

Modern Slavery Act Statement

For the year ending 31 December 2024



Submitting entities: AstraZeneca UK Limited (UK), KuDOS Pharmaceuticals Limited (UK), MedImmune Limited (UK), MedImmune UK Limited (UK), Alexion Pharmaceuticals Limited (UK), AstraZeneca Holdings Pty Limited (Australia), AstraZeneca Pty Limited (Australia), Alexion Pharmaceuticals Australasia Pty Limited (Australia), AstraZeneca AS (Norway), AstraZeneca AG (Switzerland), Alexion Pharma GmbH (Switzerland), Evionova AG (Switzerland), AstraZeneca Germany GmbH (Germany), California, AstraZeneca Canada Inc. and Alexion Pharma Canada Corp.

AstraZeneca Plc serves as the parent company of the AstraZeneca group which includes companies in various countries including the submitting entities listed above.

Where "AstraZeneca" is referred to throughout the document this is an umbrella term which includes all of AstraZeneca, where "Core AstraZeneca" is specified, this refers to the AstraZeneca business excluding Alexion and other recent acquisitions including Gracell, and Fusion. A reference to 'we' or 'our' includes all entities covered by this statement, unless otherwise specified.

Our commitment

AstraZeneca is committed to respecting all human rights – a commitment reflected in our [Code of Ethics](#), which is based on our Company Values and includes our global “Our Interactions” Policy:

“We run every part of our business with integrity, honesty and transparency everywhere we operate ... We do not allow modern slavery or human trafficking anywhere in our business... We uphold our standards of integrity in every situation, not allowing, asking, or enabling others to engage in prohibited conduct on our behalf. ... We work only with qualified third parties who have a commitment to ethics and integrity consistent with ours...”

AstraZeneca Code of Ethics, Page 3

We are committed to ensuring that we identify and fully eliminate modern slavery or human trafficking in our business.

AstraZeneca supports and adheres to the principles set out in the UN Declaration of Human Rights and the Organisation for Economic Co-Operation and Development (OECD) Guidelines for Multinational Enterprises. Our commitment includes all internationally recognised human rights, including those contained in the International Bill of Human Rights and the International Labour Organisation’s (ILO) core labour rights conventions. AstraZeneca is also a signatory to the United Nations Global Compact (UNGC).



Our business

This statement is made in accordance with Australia's *Modern Slavery Act 2018*, California's *Transparency in Supply Chains Act 2010*, Canada's *Fighting Against Forced Labour in Supply Chains Act 2023*, Germany's *Supply Chain Due Diligence Act 2023*, Norwegian *Transparency Act 2022*, Article 964j-k of Switzerland's *Code of Obligations and the Ordinance on Due Diligence and Transparency in relation to Minerals and Metals from Conflict-Affected Areas and Child Labour 2023* and the United Kingdom's *Modern Slavery Act 2015*.

This statement is jointly made on behalf of the AstraZeneca entities that report under the aforementioned legislation. All AstraZeneca entities align to the global policies referred to in this statement. In developing this statement, we consulted the relevant companies we own or control. This process included engaging with key function members supporting each reporting entity including Procurement, Employee Relations, Corporate Affairs, Finance, Compliance, and Legal. This collaboration involved sharing knowledge on human rights, including modern slavery mitigation activities, between local and global teams as well as consulting on preparation of this statement.

Our business operations

AstraZeneca is a global, science-led, patient focused pharmaceutical business committed to excellence in the research, development and commercialisation of prescription medicines. We aim to transform the lives of patients with improved outcomes and a better quality of life. We focus on three therapy areas: Oncology, Rare Disease, and BioPharmaceuticals, including Cardiovascular, Renal & Metabolism, and Respiratory & Immunology. In 2024 we had an active presence in more than 80 countries and sold our products in more than 125 countries. Our innovative medicines are used by millions of patients worldwide.

To drive our science, we have disease-area focused R&D organisations in each of our therapy areas that are responsible for discovery through to late-stage development and working to realise the potential of our pipeline to deliver sustainable growth. We have Commercial regions that align product strategy and commercial delivery, while our Operations function develops, manufactures and delivers our medicines in 16 countries around the world.

We are headquartered in Cambridge, UK, and also have major hubs in Sweden, the United States and China. We employ a highly skilled workforce of 94,000 permanent and part-time employees, but we also use contractors and labour agents in sourcing a highly skilled workforce.

The information below is provided in accordance with legislative requirements in the following countries:

- In **Germany**, Astrazeneca GmbH has more than 1,200 employees working in our headquarters in Hamburg as well as across Germany in field service functions.
- AstraZeneca operates three entities in **Australia**, AstraZeneca Holdings Pty Limited, AstraZeneca Pty Limited and Alexion Pharmaceuticals Australasia Pty Limited. AstraZeneca Holdings Pty Limited is the parent company of AstraZeneca Pty Limited and has a holding company role. AstraZeneca Pty Limited is the operating company. Astrazeneca Pty Limited and Alexion Pharmaceuticals Pty Limited do not own or control any other entities. In Australia, we separate our activities into two areas: supply and manufacturing, and marketing. Our supply and manufacturing facility, located in North Ryde, Sydney is one of the largest manufacturers of pharmaceuticals in Australia. In 2024, we manufactured \$US222 million of respiratory products of which approximately 99% were exported to countries such as China, Japan, Egypt, Belgium, Vietnam and Indonesia. We are also key partners for leadership and technical capability within the Asia Pacific operations network. AstraZeneca employs 1,048 people in

Australia. Broadly these roles fit into the following categories: 574 employees in commercial roles, 400 employees in operational roles and 74 employees in clinical roles. 979 are full time employees while 69 are part time employees. There are no casual employees in AstraZeneca Australia.

- AstraZeneca AS, based in Oslo with 106 employees, is one of **Norway's** largest pharmaceutical companies focussing on medical, regulatory, sales and marketing activities for the AstraZeneca group pharmaceuticals in Norway. Medicines are manufactured and distributed by other companies in the AstraZeneca Group.
- AstraZeneca AG, based in Baar with over 250 employees, has been present in **Switzerland** for nearly 50 years, ranking among the country's top pharmaceutical companies. Medicines are manufactured and supplied from global AstraZeneca sites, primarily UK, Sweden, France and USA. Currently, over 230,000 people are treated with a drug from AstraZeneca in Switzerland. By 2026, the company expects the approval of over 35 new therapies. AstraZeneca has pledged to an inclusive work environment based on respect and acceptance. The company was thus recognised as a Great Place to Work for the sixth consecutive time in 2024 and carries the Swiss LGBTI label.

Our supply chain

Our global supply chain supports all areas of our business with a wide range of goods and services, including raw materials (for example, the active pharmaceutical ingredients in some of our medicines and drug substance and/or finished drug product for some of our biologics medicines), equipment, formulated drugs and packaging, and services, all of which are key to our operations. From 1st October 2023 to 30th September 2024, AstraZeneca worked with ~60,000 third parties.

Core AstraZeneca has suppliers in 173 countries, with ~52% based in USA, UK, China, Germany, Sweden, Japan, France and Brazil. The top 95% of Core AstraZeneca spend is with ~4,800 suppliers of which ~512 are small businesses. Many of our business-critical operations including certain R&D processes, IT systems, HR, finance, tax and accounting services have also been outsourced to third party providers. For more information on our business structure, workforce, and operations please refer to our annual report.

AstraZeneca's Australian operations have approximately 480 suppliers with over 90% located in Australia. Outside Australia, the supply chain includes suppliers in USA, UK, Denmark, Belgium, Germany, Netherlands, Norway, Spain and New Zealand. We generally maintain global suppliers in stable long-term engagements while our local suppliers are usually more short term and changeable.



Our policies

AstraZeneca does not tolerate modern slavery or human trafficking in any part of our business or our supply chains. The [AstraZeneca Human Rights Statement](#) asserts our responsibility to respect the rights of all people.

This commitment to respecting human rights is underpinned in our policies, our values and in our relationships with third parties. Our [Code of Ethics](#) defines our values at work and guides our behaviours. It contains a requirement for our employees to interact with others in an ethical and proper manner and highlights our employment principles and other ethical standards. It specifically prohibits the use of modern slavery or human trafficking in our business.

Our employment policies detail our **high standards of employment practice**. These internal policies and practices include respecting diversity and, as a minimum, complying with national legal requirements regarding wages and working hours. We also support the International Labour Organisation's standards regarding child labour and minimum working age.

We foster an environment that supports physical and mental health to make people feel safe, energised and inspired, which not only benefits our workforce and productivity but is an investment in the communities in which we operate. Our **Global Safety, Health and Environment (SHE) Standard**, supported by a SHE Framework and accompanying training establishes minimum standards and is applicable to all employees.

Our standards comply with all current national and international laws, regulations and codes to prevent trafficking and slavery in our own business operations. When there is a divergence between international standard and national laws we adhere to the highest standard and require our suppliers and partners to do the same.

To provide greater clarity on these requirements, we have prepared a global standard on Human and Labour Rights. This standard outlines our expectations and demonstrates our commitment

to human rights across our business, employees and value chain. We are currently engaging with stakeholders to finalise the standard which will be extended to our stakeholders in 2025, including patients, healthcare professionals, communities and governments.

The AstraZeneca [Expectations of Third Parties](#) informs our third parties that we do not tolerate the use of child labour and forced labour by third parties. As part of the ongoing integration Alexion have now retired their Vendor Code of Conduct and adopted the AstraZeneca Expectations of Third Parties.

We work to develop and maintain good relations with local workforces and work closely with recognised national trade unions. We also regularly consult with employee representatives or, where applicable, trade unions, who share our aim of retaining key skills and mitigating job losses. According to our internal Human Rights survey carried out in 2024, 29% of countries in which AstraZeneca operates have a relationship with trade unions. Where trade unions do not exist in an area of operation, 100% of countries have established arrangements to engage similarly with their workforce.

The reduction in number of countries with relationships with trade unions from the numbers recorded in our 2023 report, resulted from a misunderstanding of the question in the 2022 survey. In 2024 we added an additional question to prevent this issue and ensure clarity in the survey.

Our Values

AstraZeneca's core Values require all our employees to operate with integrity and high ethical standards at all times, along with respect for the individual and diversity: they require us to "*do the right thing*". Our Values determine how we work together and the behaviours that are integral to our drive for success. Our Values guide our decision making, define our beliefs and foster a strong AstraZeneca culture.

Our relationships with third parties

The principles and values contained in our Code of Ethics also apply to our suppliers and all other third parties that we do business with. The applicable standards and requirements for third parties are entrenched in our Global Standard: Expectations of Third Parties.

To help our partners understand our values and what it takes to work with AstraZeneca, our Expectations of Third Parties sets out the values that AstraZeneca holds important and provides a clear guide on our ethical position. We require our suppliers and other third parties to operate in line with internationally recognised human rights and promote and maintain a culture of respect and equal opportunities. This means that our suppliers and other third parties must

not engage in any form of forced, bonded, involuntary or indentured labour. In 2024 we reviewed the Human & Labour Rights section of our Expectations of Third Parties, strengthening our human rights position and providing clearer guidance on best practice.

We hold suppliers to high standards whilst offering opportunities to build their own sustainability knowledge and capabilities. This published document is available on our website and referenced in all our Purchase Orders and Contracts, giving a legal standing to our 'Expectations'. We incorporate modern slavery clauses in our contracts, which helps us assess and address modern slavery risks by ensuring our suppliers adhere to ethical practices and allowing us to take corrective actions when necessary.



Risk management

AstraZeneca has a Third-Party Risk Management (3PRM) process in place to identify and assess potential risks connected with our suppliers, which is explored further below. This includes human and labour rights as a standalone risk area which assesses risks such as forced or bonded labour, child labour, wages and benefits, hours of work/rest period and leave, collective bargaining, grievance procedures, discrimination and harassment.

We work to ensure our strategies and efforts to mitigate environmental issues do not negatively impact other human rights. We operate with a first line business accountability for managing the risks in any engagement with a third party, meaning that there is clear ownership of the decision to work with a third party within AstraZeneca. This allows responsible management of relevant risks for each third-party relationship.

Any modern slavery risks are identified by the risk owner, mitigation plans are proposed and included in the risk register.

In 2024, we updated our human rights risk assessment and identified our salient risks as third party and contingent labour and sourcing of raw materials/indirect supplies such as lab consumables. The risk assessment was conducted in collaboration with an external risk SME by evaluating country context and risk, reviewing internal documents and taking a comprehensive view of our operations and supply chain including engaging with stakeholders throughout the business. We recognise this risk could be increased via new acquisitions which have not yet adopted AstraZeneca's standards and policies.

- **Third-party workers** are at a higher risk for exploitation as they often fall outside the protection of labour laws that safeguard full-time employees. The reliance on agency, outsourced or subcontracted labour creates complex employment relationships, adding a layer of separation between companies and workers. While the use of third parties is common, it elevates the risk of modern slavery

and labour exploitation due to limited visibility into the recruitment practices of third parties and the experiences of the workers they hire. AstraZeneca relies on third-party labour across various operations, activities and supply chain, making this is considered an overarching risk. The areas identified as highest risk in relation to third party labour within our business include Manufacturing, Distribution (including logistics and warehousing) and Construction/Capital projects.

- Risks of modern slavery practices are known to exist in the **construction** industry. The sub-contracting and labour hire arrangements which are common in the industry also decrease the level of transparency in resourcing. In addition to the labour aspects, the risk of modern slavery practices is considered to be present in the supply chains that support the construction industry, including building materials, fittings and other manufactured products for installation. AstraZeneca tends to be involved in either large-scale, complete builds, known as "Greenfield projects" or smaller scale projects on existing sites requiring re-fits. These projects take place in various countries. All construction agencies and suppliers are assessed via our 3PRM process which includes modern slavery and labour welfare assessment.
- AstraZeneca's **distribution** network includes markets in which AstraZeneca does not have a legal entity. In these cases, the distributor can be responsible for the product distribution and security of sites, along with employees and the marketing activities on behalf of AstraZeneca. Modern slavery training is provided to distribution partners twice a year including a session focusing on third party workers.
- AstraZeneca has **manufacturing** operations spanning many countries which rely on contractors, sub-contractors and labour agencies. We do have a due diligence process in place to assess and manage the risk of modern slavery within our manufacturing operations.

The manufacturing of pharmaceutical products typically involves combining active pharmaceutical ingredients with other substances (excipients). AstraZeneca has limited visibility into the supply chains, which may begin or involve steps in countries with a higher risk of modern slavery practices. We are continuously improving our supply chain visibility by leveraging technology and strengthening our relationships with key suppliers.

- **Facilities management** is known to present a risk of modern slavery practice because of the frequent use of unskilled labour, temporary workers/short term contracts, and the use of foreign workers. AstraZeneca has significant facilities management requirements due to the size and nature of our operations and premises, particularly our manufacturing sites. We are identifying key stakeholders to assess existing mitigations and determine where further actions might be needed.

Within our supply chain we have identified two areas of focus as particularly high risk for modern slavery; raw material sourcing and indirect supply chains.

- Our **indirect supply chain** includes consumables, electronics and supplies for facilities. Human rights risks in the production of these goods have been widely reported. These reports often highlight issues such as forced labour, child labour, poor working conditions, wage theft and environmental degradation. Although our direct suppliers are subject to the 3PRM process, we don't always have visibility of the supply chain beyond tier one. We continuously work with our approved vendors to ensure the level of due diligence being undertaken, including what mitigations are in place to prevent modern slavery.
- The **raw material** supply chain in the pharmaceutical industry includes materials used for pharmaceuticals as well as packaging and minerals involved in the manufacture of medical devices. Many of the supply chains for materials of natural origin are long and complex and can involve a wide range of companies, often many tiers removed from suppliers that we engage with directly. AstraZeneca has developed a Raw Materials Responsible Sourcing Framework, a sustainability action

plan for some of our major raw material and packaging supply chains. We continue to work with our suppliers to improve transparency and traceability in our supply chain including working with certification bodies and NGOs.

The following information is provided in line with legislative requirements in the following countries:

- Australia has low modern slavery risk from a geographic perspective. Facilities Management, Capital Projects, Consumables and Excipients for manufacturing have been assessed as the areas of our tier one procurement that have the highest risk of modern slavery.
- AstraZeneca Australia's capital projects and expansions generally focus on the delivery and installation of new manufacturing and related equipment. Construction activities are a vital part of such projects and help to create new spaces or reconfigure existing spaces within the facility to house the plant. The AstraZeneca Australia facility and the equipment within it are sophisticated, of a high value and high technology nature, and based in Australia which all reduce the inherent risk in these projects.
- In 2024, we commenced a major recruitment project at our manufacturing site in Australia to move away from outsourced specialised cleaning and site sterilisation services and move to a direct employment model, eliminating any potential third-party risks in these areas. The project was successfully completed with 24 pharmaceutical cleaners now directly employed by AstraZeneca. Their previous terms and conditions with the third-party employer exceeded statutory minimums, and now as direct employees these workers have received further enhancements in both their contractual terms and additional non-financial benefits.
- **AstraZeneca Germany** has implemented local risk analysis and risk management processes for its operations and supply chain, reporting on the results. Human Rights risks within AstraZeneca Germany and its supply chain are analysed by assessing country and industry risks, benchmarking against those identified for the broader pharmaceutical industry. Risk is further analysed using criteria such as likelihood, severity, scope and irreversibility

of the potential violation. To assign a final risk score, existing preventive and remedial measures are reviewed and rated for effectiveness. The risk analysis identified that AstraZeneca's operations in Germany are low risk for modern slavery both within our own operations and the local supply chain.

- The country president in Germany is ultimately responsible for managing these risks within the German business. An LkSG (German Supply Chain Act) task force has been set up consisting of expertise from Legal, Procurement, Human Resources and Safety, Health and Environment. This taskforce is responsible for risk analysis, the effectiveness of preventive and remedial mitigation measures and reporting and documentation.

Due diligence

When assessing third parties, the Core AstraZeneca business uses activity and geography-based factors to identify, assess and document actions to mitigate risks to our human and labour rights principles. The areas of the business that pose the highest inherent risk for human rights and modern slavery issues are determined using internal expertise and external benchmarking on higher risk industries.

These factors determine which third-party engagements are deemed high-risk requiring a deeper level of assessment. Where necessary, third parties are required to answer specific questions about the policy, procedures and controls they have in place to manage human and labour rights risks on AstraZeneca's behalf, including audits.

The questionnaire for Human & Labour rights has been designed around understanding whether third parties we engage with are aligned with local legislation on labour rights including wages and working hours along with the ILO Conventions including Freedom of Association, forced labour, child labour, equal remuneration, discrimination and occupational safety and health. We also assess whether companies have moved from policy to action by requesting information on the controls they have in place to ensure compliance.

The 3PRM process involves enhanced monitoring activities, such as process execution monitoring, ongoing adverse media screening and ensuring vendors implement the measures agreed upon during the 3PRM assessment. This approach is data-driven, considering factors like geography, spend categories, user base and third-party responsiveness to AstraZeneca's requests. In 2024, we launched a project to optimise the existing 3PRM process and technology, increase automation, improve user experience and provide a risk proportionate assessment focusing on higher risk suppliers.

In 2024, 10,656 third parties were assessed through our 3PRM process globally. Of these 6,233 were new assessments with 4,423 of these being reassessments of existing third parties. Of the 600 engagements with high risk of modern slavery, 11 of these are in Australia, 80 assessments were reviewed through the second line compliance assurance process, 1 in Australia. We did not reject any engagements at onboarding due to human and labour rights related risks, opting instead to work collaboratively with vendors to improve their processes where risks were identified. Alexion were incorporated into the second line compliance assurance process following integration with the AstraZeneca 3PRM process.

Recognising the rapidly evolving landscape, in terms of legislation and the adoption of the EU Corporate Sustainability Due Diligence Directive, we have initiated a project with external experts to understand the full scope of the legislation in relation to the AstraZeneca group and ensure we have the infrastructure in place to comply.

In 2024, we utilised specialist local auditors to perform audits on third parties which we perceive to be higher risk based on activity and geographic location, these audits follow the Pharmaceutical Supply Chain Initiative principles and include investigation into ethics and labour rights issues. The audits have identified some critical issues with labour standards which are being addressed. In 2024, these findings have primarily been around labour rights including excessive working time (including overtime hours), failure to ensure weekly rest periods and not paying overtime in line with local legislation.

Where audits uncover issues, we work with the third party to set an action plan and require evidence of resolution prior to re-audit. Reaudit is conducted within 12 months for critical findings or up to 3 years where no critical findings are identified. We also rely on clauses in our contractual agreements including audit finding resolution, right to termination and expectations of third parties, which allows us to leverage improvement or exit, depending on the severity of the issue.

Training and risk awareness

In 2024, we reviewed our training strategy and set up a new **Modern Slavery Working Group** consisting of representation from key functions including Sustainability, Human Resources, Recruitment, Compliance and Procurement. This group meets quarterly to discuss human rights related topics, share knowledge and provide updates as well as actively look for opportunities to spotlight Modern Slavery enterprise wide. We provided general awareness training on Modern Slavery on Anti-Slavery Day which was made available to all employees. As a follow up to this session we are rolling out function specific sessions to Procurement, Human Resources and Recruitment, Sustainability and Compliance teams.

All AstraZeneca employees receive an annual **Code of Ethics training**. Rolled out globally in October 2024, we expect the course to be completed by 100% of active AstraZeneca employees by year end.

Recognising that construction is still one of the highest risk activities for modern slavery across AstraZeneca operations, we have incorporated the modern slavery risk into the Global Standard and guidance materials on Managing SHE risks in Construction and Contractor Safety requiring sites to conduct Modern Slavery training during the orientation of all workers on site. Assurance completed in 2024 showed that of the 35 sites assessed, 100% had declared that the Modern Slavery awareness training was implemented.

In 2024, we continued to raise awareness of these topics sharing real life cases from media, discussing risk mitigation and sharing content using an internal social media channel on Sustainability which has an audience of over 13,000 members.

Further management

We include modern slavery as an aspect of our human rights agenda. We commit to monitor our human rights performance, set targets, and share challenges and outcomes publicly. The AstraZeneca Annual Report discloses this information and since 2022 has incorporated Alexion.

As Signatories to the United Nations Global Compact (UNGC) since 2010 and Participants since 2018, we commit to advance the Ten Principles on human rights, labour, environment and anti-corruption and the UN Sustainable Development Goals (SDG). We share our progress against the UN SDG targets for Good Health and Wellbeing, Gender Equality, Decent Work and Economic Growth, and others in the AstraZeneca Annual Report.

AstraZeneca's approach to human rights has continued to evolve and progress over the last 12 months. Alexion have now adopted all AstraZeneca global policies including the Expectations of Third Parties further solidifying our unified approach to human rights and ethical business practices.

We conduct an internal labour rights survey every two years in the countries where we operate. In 2024, we launched another global Human Rights Labour Review, which focused on the ILO's core themes, including freedom of association and collective bargaining, child labour, discrimination, working hours and wages. We incorporated questions about worker voice, to get visibility of any best practice within AstraZeneca. The responses to this survey are currently being reviewed to identify and agree appropriate actions.

In addition to the survey, we also analyse our wage data with the Fair Wage Network who aim to improve wage levels and development mechanisms beyond minimum legal requirements for all industries. It collects available associated data from all countries' economies and logs all locally recognised definitions of a 'living wage' to provide an average. In 2024 we received an updated data base from the Fair Wage Network, this is currently being analysed to ensure that all employees are paid a fair wage.

Collaboration and partnerships

We are members of Pharmaceutical Supply Chain Initiative (PSCI) Human Rights and Labour subgroup. PSCI is an industry collaboration that supports principles for responsible supply chain management for ethics, human and labour rights, health, safety, environment and related management systems.

In 2024, we continued our engagement with Slave Free Alliance (Hope for Justice) and have also participated in working groups with peer multinationals to benchmark our approach to risk identification and mitigation.

We are also members of BSR's Human Rights Working Group, a global, cross-industry network of businesses focused on human rights challenges and sharing best practices.

In 2024, we reviewed our Modern Slavery report in line with applicable regulatory requirements to identify strengths and areas for improvements to strengthen AstraZeneca's disclosures on modern slavery over the next three years. This exercise included a mapping of reporting obligations under relevant regulations which AstraZeneca is now in scope for to ensure these are incorporated into a global reporting framework.

In 2024, AstraZeneca participated in the UN Global Compact Human Rights Accelerator programme, a six-month programme to support companies with moving from commitment to action on human and labour rights through establishing an ongoing human rights due diligence process. This has helped us to assess actual and potential adverse human rights impacts and prioritise action which will support the ongoing activities to mitigate our salient human rights risks.



Ongoing compliance and supplier monitoring

For the reporting year ending 31 December 2024, 10,656 third party assessments were conducted through our Third-Party Risk Management process. In this time, there was no recorded cases of human rights violations including related to trafficking or slavery among the third parties surveyed. No indications of child labour were observed in 2024.

As part of the 3PRM process, all in-scope assessments were screened for negative findings in the public domain. During this reporting period, we identified no findings related to human and labour rights but continued to investigate a risk identified in 2023.

In 2023, our due diligence identified that a third party we work with had been accused by a US thinktank of connections with forced labour.

- We undertook a business transparency exercise with the third party to fully understand the risks and accuracy of the report, this assessment raised additional concerns prompting us to undertake a comprehensive due diligence exercise which highlighted the supplier as very high risk of being connected with forced labour.
- Due to limitations in due diligence, we were unable to fully verify the risk. Therefore, we are leveraging our relationship with the third party to mitigate the risk whilst also establishing a backup plan in case we cannot confirm that this company operates within the same ethical standards.

Following an internal investigation in 2022 we discovered that single use gloves potentially manufactured using forced or bonded labour were previously in use within our organization for three months. At the time we worked with our key supplier to ensure we no longer sourced these particular gloves for use within AstraZeneca. Towards the end of 2023, another case of single use gloves connected to Modern Slavery was flagged. Our investigations into both cases revealed that the same supplier, several tiers down our supply chain, was the root cause.

As a result, our tier 1 supplier has ceased sourcing products from this supplier until thorough due diligence confirms the absence of any connections to modern slavery practices. We have also verified through internal audits that there are no further stocks of gloves tainted by forced labour in our organisation.

We have continued to work with our tier 1 supplier and their end-to-end supply chain for single use gloves. This work has led to actions aimed at reducing the risk of recurrence, including on-site audits of manufacturing locations in Asia, ESG reviews of these suppliers, and implementation of supply chain transparency and ethics tools.

We have received positive results from our ESG analysis of our Tier 1 and Tier 2 suppliers of single use gloves, with the Tier 2 supplier confirmed as a member of the Responsible Glove Alliance. We continue to monitor assessments via EcoVadis and we are actively working with local partners and recognised experts to advocate for and drive change within the industry.

In 2024, we received a flag that a company we partner with for carbon credits, had previously acquired carbon credits from another company that was found to have used forced labour in clearing land to create a cattle ranch.

- In 2023, when signing the contract with this company for the AstraZeneca Forest initiative, we undertook enhanced human rights due diligence on the company and their implementation partner. This highlighted a limited understanding of human rights topics such as modern slavery, so we engaged an external subject matter expert (SME) to conduct a gap analysis on their human rights programme to help us understand the human rights risks with carbon compensation projects.
- The SME identified several gaps and areas for improvement. As a result of their increased awareness of this topic, our partner engaged with a local NGO to implement mitigations, including a human rights policy and training. These improvements are being applied to all

projects across the partner's portfolio, including those not connected with AstraZeneca.

- We have continued to undertake enhanced human rights due diligence on carbon compensation projects to assess the level of understanding of human rights topics, the extent of community engagement and any potential implications on the rights of indigenous people. As a result of this due diligence, we will be supporting gap assessments for four additional projects partners in 2024.

AstraZeneca's Global Ethics & Compliance function performs second line monitoring of Third-Party Risk Assessments through sample review to assure that all forms of risk, including human and labour rights risks, have been correctly identified and mitigated as appropriate. Our second line monitoring identified 44 engagements that required more in-depth review by a contract manager.

Our governance group which has oversight of our Third-Party Risk Management process, and includes senior leaders in Procurement, Finance and Compliance functions, would be informed of any third parties exited because of human and labour rights risks identified through due diligence. No third parties have been exited to date.

In addition to the risk management process outlined above, we continue to meet with our suppliers on a regular basis to ensure that they adhere to our ethical standards, drive innovation and help us build a long-term competitive advantage.

Our Global Procurement function uses sustainability performance assessments to rate our suppliers using the **EcoVadis platform**, which rates our suppliers' Environment Social and Governance (ESG) performance against four themes: Environment, Labour & Human Rights, Ethics, and Sustainable Procurement. The Labour & Human Rights theme includes the elements of Child Labour, Forced Labour & Human Trafficking, Inclusion & Diversity, Discrimination & Harassment and Supplier Diversity. Higher ESG ratings via the EcoVadis platform should correlate strongly with lower risk Human Rights and Labour issues.

As of October 2024, 75% of our spend is with suppliers who have completed an EcoVadis ESG assessment, 80% of these suppliers have achieved the overall target score of 45 or more for the Human Rights and Labour assessment category.

Our objective is to ensure that our top 95% of suppliers by spend are reporting via EcoVadis by 2025. We will continue to work with suppliers to address any gaps identified with tracked action plans. If this is not achievable, we will work towards moving business to alternative suppliers where this is feasible.

We are beginning to evaluate meaningful KPIs to track our performance in mitigating modern slavery risks, both within our own organisation and among our third-party partners.



Grievance mechanisms

We have a well-established process and associated systems that allow AstraZeneca employees, third parties or anyone who has a concern to raise issues whilst ensuring whistle-blowers are protected from retaliation and identification. Any act or threat of retaliation is a serious violation of our [Code of Ethics](#).

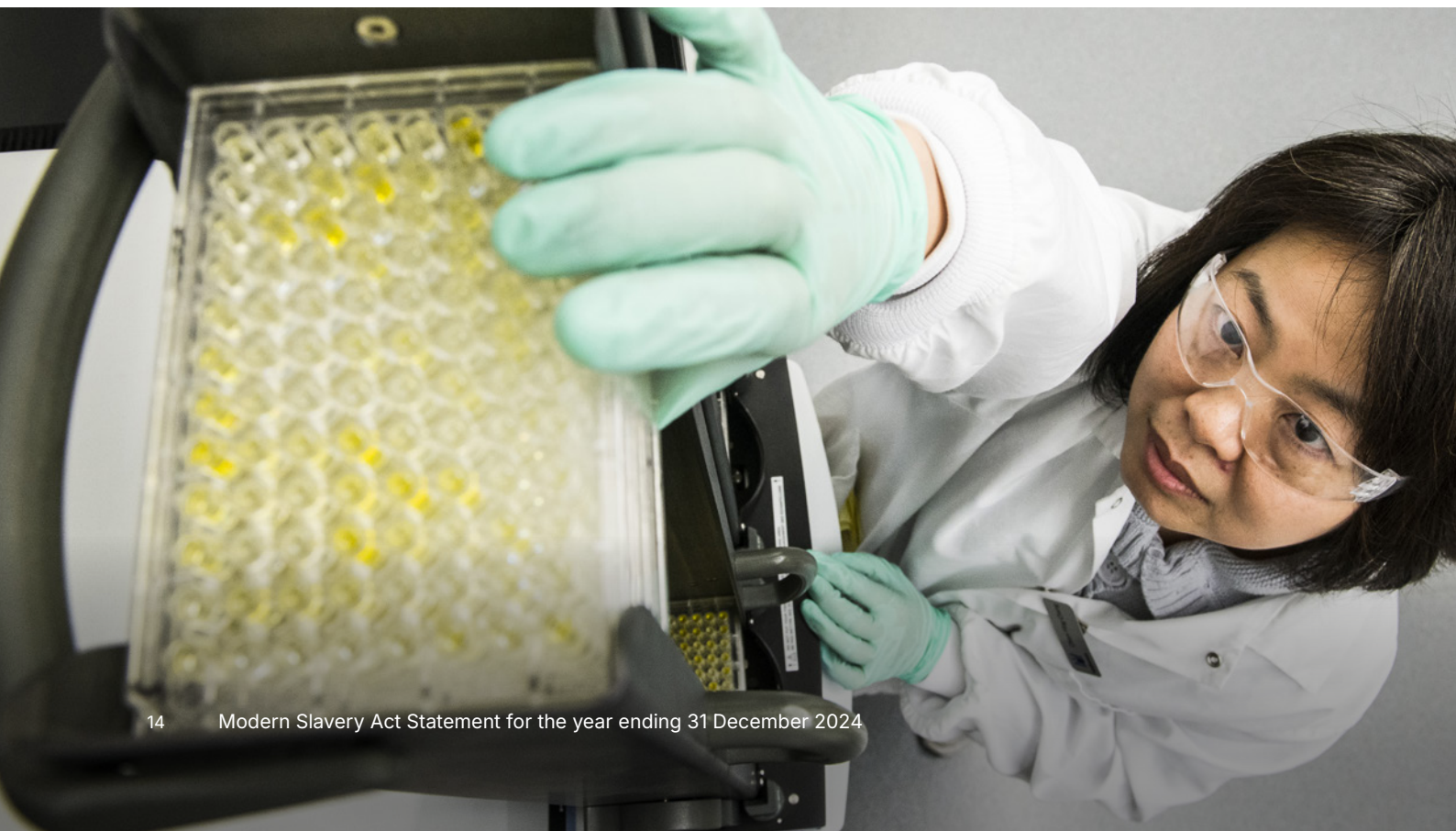
We encourage everyone to report in good faith any concerns regarding labour conditions including slavery and human trafficking that take place within AstraZeneca or our supply chain, as well as any other compliance risks. Everyone has the option to report anonymously at www.AZethics.com. AstraZeneca takes any such reports seriously and investigates all concerns raised, seeking to resolve matters in accordance with our [Code of Ethics](#) and applicable law. Reports can also be made internally via line management, Human Resources, Legal or Compliance representatives or via email or post to Global Compliance: Global Compliance, AstraZeneca PLC, Cambridge Biomedical Campus, 1 Francis Crick Avenue, Cambridge, United Kingdom, CB2 0AA.

All complaints reported through the listed channels are registered in AZethics, enabling AstraZeneca to track and process complaints.

AZethics web portal and hotline, available 24/7, are administered by an independent third party on AstraZeneca's behalf. The hotline can accommodate calls in more than 30 languages. AstraZeneca's Global Investigations team triage cases received and engage appropriate functions and experts depending on the nature of the cases reported. We ensure that our grievance mechanism is aligned with the criteria outlined in UN Guiding Principle 31.

Our [Expectations of Third Parties](#) provide details of this grievance mechanism throughout our value chain, these expectations are communicated in our contracts, purchase orders and terms and conditions.

In 2024, our due diligence processes did not uncover any substantiated cases of modern slavery. Consequently, we did not remediate the loss of income to those impacted directly by forced labour or child labour. We continued to assess indicators throughout the year and investigate as appropriate. Internally, we are proactively taking measures to ensure our remediation efforts will be adequate in the event that we identify a substantiated case of modern slavery.



Further steps

AstraZeneca will continuously improve practices to identify and, eliminate modern slavery or human trafficking, including enhancing the 3PRM Framework, rolling out a global standard on human and labour rights both internally and to our supply chain, creating SOPs to support this global standard and provide greater clarity on topics such as remediation.

AstraZeneca will continue to work with our suppliers to increase awareness of these topics by broadening sustainability topics in our category strategies and supplier relationship management frameworks to incorporate human and labour rights.

Internal collaboration continues between Global Compliance, Global Procurement and Business Development to refine our approach to human rights due diligence for acquisitions and joint ventures. This will enable us to implement a more tailored due diligence process, allowing us to better assess these types of deals and understand the associated risks with new partnerships.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015, Section 14(2) of the Australian Modern Slavery Act 2018, California's Transparency in Supply Chains Act 2010, Canada's Fighting against Forced Labour in Supply Chains Act 2023, Germany's Supply Chain Due Diligence Act 2023, Norwegian Transparency Act 2022 and Article 964j-k of Switzerland's Code of Obligations and the Ordinance on Due Diligence and Transparency in relation to Minerals and Metals from Conflict-Affected Areas and Child Labour 2023 and constitutes the AstraZeneca Group's slavery and human trafficking statement for the financial year ending 31 December 2024. It covers the following AstraZeneca entities including Australian entities with an annual turnover of over AUD100m, the following UK legal entities with an annual turnover of over £36m:

- AstraZeneca UK Limited (UK)
- KuDOS Pharmaceuticals Limited (UK)
- MedImmune Limited (UK)
- MedImmune UK Limited (UK)
- Alexion Pharmaceuticals (UK)
- Alexion Pharmaceuticals Australasia Pty Limited (Australia)
- AstraZeneca Holdings Pty Limited (Australia)
- AstraZeneca Pty Limited (Australia)
- Alexion Pharmaceuticals Australasia Pty Limited (Australia)
- AstraZeneca Canada Inc (Canada)
- Alexion Pharma Canada Corp (Canada)
- AstraZeneca Germany GmbH (Germany)
- AstraZeneca AS (Norway)
- AstraZeneca AG (Switzerland)
- Alexion Pharma GmbH (Switzerland)
- Evinova AG (Switzerland)

This statement has been approved by the AstraZeneca Plc Board of Directors



Pascal Soriot
Chief Executive Officer
AstraZeneca PLC

February 2025