

# 2024 Forced Labor, Child Labor, Human Rights, and Decent Working Conditions Regulatory Disclosures



Breakthroughs that change patients' lives

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# Introduction

This Statement is for the period from January 1, 2024, to December 31, 2024, and has been prepared pursuant to the *Australian Commonwealth Modern Slavery Act*, *California Transparency in Supply Chains Act*, *Canadian Fighting Against Forced Labour and Child Labour in Supply Chains Act*, *Norwegian Transparency Act*, and *UK Modern Slavery Act* (collectively, the **Acts**). This Statement describes our approach to human rights due diligence, as required by the *Norwegian Transparency Act*, and also outlines our approach to the specific issue of forced and/or child labor as required under the *California Transparency in Supply Chains Act*, *UK Modern Slavery Act*, *Canadian Fighting Against Forced Labour and Child Labour in Supply Chains Act*, and the *Australian Modern Slavery Act 2018*. Additionally, this Statement serves as our notice that, while certain Pfizer entities are subject to the child labor provisions of the *Swiss Code of Obligations Section 221.433 (the Ordinance on Due Diligence and Transparency in relation to Minerals and Metals from Conflict-Affected Areas and Child Labor)*, such entities are exempt from the due diligence and reporting obligations thereunder as Pfizer complies with internationally equivalent regulations (i.e., Convention No. 182, Convention No. 138 and the ILO-IOE Child Labour Guidance Tool for Business and the Organisation for Economic Co-operation and Development (**OECD**) Due Diligence Guidance for Responsible Business Conduct). We prepared a single statement because we generally follow the same policies and procedures globally to address and mitigate human rights risks in our operations and supply chain. However, not all of our group companies are subject to the Acts mentioned above.

In this Statement, “**Pfizer**,” “**we**,” and “**our**” refers to Pfizer Inc. and its subsidiaries, unless stated otherwise.

This Statement details the actions we have taken to assess and respect fundamental human rights, including the right to freedom from forced labor and child labor and the right to decent working conditions, in our operations and supply chains.

As used in this Statement, the following definitions are used.

- “**Fundamental human rights**” are internationally recognized human rights pursuant to, among other things, the International Covenant on Economic, Social and Cultural Rights, the International Covenant on Civil and Political Rights and the International Labour Organization’s (**ILO**) core conventions on fundamental principles and rights at work (**Core Conventions**).
- “**Modern slavery**” encompasses forced labor, prison labor, indentured labor, bonded labor, debt servitude, state imposed forced labor, human trafficking, forced marriage, and other similar conduct commonly thought of as modern slavery. For purposes of this Statement, child labor is included within this definition of “modern slavery.”
- “**Child labor**” means labor or service provided or offered to be provided by persons under the age of 18 and that: (1) are contrary to applicable child labor laws; (2) are provided or offered to be provided under circumstances that are mentally, physically, socially, or morally dangerous to the persons providing the labor; (3) interfere with their schooling by depriving them of the opportunity to attend school, obliging them to leave school prematurely or requiring them to attempt to combine school attendance with excessively long and heavy work; or (4) constitute the worst forms of child labor as defined in Article 3 of the ILO’s Worst Forms of Child Labour Convention (Convention No. 182).
- “**Decent working conditions**” are work conditions that safeguard fundamental human rights and health, safety, and the environment, while providing a living wage.

# About Pfizer

Pfizer is a research-based, global biopharmaceutical company. We apply science and our global resources to bring therapies to people that extend and significantly improve their lives through the discovery, development, manufacture, marketing, sale and distribution of biopharmaceutical products worldwide. We work across developed and emerging markets to advance wellness, prevention, treatments and cures that challenge the most feared diseases of our time. We collaborate with healthcare providers, governments and local communities to support and expand access to reliable, affordable healthcare around the world.

Pfizer is headquartered in New York and has operations around the world. As of December 31, 2024, Pfizer had approximately 81,000 employees around the world.

Pfizer operates 37 manufacturing sites<sup>1</sup> worldwide in addition to research and development, commercial, and logistics operations. Our sites operate according to Pfizer's policies and procedures, including, but not limited to, those outlined in this Statement. The performance of Pfizer's sites is monitored and regularly reviewed to help ensure our standards of conduct meet our expectations as we aim to deliver breakthroughs for patients. We have quality management systems in place that include a culture of integrity and quality, designated oversight responsibilities, policies and procedures, training and monitoring systems, including of third parties, to help enable quality, compliance, safety, and manage risk. Our operations allow us to supply our medicines and vaccines to approximately 200 countries and territories.

Additional information about Pfizer's responsible business growth strategy is set out in Pfizer's [Annual Review](#) and [Impact Report](#).

## Our Supply Chain

At Pfizer, responsible supply chain management is an important part of how we do business. We have high standards and expectations for our internal and external partners guided by set governance processes to help promote responsible supply chain management. This seeks to ensure the safety and quality of everything we produce. We see compliance with regulatory standards as the foundation of risk mitigation and a crucial component of providing the world with a reliable supply of safe and effective medicines and vaccines.

While our most important suppliers are our related Pfizer entities that supply us with medicines and vaccines that are distributed worldwide, a network of external suppliers is essential to enable the manufacture of medicines and vaccines that deliver breakthroughs that change patients' lives. Pfizer's supply chain supports the research, development, and manufacturing process by providing flexibility and access to technologies necessary to meet our commitment to patients. For example, Pfizer's manufacturing division uses suppliers to produce and warehouse selected materials and products to supplement internal as well as external facilities. Where possible, we use multiple suppliers to minimize risk of supply interruptions of essential medicines and have a global supply chain that can reallocate supplies quickly, across borders, to maintain supply and address shifting needs across the world. Our supply chain has built-in flexibility to support resiliency, extra inventory, an increased workforce, and multiple suppliers.

<sup>1</sup>As of December 31, 2024.

# Human Rights

Pfizer is committed to conducting business in an ethical and responsible manner. This includes respecting fundamental human rights throughout our operations and supply chains. Pfizer is also committed to acting in line with the OECD Guidelines for Multinational Enterprises. Pfizer is proud to have been one of the early signatories to the United Nations (UN) Global Compact, an initiative that calls on companies to align strategies and operations with universal principles on human rights, labor, environment, and anti-corruption, and to take actions that advance societal goals. In honoring our commitment, we seek to prevent and mitigate adverse human rights impacts in our global operations and supply chains, and remediate adverse human rights impacts we may cause or contribute to.

In line with the UN Guiding Principles on Business and Human Rights (UNGPs) and OECD Guidelines for Multinational Enterprises, Pfizer's human rights approach focuses on addressing risks that could have the most severe impact on people: our patients, our colleagues, the workers of our business partners, and the communities in which we operate. Our initiatives to respect human rights extend throughout our operations, from lab to patient, including our numerous local and global third-party vendors.

As a biopharmaceutical company, the right to health is of paramount importance. Other salient human rights are the principle of non-discrimination; the right to privacy; freedom from slavery and forced labor; the right to enjoy just and favorable conditions of work; the right to a safe workplace; and the right to a clean, healthy, and sustainable environment. Pfizer's human rights strategy, including the procedures described herein, seeks to address these salient rights.

Pfizer prohibits the use of all forms of modern slavery, including forced labor and child labor, in our supply chain and business operations. We recognize that the risks of modern slavery are heightened where our business partners rely upon migrant workers and other workers who are particularly vulnerable to exploitation. We conduct due diligence to assess and address risks of modern slavery in our own operations and in our supply chain. Pfizer uses a global corporate labor and human rights standard for our supplier base with a focus on modern slavery. The standard includes requirements for mitigating potential risk of harm to people arising from violation of human rights and labor standards.

## Risk Areas in Pfizer's Operations and Supply Chain

### Our Operations

For the reasons described below, we believe that the risk of adverse human rights impacts, including working condition violations and modern slavery, for our business operations is low.

- We maintain robust human resource, environment, health, and safety (EHS), and compliance functions.
- Our employees generally are hired on a regular full-time basis, rather than being temporary, seasonal, or migrant workers.
- The contractors we engage directly as part of our operations are generally in highly skilled and professional roles.
- To the extent our manufacturing sites may engage workers (e.g., machine operators and technical roles such as engineers and scientific roles) through a recruitment agency, we have arrangements with only a select number of recruitment agencies that are required to satisfy due diligence checks prior to formal engagement and with clauses prohibiting modern slavery in our standard supplier and service provider contracts.
- Except for those engaged in a formal apprentice or internship program, everyone working in our operations is 18 years or older.
- All of our employees are paid in excess of minimum wage.

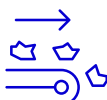
# External Supply Chain

Because responsible supply chain management is core to how we do business, Pfizer aims to partner with external suppliers that are committed to operating their businesses in a responsible and ethical manner, including respecting the rights of the individuals whom they employ. Our supply chain includes a broad range of direct suppliers from various locations and industries, including those generally considered to have an increased prevalence of, and vulnerability to, adverse human rights impacts by virtue of their inherent sector risk or geography. In seeking to assess our connection to human rights impacts and decent working conditions in our supply chain, we consider the potential for our business to cause, contribute to, or be directly linked to adverse impacts, as defined in the UNGPs.

Based on a global internal assessment performed by Pfizer, taking into account published civil society and NGO studies and other thought leadership, the following categories within our supply chain are considered to have increased risk of adverse human rights impacts, including forced and child labor, irrespective of geographic location or the specific supplier:



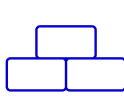
Freight & Shipping



Raw Material Supply



Packaging



Building & Construction Services and Materials



Electronics and Telecommunications, including IT hardware



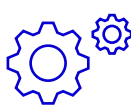
Garment Supply



Industrial Cleaning Services



Personal Protective Equipment (PPE)



Manufacturing



Accommodation and Food Services



Waste Management

We consider the above sectors to have heightened risk due to their use generally of lower-skilled workers, often with limited ability to negotiate their wages and rights in the workplace. We also recognize that the risks of adverse impacts are heightened where our business partners rely upon migrant workers (possibly on temporary visas) and other workers who are particularly vulnerable to exploitation. We also consider that some of our suppliers have a global footprint and, accordingly, could potentially present a higher risk of human rights violations due to operating in higher risk regions.

Taking the above and, more generally, the contents of this Statement into account, the highest potential risk area related to modern slavery is in our supply chain, where modern slavery could potentially occur without our knowledge and in violation of our policies. While we believe that our existing policies and procedures assist us to mitigate against this risk at our direct suppliers, modern slavery becomes increasingly difficult to assess beyond the first tier of our supply chain, where we may in some cases be several levels removed from the impact to workers.

Our supplier management program focuses on external suppliers that play an active role in the production of our products, including suppliers related to our raw materials, drug substance, and drug product supply, warehousing and distribution, contract manufacturing and packaging, and services conducted on Pfizer manufacturing premises (the “Product Suppliers”).

# Actions Taken to Assess and Address Risks related to Human Rights and Decent Working Conditions

As noted above, Pfizer is committed to conducting business in an ethical and responsible manner, which includes seeking to prevent and mitigate adverse human rights impacts. Our approach to human rights risks is informed by international standards, industry best practice, and expert assessment.

## Governance and Risk Management

Our established risk-based evaluations for Product Suppliers, and other external suppliers deemed to be high-risk, assess EHS and sustainability performance, including labor and human rights. When assessing whether a Product Supplier is high-risk for adverse human rights impacts, we consider the supplier's geography, industry, and other proprietary and public domain information. For example, we use Modern Slavery Risk Indices (e.g., the [Global Slavery Index](#)) to inform risk assessments and focus on suppliers from high-risk jurisdictions.

Our collaborations with suppliers are focused on improving sustainability, compliance with laws, and alignment to our Supplier Conduct Principles and the Pharmaceutical Supply Chain Initiative's (PSCI) Principles for Responsible Supply Chain Management (each of which are described below).

Pfizer applies a global corporate labor and human rights standard for our supplier base and uses a risk-based governance process. The standard includes measures intended to mitigate potential risks of harm to people in connection with violations of human rights and labor standards. The program for Pfizer's Product Suppliers includes a risk-based assessment process that results in a supplier risk score. Product Suppliers that are determined to have an elevated risk, e.g., EHS and labor and human rights risks, are subject to a governance process which may result in the supplier being required by Pfizer to mitigate identified risks by developing corrective actions to improve their operations and procedures. If the supplier does not comply with the agreed corrective actions, Pfizer may seek an alternative supplier.

Pfizer has an active labor and human rights working group, consisting of members from various functions including legal, procurement, and global EHS. This working group is responsible for implementing the actions set out in this Statement, developing further actions, and monitoring Pfizer's labor and human rights commitments.

## Policies

Pfizer has established policies designed to mitigate adverse human rights risks in our business and supply chain. We expect all our employees and suppliers to be aware of, and comply with, their obligations set out in our policies. As needed, Pfizer reviews and updates its policies and procedures related to fundamental human rights.

## Code of Conduct

Pfizer's [Code of Conduct](#) – the Blue Book – describes how we operate and guides the decisions we make. All employees and certain contractors are required to adhere to these standards. The Code of Conduct specifically covers our commitment to our core value of equity and respecting human rights and is publicly available in over 30 languages.

Code of Conduct training is assigned to all new colleagues upon hire and to existing colleagues regularly. The training system is designed to allow for escalation if an employee fails to complete a training within the set timeline. The training includes a certification to confirm that colleagues are familiar with and agree to abide by the Code of Conduct and that they understand their responsibility to report and have reported potential violations of law, regulations, ethical standards, or Pfizer policy.

# Human Rights Policy

In line with the UNGPs and the ILO's Core Conventions, Pfizer's [Human Rights Policy Statement](#) focuses on addressing risks that could have the most severe impact on people. Our commitment to respect human rights extends throughout our operations, including our third-party vendors. The Human Rights Policy Statement expressly indicates that Pfizer prohibits the use of all forms of forced and child labor in our supply chain and business operations.

Internal training is provided to relevant functions on Pfizer's Human Rights Policy.

Pfizer's Human Rights Policy Statement and more about Pfizer's commitment to human rights can be found here: <https://www.pfizer.com/about/responsibility/human-rights>.

## Supplier Conduct Position Statement

Pfizer's [Supplier Conduct Position Statement](#) states Pfizer's aim to partner with external suppliers that are committed to operating their businesses in a responsible and ethical manner, respecting the rights of the individuals whom they employ, and helping protect the environment. Pfizer strongly encourages all its supply partners to support Pfizer's [Supplier Conduct Principles](#) (which are aligned to the PSCI [Principles for Responsible Supply Chain Management](#)<sup>2</sup>) or adopt their own codes which include similar expectations.

Among other things, the Supplier Conduct Principles strongly encourages Pfizer's suppliers (regardless of the product or service provided) to:

- Operate in full compliance with all applicable laws, rules, and regulations.
- Conduct their business in an ethical manner, acting with integrity.
- Not use forced, bonded or indentured labor or involuntary prison labor.
- Not use child labor, and more specifically limit employment of young workers below the age of 18 to non-hazardous work and when young workers are above a country's legal age for employment, or the age established for completing compulsory education.
- Provide a workplace free of harassment and discrimination.
- Provide a workplace free of harsh and inhuman treatment.
- Pay workers according to applicable wage laws, including minimum wages, overtime hours and mandated benefits.
- Respect the rights of workers as set forth in local laws, to associate freely, join or not join labor unions, seek representation and join workers' councils.
- Cascade these principles to their supply partners.

The Supplier Conduct Position Statement warns that failure to comply with the Supplier Conduct Principles and/or failure to correct non-complying situations are grounds for business relationship termination.

## Additional Policies

Pfizer also has an Equal Opportunity Policy, reiterated in the Blue Book, and an [Environmental, Health and Safety Policy](#), each of which support our commitment to respect fundamental human rights.

## Contract Clauses

Pfizer has clauses prohibiting modern slavery in all standard global agreement templates for procuring goods and services, including representations and warranties regarding a third party's knowledge of modern slavery in its operations and supply chain, rights to audit, notification obligations, and obligations to follow Pfizer's Supplier Conduct Principles as well as the PSCI Principles for Supply Chain Management.

<sup>2</sup>PSCI, an organization of pharmaceutical companies, established the Principles for Responsible Supply Chain Management to aide pharmaceutical suppliers in establishing sustainable business practices, including ethical and responsible labor practices. Additional information about PSCI and its activities can be found here: <https://pscinitiative.org/home>.

# Supplier Management and Audits

Pfizer seeks to ensure that our Product Suppliers demonstrate strong performance in the management of EHS and human rights risks. We assess the EHS and human rights performance of our Product Suppliers by performing a combination of desktop and onsite audits on a periodic basis. Based on the level of risk of a Product Supplier, and their performance during past audits (if applicable), Pfizer assigns the Product Supplier a schedule for how often it needs to complete EHS and human rights audits. Labor and human rights audits are also completed for Product Suppliers on an ad hoc basis, as we deem appropriate.

Our labor and human rights audits integrate evaluation of human rights considerations aligned with SA 8000.<sup>3</sup> Labor and human rights audits are completed by independent third-party auditors engaged by Pfizer in high-risk jurisdictions and by internally trained Pfizer colleagues in other instances. The auditors follow the PSCI's standard audit protocols, which include standard labor and human rights criteria and involve interviews with employees, contracted staff, and management. Audit outcomes are used to drive continuous improvement in both performance and compliance. We share our observations with the suppliers and ask them to establish corrective action plans to mitigate identified risks. Where we can, we also help suppliers to reduce risk with targeted training and coaching. As applicable, we continue to monitor suppliers' implementation of agreed actions.

In 2024, Pfizer assessed EHS and sustainability performance for 90 supplier facilities through a combination of remote and on-site audits. The scope of these audits included labor and human rights assessments. Overall, 602 observations were made as part of these audit, of which 26 related to labor and human rights.

As noted above, rather than immediately terminating suppliers that do not meet all our supplier expectations, we generally seek to continue to work with suppliers who are amenable to improvements and change to help prevent harm to the employees of such suppliers. This approach helps prevent the loss of income to the most vulnerable families and is also consistent with the UNGPs.

The results of these audits/assessments are factored into the supplier management process. We aim to select companies that are responsible, ethical, and reliable partners, in addition to reducing Pfizer's potential risk of business interruption to our global supply chain. After suppliers are selected and onboarded, they are expected to comply with Pfizer's guidelines and Supplier Conduct Principles.

## Raising Concerns

Pfizer is dedicated to fostering an open-door culture in which all colleagues can ask questions, raise concerns, and report potential misconduct without fear of retaliation. Our internal Open Door Policy (i.e., our whistleblower policy) encourages colleagues to present ideas, ask questions, and raise concerns. Retaliation against anyone who seeks advice, raises a concern, reports misconduct, or provides information in an investigation is strictly prohibited by our policy that protects whistleblowers. We measure colleague comfort and awareness about raising concerns, including awareness of our whistleblower policy, through the confidential enterprise Pfizer Pulse Engagement Survey sent to all colleagues annually. The results are used to focus our leadership communications, training, and other proactive efforts to foster our Purpose-driven culture and encourage speaking up.

Pfizer colleagues, contingent workers, those in our supply chain, and the public can ask questions and report concerns via the following channels:

- The [Compliance Helpline](#), a third-party operated public hotline available by phone and online, 24 hours a day, every day. The Compliance Helpline is available in over 30 languages. Employees, suppliers and other third parties are able to report a concern or get information or advice anonymously (where permitted by law).
- Contacting [Pfizer Compliance](#) through email, phone and fax. Pfizer Compliance investigates known or suspected violations of company policies and applicable laws.
- For employees, internal human resources reporting procedures.
- Our Office of the Ombuds is a resource to support colleagues with information and guidance to help them resolve work related issues. Pfizer's Ombuds is informal, independent, and neutral, and is not an advocate for any party, but an advocate for fair process.

<sup>3</sup>SA 8000 is an international certification standard that encourages organizations to develop, maintain and apply socially acceptable practices in the workplace.

Pfizer's [Code of Conduct](#) and our [Ethics and Compliance webpage](#) set out the different reporting mechanisms described above. Employees of suppliers are encouraged to report any or all violations of the Supplier Conduct Principles.

Additionally, the Pfizer Resilience Center is available globally to all colleagues and contingent workers with 24-hour contact for issues that concern an immediate violence or threat or other serious situation.

Pfizer takes seriously reports of known or suspected violations of company policies and applicable law; our goal is to respond promptly to all questions and reported concerns. We aim to identify and address potential inappropriate conduct as early as possible, prevent future recurrences, and inform continuous improvement. We investigate all referable compliance issues (**RCIs**)— significant potential, suspected, or actual violations of law or policy, including alleged or potential human rights violations and modern slavery. For RCIs where there is a substantiated violation, we institute individual discipline where appropriate, including measures such as coaching, warnings, and termination. Our compliance investigations process also includes analysis of the root cause of substantiated RCIs. After investigation, we work with accountable stakeholders to implement corrective and preventive actions. Pfizer has a process to escalate certain significant matters to the Executive Compliance Committee, the Regulatory and Compliance Committee, and the Audit Committee of the Pfizer Board of Directors.

## External Engagement

We actively encourage our direct material suppliers to participate in capability-building conferences and webinars.

In addition, Pfizer is a co-founder and active member of PSCI. Pfizer colleagues currently sit on the PSCI board and several PSCI working committees on various topics including Audits, Capability and Projects, Human Rights, Health & Safety, and Environment. In 2024, Pfizer colleagues also supported PSCI capability-building initiatives by serving as speakers at supplier conferences.

Pfizer is also a long-standing member of Business for Social Responsibility (**BSR**), an organization that works with its global network of leading companies to create a just and sustainable world. Pfizer is an active contributor to BSR's Human Rights Working Group (**HRWG**). The HRWG is a collaborative initiative convening companies supporting each other on implementing the UNGP. Practitioners in the group represent more than 50 cross-industry companies partnering to advance and refine human rights programs at each participant company.

# Annex: Australia

## Legislation Approvals

### 1. Australian Commonwealth Modern Slavery Act

Each of the reporting entities named below (the **Reporting Entities** (in this section) or **Pfizer Australia**) are required to submit a statement under section 14 of the *Modern Slavery Act 2018* (Cth).

- Pfizer Australia Pty Ltd ABN 50 008 422 348
- Pfizer (Perth) Pty Ltd ABN 32 051 824 956
- Pfizer PFE Pty Ltd ABN 17 169 276 920<sup>4</sup>
- Pfizer Australia Investments Pty Ltd ABN 86 146 429 138\*
- Hospira Australia Pty Ltd ABN 58 097 064 330
- Hospira Adelaide Pty Ltd ABN 60 007 988 767\*
- Hospira Holdings (S.A) Pty Ltd ABN 14 121 147 019\*
- Pfizer Australia Holdings Pty Ltd ABN 91 108 292 799\*
- ResApp Health Limited ABN 51 094 468 318

This Statement constitutes the Reporting Entities' modern slavery statement for their financial year (**FY**) ending 30 November 2024 (**the Reporting Period**). The Reporting Entities, each of which is a company owned by Pfizer Inc., come within Pfizer's global compliance program which is discussed throughout this Statement. This Statement relates to all of Pfizer's activities in Australia. References to "we", "us", or "our" in Annex A refer to the Reporting Entities and their owned or controlled entities.<sup>5</sup>

### 2. About Pfizer Australia

During the Reporting Period, Pfizer Australia's workforce comprised over 925 employees, with approximately 96% hired on a permanent basis, and the remaining 4% on fixed term contracts. Pfizer Australia's employees perform roles from a variety of fields and functions including science, medical, regulatory affairs, manufacturing, sales and marketing, health economics, research and development, as well as administrative services.

There were two commercial offices and one manufacturing site in Melbourne.<sup>6</sup> Hospira Australia Pty Ltd operated Pfizer's manufacturing site in Melbourne, Australia. The site manufactures medicines for both the Australian and overseas markets, exporting medicines to more than 60 countries.

The commercial business is a local sales and marketing affiliate of Pfizer Inc. which, among other things, distributes medicines (over 300 products (SKUs)) to all states and territories in Australia. Pfizer Australia Pty Ltd is Pfizer's sales and marketing entity in Australia.

ResApp Health Limited (**ResApp**) developed digital healthcare solutions designed to assist healthcare providers and consumers in relation to respiratory disease diagnosis and management. As a result of a decision to cease ResApp's business and operations, a decision was made to deregister ResApp Health Limited. The deregistration application was lodged with Australian Securities and Investments Commission (**ASIC**) and approval was granted on 7 April 2025.

The entities included in Pfizer Australia marked with an asterisk under part 1 above are either holding companies for the purposes of consolidating results or inactive or asset companies, none of which have employees.

### 3. Pfizer Australia's Supply Chain

Our most important suppliers are our related Pfizer entities that supply us with medicines and vaccines that are distributed in Australia. Pfizer manufacturing sites operate according to Pfizer's policies and procedures including those outlined in this Statement.

Our medicines in Australia are distributed through reputable wholesalers, including major Australian pharmaceutical wholesalers and a global provider (DHL) for warehousing and distribution.

<sup>4</sup>Pfizer PFE Pty Ltd was included in the supply chain mapping but was deregistered in August 2024 and ceased to be a part of the Pfizer group of companies prior to the financial year end.

<sup>5</sup>Excluding ResApp Health Limited. A decision was made to cease ResApp's business and operations in early 2024.

<sup>6</sup>Outside of Australia, Zydus Hospira Oncology Private Limited (**ZHOPL**) is a Joint Venture between Cadila Healthcare Limited and Hospira Australia Pty Limited. The company manufactures oncology formulations in Pharmez, Special Economic Zone near Ahmedabad, India. The company started commercial production on May 1, 2009 and Hospira own 50%. Pfizer Australia does not operate the assets.

Pfizer Australia's non-related direct suppliers generally reflect those of Pfizer (as described in this Statement) and provide materials and services such as raw materials, freight and logistics, packaging, and temporary labour. Based on the information gathered during the due diligence process to date (discussed in more detail below), approximately 88% of Pfizer Australia's non-related direct suppliers are domiciled in Australia. Based on volume of spend, most non-Australian direct suppliers are located in Italy, USA, Canada, South Africa, and Switzerland. The top 10 categories by number of suppliers are broadly categorised by the list below:

- Maintenance, Repair & Operations (MRO)
- Meetings, Congress & Symposia
- Marketing & Communications Agencies
- Freight & Logistics
- Lab & Med Equipment and Supplies
- Capital Equipment
- Temporary Labor (e.g., Skilled admin, IT and procurement workers)
- Facilities (e.g., water, electricity, rent, facilities management)
- Consulting & Professional Services Healthcare Advisory

Out of Pfizer Australia's top 10 suppliers by spend during the Reporting Period, the approximate split is related to:

- 10% - Construction Services (e.g. construction of a new line in the manufacturing plant)
- 40% - Raw Materials (e.g. active pharmaceutical ingredients and excipients)
- 10% - Freight and Logistics
- 10% - Travel, Meetings, Congress & Symposia
- 10% - Capital Equipment
- 10% - Temporary Labour
- 10% - Marketing and Communication

#### **4. Risks of Modern Slavery in Pfizer Australia's Operations and Supply Chain**

Pfizer Australia's workforce profile during FY24 remained largely unchanged from the previous year. Therefore, Pfizer Australia remains of the view that modern slavery risks in the Reporting Entities' own workforce is low for the reasons set out in the main body of this Statement. In general, the description of modern slavery risks pertaining to Pfizer operations and supply chain, as set out in the main body of this Statement, are also largely applicable to Pfizer Australia.

We acknowledge that, in being reliant on an international supply chain, we may become linked to adverse human rights impacts, including modern slavery in our procurement of transport and logistics services, which is considered a higher-risk industry within most supply chains. Pfizer Australia uses DHL as our main logistics service provider for the transportation and storage of our products. DHL Global Forwarding is our main customs broker for our inbound deliveries. Pfizer Australia continued to discuss the topic of modern slavery in its engagements with DHL.

## 5. Additional Actions Taken to Assess and Address Modern Slavery

In addition to the policies and procedures described earlier in this Statement, during the Reporting Period, Pfizer Australia continued to use the Ethixbase360 platform to assist with the assessment of potential modern slavery risks at its direct suppliers and potential red flags beyond the first tier. The platform issues a Modern Slavery Questionnaire (**MSQ**) which asks vendors about their operations, relevant policies and controls that they have in place, information about their workforce, the goods and services they supply to us, their measures to mitigate modern slavery, provision of relevant training and compliance with Pfizer's Supplier Conduct Principles.

The MSQ was designed with five key risk areas in mind:

- Jurisdiction/country of origin risk
- Inherent industry/product risk
- Utilisation of potentially vulnerable categories of workers
- Prior human rights impact assessment
- Existence of policies, procedures and systems to mitigate adverse impacts

The analytics underpinning the MSQ generated a modern slavery risk rating for each supplier based on responses to the weighted questions. The analytics datasets are driven by global indices on modern slavery and human rights risks. In comparing the completed MSQ results from 2023 and 2024, Pfizer Australia observed consistency in the average low risk score for suppliers.

Our processes require new vendors with Pfizer Australia to certify that they will complete the MSQ within six weeks of commencing work or risk termination of the onboarding process, and a follow up process is in place.

Any vendors to Pfizer Australia that return a high-risk score via the MSQ become the subject of further due diligence. Pfizer Australia's further review of such vendors' operations and processes occurs by issuing a qualification review that requires a self-assessment of labour practices. This self-assessment questionnaire (**SAQ**) is segmented into six key areas:

- Policy information & awareness
- Freely chosen labour
- Migrant workers
- Child labour and young workers
- Non-discrimination and fair treatment
- Wages, benefits and working hours

Pfizer Australia continues to have in place a risk governance process for colleagues to follow once a supplier has been identified as potentially high risk for modern slavery.

Pfizer Australia continued raising awareness of modern slavery within its workforce via annual modern slavery training. In November 2024, Pfizer Australia conducted training for all its commercial employees. The training was led by Pfizer Australia's main logistics provider, DHL, providing knowledge and actionable methods on reducing risks associated with modern slavery. Over 230 commercial employees attended the training. The training is designed to equip colleagues with the requisite knowledge to identify red flags in Pfizer Australia's supply chains.

Additionally, Pfizer Australia has partnered with Ethixbase to offer online modern slavery training to Pfizer Australia's top 20 non-related suppliers. In 2024, Pfizer Australia made the module "Forced Labor and Human Trafficking" available for the suppliers to register. Pfizer Australia plans to expand the offering of this training to its top 50 suppliers in 2025.

Pfizer Australia continues to work with Medicines Australia and our key suppliers to share knowledge about modern slavery.

## 6. Assessing Effectiveness

One of the means by which Pfizer Australia assesses the effectiveness of its actions, year-on-year, is to compare the results of the MSQ. As noted in the section above, the MSQ results for FY24 remained low as per previous years which indicates that Pfizer's supplier selection and management processes continues to support our efforts to mitigate modern slavery risks in our supply chain.

Pfizer Australia will continue to track our performance against the successful implementation of action plans and due diligence assessment processes as and when required (as discussed throughout this Statement).

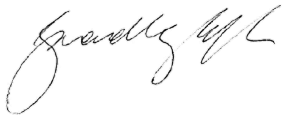
We seek to increase awareness of modern slavery within our spheres of influence by collaborating in training with our suppliers and we assess the effectiveness of our actions by offering training to a broader audience within our supplier population as well as increasing the number of our workforce educated in relation to modern slavery.

The Board of each of the Reporting Entities will continue to be kept abreast of the progress and ongoing and proposed activities described above.

## 7. Consultation

This Statement was prepared after consultation with each of the Reporting Entities. Consultation on the contents of this Statement involved engagement with each of the Reporting Entities and their owned or controlled entities by virtue of senior managers and the members of Pfizer Australia's cross-functional Modern Slavery Working Group, who collectively have Australian group-wide responsibility, including for each of the Reporting Entities and their owned or controlled entities.

In accordance with section 14 of the *Modern Slavery Act 2018* (Cth), this Statement has been approved by the Board of each of the Reporting Entities and has been signed by the responsible member Bradley Apps, director of Pfizer Australia Pty Ltd on behalf of the Reporting Entities' boards.



**Bradley Apps**  
Director

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**Pfizer Australia Pty Ltd** | ABN 50 008 422 348

**Pfizer (Perth) Pty Ltd** | ABN 32 051 824 956

**Pfizer PFE Pty Ltd** | ABN 17 169 276 920

**Pfizer Australia Investments Pty Ltd** | ABN 86 146 429 138

**Hospira Australia Pty Ltd** | ABN 58 097 064 330

**Hospira Adelaide Pty Ltd** | ABN 60 007 988 767

**Hospira Holdings (S.A) Pty Ltd** | ABN 14 121 147 019

**Pfizer Australia Holdings Pty Ltd** | ABN 91 108 292 799

**ResApp Health Limited** | ABN 51 094 468 318

**Modern Slavery Act 2018 (Cth)**

Mandatory criteria	Page number
a) Identify the reporting entity	11
b) Describe the reporting entity's structure, operations and supply chains	3-5, 11-12
c) Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls	5-6, 12
d) Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes	5, 7-10, 13
e) Describe how the reporting entity assesses the effectiveness of these actions	14
f) Describe the process of consultation on the development of the statement with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity covered by the statement)	14
g) Any other information that the reporting entity, or the entity giving the statement, considers relevant	

