



AbbVie Pty Ltd

Modern Slavery Statement for the year ended 31 December 2021

Reporting entity and reporting period

For the purposes of this Modern Slavery Statement the reporting entity is AbbVie Pty Ltd (ACN 156 384 262) ("AbbVie Australia"). AbbVie Australia has no subsidiaries.

This Statement covers AbbVie Australia's reporting period of 1 January 2021 to 31 December 2021.

AbbVie Australia is a subsidiary of AbbVie Inc, a global, research-based biopharmaceutical company formed in 2013 following its separation from Abbott Laboratories. References in this Statement to "AbbVie" are references to AbbVie Inc, but, where the context permits, the relevant statements apply equally to AbbVie Australia.

Consultation

As AbbVie Australia has no subsidiaries, no consultation was required.

Our values and mission

AbbVie believes in the inherent dignity of every human being and respects individual rights as set out in the Universal Declaration of Human Rights. We reflect these principles in our company's core values and it's in our mission to address the world's pressing health challenges.

AbbVie supports the Universal Declaration of Human Rights and key tenets of the United Nations Guiding Principles on Business and Human Rights. While governments have a key role to respect, protect, promote and fulfil the human rights of their citizens, we recognise that companies have a responsibility to respect human rights within their own operations and business relationships and also to take steps to identify and eliminate modern slavery in their business operations and supply chains. AbbVie is committed to these objectives and fully supports the *Modern Slavery Act 2018* (Cth).

Our structure, operations and supply chains

AbbVie is committed to developing and delivering a consistent stream of innovative new medicines for some of the world's most complex conditions. In May 2020, AbbVie Inc. announced that it has completed the acquisition of Allergan plc ("Allergan") as part of a global transaction. This transformative acquisition is being followed by a complex integration process which is ongoing in Australia as of the date of this Statement.

AbbVie's mission is to discover and deliver innovative medicines that solve serious health issues today and address the medical challenges of tomorrow. We strive to have a remarkable impact on people's lives across several key therapeutic areas: immunology, oncology, neuroscience, eye care and virology.



In more than 70 countries, approximately 47,000 AbbVie and Allergan employees are working every day in the pursuit of better health outcomes for people around the world. AbbVie's global business purchases goods and services from suppliers located in over 143 countries.

AbbVie Australia has more than 450 employees engaged around Australia, with its head office in Sydney. For more information about AbbVie, please visit us at www.abbvie.com.au. Follow [@abbvie_AU](#) on Twitter, [Facebook](#), [Instagram](#) or our [LinkedIn](#) page.

AbbVie Australia's operations consist of importation of finished goods from manufacturing facilities in Europe and the United States owned and operated by entities within the AbbVie Group. AbbVie Australia does not have local manufacturing activities in Australia. AbbVie Australia uses a third-party logistics supplier to warehouse and ship its products to customers throughout Australia.

When it comes to relationships with supply partners, AbbVie has diverse supply chains. Our focus is to identify like-minded partners who mirror similar values to ours and will drive value for our organisation. With patient outcomes always our priority, we work with leading edge organisations across the media, warehousing and logistics, creative agency, meeting and events, support programs and social media platforms.

Risks of modern slavery practices in our operations and supply chains

To assess modern slavery risks, AbbVie Australia has considered external data sources and consulted with external experts.

When considering its operations and supply chains, AbbVie Australia's principal tier 1 suppliers are entities within the AbbVie global network. Given these entities are AbbVie entities over which we have a high degree of visibility and control, regardless of their locations, we consider the risk of modern slavery within our operations and in these internal supply chains to be very low. However, AbbVie understands that the pharmaceutical industry generally relies on high risk industries such as mining, agriculture and manufacturing that are associated with high risk geographical locations and that this risk applies to AbbVie lower down its global supply chains.

In relation to AbbVie Australia's external supply chains, AbbVie Australia relies on suppliers from industries including logistics, security, cleaning and catering contractors, as well as other suppliers performing facilities management services. Individuals undertaking this type of work commonly come from migrant, low socioeconomic or culturally and linguistically diverse backgrounds which AbbVie Australia acknowledges elevates the risk of modern slavery practices.

Actions taken to assess and address the risks of modern slavery occurring in our operations and supply chains

AbbVie Australia has designed and implemented a due diligence process to assess new suppliers and existing suppliers, reviewed its policies, updated its contracts to include clauses specific to anti-modern slavery, mapped its operations and supply chain, assessed suppliers based on geographical locations, developed and implemented modern slavery training, and established a management and monitoring process. AbbVie Australia has sought third party specialist advice regarding modern slavery by engaging external lawyers, Baker McKenzie.

AbbVie Australia recognises the complexities of modern slavery and has identified a need for ongoing education among employees, and operation and supply chain partners. By building advocacy from within, employees are equipped with the right information and resources to engage with operation and supply chain partners who may be at the early stages of their respective modern slavery journeys.

A large part of this educational objective, sits within employee engagement and internal communication activities. In July 2021, core members of the AbbVie Australia's internal modern slavery committee participated in an interactive panel discussion during an all employee meeting. The purpose of this was to raise awareness amongst employees of the issues around modern slavery, outline AbbVie Australia's commitment to the *Modern Slavery Act 2018* (Cth) and highlight some of the tactical ways employees can help support AbbVie Australia's activities. A highly effective way of bringing the modern slavery concept to life and creating relatability among employees, was to share personal anecdotes of panellists.

Other general awareness initiatives are shared with employees through internal newsletters and dedicated modern slavery pages on the company intranet. AbbVie Australia invests in the production of bespoke resources, including frequently asked questions and visually impactful materials such as flyers, to guide employees through AbbVie Australia's supplier questionnaire and associated communications with suppliers. Articles of interest and other relevant materials are also shared through these internal communication channels to help keep employees engaged and informed throughout the year.

To upskill from third party experts to learn about the latest trends and challenges with modern slavery and best practices in reporting, members of AbbVie Australia's internal modern slavery committee attended a virtual discussion in November 2021, hosted by Informed365 with presenters from the Australian Border Force, Better Sydney, and the Australian Red Cross.

Commitment and policies

AbbVie's [Commitment to Human Rights](#) document outlines the human rights issues that are most salient for our business. In it, we explicitly commit to, among other things, complying with laws and practices that prohibit child labour, forced, bonded or indentured labour, involuntary prison labour, human trafficking and unfair wages and benefits. This commitment and other workplace commitments are supported by our employment policies. As part of our commitment to preventing, mitigating and remedying any adverse human rights impacts across our supply chains, we seek to ensure that modern slavery and human trafficking do not enter our product supply chains or any part of our business operations. We have implemented a range of [corporate policies, guidelines and](#) codes which address the need for a safe and fair working environment where the rights of those who work for and with us are respected and protected.

AbbVie's [Code of Business Conduct](#) applies to all AbbVie employees and sets out our commitment to conduct business with the highest ethical standards and to comply with all applicable laws and regulations. It states that AbbVie is committed to maintaining a work environment free from intimidation, violence or threats of violence. It further confirms our respect for human rights and our prohibition of labour practices that constitute modern slavery. Our employees worldwide are required to complete interactive online training on the Code of Business Conduct and certify their adherence to it. In 2021, approximately 47,000 AbbVie and Allergan employees certified to our code. In Australia, 520 AbbVie and Allergan employees certified to our code.

Expectations of suppliers

Our suppliers are integral to the success of our company. While we cannot control all actions of our suppliers, we expect suppliers to treat their employees with dignity and respect and to comply with all legal and regulatory requirements pertaining to the fair and equitable treatment of employees. All suppliers are expected to understand and comply with AbbVie's [Supplier Code of Conduct](#) and our expectation that suppliers:

- Commit to fair treatment of their employees.



- Shall not use forced, bonded or indentured labour, involuntary labour or human trafficking.
- Shall not use child labour.
- Shall maintain employee files with adequate data to verify ages of employees.
- Shall pay workers according to applicable wage laws, including minimum wage, overtime hours and mandated benefits as per custom of the country of employment.

Our key supplier network is required to certify compliance with AbbVie's Supplier Code of Conduct and the above requirements. Additionally, in contractual agreements, we require our suppliers to comply with all applicable laws and regulations.

In addition, AbbVie is a member of [Pharmaceutical Supply Chain Initiative](#) (PSCI), an international membership organisation of pharmaceutical and health care companies that formalise, implement and champion responsible supply chain practices. We support PSCI's [Principles for Responsible Supply Chain Management](#) and are working to implement PSCI [audit standards](#) in our supplier audits globally. These standards outline that suppliers uphold the human rights of workers and shall not use forced, bonded, indentured, involuntary prison or child labour.

Due diligence and remediation

In our own operations, our Human Resources function verifies work eligibility during the hiring process. We also conduct audits to ensure that we are in compliance with minimum wage and age requirements.

Further, our employees and contractors are required to promptly report any known or suspected breach of AbbVie's Code of Business Conduct or other illegal or unethical behaviour. We offer a number of resources such as our confidential Ethics and Compliance Helpline, a telephone and web-based hotline maintained by a third party for the purpose of gathering information regarding compliance and ethics concerns. The requirement to report known or suspected non-compliances and our Helpline is supported by AbbVie Australia's Whistleblower Policy which facilitates reports anonymously (if so chosen). Therefore, if there are any reported instances of modern slavery or other concerns relating to a breach of AbbVie's Code of Business Conduct, these can be raised in confidence and without fear of retaliation. In line with our values, we confirm that we would take all appropriate steps to rectify any confirmed incidences of modern slavery in our operations or supply chains.

AbbVie Australia also verifies and ensures all Australian based employees and contractors have the right to work in Australia.

AbbVie engages in the assessment of our supply chains which includes evaluating the risk of human trafficking and modern slavery. As part of our Global Supplier Sustainability programme, AbbVie surveys and measures our most critical suppliers on their environmental and social practices. Specifically, suppliers answer labour-related questions including whether they have a written policy against human trafficking and modern slavery, minimum hiring age and wages in accordance with local/national laws. The survey also assesses whether these suppliers have any human trafficking violations. This may be verified via an additional audit by PSCI. Our most recent supplier sustainability survey (2021) showed that 99% of surveyed suppliers had a policy or statement of commitment regarding labour practices and 88% of suppliers surveyed have a formal policy or statement of commitment against human trafficking.

Since the introduction of the Modern Slavery Act, AbbVie Australia has two streams of approach. For new suppliers, we utilise the questionnaire as part of our onboarding process to ensure that the requirement is understood and met by supply partners.

For existing suppliers, we issued the questionnaire for completion and return. While some suppliers completed the questionnaire, a number of suppliers were unaware of the modern slavery legislation or misunderstood the requirements. To address the gap and drive completion of the remaining questionnaires, AbbVie Australia provided educational material that help support learning around what the modern slavery legislation aims to address and AbbVie Australia's responsibilities. In addition, we then matured our approach by targeting the top 50 suppliers who we have since called and supported with queries regarding completion of the questionnaire. AbbVie Australia continues to follow up with those suppliers who have not returned the questionnaire on a monthly basis.

More broadly, we continuously scan the landscape for signals of potential human rights risk, by monitoring media reports and other sources of information in countries where we have operations or suppliers. When signals of potential risk are detected, we investigate further.

Accountability

Any employee or contractor discovered to be involved in inappropriate conduct or in violation of our Code of Business Conduct, our policies, our procedures and/or applicable laws or regulations, is subject to corrective action, up to and including termination of employment or engagement. Additionally, if AbbVie becomes aware of any actions or conditions not in compliance with our Supplier Code of Conduct, we may seek corrective action.

The effectiveness of actions being taken to assess and address modern slavery risks

In order to assess the effectiveness of the actions being taken by AbbVie Australia, AbbVie's internal committee involving members of senior management meets on a monthly basis. This committee provides an opportunity for engagement and feedback between key areas of the business, allows regular checks of AbbVie's risk assessment processes, and maps the future actions AbbVie Australia will take to assess and address modern slavery risks.

AbbVie also periodically reviews all its processes, procedures and policies to ensure they remain up to date and to align as closely to best practice as we can be achieved.

Approval

This Modern Slavery Statement is made in accordance with section 13 of the *Modern Slavery Act 2018* (Cth).

This Statement was approved by the Board of Directors of AbbVie Pty Ltd on 29 June 2022.

Signed for and on behalf of AbbVie Pty Ltd



Electronically signed by: Paul
Hodgkinson
Date: Jun 29, 2022 13:17 GMT+10

Paul Hodgkinson

Director of AbbVie Pty Ltd

Modern Slavery Statement (Australia) 1 Jan - 31 Dec 2021 - FINAL

Final Audit Report

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