

**BOEHRINGER INGELHEIM**  
**JOINT MODERN SLAVERY STATEMENT**  
**FINANCIAL YEAR ENDING 31ST DECEMBER 2020**

At Boehringer Ingelheim we are driven by the desire to serve mankind by improving human and animal health. Our passion comes from believing in the value of our work beyond its commercial potential. As a long-standing, successful, family-owned company we plan in generations.

Aiming to make significant contributions to health care, we focus on diseases which have so far not been satisfactorily treated. We innovate to make breakthrough therapies and life-enhancing improvements available to patients and to provide advanced, preventive animal healthcare.

Our values of Respect, Empathy, Trust and Passion form the foundation for how we work with our colleagues, stakeholders and the community. As a family-owned company, in all of our activities we feel responsible for our communities and are respectful of our resources. We are committed to sustainable development and work closely with communities to understand and meet their needs.

## **REPORTING ENTITIES**

This Joint Modern Slavery Statement is made pursuant to section 14 of the *Modern Slavery Act 2018* (Cth) by Boehringer Ingelheim Pty Ltd (ACN 000 452 308) (**BI**) on behalf of itself and the following reporting entities:

- Boehringer Ingelheim Animal Health Australia Holding Pty Ltd (ACN 623 185 311) (**BIAH Holding**); and
- Boehringer Ingelheim Animal Health Australia Pty Ltd (ACN 071 187 285) (**BIAH**).

## **OUR STRUCTURE**

BI, BIAH Holding and BIAH are part of the Boehringer Ingelheim group. Boehringer Ingelheim is a research-driven global biopharmaceutical company which has a focus on developing innovative therapies in areas of high unmet medical need in human and animal health. The group is headquartered in Ingelheim, Germany and is one of the world's 20 leading pharmaceutical companies. The ultimate parent company of the Boehringer Ingelheim group is C.H. Boehringer Sohn AG & Co. KG.

Each of BI, BIAH Holding and BIAH is an Australian proprietary company limited by shares. BIAH is a subsidiary of BIAH Holding, which owns 100% of the shares of BIAH. The directors of BIAH Holding are also the same as the directors of BIAH.

Together, BI and BIAH employ approximately 415 people in Australia.

## **OUR OPERATIONS**

### **BI – Human Pharmaceuticals**

In Australia, BI is a leading provider of innovative prescription medicines that improve the health and save the lives of Australian patients. Our Human Pharma division is underpinned by a broad portfolio across many therapeutic areas, and in many cases the company's products are standard treatments in medicine. Boehringer Ingelheim's research into new medicines is focused on those of areas of science with significant medical need and where Boehringer Ingelheim can continue to innovate and lead the science. Boehringer Ingelheim's current research focus is in the key areas of CardioMetabolic diseases; Central Nervous System diseases; Immunology and Respiratory diseases; Oncology and Cancer Immunology and Retinal health. Boehringer Ingelheim's scientists are also contributing to the collective effort to fight COVID-19.

BI Australia also plays an important role in contributing to the company's ambitious global Clinical Trial program. Currently BI's Australian clinical research activities are focused on the key focus areas of oncology, respiratory, immunology and central nervous system diseases.

BI is committed to promoting the Quality Use of Medicines, ensuring that our medicines conform to the highest standards of safety, efficacy and quality; are supported by comprehensive technical and information services; are professional in dealing with healthcare professionals, public health officials and consumers; and promote the quality use of medicines and principles within the Australian National Strategy for Quality Use of Medicines.

### **BIAH – Animal Health**

In Australia, BIAH is a leading provider of veterinary vaccines and medicines. BIAH develops, markets and distributes vaccines, parasiticides and pharmaceuticals that protect animals against disease and pain. BIAH's portfolio includes products for pets and horses as well as livestock such as swine, cattle and sheep.

BIAH also plays an important role in contributing to the company's global Clinical Trial Program. These efforts ensure that the products developed to protect Australian pets and livestock are safe and effective under local conditions.

BIAH is committed ensuring that our products conform to the highest standards of safety, efficacy and quality; are supported by comprehensive technical and information services; are professional in dealing with veterinary professionals, public health officials and consumers; and promote the responsible and appropriate use of our products.

## **OUR SUPPLY CHAIN**

BI and BIAH operate extensive supply chain. Products are globally manufactured from sites owned and operated by Boehringer Ingelheim as well as sites operated by independent third-party contract

manufacturers. In addition, BI and BIAH's supply chains include manufacturers of the raw materials which are incorporated in finished pharmaceutical products, namely active pharmaceutical ingredients, excipients and other components such as packaging materials.

Once products are imported into Australia, BI and BIAH utilize the services of freight forwarders to transport and store products.

## **RISKS OF MODERN SLAVERY PRACTICES IN OUR OPERATIONS AND SUPPLY CHAINS**

BI and BIAH maintain a well-established Environment, Health, Safety & Sustainability program. The Environment, Health, Safety & Sustainability program reflects BI and BIAH's commitment to ensure the health, safety and welfare of their employees, visitors and contractors working at their premises. Given the maturity of the Environment, Health, Safety & Sustainability program, BI and BIAH consider the risk of modern slavery occurring in its business to be extremely low (if any).

BI and BIAH purchase finished pharmaceutical products. These finished pharmaceutical products incorporate raw materials (active pharmaceutical ingredients, excipients and other components such as packaging materials) from an extensive supply chain around the world. In some cases, BI and BIAH are multiple tiers away from third parties responsible for the manufacture of raw materials necessary for the finished pharmaceutical products. BI and BIAH acknowledge any multi-tiered global supply chain presents possible risks of modern slavery due to its significant reach and complex structure. However, BI and BIAH believe the overall risk of modern slavery is low in their supply chains due to BI and BIAH's actions to assess and address modern slavery risks, as well as the Boehringer Ingelheim group's firm position that any kind of modern slavery is incompatible with Boehringer Ingelheim's ethical basics. The Boehringer Ingelheim group expects its suppliers/contractors and their subcontractors to fight against any form of modern slavery.

## **OUR ACTIONS TO ASSESS AND ADDRESS MODERN SLAVERY RISKS**

BI and BIAH recognize and expect adherence to exemplary ethical and professional conduct from their business partners. BI and BIAH expect their business partners to promote these responsibilities – including throughout their own supply chain.

To that end, the Boehringer Ingelheim Global Supplier Code of Conduct is provided to all suppliers of BI and BIAH. This Supplier Code of Conduct sets out BI and BIAH's expectations for how suppliers should conduct business with BI and BIAH. Where necessary, BI and BIAH include in their agreements contractual obligations which require suppliers to comply with the Supplier Code of Conduct. A copy of the Supplier Code of Conduct is available at: <https://www.boehringer-ingelheim.com/corporate-profile/sustainability/supplier-code-of-conduct>.

In addition to general requirements for suppliers to comply with applicable laws, the Supplier Code of Conduct specifically addresses Labour and Human Rights. The Supplier Code of Conduct requires BI and BIAH suppliers to ensure that:

- Forced, bonded or indentured labour or involuntary prison labour or other kind of forced labour is not used in its supply chain.

- Employees shall not be required to surrender their passports or other legal document or pay fees to an employer or the supplier before commencing work.
- Child labour is not used. 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 shall respect the rights of workers, as set forth in local laws, to associate freely, join or not join labour unions.
- Workers shall be able to communicate openly concerns regarding working conditions with management without threat of reprisal, intimidation or harassment.

### **Due Diligence**

BI and BIAH have implemented a new modern slavery due diligence process as part of its onboarding of new suppliers. BI and BIAH's modern slavery due diligence includes a screening process aimed at identifying key risk indicators of modern slavery to assess the risk of modern slavery occurring within a new supplier's business and supply chain. The screening process assesses the new supplier's industry, existing social and labour policies, past modern slavery violations, modern slavery audit programs, and grievance mechanisms in place. For new suppliers identified as potentially "High Risk", BI and BIAH implement measures to mitigate the risk of modern slavery, up to and including the discontinuance of the potential business relationship.

In addition, BI and BIAH have completed a review of their current third-party tier 1 suppliers (excluding financial service providers) as at July 2020 to identify and assess the risk of modern slavery occurring within their existing suppliers and supply chains. BI and BIAH categorised these suppliers based on industry and expenditure type. BI and BIAH intend to apply their new due diligence screening process to those existing suppliers which were identified as operating in a high risk industry by the end of 2021.

### **Remediation**

BI and BIAH are committed to conducting business with integrity and in compliance with applicable laws, regulations and company policies and procedures. BI and BIAH actively promotes a "Speak Up" culture and encourage employees and third parties to report any action or behaviour which is, or could be assumed to be, not in line with BI and BIAH's commitment, such as wrongdoing, misbehaviour, doubtful practices, or deviation from policies and procedures.

If employees and third parties do not feel comfortable or are not able to report concerns directly to BI and BIAH, employees and third parties may utilize Boehringer Ingelheim's global "Speak up" portal (available at <https://www.bkms-system.net/bkwebanon/report/clientInfo?cin=2BI9&c=-1&language=eng>). This portal allows employees and third parties to submit reports at any time via

an internet-based system secured by a specialized vendor. The “Speak up” portal also offers the option for reports to be submitted anonymously if individuals do not wish to disclose their identity.

BI and BIAH take all reports of non-compliance seriously and addresses matters according to the nature of the report. If an investigation is deemed necessary, investigators will conduct an objective, thorough and timely investigation. Once an investigation is concluded, appropriate corrective action may be taken, depending on the findings. This may include a Corrective and Preventative Action plan to mitigate the risk of Modern Slavery occurring, or other actions including an immediate review to assess future business relationships with the offending third party.

## **ASSESSING THE EFFECTIVENESS OF OUR ACTIONS**

BI and BIAH have engaged third party expert Corporate Social Responsibility and Environment Social Governance consultants to ensure their approach to modern slavery aligns with the recommended best practices. This has resulted in BI and BIAH’s implementation of a new due diligence process specifically addressing modern slavery risks.

Additionally, BI and BIAH will track Australian modern slavery reports of potential non-compliance received via Boehringer Ingelheim’s “Speak up” portal and present trends in cases to the senior management of BI and BIAH as part of the established Compliance Committee governance structure.

## **OUR CONSULTATION BETWEEN REPORTING ENTITIES**

BI and BIAH utilise the same processes, resources and systems to manage their supply chains. Accordingly, BI and BIAH have adopted a consolidated approach to addressing modern slavery risks in their businesses and supply chains.

The directors of BI and BIAH all attend joint briefings to remain informed about updates in connection with the local modern slavery program, including required actions to address identified modern slavery risks.

This statement has been reviewed and approved by the directors of BI, BIAH Holding and BIAH.

Signed for and on behalf of **Boehringer Ingelheim Pty Ltd (ACN 000 452 308)**:

Signature:  \_\_\_\_\_  
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Name: \_\_\_\_\_

Position: \_\_\_\_\_

Date: \_\_\_\_\_

Signed for and on behalf of **Boehringer Ingelheim Animal Health Australia Holding Pty Ltd (ACN 623 185 311)**:

Signature:  \_\_\_\_\_  
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Name: \_\_\_\_\_

Position: \_\_\_\_\_

Date: \_\_\_\_\_

Signed for and on behalf of **Boehringer Ingelheim Animal Health Australia Pty Ltd (ACN 071 187 285)**:

Signature:  \_\_\_\_\_  
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Name: \_\_\_\_\_

Position: \_\_\_\_\_

Date: \_\_\_\_\_