfizer Australia or Pfizer; where the meaning of these words may not be clear from the context, we have inserted footnotes for clarity.

Modern Slavery is a global problem affecting an estimated over 40 million people worldwide. Modern Slavery means exploitative practices including human trafficking, slavery, slavery-like practices, servitude, forced labour, forced marriage, debt bondage, the worst forms of child labour, deceptive recruiting for labour services and all other conduct mentioned in section 4 of the Act.

Pfizer's purpose is creating 'Breakthroughs that change patients' lives'. This is more than just improving patients' conditions – we work to dramatically change their lives, and the lives of those they touch, for the better. Every day, we work to advance wellness, prevention, treatments and cures that challenge the most feared diseases of our time.

At Pfizer, our purpose is more important now than ever, as societal, environmental, and economic shifts challenge the way in which we think about global health and, more broadly, health equity. As we work to meet patient and societal needs, we are committed to acting ethically, thoughtfully, and responsibly and to doing business with suppliers and partners that share this same commitment.

With the entire purpose of why we do business to improve people's lives for the better, we have a strong commitment to working on making sure this purpose extends out to all the ways we work. We are committed to conducting business in an ethical and responsible manner and ensuring that all businesses we work with have the same commitment.

This Statement details the actions Pfizer Australia has taken to assess and address modern slavery risks in our operations and supply chain as well as outlining our plans going forward.

Our Purpose and Values

'Breakthroughs that change patients' lives'

Pfizer's purpose 'Breakthroughs that change patients' lives' fuels everything we do. Our COVID-19 vaccine has the potential to change more lives than any other breakthrough from the past century, and we are equally as proud of our other breakthroughs that deliver meaningful value to patients.

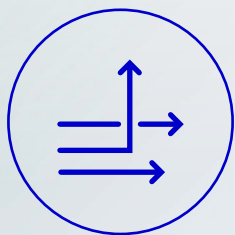
As a research-based biopharmaceutical company, we apply science and our global resources to bring therapies to people that extend and significantly improve their lives through the discovery, development and manufacture of medicines and vaccines.

We innovate every day to make the world a healthier place. From scientific discovery to breakthrough products to our essential partnerships around the world, we're committed to quality healthcare for everyone. Because every individual matters.

Our Values

To fully realise our purpose, we have established a clear set of expectations regarding "what" we need to achieve for patients and "how" we will go about achieving those goals.

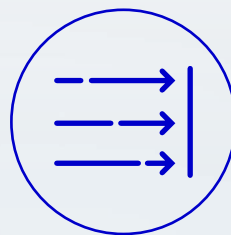
The "how" is represented by four simple, powerful values:



Courage



Excellence



Equity



Joy



Our Structure, Operations and Supply Chain

Pfizer Australia is a subsidiary of Pfizer Inc, a company with its global headquarters in New York with operations around the world. In Australia, there are two commercial offices and three manufacturing sites that export to more than 60 countries.

In 1956, Pfizer commenced operations in Australia with just six people: an accountant, a medical director, two employees responsible for handling sample storage and two secretaries. Many of the diseases that significantly impacted the lives of Australians in the 60s and 70s can now be managed through medication because of the hard work and commitment of these first Pfizer Australia employees, and the many employees who have since followed in their footsteps.

Today, Pfizer Australia's employees perform roles from a variety of fields including science, medical, regulatory affairs, manufacturing, sales and marketing, health economics, research and development, as well as administrative services.

Our Company Global Snapshot¹

\$41.9b

in revenue in 2020

More than

125

countries in which Pfizer sells products

Over

40

manufacturing sites worldwide

Approximately

78,500

employees around the world

Our Company Australia²

Over

1,500

employees in Australia

Over

400

Products (SKUs)

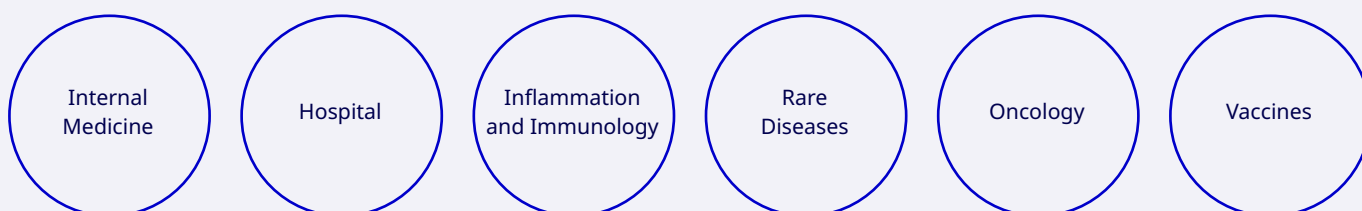
3

Manufacturing sites: Perth, Melbourne and Adelaide

Pfizer Australia's operations are divided into two categories. The commercial business is a local sales and marketing affiliate of Pfizer Inc. which, among other things, distributes medicines to all states and territories in Australia. In addition, the manufacturing site entities manufacture medicines for both the Australian and overseas markets.

Our medicines in Australia are distributed through wholesalers and a direct to pharmacy supply chain model. Pfizer Australia works with major Australian pharmaceutical wholesalers and uses a global provider for our warehousing and distribution needs.

Pfizer Australia's commercial business consists of 6 therapeutic areas:



¹ As at December 2020

² As at November 2020

Joint Venture – Australia

Outside of Australia, Zydus Hospira Oncology Private Limited is a Joint Venture between Cadila Healthcare Limited and Hospira Australia Pty Limited. The company manufactures anti-cancer formulations in Pharmez, Special Economic Zone near Ahmedabad, India. The company started commercial production on 1 May 2009 and Hospira own 50%. Pfizer Australia does not operate the assets.

Our Supply Chain

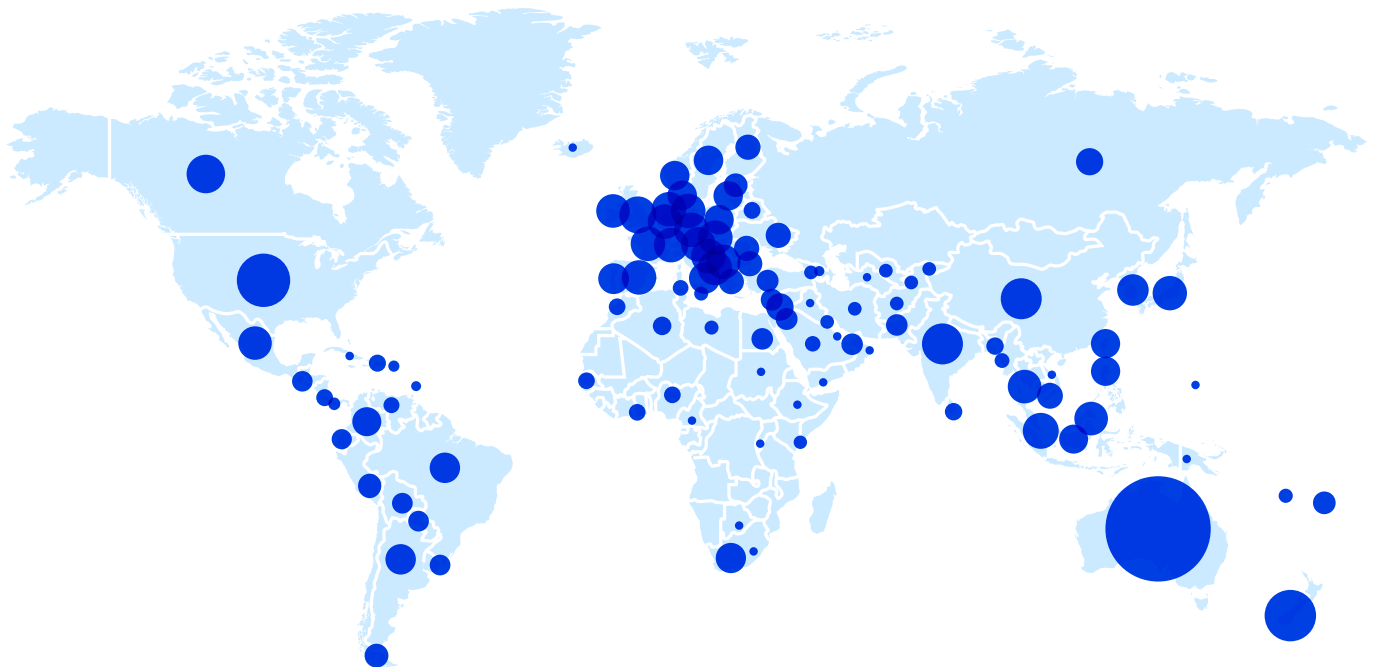
Pfizer, with more than 170 years of experience and hundreds of products to its name, continues to invest more than \$1B annually into its manufacturing sites.

Our global manufacturing network includes over 40 sites across six continents. This network supplies a significant proportion of the products sold by Pfizer Australia. There is more information about Pfizer's standards for its sites below.

The bulk of Pfizer Australia's unrelated direct suppliers are Australian-based companies providing goods and/or services in the following categories:

- Professional, scientific and technical services
- Wholesale and trade
- Agriculture, forestry and fishing
- Information, media and telecommunications
- Manufacturing
- Health care and social assistance
- Construction
- Retail trade
- Rental, hiring and real estate
- Transport, postal and warehousing
- Electricity, gas, water and water services
- Training and education
- Administrative and support services
- Financial and insurance services

Based on the information gathered during the due diligence process to date (discussed in more detail below), the geographic footprint of a subset of our FY20 suppliers is shown below:



The mapping of where Pfizer Australia's direct suppliers have operations (as depicted in the above image) illustrates the breadth of Pfizer Australia's supply chain around the world and the complexity in better understanding the modern slavery risks in the supply chain of our direct suppliers to Australian entities.

Risks of Modern Slavery in Pfizer Australia's Operations and Supply Chain³

Operations

The majority of Pfizer Australia's employees are hired on a permanent basis and the contractors we engage directly as part of our operations are generally in highly skilled and professional roles. Manufacturing sites may also hire operators through a recruitment agency. We have arrangements with only a small select number of recruitment agencies which are required to satisfy due diligence checks prior to formal engagement and agree to our modern slavery clauses in our contracts. For the reasons described in this paragraph, we believe that the risk of modern slavery in our Australian operations is low.

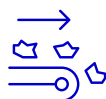
We recognise that modern slavery may exist in the joint ventures we are associated with. In respect of the joint venture between Cadila Healthcare Limited and Hospira Australia Pty Limited, which Pfizer Australia does not operate, we have sought to assess modern slavery risk at a broader level. Zydus Hospira Oncology Private Limited is required to comply with Pfizer Environment Health & Safety (EHS) policy requirements and is required to conduct regular audits. At the time of Hospira's integration with Pfizer, a comprehensive EHS baseline assessment on worker protection was conducted which included matters such as working conditions and employer safety procedures. We plan to request annually from the operator of the joint venture, the processes and procedures that the joint venture has in place to address modern slavery risk in its operations and supply chains. If we become aware of any material modern slavery risk in the joint venture, we will endeavour to address such risk with the operator of the joint venture.

Supply Chain

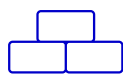
In seeking to identify the modern slavery risks in our supply chain, we considered the potential for our business to cause, contribute to, or be directly linked to modern slavery. Our supply chain includes a broad range of direct suppliers from various locations and industries, including those generally considered a higher risk for modern slavery by virtue of their sector risk. Based on the guidance of a number of international bodies, the following categories within our supply chain are deemed as having increased modern slavery risks irrespective of geographic location:



Freight and Shipping



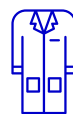
Raw Material Supply



Building and Construction



Electronics and telecommunications



Garment Supply



Personal Protective Equipment (PPE)



Industrial Cleaning Services

We understand that the risk profile of the above sectors is heightened by the utilisation of lower skilled workers (possibly some on temporary visas) with limited ability to negotiate their wages and rights in the workplace.

We also acknowledge the modern slavery risks in the supply chain behind the uniforms and corporate merchandise we purchase, the lithium in our laptops and smartphones, the food and beverages we serve on our premises and hospitality services we purchase.

Based on our mapping to date, over 90% of non-related suppliers that supply directly to our Australian entities⁴ are Australian domiciled companies. However, as shown in the map of the global footprint of our suppliers and their operations, our supply chain is exposed to modern slavery risks by virtue of the fact that some of our suppliers have operations in higher risk jurisdictions.

³ All references to "we" and "our" in this section headed "Risks of Modern Slavery in Pfizer Australia's Operations and Supply Chain" refer to Pfizer Australia.

⁴ Includes suppliers to Upjohn, not included in the risk assessment.

Pfizer is proud to have been one of the early signatories to the United Nations (UN) Global Compact.



Actions Taken to Assess and Address the Modern Slavery Risks

Pfizer is committed to conducting business in an ethical and responsible manner, which includes respecting internationally recognised human rights. Pfizer is proud to have been one of the early signatories to the United Nations (UN) Global Compact, an initiative that calls on companies to align strategies and operations with universal principles on human rights, labour, environment, and anti-corruption, and to take actions that advance societal goals. In honouring our commitment, we seek to prevent and mitigate adverse human rights impacts in our operations globally, and remediate any adverse human rights impacts we may inadvertently cause or contribute to. Wherever we can, we also seek to advance human rights. Our approach to human rights risks is informed by international standards, industry best practice, and expert assessment.

Policies and Governance

Pfizer has stringent established policies designed to mitigate risks in our supply chain. We expect that all of our employees and suppliers are aware of, and comply with, their obligations set out in our policies.

Pfizer fully supports the principles of the United Nations Declaration of Human Rights and the International Labour Organization Declaration on Fundamental Principles and Rights at Work. As a signatory of the United Nations Global Compact, we also have committed to support the ten principles on human rights, labour, environment, and anti-corruption, including calling for the elimination of all forms of forced and compulsory labour and the effective abolition of child labour.

In line with the UN Guiding Principles on Business and Human Rights, Pfizer's human rights policy focuses on addressing risks that could have the most severe impact on people: our patients, our colleagues, the workers of our business partners, and the communities in which we operate. Our responsibility to respect human rights extends throughout our operations, from lab to patient, including our diverse global supply chain of numerous local, third-party vendors. Please see Pfizer's [Human Rights page](#) for our Human Rights Policy Statement and Modern Slavery Statement.

During 2020, Pfizer developed a corporate labour and ethics standard for our supplier base with a focus on Modern Slavery. This risk based governance process is being implemented in 2021.

Pfizer is a co-founder and active member of the Pharmaceutical Supply Chain Initiative (PSCI), a group of pharmaceutical companies that have established a set of principles (PSCI Principles) to aide pharmaceutical suppliers in establishing sustainable business practices, including ethical and responsible labour practices. PSCI's Principles regarding labour state that suppliers shall not use forced, bonded, indentured, or child labour. Pfizer is part of the Human Rights and Labour Committee within PSCI. Among other accomplishments in 2020 the Committee developed responsible sourcing guides for 14 raw materials as well as ongoing collaboration on developing Human Rights and Labour regulations and trends. The PSCI Principles are available online at: <https://pscinitiative.org/resources>.

Pfizer Australia established a Modern Slavery Working Group, consisting of members from various functions including legal, procurement and supply chain. This working group is overseen by members of the Board and is responsible for implementing the actions set out in this Statement, developing further actions and monitoring Pfizer's modern slavery commitments.

Pfizer's global Human Rights Policy Statement supports this work and specifically references the Australian Modern Slavery Act.

Pfizer's Blue Book – our Code of Conduct – describes how we operate and guides the decisions we make, and each employee and contractor is required to adhere to these standards. The Blue Book specifically covers our strong commitment to Equity and respecting human rights ([see page 27: Blue Book](#)).

Audits

Globally, Pfizer audits the potential for EHS and labour and ethics risks, including modern slavery in its direct material supply chain. Labour and ethics audits are completed by independent third-party auditors engaged by Pfizer. Audits conducted to date have not identified significant modern slavery risks at our direct material suppliers. In 2019, Pfizer conducted 102 Supplier Environment, Health and Safety audits, with 34 of these including Labor and Ethics audits. Due to COVID-19, on-site supplier audits in 2020 were limited and alternative risk monitoring processes (e.g., remote audits) were developed and implemented.

Human Rights Policy

In line with the UN Guiding Principles on Business and Human Rights, Pfizer's Human Rights Policy focuses on addressing risks that could have the most severe impact on people: our patients, our employees, the workers of our business partners, and the communities in which we operate. Our responsibility to respect human rights extends throughout our operations, from lab to patient, including our diverse global supply chain of numerous local, third-party vendors.

Supplier Conduct Position Statement

Pfizer strongly encourages our suppliers to support our Supplier Conduct Principles or adopt their own codes which include expectations similar to ours. Failure to comply may result in business relationship termination.

- [Download Pfizer's Supplier Conduct Position Statement \(PDF\)](#)
- [Download Pfizer's Supplier Conduct Principles \(PDF\)](#)

Among other things, the Supplier Conduct Principles ask suppliers to:

- operate in full compliance with all applicable laws, rules and regulations;
- conduct their business in an ethical manner, acting with integrity;
- commit to upholding the human rights of workers and to treat them with dignity and respect, including adhering to express prohibitions against the use of forced, bonded or indentured labour, and child labour;
- provide a safe and healthy work environment.

Suppliers to Australian entities who received the due diligence questionnaire were provided Pfizer's Supplier Conduct Principles and asked to confirm if they had adequate policies, controls, procedures and training in place designed to prevent, detect, assess, manage and remedy Modern Slavery in their operations and supply chains.

Anti-Bribery and Anti-Corruption

Corruption is a red flag for modern slavery risks.

Pfizer has extensive international anti-bribery and anti-corruption policies and procedures in place to ensure that employees comply with all anti-bribery and corruption legislation, including but not limited to the Australian Commonwealth Criminal Code, the U.S. Foreign Corrupt Practices Act of 1977, the U.K. Bribery Act, the People's Republic of China Criminal Law, and the laws of the other countries that have signed the United Nations Convention Against Corruption (UNCAC).

These policies and procedures cover, among other things, employees' interactions with government officials and non-U.S. healthcare professionals, as well as third parties that provide goods or services to Pfizer. These policies and procedures are reinforced through anti-corruption training and tested through periodic auditing and monitoring. Where appropriate, third parties are required to undergo anti-corruption due diligence and auditing, follow Pfizer's internal anti-bribery and anti-corruption policies and procedures, receive anti-corruption training and/or abide by Pfizer's International Anti-Bribery and Anti-Corruption Business Principles.

Raising Concerns

Globally there are many channels which exist for raising concerns. The Compliance Division investigates all significant potential, suspected or actual violations of applicable law or company policy. Pfizer has Open Door, Anti-Retaliation and Confidentiality policies as well as a Compliance Hotline.

As an additional resource, Pfizer's Office of the Ombuds offers a place where employees at any level can get information and guidance to help them address and resolve work-related issues. Pfizer's Ombuds is informal, independent and neutral, and is not an advocate for any party, but an advocate for fair process.

There are various methods and resources to report compliance concerns, for both employees of Pfizer and also for the public. The Compliance Hotline is available to call 24 hours a day, every day of the year and is operated by specially-trained third-party representatives and offered in multiple languages. There is also a portal to obtain assistance or report online. Both of these methods have the option to remain anonymous if local laws allow.

Further to this, for any issue that concerns an immediate violence or threat or other serious situation, the Global Security Operations Centre is available with 24 hour contact.

Whistleblower Protection Policy

Further to international anti-retaliation policies, Pfizer Australia has an established Whistleblower Protection Policy which reinforces whistleblower protection in Australia. The policy provides comprehensive information to employees about the types of disclosures that qualify for protection under the Whistleblower Protection Scheme as well as information about the protections available. It also outlines who to disclose to, how Pfizer Australia will investigate disclosures that qualify for protection, ways the whistleblower will be protected from detriment as well as ensuring the fair treatment of employees who are mentioned in these disclosures.

Contract Clauses

Pfizer implemented a modern slavery clause into our standard global agreements for procuring goods and services. Additionally, Pfizer Australia implemented a modern slavery clause into our standard Australian agreements where we procure goods and services. The clause was also added to Pfizer Australia's:

- purchase order Terms and Conditions;
- standard Supplier Terms; and
- standard hotel contract.

For material contracts that are not on Pfizer Australia's terms and/or when material contracts are renewed, we seek to include modern slavery clauses where they are absent.

Training

Training on modern slavery was conducted as part of Pfizer Australia's annual legal training which is compulsory for all commercial employees in Australia. This training gave a high-level overview of the legislation and how to identify modern slavery risks and red flags. This training will continue to be conducted on an annual basis.

Training on modern slavery will also be introduced as part of the orientation program for Pfizer Australia to ensure that all new employees receive the annual training when commencing employment.

Procurement employees undertake more specific training in this area.

All Pfizer employees globally must complete training on Anti-Bribery and Anti-Corruption.

Due Diligence⁵

Pfizer Australia engaged ethiXbase, an established provider specialising in providing organisations with compliance risk management tools, to provide us with a tool to assist with the identification of potential modern slavery risks in our direct suppliers. Through their system, and in consultation with subject matter experts, we were provided with an in-depth Modern Slavery Questionnaire (MSQ) asking vendors about their operations, what policies they have in place, information about their workforce, the goods and services they produce, the work they have conducted around human rights, how much training they have completed and confirming whether or not they could agree to Pfizer's Supplier Conduct Principles.

The questionnaire was designed with five key risk areas in mind:

- a. Jurisdiction/country of origin risk
- b. Industry/product risk
- c. Utilisation of vulnerable workers
- d. Prior human rights impact assessment
- e. Implementation of policies, procedures and systems

The analytics underpinning the questionnaire generated a modern slavery risk rating for each supplier based on responses to the weighted questions. The analytics datasets are driven by global indices on modern slavery and human rights risks.

Using a risk-based approach, the in-scope suppliers for the first Reporting Period were those with an annual spend of over \$20,000 and also all vendors in sensitive geographics where risk may be higher, regardless of spend.

Approximately 50% of the suppliers entered into the ethiXbase platform completed the MSQ. The completion rate may have been impacted by a lack of familiarity/awareness amongst our suppliers of the concept of 'modern slavery' and the impact of COVID-19. We anticipate that the completion rate will improve year on year.

While no modern slavery was identified through the due diligence process, we identified two suppliers in the manufacturing and construction sectors requiring further review. We have assessed the results of their responses to the questionnaire and determined that based on both vendors' agreement to Pfizer's Supplier Conduct Principles and having some level of policies in place, the risk rating is based mainly around their presence in sensitive geographies. We are continuing discussions with one of the suppliers around future plans to implement more related policies and do a more specific assessment of their supply chain.

We are working through the results for vendors returning a moderate risk result and assessing the results to determine what the categorisation is based on and whether further action is needed. As we continue to receive the completed questionnaires, we are working on implementing a process for any vendors that may return a high-risk, or for those returning a moderate result where their responses are not considered adequate. We will be making further efforts to educate our suppliers on the risk of modern slavery and their contractual obligations and will begin to work through a change management process for suppliers that do not demonstrate a commitment to meet their obligations.

Pfizer Australia will continue this process to encourage questionnaire completion for suppliers who have not yet completed the assessment. Pfizer Australia is also working on implementing due diligence on modern slavery at the time of onboarding new suppliers to ensure that this check becomes a standard part of procurement operations and an express consideration when determining whether to use a vendor at the point of engagement.

⁵ All references to "we" and "our" in this section headed "Due Diligence" refers to Pfizer Australia.

Assessing Effectiveness⁶

As outlined, we have a number of existing measures in our business to mitigate the risk of modern slavery and Pfizer Australia is in the process of establishing further frameworks to assess the modern slavery risks of our suppliers. One of the means by which we will assess the effectiveness of our actions, year-on-year, is to compare the results of our modern slavery questionnaires.

In our second year of reporting, we will seek to implement the further actions mentioned in this Statement and we will track our performance against the successful implementation of the actions and the completion rates of suppliers undergoing due diligence assessments.

Our Boards will be kept abreast of our progress and ongoing activities.

⁶ All references to “we” and “our” in this section headed “Assessing Effectiveness” refers to Pfizer Australia.



Response to COVID-19

Being one of the largest biopharmaceutical companies in the world, Pfizer needed to sustain continuity of supply to ensure patients continued to have uninterrupted access to medications. We recognise that this critical need carried with it increased modern slavery risks in our supply chain.

Due to COVID-19, on-site supplier audits in 2020 were limited and alternative risk monitoring processes (e.g., remote audits) had to be implemented.

Relationships/Communications with Suppliers

Pfizer's Australian entities worked with our vendors that were facing hardship as a result of COVID-19. Some of the ways in which Pfizer Australia sought to alleviate hardship are set out below:

- We worked with small businesses and when needed, reduced the agreed payment terms to assist with continuing cash flow
- No supplier contracts were unilaterally terminated or varied as a result of supplier delays arising from the COVID-19 pandemic
- We assisted critical suppliers in proving they were essential by providing letters and documentation to ensure they were able to remain in operation

Collaboration with External Stakeholders

As COVID-19 was unfolding, Pfizer Australia were in a position to be able to leverage our knowledge and ability as an industry leader, to work with external stakeholders to mitigate further risk.

- Pfizer Australia worked with government, wholesalers and industry bodies to ensure equitable distribution of medicines
- Vendors operating in higher-risk areas (e.g., contract sales force and nurse advisory programs) were contacted to work on adjusting programs to ensure safety of patients and contractors
- Supply chain colleagues assessed at-risk products on a weekly basis to ensure we could continue supply
- Labour hire agencies with staff working for Pfizer Australia were contacted to ensure they allowed for special leave provisions during this time

Protection of Our Workforce

The work we do in our manufacturing sites is, in some instances, critical to human life and a reduction in operations was not an option. While all Pfizer colleagues are essential to our operations, employees engaged in manufacturing and building operations remained on site to continue to manufacture product during this time. We provided support in various ways to the employees who remained on site and also to those working from home.

- Special leave provisions were implemented to ensure that no staff member felt they needed to work when unwell or take associated risks
- Global task forces are in operation, ensuring all employees and contractors are supported during this time
- Strict protocols were implemented in sites and all offices related to social distancing and cleaning
- PPE packages were sent to all employees, both those on site and those working from home, containing essentials such as face masks and hand sanitiser
- Allowances were provided to support employees who needed to work from home in ensuring that the equipment to do so was adequate

Consultation

All of the Pfizer Australia companies operate under a common set of global and local policies and procedures. The Pfizer Australia companies also share a number of common directors and have the same company secretary.

In addition to this common leadership, consultation on the contents of this Modern Slavery Statement also involved engagement with all of the Pfizer Australia Reporting Entities and their owned or controlled entities by virtue of senior managers and the members of our cross-functional Modern Slavery Working Group, who collectively have Australian group-wide responsibility, including for each of the Pfizer Australia Reporting Entities and their owned or controlled entities.

Modern slavery is discussed at every Board meeting for the Reporting Entities, and updates are regularly provided by the working group to the Board.

This statement has been approved by the board of each of the Reporting Entities.



Bradley Apps
Company Director

[Pfizer Australia Pty Ltd](#) | ABN 50 008 422 348

[Pfizer \(Perth\) Pty Ltd](#) | ABN 32 051 824 956

[Pfizer PFE Australia Pty Ltd](#) | ABN 17 169 276 920

[Pfizer Australia Investments Pty Ltd](#) | ABN 86 146 429 138

[Hospira Australia Pty Ltd](#) | ABN 58 097 064 330

[Hospira Adelaide Pty Ltd](#) | ABN 60 007 988 767

[Hospira Holdings \(S.A.\) Pty Ltd](#) | ABN 14 121 147 019

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