



Modern Slavery Statement

Sanofi Australia

2023

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Modern Slavery Statement 2023

This statement refers to the financial year ending 31 December 2023 and sets out the steps we have taken to address modern slavery risks in our business and supply chains.

1. 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 (Group) and our ultimate parent company is Sanofi S.A. Sanofi S.A. has its head office in Paris, France.

2. 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.

3. 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.

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.

4. 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:

- *Prohibition of Child Labor;*
- *Elimination of forced labor;*
- *Anti-bribery Policy;*

- [Respect for freedom of association and the right to collective bargaining](#)
- [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.

In addition to our internal policies and Codes of Conduct, we publish a [Vigilance Plan](#) on a yearly basis (in accordance with French Duty of Vigilance law 2017), along with factsheets that summarise what has been done in relation to human rights including [Fundamental Human Rights at Work](#), [Human rights Due Diligence](#), [Children's Rights](#) and [Sustainable Procurement](#)

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.

5. Risks of modern slavery practices in our operations and supply chains

In relation to our operations, the following risks have been specifically identified as salient with respect to the fundamental rights of employees in manufacturing and distribution activities: risk of employment of migrant workers in situations that may amount to forced labour, risk of excessive working hours, risk of a wage lower than the minimum legal wage, risk of hazardous work and risk of engaging minors. 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.

Sanofi Australia recognises that the highest risk of modern slavery practices within our supply chain stems from our use of third-party suppliers and services providers associated with the sourcing of raw materials and manufacturing of our products as well as engagement of contract manufacturing organisations (CMOs). We are aware that we may be indirectly exposed to modern slavery risks through our supply chain,

as some of our third-party suppliers and service providers operate in countries that have a high prevalence of modern slavery. Risks specifically identified as salient with respect to Sanofi's supply chain for raw materials are predominantly associated with subcontractors manufacturing critical Sanofi raw materials. Sanofi buys raw materials from all over the world, and uses a diversified panel of suppliers reflecting the diversity of our activities. Sanofi's procurement of raw materials is centralised, and our procurement policy is based not only on economic principles but also on ethical, environmental and social principles.

6. Due diligence processes for slavery

In 2023, 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 are background checked, having their identity, qualifications and previous work history verified as a condition of employment. Regular audits are made of employees who have only a temporary right to remain in Australia.

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. In determining which categories of suppliers we should assess for modern slavery risks, we take into account the following factors:

1. the country or region where the supplier operates;
2. The industry or sector in which the supplier operates; and
3. The product or service that the supplier provides.

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 2023, 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 monitoring the risk profile of each of our suppliers. The questionnaire includes enquiries pertaining to respect for human rights and compliance with modern slavery laws.

Contractual obligations

Sanofi Australia's standard service agreements 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.

Supplier audits, focusing primarily on Health, Safety and Environment (HSE) performance but also, where relevant, on human rights issues are conducted by the Sanofi HSE department or outsourced to external auditors. These supplier audits are mainly targeted at high-risk subcontractors manufacturing critical Sanofi raw materials. Action plans are continuously monitored to ensure issues are remedied.

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

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.

9. Further Steps and Remediation

Sanofi Australia expects that there will be significant new measures and tools to be introduced by the Sanofi Group in tackling modern slavery risks around the globe which may include adoption of new due diligence and monitoring and assessment tools and 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 2023 were reviewed to ensure that reasonable steps continue in the effort to minimise the risk of modern slavery in our supply chains.

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 2023.

This Statement was approved by our Board of Directors on 28 June 2024.



Liz Selby
Head of Pharma & Country Lead
Sanofi Australia & New Zealand
June 2024