

# BOEHRINGER INGELHEIM JOINT MODERN SLAVERY STATEMENT FINANCIAL YEAR ENDING 31ST DECEMBER 2022

Boehringer Ingelheim is working on breakthrough therapies that transform lives, today and for generations to come. As a leading research-driven biopharmaceutical company, the company creates value through innovation in areas of high unmet medical need. Founded in 1885 and family-owned ever since, Boehringer Ingelheim takes a long-term perspective. More than 53,000 employees serve over 130 markets in the three business areas, Human Pharma, Animal Health, and Biopharmaceutical Contract Manufacturing.

# **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).

Boehringer Ingelheim's Australian and New Zealand businesses utilise the same policies, processes, resources and systems to manage their supply chains. As a result, this Joint Modern Slavery Statement will provide a single, consolidated description of each reporting entity's actions to address modern slavery risks in their businesses and supply chains.

### **OUR STRUCTURE**

BI, BIAH Holding and BIAH are part of the Boehringer Ingelheim group. 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.

BI, BIAH Holding and BIAH are each Australian proprietary companies limited by shares. BI and BIAH do not own or control any other entities. BIAH is a subsidiary of BIAH Holding, which owns 100% of the shares of BIAH.

In Australia, BI and BIAH together employed approximately 378 people.

### **OUR OPERATIONS**

#### **BI – Human Pharmaceuticals**

In Australia, BI is a leading provider of innovative prescription medicines that improve the health and lives of Australian patients. BI markets and distributes therapeutic options for a broad range of therapeutic areas including cardiometabolic and respiratory diseases and conditions such as diabetes, chronic obstructive pulmonary disease (**COPD**), high blood pressure, stroke, Parkinson's disease, HIV, arthritis, thrombosis and complications of blood clotting and restless leg syndrome (**RLS**). Many of BI's products are standard treatments in Australian clinical practice.

Boehringer Ingelheim's research into new medicines is focused on areas of science with significant medical need and where Boehringer Ingelheim can continue to innovate and lead the science. BI Australia also plays an important role in contributing to the company's global Clinical Trial program. Currently, BI's Australian clinical research activities are focused on the key focus areas of oncology, respiratory, immunology, central nervous system (CNS) diseases and retinal health.

BI is committed to upholding the central objective of Australia's National Medicines Policy by promoting the Quality Use of Medicines (**QUM**). BI does this by ensuring that: (i) our medicines conform to the highest standards of safety, efficacy and quality; (ii) our human pharmaceutical medicines are supported by comprehensive technical and information services; (iii) our teams are professional, ethical and transparent in dealing with healthcare professionals, public health officials and consumers; and (iv) we promote the Quality Use of Medicines 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, equine and 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 Boehringer Ingelheim's animal health products are safe and effective under local conditions.

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

### **OUR SUPPLY CHAIN**

BI and BIAH each operate an extensive global supply chain. Both supply chains include manufacturers of finished pharmaceutical products and manufacturers of raw materials which are incorporated in finished pharmaceutical 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 ingredient(s)) and other components such as packaging materials. Related companies in the Boehringer Ingelheim Group and independent third-party contractors manufacture BI and BIAH finished products, as well as the necessary raw materials for BI and BIAH finished products.

BI's supply chain for its human pharmaceutical products includes manufacturing sites located in China, France, Germany, Greece, Italy, Mexico, Spain and the United States of America (USA).

BIAH's supply chain for its animal health products includes manufacturing sites which are located in Australia, Belgium, Brazil, Denmark, France, Germany, Italy, Mexico, New Zealand, Puerto Rico, Spain and the USA.

Once the human pharmaceutical products and animal health products are imported into Australia, BI and BIAH use freight forwarders to transport the products within Australia and store the products in warehouses located in Australia.

# **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.

BI and BIAH purchase finished pharmaceutical products which 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 finished pharmaceutical products.

BI and BIAH acknowledge that any multi-tiered global supply chain presents inherent risks of modern slavery due to its significant reach and complex structure. In particular, the global structure of BI and BIAH's supply chains include suppliers which operate in countries with varying labour laws, ranging from developing to mature labour standards and practices. As a result, there is an inherent risk that suppliers in developing countries may engage in modern slavery practices by virtue of following local labour practices.

Despite these inherent risks, BI and BIAH believe that 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 and the Boehringer Ingelheim Group's policies which reflect the Group's firm position that any kind of modern slavery is incompatible with Boehringer Ingelheim's values. The Group expects its suppliers, contractors and sub-contractors to fight against any form of modern slavery.

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

**Global Human Rights Policy** 

Boehringer Ingelheim's Global Human Rights Policy sets out its commitment to respect and contribute to the realisation of all human rights. The Policy confirms Boehringer Ingelheim's commitment to conduct its business activities based on the following international standards and guidelines: (i) the Universal Declaration of Human Rights (UDHR); (ii) the United Nations Guiding Principles on Business and Human Rights (UNGP); (iii) the Core Labour Standards of the International Labour Organisation (ILO); (iv) the United Nations Convention on the Rights of the Child (UNCRC); and (v) the Guidelines of the Organisation for Economic Co-operation and Development (OECD) for multinational companies.

# **Global Code of Conduct – Our Employee Commitment**

At Boehringer Ingelheim, our Global Code of Conduct sets out the actions and behaviours expected of our employees within the company and externally. Our Global Code of Conduct demonstrates to each and every one that integrity is "part of our DNA". Every Boehringer Ingelheim employee is accountable for their actions and are entrusted to make decisions, not only in line with laws and regulations, but also in accordance with our ethical principles. A copy of our Global Code of Conduct is available at: <u>https://www.boehringer-ingelheim.com/corporate-profile/ethics-compliance/our-global-code-of-conduct</u>.

Purchasing and Supplier Relations, Speak Up and Human Rights form key tenants of our Global Code of Conduct. Employees are regularly engaged and participate in regular training on both our Code of Conduct and our Speak Up channels. We also proactively communicate to employees how to ask for help when they have questions or are unsure of what to do.

### **Global Supplier Code of Conduct – Supplier Engagement**

BI and BIAH have a zero-tolerance approach to modern slavery in their supply chain and across the business. BI and BIAH expect their business partners to act with exemplary ethical and professional conduct and promote these responsibilities throughout their own operations and supply chains.

The Boehringer Ingelheim Global Supplier Code of Conduct is provided to all suppliers of BI and BIAH. Our Supplier Code of Conduct outlines how BI and BIAH expect suppliers to conduct their business. Where necessary, BI and BIAH include obligations in their contractual agreements with suppliers to comply with our Supplier Code of Conduct. A copy of our Global Supplier Code of Conduct is available at: <u>https://www.boehringer-ingelheim.com/corporate-profile/sustainability/supplier-code-of-conduct</u>.

In addition to general requirements for suppliers to comply with applicable laws, our Supplier Code of Conduct specifically addresses Labour and Human Rights. Our Supplier Code of Conduct requires BI and BIAH's 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 are be required to surrender their passports or other legal documents, or pay fees to an employer or the supplier before commencing work;
- Child labour is not used and employment of workers below the age of 18 only occurs in nonhazardous work and if 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; and
- Workers are able to openly communicate concerns regarding working conditions with management without threat of reprisal, intimidation or harassment.

#### **Due Diligence**

BI and BIAH follow a modern slavery due diligence process when onboarding new suppliers. BI and BIAH's modern slavery due diligence includes a screening process which identifies key risk indicators of modern slavery, which assists in assessing 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. The screening process also occurs continuously so that existing vendors are regularly reviewed to ensure that any risks of modern slavery arising after the onboarding process is identified and actioned.

### Remediation

BI and BIAH are committed to conducting business with integrity and in compliance with applicable laws, regulations, company policies and procedures. BI and BIAH actively promote a 'Speak Up' culture and encourage individuals both inside and outside the company to report any action or behaviour which is or 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 individuals both inside and outside the company s do not feel comfortable or are not able to report concerns directly to BI and BIAH, they may use Boehringer Ingelheim's global 'Speak Up' portal available at: <u>https://www.bkms-system.net/bkwebanon/report/clientInfo?cin=2BI9&c=-1&language=eng</u>. Our 'Speak Up' portal allows individuals to submit reports at any time via an internet-based system secured by a specialised vendor. Our 'Speak Up' portal also offers the option for anonymised reporting if individuals prefer not 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 (CAPA) plan to mitigate the risk of modern slavery occurring, or other actions up to and including the termination of the business relationship with the offending third party.

### Assessing the effectiveness of Our Actions

BI and BIAH's primary method to assess the effectiveness of their actions in addressing modern slavery is to measure metrics from different reporting periods in relation to the number of high-risk suppliers engaged and the number of reports of potential non-compliance received via our 'Speak Up' portal. Reports of potential non-compliances are presented to senior management of BI and BIAH as part of our established Compliance Committee governance structure.

### **OUR CONSULTATION BETWEEN REPORTING ENTITIES**

Boehringer Ingelheim's Australian and New Zealand businesses have an established Compliance Committee which is responsible for ensuring compliance with legal and regulatory requirements, as well as fostering a culture of ethics and integrity within the businesses. The Compliance Committee is comprised of local senior management, including leaders from BI and BIAH. The Compliance Committee meets quarterly and is consulted on developments to Boehringer Ingelheim's local Australia and New Zealand Human Rights Program, including reported instances of modern slavery, recurring modern slavery risks and actions taken to address these risks.

In preparing this Joint Modern Slavery Statement, the Board of Directors for each reporting entity covered by this Joint Modern Slavery Statement has been consulted and have reviewed this Joint Modern Slavery Statement.

### APPROVAL OF THIS JOINT MODERN SLAVERY STATEMENT

This Joint Modern Slavery Statement was approved by the Boards of Directors of BI, BIAH and BIAH Holding on 13 June 2023.

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

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Signature:		
Signature.		

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

Position: General Manager Australia / New Zealand

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

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

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Signature:	7462C322387447E	

Name: \_\_\_\_\_ Dirk Otto\_\_\_\_\_

Position: General Manager Australia / New Zealand

Date: 13-Jun-2023

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

Signature:

Name: Dirk Otto

Position: \_\_\_\_\_\_ General Manager Australia / New Zealand

Date: 13-Jun-2023