



AstraZeneca
Modern Slavery Statement
Australia

For The Year Ending 31 December 2022

Our Commitment

AstraZeneca is committed to operating with integrity and high ethical standards. This includes ensuring that our business respects human rights - a commitment reflected in our **Code of Ethics**, which is based on our Company Values and includes our global “Our Interactions” Policy.

Specifically, we are committed to ensuring that we identify and eliminate to the fullest extent practicable modern-day slavery or human trafficking in our business.

Our standards comply with all current national and international laws, regulations and codes to prevent trafficking and slavery in our own business operations. Further, we require our contracting partners and those companies within our supply chain to do the same, as set out in our **Global Standards: Expectations of Third Parties**. Further details can be found in the ‘Our Relationships with Third Parties’ section below.

In 2022, AstraZeneca’s “Expectations of Third Parties” was updated and launched at a supplier conference as part of our efforts to accelerate sustainability across our supply chain. We hold third parties to high standards whilst offering opportunities to build their own sustainability knowledge and capabilities. Further details can be found in the ‘Our Relationships with Third Parties’ section below.

AstraZeneca supports and adheres to the principles set out in the UN Declaration of Human Rights, and 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.

Since 2018, AstraZeneca has been using the Fair Wage Network database on living wage thresholds (existing in more than 200 countries) to systematically compare average wages of the employees within our company to living wage thresholds.

This modern slavery statement is made jointly by AstraZeneca Holdings Pty Limited (ACN 066 876 962) and AstraZeneca Pty Limited (ACN 009 682 311) which are both reporting entities under the *Modern Slavery Act 2018* (Cth) (**Act**).



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



Our Business

Structure

AstraZeneca is a global, science-led biopharmaceutical company that focuses on the discovery, development, and commercialisation of prescription medicines in Oncology, Rare Disease (Alexion), and BioPharmaceuticals, including Cardiovascular, Renal & Metabolism, Respiratory & Immunology, and Vaccines & Immune Therapies. We have an active presence in some 90 countries, our products are sold in more than 130 countries and our innovative medicines are used by millions of patients worldwide.

To drive our science, we have disease area-focused Research & Development (R&D) organisations that are responsible for discovery through to late-stage development for Oncology, BioPharmaceuticals and Rare Disease. Two commercial units, one for Oncology and one for BioPharmaceuticals, align product strategy and commercial delivery across our US and Europe-Canada regions. Our International region has commercial responsibility for emerging markets, including China, as well as Australia and New Zealand. Our Operations function plays a key role in developing, manufacturing, testing and delivering our medicines to our customers. Our Rare Disease group, in addition to R&D, also manages the commercial and operations functions for our rare diseases portfolio in our established markets.

We are headquartered in Cambridge, UK, and also have major hubs in Sweden and the United States. We employ a highly skilled permanent and part-time workforce of approximately 85,000 employees, but we also use contractors and labour agents in sourcing a highly skilled workforce.

AstraZeneca operates two entities in Australia, AstraZeneca Holdings Pty Limited and AstraZeneca Pty Limited. AstraZeneca Holdings Pty Limited is the parent company and has a holding company role. AstraZeneca Pty Limited is the Australian operating company. The reporting entities do not have any active owned or controlled entities.

We are the largest national manufacturer of pharmaceuticals, providing over A\$724 million of medicines to the local market.

Operations

In Australia, we separate our activities into two areas: supply and manufacturing, and marketing. Our one supply and manufacturing facility in Australia is located in North

Ryde, Sydney and manufactures over 59 different product variations of local anaesthetics, diluents and respiratory products. We are the largest national manufacturer of pharmaceuticals, providing over A\$724 million of medicines to the local market and approximately A\$150 million in exports, predominantly to China and Japan. We are the global sole supplier to China of a primary respiratory product used in the treatment of asthma. We are key partners for leadership and technical capability within the Asia Pacific operations network.

AstraZeneca employs 935 people in Australia. Broadly, these roles fit into the following categories: 510 employees in commercial roles, 362 employees in operational roles and 63 employees in clinical roles. 793 are full-time employees while 142 are part-time employees. There are no casual employees in AstraZeneca Australia.

Our products are sold in more than 130 countries and our innovative medicines are used by millions of patients worldwide.



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. 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.

AstraZeneca's Australian operations have approximately 700 suppliers with over 89% located in Australia. Outside Australia, the supply chain includes suppliers in the United States, the United Kingdom, Denmark, Switzerland, Singapore, Netherlands, and New Zealand.

The largest supplies in terms of value are raw materials, packaging materials, distribution, research and development, marketing (conferences and events), facilities management (building repairs, maintenance and utilities), market research, consultancy services (tax, legal and administrative), consumable materials (safety clothes, equipment and uniforms), and IT and telecommunications. The types of business arrangements with our suppliers vary depending on business need. We generally maintain global suppliers in stable long-term engagements, while our local suppliers are usually more short-term and changeable.



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Risks of Modern Slavery

Approach to identifying risk

We identify and assess potential modern slavery risks in our supply chain through our Third-Party Risk Management process that is described in the 'Actions' section below.

The potential risks posed to workers are continuously evolving and may have been exacerbated by increasing geopolitical tensions, as well as the COVID-19 pandemic at a time when restrictions on movements made it more challenging to deliver effective oversight.

We continuously review our approach to assessing risk in our global supply chain, to take account of emerging challenges and updated information sources. For example, as discussed in further detail in the 'Supply Chain' section below, in March 2022 we launched a new supplier assessment program, EcoVadis, to assess the sustainability ratings of our suppliers, including in relation to modern slavery risks. Also during the 2022 reporting period, our Third-Party Risk Management framework was improved, as discussed further in the 'Due Diligence' section below. Organisationally, we also maintain dedicated internal compliance and audit resources that review the way we manage all forms of risk, including modern slavery risk (see the 'Our Governance / Risk Ownership' section below). For more detail regarding AstraZeneca's approach to reviewing how we assess risk in our global supply chain, refer to the 'Effectiveness' section of this statement.

This risk assessment process also informs the risk register that AstraZeneca maintains of our business operations, which includes modern slavery risks. Any modern slavery risks are identified by the risk owner. Mitigation plans are proposed and included in the risk register. The risk register is then reviewed by and aligned with the Senior Management Team on a quarterly basis, which includes mitigation plans to address such risks. Implementation and follow through of such mitigation plans are done by respective risk owners.

Operations

As noted above, our operations in Australia include marketing, and supply and manufacturing. Australia has low modern slavery risk from a geographic perspective. Marketing is a low-risk activity from a modern slavery perspective, and involves a high skilled workforce largely engaged on permanent contracts. We acknowledge that manufacturing can potentially present a higher modern slavery risk, however because of the employment arrangements in place with our manufacturing workforce and the high level of unionisation in that workforce, we consider the risk to be low.

Supply Chain

Set out below are the areas of our tier 1 procurement that we have assessed to have the highest risk of modern slavery. We implemented a new Third-Party Risks Assessment in April 2022 which provides a more detailed approach to assessing risks, including modern slavery. We also launched EcoVadis in March 2022 which assesses sustainability ratings of suppliers, including modern slavery risks. We do acknowledge that the risk of modern slavery may be higher deeper in our supply chains. We continue to look at ways in which we can further understand and assess modern slavery risks beyond our direct suppliers.

Facilities Management

The facilities management industry and certain activities in particular (e.g. security and cleaning) are known to present a risk of modern slavery practices. This is due to the frequent use of unskilled labour, temporary workers/short term contracts, and the use of foreign workers. These risks may be increased where the work in question is carried out at night and when the work is not well paid. Outsourcing and the related tendering activities also place downwards pressure on pricing which increases the risk of low pay and/or poor working conditions. While the fact that Australia is a low-risk jurisdiction from a modern slavery perspective may reduce the risk of modern slavery in facilities management, we acknowledge that the risk still exists.

AstraZeneca has significant facilities management requirements due to the size and nature of our operations and premises. These requirements are outsourced to service providers who specialise in providing these services.



Capital Projects

Risks of modern slavery practices are known to exist in the construction industry. This is due to seasonal and temporary work being common, there often being significant time pressure to complete jobs, and because much of the work involved is “base-skill” level. 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 has carried out a number of expansions of its facilities. Whilst AstraZeneca capital projects and expansions have a focus on the delivery and installation of new manufacturing and related equipment, construction activities are a vital part of such projects in order to create new spaces or reconfigure existing spaces within the facility to house the expanded plant. The AstraZeneca 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. Nonetheless, AstraZeneca must still consider the sectoral risks from this activity.

Consumables

The manufacturing activities of AstraZeneca’s operations predominantly occur in a clean room environment. The nature of this environment requires personnel to wear disposable clean room garments such as hairnets, shoe covers and gloves. Whilst these items are supplied through Australian-based organisations, they are generally manufactured in off-shore markets, such as China and Malaysia, which present a higher risk of modern slavery practices.

As a result of concerns raised internally, we discovered that single use gloves used within AstraZeneca’s global operations had been manufactured in a factory in Malaysia with links to modern slavery.

Following investigation, we know that 95% of the single use gloves in our operations are modern slavery free. The gloves with ties to modern slavery were in use within AstraZeneca for approximately three months; the manufacturer took proactive steps to increase internal production capacity and end their relationship with the factory in question after discovering working conditions had declined during the pandemic. We are working to understand where the remaining 5% are being manufactured and the level of due diligence being undertaken on the manufacturers, including, what mitigations they have in place to prevent modern day slavery. This issue does not directly impact any of AstraZeneca’s Australian operations.

Excipients for manufacturing

The manufacturing of pharmaceutical products generally involves the combination of active pharmaceutical ingredients with other substances (excipients). Excipients can be used to assist with the stabilisation and dilution of potent active ingredients in the finished goods formulation. Whilst active ingredients are generally sourced through AstraZeneca globally, excipients are generally sourced through the local arms of reputable global manufacturers. The global nature of

these providers means that AstraZeneca has reduced visibility over the supply chains and that supply chains may commence or involve steps in countries that have a higher risk of modern slavery practices. This is something that AstraZeneca will explore further in future reporting periods.

Actions

Our Governance / Risk Ownership

The Global Risk Owner for modern slavery and human trafficking is the Executive Vice-President Operations & Information Technology. Their remit includes accountability for our Global Supply Chain and Global Procurement function. To support the Executive Vice-President, we have dedicated internal compliance and audit resources responsible for reviewing the way we manage all forms of risk, including human and labour rights which cover modern slavery and human trafficking.


 **The AstraZeneca 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 Australia, a governance group comprised of senior leaders in the Procurement, Compliance and Legal functions has oversight of the Third-Party Risk Assessment process described below.

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.

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Our Policies

AstraZeneca is committed to ensuring that we do not tolerate modern slavery or human trafficking in any part of our business or our supply chains. The [AstraZeneca Human Rights Statement](#), which applies to the Australian business, sets out 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 [Global Standards: Expectations of Third Parties](#) policy also informs our third parties that we do not tolerate the use of child labour and forced labour by third parties. This policy states that Third Parties should never engage in, support, or condone any form of slavery or human trafficking. Further, through this policy, AstraZeneca requires Third Parties to promptly report all concerns and issues related to Modern Slavery and Human Trafficking identified in their business and supply chain. This is addressed in further detail in the ‘Our Relationships with Third Parties’ section below.

We are also committed to the International Labour Organisation standards on child labour and minimum working age. Our internal policies (including those mentioned above) build on this commitment.

We have an established process and affiliated systems in place for employees to raise concerns and to protect whistle-blowers from retaliation and identification. We encourage anyone to report in good faith any concerns regarding slavery and human trafficking, as well as any other compliance risks.

Whistle-blowers can choose to report anonymously at www.AZEthics.com. AstraZeneca’s Global Investigations team triage cases received and engage appropriate functions depending on the nature of the cases reported. AstraZeneca takes such reports seriously and investigates all concerns raised, seeking to resolve matters in accordance with the Code of Ethics and applicable law. AstraZeneca’s Third-Party Risk assessment requires suppliers to disclose practices that encourage workers to report concerns without fear of reprisal and ensure concerns are formally investigated.

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 rights and labour principles. These factors determine which third-party engagements are deemed to be high-risk and therefore require a deeper level of assessment. In practice, this means that vendors identified as being high-risk will be subjected to a further round of due diligence questions as part of the Third-Party Risk Assessment process discussed in more detail below. Where necessary, third parties are required to answer specific questions about the policy, procedures and controls they have in place to manage human rights and labour risks on AstraZeneca’s behalf, including audits.

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.



The core AstraZeneca business has made significant improvements to the Third-Party Risk Management Framework (3PRM) in 2022, which is used to assess new in-scope vendors prior to engagement and then undertake periodic reassessment thereafter. The transformation of 3PRM has resulted in a truly risk-led process which is enhanced by continuous monitoring of publicly available information.

A new system and associated processes have been implemented, with outsourced support, delivering a greater level of automation, control and expertise to deliver due diligence and risk assessment requirements.

The new 3PRM process also includes increased monitoring activities. This includes process execution monitoring, ongoing adverse media screening and monitoring to ensure that vendors implement measures that they have agreed to as part of the 3PRM assessment. The approach is data-driven, in terms of geography, spend categories, the user base and third-party responsiveness to AstraZeneca requests.

There are recognised opportunities to refine and strengthen the new process further in future, some of which are being considered as part of AstraZeneca’s broader Future of Work programme.

Globally, of the 252 engagements with high risk of modern slavery, 26 assessments were reviewed through the second line compliance assurance process. We did not reject any engagements at onboarding due to labour rights related risks, opting instead to work collaboratively with vendors to improve their processes where risks were identified. We continue to be firm on ending the relationship where no satisfactory improvement or resolution is reached or where the supplier cannot meet our high third-party expectations. We also provide enhanced real-time guidance to our contract managers during the due diligence process.

Within Australia, we have made a decision not to engage third parties from countries that are high-risk from a modern slavery perspective. Where possible, rights of audit are also included in supplier contracts.



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Further management

We include modern slavery as an aspect of our human rights agenda. Human rights is one of the focus areas within our sustainability strategy that was selected through a prioritisation process by both internal and external stakeholders, including suppliers and non-government organisations. We commit to monitor our human rights performance, set targets, and share challenges and outcomes publicly. The annual [AstraZeneca Sustainability Report](#) discloses this information.

As Signatories of the United Nations (UN) Global Compact 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 our annual [AstraZeneca Sustainability Report](#).

We conduct a labour rights survey every two years in the countries where we operate. In 2022, we launched another global Human Rights Labour Review, which focuses on the International Labour Organisation's core themes, including freedom of association and collective bargaining, child labour, discrimination, working hours and wages. We also incorporated questions about family-friendly leave to support addressing global inclusivity in this area.

In addition to the survey, we also analyse our wage data with the Fair Wage Network, which aims 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.

We are currently working through a recent update of the database which flagged around 100 employees within the AstraZeneca Group's global operations as having fallen below the threshold. None of these employees are Australia-based or employed by either AstraZeneca Holdings Pty Limited or AstraZeneca Pty Limited.

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, labour, health, safety, environment and related management systems.

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

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 we do business with. The applicable standards and requirements for third parties are explained in our [Global Standards: Expectations of Third Parties](#).

The refreshed 'Expectations' were launched by Procurement at a supplier sustainability conference on Earth Day in April 2022 and have since been referenced in external presentations, underpinning our commitment to sustainability and determination to "do the right thing". To help our partners understand our values and what it takes to work with AstraZeneca, our "Expectations of Third Parties" document 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 requires our suppliers and other third parties to not use any form of forced, bonded, involuntary or indentured labour.

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 of our Purchase Orders and Contracts, giving a legal standing to our new 'Expectations'.

Training and Awareness

All AstraZeneca employees (including those in Australia) receive an annual Code of Ethics training that explicitly raises awareness of the risks of modern slavery and human trafficking. Rolled out globally in October 2022, the course was completed by 100% of AstraZeneca employees (both in Australia and globally) by 31 December 2022.


In 2022, we delivered a global risk awareness module to all employees in risk gate-keeping roles in Operations, Human Resources and Compliance. The awareness training explained how to spot the signs of modern slavery, detail the high-risk activities for the company and clarify the internal escalation process for concerns related to this risk. This training will also be available to be rolled out to third parties.

We have created videos and presentations which have been rolled out as part of a campaign to raise awareness of modern slavery within internal groups that interact regularly with third parties.

Stakeholder and industry collaboration and engagement

In 2022, we continued our engagement with Slave Free Alliance (Hope For Justice) and we have also participated in working groups with peer multinationals to benchmark our approach to risk identification and mitigation. Through these engagements, we have validated that our highest risk activities continue to be construction, temporary resources, recruitment, facilities, logistics and hotels, sourcing of human biological samples, use of agricultural and electronic components in our products and devices, as well as sourcing and supply of some lab consumables.

Recognising the rapidly evolving landscape in terms of legislation and the increase in cases of modern slavery reported as indicated by the updated Global Slavery Index, we plan to work with Slave Free Alliance in 2023 to further understand present gaps and risk areas and undertake improvements. This gap analysis will help inform and drive our human rights strategy.



All AstraZeneca employees (including those in Australia) receive an annual Code of Ethics training that explicitly raises awareness of the risks of modern slavery and human trafficking.

Effectiveness

For the reporting year ending 31 December 2022, over 10,669 third party assessments were conducted across AstraZeneca globally through our Third-Party Risk Management process. During this time, as mentioned in the ‘Consumables’ section above, through our Third-Party Risk Management process, we identified one recorded incidence of single use gloves within AstraZeneca having been manufactured in a factory in Malaysia with identified links to modern slavery.

AstraZeneca’s Global Compliance function performs second line monitoring of Third-Party Risk Assessments through sample review to assure that all forms of risk, including “Employment Principles” risks, have been correctly identified and mitigated as appropriate. Our second line monitoring identified 10 engagements that required more in-depth review by a contract manager as a result of risks not being appropriately mitigated. Completion of modern slavery and human and labour rights training by third parties is also monitored within the 3PRM process.

Within Australia, 67 third party assessments were conducted. There were no recorded cases of human rights violations, including those related to trafficking or slavery.

Our governance group which has oversight of our Third-Party Risk Management process, and includes senior leaders in Procurement, Finance, Legal, and Compliance functions, are informed of any third parties exited as a consequence of “Employment Principles” risks identified through due diligence. Our “Employment Principles” risks include the risks related to slavery and trafficking (such as forced or bonded labour, underage employment, wages and benefits, hours/rest period and leave, collective bargaining, grievance procedures, non-discrimination and harassment).

We currently undertake enhanced due diligence on carbon offset projects, working with external subject matter experts to ensure we fully understand the local risk profile and are not contributing to other issues in our efforts to reach carbon zero.

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.

We have extended our collaboration with EcoVadis to conduct bench marking of over 1,100 suppliers to rate their Environment, Social and Governance (ESG) performance against 4 themes: environment, labour and human rights, ethics, and sustainable procurement. The labour and human rights theme includes the elements of child labour, forced labour and human trafficking, diversity, discrimination and harassment.

Within Australia, 67 third party assessments were conducted. There were no recorded cases of human rights violations, including those related to trafficking or slavery.

Of the suppliers that have completed their assessments, 78% have achieved the overall target score of 45 or more. In response to the assessment, the EcoVadis platform produced an action plan, which we are working with suppliers to progress through and achieve acceptable future assessments. To date, 154 suppliers have been identified with a low theme score for labour and human rights with whom we are working through their action plan to improve their position.

Our objective is to ensure that all suppliers above \$100,000 thresholds achieve the overall target by 2025, after which any supplier will be supported to address any gaps; if this is not achievable, they will no longer continue to provide goods and services to AstraZeneca.

As a result of the implementation of the United States *Uyghur Forced Labor Prevention Act* 2021, we have initiated a supply chain mapping exercise to fully understand whether there are any risks within our supply chain related to forced labour in the Xinjiang Uyghur Autonomous region of China.

Consultation

The two reporting entities covered by this statement share common processes and approaches to assessing and managing modern slavery risk. They operate under a single leadership team and the directors on the Board of each entity are the same. In the course of preparing this statement, consultation has occurred between Procurement, Finance, Legal, Compliance and Human Resources, covering the operations and supply chains of both reporting entities, and the boards of both entities have been provided with an overview of the approach to preparation of the statement. As noted above, the reporting entities do not have any active owned or controlled entities.

Further Steps

AstraZeneca will continue to review and improve its practices to identify and eliminate to the fullest extent practicable modern slavery or human trafficking from our business. This includes continuous improvement of our Third-Party Risk Management Framework.

This statement has been reviewed and approved by the board of directors of AstraZeneca Holdings Pty Ltd pursuant to section 14(2)(d)(ii) and is signed by Benjamin McDonald.



Benjamin McDonald
Country President,
Australia and New Zealand



30 June 2023