



Modern Slavery Statement

Sanofi Australia

2022

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Pictured: Team members at Sanofi Australia's Headquarters at Macquarie Park, New South Wales.



1. Introduction

Sanofi Australia is part of an innovative global healthcare company, across some 100 countries, driven by one purpose: *'we chase the miracles of science to improve people's lives'*.

Our team is dedicated to transforming the practice of medicine by working to turn the impossible into the possible. We provide potentially life-changing treatment options and life-saving vaccine protection to millions of people globally, while putting sustainability and social responsibility at the centre of our ambitions.

To chase the miracles of science, we need a strong moral compass. A bold and noble purpose like ours requires a culture that drives and is driven by ethics and business integrity. It means all of us bring our best ethical selves to work so that we make the right decisions for the people we serve.

This statement refers to the financial year ending 31 December 2022 and sets out the steps we have taken to address modern slavery risks in our business and supply chains.

2. Our Structure

Sanofi Australia consists of the following Sanofi companies:

- Sanofi-Aventis Australia Pty Ltd
- Sanofi-Aventis Healthcare Pty Ltd

We are a part of the Sanofi Group and our ultimate parent company is Sanofi S.A. Sanofi S.A. has its head office in Paris, France. With more than 100,000 people in 100 countries, Sanofi is transforming scientific innovation into healthcare solutions around the globe.

3. Our Business

Sanofi Australia is organised into four business units: General Medicines including diabetes, cardiovascular and our mature medicines; Vaccines; Speciality Care including rare diseases, oncology, rare blood disorders, and immunology; and Consumer Healthcare. Supported by business functions across Supply Chain, Corporate Affairs, Market Access, Medical, Regulatory, Quality, Patient Safety, People & Culture, and Finance.

We ensure the way we contribute to improving health is one which is both sustainable and responsible. We are convinced that each of us has an obligation to leave the world a better place for the next generation. Our contract with society is built within our organisation and our corporate responsibility strategy is embedded as part of our business strategy - locally, regionally and globally.

4. Our supply chains

Sanofi Australia is part of a global supply chain involved in the manufacture of active pharmaceutical ingredients, finished goods, devices and packaging through a network of manufacturing sites and distribution centres. This network includes the procurement of goods and services from a large number of suppliers. In 2022, we spent around \$200M AUD with over 450 suppliers.

Sanofi Australia understands the global challenges related to modern slavery and works to minimise the risk of this being present in any part of our business, including all suppliers and the supply chain.

5. Our Policies

Sanofi Australia is required to comply with all Sanofi policies including our [Code of Conduct](#) which outlines our commitment to complying with national laws and regulations, including in the areas of human rights and labour law. Sanofi has also implemented the following policies that, among other things, promote respect for human rights:

- [Children's Rights](#) – which describes how Sanofi aligns with the Ten Children's Rights and Business Principles;
- [Anti-bribery Policy](#) – committing to fighting all forms of corruption;
- [Human Rights Due Diligence](#) - committing to respect internationally recognised human rights and to exercise human rights due diligence in all its activities;
- [Fundamental Human Rights at Work](#)
- [The Suppliers' Code of Conduct](#) – which outlines Sanofi's expectations that our contractors adhere to the fundamental principles of the International Labour Organisation, in particular those relating to forced labour, violence and harm, child labour, discrimination, working hours, pay, freedom of expression and equality of opportunity.

Additionally, Sanofi Australia has implemented the following local policies and procedures:

- [Sanofi Australia Modern Slavery Policy](#) – aimed at ensuring compliance with applicable Australian modern slavery legislation and reporting requirements;
- [Alerts Management Global Policy Appendix](#) and [Global Compliance Helpline](#) – aimed at

encouraging internal reporting and whistleblower protection (e.g. through 'non-retaliation' assurance);

- *Domestic Violence Policy* – aimed at supporting employees, agents and contractors in the workplace to ensure that everyone has a safe working environment;
- *Recruitment Selection Policy* – sets out Sanofi's sourcing and recruiting framework and principles;
- *Appropriate Workplace Behaviour Policy* – aimed at ensuring that discrimination, harassment and bullying do not take place in Sanofi's operations;

The applicable Sanofi policies underpin our culture of zero tolerance attitude toward abuse of human rights within any part of our business or supply chains.

6. Due diligence processes for slavery

In 2022, Sanofi Australia continued to engage a third party due-diligence and risk assessment service provider '*ethiXbase*' to continue to monitor, assess and address modern slavery risk in our supply chain in Australia.

As part of our initiative to identify modern slavery and mitigate associated risks in our business and supply chain, we undertake the following:

6.1 Our Employees

All employees who work for Sanofi Australia have their work rights as well as their work history verified as a condition of employment. Regular audits are made of employees who have only a temporary right to remain in Australia.

Sanofi Australia complies with all applicable legislative requirements and employment standards relating to the payment of minimum wages. We believe that the risk of modern slavery in our directly employed workforce is low.

6.2 Our Suppliers

Supplier selection

Sanofi Australia conducts due diligence on its suppliers where it considers there may be risk in line with its global Ethics & Business Integrity and other Risk Management directives.

The standard Request for Proposals/Tenders used by Sanofi Australia includes questions directed at assessing the risk of modern slavery in the prospective supplier's operations and the capacity to comply with the requirements of Australian legislation.

Sanofi Australia continually looks for new ways to further improve its vendor selection processes. This is an ongoing area of focus.

Existing suppliers

In 2022, Sanofi Australia continued to use ethiXbase to assess and address the risk of modern slavery in its supply chain. Through the use of ethiXbase and its questionnaire, Sanofi Australia is continuing its efforts to understand the risk profile of each of our

suppliers which, in turn, informs its decision on which suppliers it should seek to better understand their business operations and practices based on the risk rating system generated by the tool. The questionnaire includes enquiries pertaining to respect for human rights and compliance with modern slavery laws. Depending on the response to the questionnaire, representatives of Sanofi may ask the suppliers for more information.

In cases where a potential issue with a supplier is identified, Sanofi will undertake appropriate action dependent on the circumstances presented (and legal considerations), which may include, for example, training on modern slavery awareness, working with the supplier to develop an improvement plan, or declining to continue the supplier relationship.

Contractual obligations

Sanofi Australia's standard service agreements that may be provided to potential suppliers include an obligation that it will carry out any services in full compliance with all applicable laws (including laws prohibiting all forms of modern slavery with a specific requirement to comply with the *Modern Slavery Act 2018 (Cth)*).

Sanofi Australia's standard service agreements also require suppliers to take reasonable steps to assess and address the risk of modern slavery in their operations and supply chains and to comply with Sanofi's Suppliers Code of Conduct (a copy of which may be accessed at <https://suppliers.sanofi.com/en/standards-and-procedures/sanofi-standards>) which includes obligations in relation to respecting human rights (including prohibitions regarding forced labour, violence and harm, child labour, discrimination, working hours, pay, freedom of expression and equality of opportunity). In each case, Sanofi Australia reserves the right to audit to ensure compliance to our high standards on quality and ethical behaviour.

7. Training and Capacity Building

As part of their employment conditions, all Sanofi Australia employees must agree to uphold Sanofi's Code of Conduct and training is provided throughout employment on topics relating to business ethics. Sanofi staff are also given Core Inclusion training and this includes the importance of respecting human rights in Sanofi's operations.

To ensure a high level of understanding of the risks of modern slavery in our supply chains and our business, we provide modern slavery training to the relevant staff members. Training content is reviewed by Sanofi Australia on an ongoing basis.

8. Our Effectiveness in Combating Slavery

To address the potential areas for improvement in relation to the questionnaire issued in 2021, Sanofi Australia is continuing to work closely with ethiXbase to explore improvements in the tool thereby seeking to increase our capabilities in gaining a deeper understanding of the risk profile of each supplier.

Sanofi Australia is also currently reviewing our Modern Slavery online training module for employees and intends to roll this out to all relevant employees during 2023.

9. Further Steps and Remediation

Sanofi Australia will take a continuous improvement approach to reviews of relevant systems, processes and training to ensure ongoing effectiveness.

The effectiveness of the steps taken in 2022 were reviewed to ensure that reasonable steps continue in the effort to minimise the risk of modern slavery in our supply chains. We intend to take the following further steps:

- continue to work with ethiXbase to enhance our ability to monitor, assess and address modern slavery risks;
- work with suppliers to ensure modern slavery risk is minimised (this may include additional auditing, training, the implementation of an improvement plan or where appropriate ceasing the supplier relationship).
- systematise our approach to dealing with moderate and high-risk suppliers including using due diligence reports from ethiXbase to inform Sanofi Australia's decision on remediation action.

10. Consultation Process

This statement has been prepared in consultation with our teams that collaborate to deliver our labour rights risk identification, and assess and manage processes for our own operations and supply chain. This includes the Corporate Affairs; Health & Safety; Human Resources; Ethics & Business Integrity; Supply Chain; Procurement, and Legal teams.

This Modern Slavery Statement is made by Sanofi Australia for the financial year ending 2022.

This Statement was approved by our Board of Directors on 30 June 2023.



Karen Hood
Country Lead, Sanofi Australia & New Zealand
June 2023