



MODERN SLAVERY STATEMENT

for **Elanco Australasia Pty Limited** and **Elanco Australia Holding Pty Limited**

pursuant to the Modern Slavery Act 2018
for the financial year ended 31 December 2023

Elanco Animal Health and its affiliates (“Elanco”) is committed to conducting business with integrity, complying with all legal requirements and ethical standards, while supporting initiatives that advance animal care and improve animal health outcomes. As a global U.S. publicly traded animal health company, Elanco works in a complex legal and regulated environment.

MODERN SLAVERY ACT STATEMENT

This Statement is made pursuant to the Modern Slavery Act 2018 (“**Act**”) which requires entities based or operating in Australia, which have an annual consolidated revenue of more than \$100 million, to “report annually on the risks of modern slavery in their operations and supply chains, and actions to address those risks”.

REPORTING ENTITY AND STRUCTURE

This Statement is made on behalf of each of the two following private limited Australian companies, both of which are a “*reporting entity*” under the Act, for their financial year ending 31 December 2023:

- **Elanco Australasia Pty Limited** (ABN 64 076 745 198)
- **Elanco Australia Holding Pty Limited** (ABN 24 628 673 754)

Each of the above companies are located at Level 3, 7 Eden Park Drive, Macquarie Park, NSW 2113, Australia. Elanco Australasia Pty Limited is wholly owned by Elanco Australia Holding Pty Limited. These two reporting entities are the only Australian Elanco group legal entities. For the purposes of this Statement, the above reporting entities are together referred to as “**Elanco Australia**”.

ELANCO GROUP OPERATIONS

Elanco Australia is part of the Elanco group of companies (“**Elanco**”), with the ultimate parent company being Elanco Animal Health Incorporated. Elanco is headquartered in Indiana, United States (“**US**”) and Elanco Animal Health Incorporated is listed on the New York Stock Exchange (NYSE: ELAN).

Elanco is a global leader in animal health dedicated to innovating and delivering products and services to prevent and treat disease in farm animals and pets, creating value for farmers, pet owners, veterinarians, stakeholders, and society as a whole. For more information on Elanco please refer to www.elanco.com.

Elanco distributes its products to veterinarians, retailers, wholesalers and distributors, food animal producers and pet owners in over 90 countries, including Australia. Elanco's four main areas of business are:

- **Companion Animal Disease Prevention:** Vaccines and parasiticide products that protect pets (dogs and cats) from worms, fleas and ticks
- **Companion Animal Therapeutics:** Pain and osteoarthritis products including treatments for otitis (ear infections), as well as cardiovascular and dermatology indications
- **Food Animal Ruminants & Swine products:** Food animal products (including vaccines, antibiotics and parasiticides) used in ruminant (beef and dairy cattle and sheep) and swine production
- **Food Animal Future Protein & Health:** Vaccines, parasiticides, functional nutritional health products (enzymes, probiotics, and pre-biotics) and animal-only antibiotics used in poultry and aquaculture production.

Elanco owns and operates manufacturing facilities located in various countries, currently including the US, France, Germany, China, Canada, Taiwan, New Zealand, Vietnam, Korea, Mexico and Brazil. Additionally, Elanco has external contracted manufacturing suppliers in many countries. The countries in which it has external contracted manufacturers for products supplied to Elanco Australia currently include the US, Australia, New Zealand, Switzerland, Ireland, Brazil, China, Portugal, Belgium, Singapore, Germany and England.

Elanco has R&D facilities and operations based in the US, Australia, Germany, Switzerland, Brazil, China, and India.

ELANCO AUSTRALIA'S OPERATIONS AND SUPPLY CHAIN

In Australia, Elanco was established as part of Eli Lilly and Company in 1960. Elanco Australia's head office is located at Macquarie Park, NSW. It also has a separately located R&D facility.

Elanco Australia researches and develops and markets and distributes animal health products (and related services) in Australia, as follows:

Marketing and Distribution: Elanco Australia markets and distributes a wide range of animal health products in Australia primarily for farm animals - sheep, beef cattle, dairy cattle, pigs, and poultry; and companion animals - primarily cats and dogs.

Research & Development: Elanco's Australian based R&D facility conducts various R&D activities from early research to full development.

Manufacture and Supply Chain: Elanco does not itself manufacture products in Australia, although it has several external contracted manufacturers in Australia. Many of the Elanco products sold in Australia are manufactured overseas, mostly in the US, Europe and Asia Pacific, by either Elanco owned sites or external contracted manufacturer sites. Where external contracted manufacturers are used to supply products, there are a number of mandatory conditions of supply to Elanco, which are further outlined below.

Elanco Australia's supply chains (both from external suppliers and within the Elanco group) broadly fall into the following main supplier categories:

- finished products suppliers and distribution arrangements (including in-licencing);
- external contracted manufacturing suppliers;
- production inputs including raw materials, packaging materials, active ingredients and excipients;
- research and development activities including clinical trials;
- transport services to transport products both within Australia and to import products from overseas locations;
- marketing services;
- supply of good and services ancillary to core business such as Information Technology, administration and general goods and services, maintenance services for Elanco sites, management and recruitment of Elanco workforce, and provision of professional services;
- provision of services by Elanco owned offshore service centres including HR, accounts and financial/accounting service centres in Malaysia, India, and Poland.

RELEVANT ACTIONS AND PRACTICES IN ELANCO AUSTRALIA'S OPERATIONS AND SUPPLY CHAINS

Upholding and advancing internationally recognized human rights across Elanco's global operations and supply chain is central to Elanco's mission as we work to improve the health of animals, benefit our customers and strengthen our communities. Support for human rights also aligns with Elanco's Employee Promise and our commitment to strengthen the integrity and resilience of our value chain – including suppliers and third parties with whom we do business.

Elanco sets out, on its public website, an outline of its approach to sustainability (refer: www.elanco.com/en-us/sustainability) including through the publication of Elanco's annual ESG Report and accompanying disclosures (refer: www.elanco.com/en-us/sustainability/esg-reporting). It also publicly outlines its Ethics and Compliance program (refer: www.elanco.com/en-us/about-us/governance/e-and-c).

We set out below the key steps Elanco takes (or, where noted, intends to take in the near future) to identify and mitigate risks of modern slavery in its operations and supply chains and to assess the effectiveness of same:

General

- **Laws and regulations:** As a business with global operations, Elanco is committed to acting legally and ethically, following the laws, regulations, industry codes, policies, and procedures that govern Elanco's business in all locations in which Elanco operates. Likewise, Elanco's contracts with third parties typically contain provisions by which each party undertakes to comply with (on a continuous basis) all applicable laws and regulations, and Elanco typically ensures that it has customary rights to audit third party supplier's compliance with such obligations.
- **Reporting:** Elanco's approach to human rights is outlined in its ESG disclosures at: <https://www.elanco.com/en-us/sustainability/esg-reporting>. In required jurisdictions, including Australia, the United Kingdom, Canada and Norway, Elanco files annual modern slavery statement(s) or report(s) explaining how Elanco addresses modern slavery risks. In the event human rights risks are identified and determined to be financially material, they are discussed in additional corporate disclosures (refer: [Elanco Animal Health Inc. - Financials - SEC Filings](#)), filed with the

United States Securities and Exchange Commission – or as required by other jurisdictions. Additionally, Elanco submits various reports to regulatory authorities, as required, including, where applicable, in relation to employment practices and conditions, such as reporting on gender pay equity.

Suppliers & other Business Partners

- **Business Partner Code of Conduct:** Elanco seeks to work with companies who align with our ethical standards. Suppliers and other third parties working on Elanco’s behalf (collectively our “Business Partners”), share a responsibility to act legally, ethically and abide by Elanco’s published Business Partner Code of Conduct (refer: [Elanco | Suppliers](#)) (**Business Partner Code**). In 2023, we revised our Business Partner Code to reinforce the importance of human rights and reaffirm Elanco’s standards and expectations — as a foundation to our enhanced due diligence efforts.

The Business Partner Code makes it clear that compliance with Elanco’s human rights expectations encompasses more than avoiding grave abuses such as modern slavery. The document further outlines labour-related principles such as freedom from discrimination, fair pay and working time, freedom of association and employee health and safety. We also reiterate our focus on protecting the environment and safeguarding information.

Business Partners are responsible for ensuring their employees are aware of and comply with the Business Partner Code. Elanco also expects our Business Partners to hold their business partners and other third parties to the same standards.

Through contractual provisions, Elanco typically requires its third-party business partners to abide by its Business Partner Code. Elanco Australia’s suppliers are referred to the Elanco supplier website (which houses the Business Partner Code) on Purchase Orders issued to suppliers. Elanco Australia’s Purchase Order Terms & Conditions (clause 13) also require suppliers to agree to comply with all applicable laws, regulations, and industry codes together with applicable Elanco policies they are made aware of, including, Elanco’s Business Partner Code.

- **Pharmaceutical Supply Chain Initiative:** Elanco is a member of the Pharmaceutical Supply Chain Initiative (**PSCI**) organization (refer: [PSCI \(pscinitiative.org\)](#)) and requires that key suppliers meet the PSCI principles in their workplaces. This includes potential completion of periodic surveys and the potential for onsite assessment to verify adherence to the PSCI principles.

The PSCI principles articulate what the industry expects from the supply chain. The PSCI principles address five areas of responsible business practice: ethics, labour, health & safety, environment, and management systems. In each area, the PSCI principles set out the relevant practices any business operating within the pharmaceutical supply chain is expected to uphold. The PSCI human rights sub-principles to be upheld by members encompass: freely chosen employment, child labour & young workers, non-discrimination, fair treatment, wages, benefits & working hours, freedom of association and local communities.

Elanco’s standard supply contracts typically include commitments that support PSCI principles such as prohibitions on modern slavery, child labour and forced labour.

- **United Nations Global Compact:** In late 2023, Elanco furthered its commitment to upholding internationally recognized human rights by joining the United Nations Global Compact (**UNGC**). As a UNGC participant, we seek to demonstrate alignment with the initiative’s [Ten Principles](#) throughout our operations — including a focus on human rights, labour issues, environmental concerns and anti-corruption — while also advancing our contributions to the UN Sustainable Development Goals.

- **Third party Anti-Corruption due diligence:** As part of Elanco’s anti-corruption and third-party management program, Elanco is committed to compliance with anti-corruption and anti-bribery laws globally. Elanco conducts anti-corruption due diligence (**ACDD**) on third parties with whom Elanco does business that meet certain pre-determined criteria. ACDD helps Elanco assess that the third party is trustworthy and shares a commitment to doing business the right way. The process screens these third parties prior to Elanco engaging in work with them to look for common "red flags" that may signal corruption, and we renew the ACDD screen for third parties on a regular basis.
- **Third party monitoring platform:** In 2023 Elanco implemented an additional third-party due diligence platform to identify regional and industry level risks and compile comprehensive information from current and prospective suppliers and business partners on their practices related to more than 20 leading ESG topics. We expand on the use of this platform below.
- **Contractual provision:** Elanco has recently reviewed their template procurement contracts and, as part of this process, has updated them to ensure they contain appropriate provisions regarding modern slavery, human rights, and sustainability (including related audit and monitoring rights).
- **Reporting of Concerns:** Elanco has an established reporting channel, *IntegrityLine*, where any person, including Business Partners and other third parties, can raise a concern. This is available 24 hours a day, seven days a week by telephone or online; translation services are available in most languages. It is a convenient, confidential and anonymous way to report issues, concerns, or behaviours that could harm Elanco or those it serves. The existence of, and how to contact, *IntegrityLine* is published in the Business Partner Code and on Elanco’s website (www.elanco.com/en-us/contact).

Elanco encourages all Business Partners as well as its employees, contractors, customers and other third parties to promptly “speak up” and report any known or suspected violation(s) of the law, Elanco’s Business Partner Code, Elanco’s Code of Conduct and/or any Elanco Ethics & Compliance policies and procedures without fear of retaliation. When a concern is reported, Elanco has an established process to investigate those concerns. Elanco does not tolerate retaliation in any form against individuals who report a concern or those who participate in an investigation.

Additionally, Elanco publishes a direct email address to Elanco’s Ethics & Compliance team in its Business Partner Code.

- **Specialist functions and auditing:** Elanco has global specialist functions including Ethics & Compliance, ESG, Legal, Health, Safety & Environment (**HSE**) and Quality who provide specialist advice and guidance to the Elanco business and its employees. Various of these functions conduct audits and inspections of key suppliers. In addition, due to the highly regulated business in which Elanco operates, Elanco and many of its suppliers are audited and/or inspected by relevant authorities. Elanco also has an internal audit function which audits its own functions and processes.

Employees

- **Culture:** Elanco fosters a culture of integrity and doing the right thing in the right way. At Elanco, all employees have a shared responsibility for developing and cultivating such a culture. To support Elanco’s employees in this effort, Elanco’s global Ethics and Compliance team, led by the Chief Compliance Officer, have designed a global ethics and compliance program. Program implementation, execution, consultation, and monitoring is supported by a centralized team which includes Regional

Ethics and Compliance Leaders in Asia Pacific, Europe/Middle East/Africa (EMEA) and the Americas and within countries, including Australia, by local compliance operation personnel, whom are ethics and compliance champions embedded in Elanco Australia's business. As part of this program Elanco helps employees implement ethical culture and behaviours by providing education and pragmatic advice and by partnering with the business teams to navigate regulatory complexities and devise effective solutions to ensure compliance.

- **Employee Code of Conduct:** Elanco has an employee Code of Conduct which is both publicly available via Elanco's website (refer: [Ethics & Compliance \(elanco.com\)](https://www.elanco.com/ethics-compliance)) and is made available to all employees through the Elanco intranet, in eighteen languages (**Code of Conduct**). Elanco's Code of Conduct guides employees in their decisions and relationships, establishes behavioural expectations, and sets the high standards against which performance is measured. The Code states that *"We are committed to acting legally and ethically, following the laws, regulations, industry codes, policies and procedures that govern our business. We apply good judgment, and we seek help when we're not sure of the right thing to do."* The Code contains ten guiding principles, two of which are: *"RESPECT ALWAYS. We adhere to fair employment practices and value diversity of thought, backgrounds, experiences, skills and perspectives."* *"ASK QUESTIONS, RAISE CONCERNS. We don't compromise on issues of integrity. We recognise that asking questions and raising concerns – even if anonymously - is our right and responsibility, knowing that Elanco does not tolerate retaliation."*
- **Training:** Elanco carries out regular staff training of key ethics and compliance topics through online training courses. This includes annual Code of Conduct training which includes lessons on respecting people (covering human rights, including forced labour), speaking up and no retaliation. The Code of Conduct training is offered in multiple languages and is mandatorily required to be completed by all Elanco employees on an annual basis. Additionally, from time to time face to face training is carried out by local personnel in Australia on key compliance topics.
- **Reporting of Concerns:** As noted above, Elanco has *IntegrityLine*, a convenient, confidential and, where permitted by law, anonymous reporting line. As well as being available to Elanco's Business Partners, it is also available to Elanco employees and contractors who are encouraged to report any known or suspected violation of Elanco's Code of Conduct, policies, procedures or laws that regulate Elanco's business - without fear of retaliation.

How employees can report concerns, including via Elanco's *IntegrityLine*, is set out in the Code of Conduct and on the Elanco intranet. Additionally, Elanco has a policy *Speak Up: No Retaliation* which applies globally to all employees (and designated contractors) which specifically covers discrimination, harassment and bullying and human rights violations. Elanco employees can also report concerns to their manager, Human Resources, Ethics & Compliance or Legal. No Elanco policy or procedure prohibits Elanco employees from reporting potential violations of any federal law or regulation to any government agency.

- **Adherence to Laws:** Elanco adheres to applicable local labour laws and requirements in respect of all its employees and commonly offers additional benefits and support to employees, their families, and their communities. As noted above, many of Elanco products sold in Australia are manufactured by Elanco-owned and operated manufacturing sites. In all these sites, as well as shared service centre sites operated by Elanco, Elanco adheres to applicable local labour laws and requirements.

POTENTIAL RISKS OF MODERN SLAVERY PRACTICES IN ELANCO AUSTRALIA'S OPERATIONS AND SUPPLY CHAINS

As outlined in this Statement, Elanco implements comprehensive actions and practices with regards to addressing potential risks of Modern Slavery in Elanco's operations and supply chains. As such, Elanco considers the risk of modern slavery occurring in Elanco's own business to be low.

Elanco purchases raw materials (including pharmaceutical ingredients, excipients, and other components such as packaging materials), finished products and services from an extensive supply chain (including external contracted manufacturers) around the world. In some cases, Elanco Australia may be multiple tiers away from third party suppliers. Although Elanco expects its suppliers to source materials, products and services responsibly, and expects them to conduct due diligence regarding their own sourcing, Elanco acknowledges that any multi-tiered global supply chain presents possible risks of modern slavery due to significant reach and complex structure, including suppliers operating from a range of countries including those with varying labour laws, ranging from developing to mature labour standards and practices. Suppliers who operate in jurisdictions which have developing labour practices may have an increased risk of modern slavery practices if they follow such local labour practices.

Assessing risks in our Supply chain – third party monitoring platform: Elanco works with approximately 15,000 business partners across many geographies and sectors. We're increasingly required by due diligence regulations and principles to identify and manage human rights and environmental risks in our supply chain. To advance our understanding of risk throughout our supply chain, as noted above, in 2023 we implemented a third-party monitoring platform and embedded responsibility for supply chain due diligence into roles and responsibilities across functions such as procurement, supply chain, legal, ethics and compliance, HSE, ESG and sustainability, and others. To date, we've screened our entire business partner population for industry-level social and environmental risks. We're further prioritizing organizations for more detailed evaluation, ongoing monitoring and engagement based on geography, level of spend and identified potential for bribery, corruption, environmental protection, human rights or other labour and/or operational concerns. This effort supports responsible procurement, as well as supply chain due diligence and reporting in alignment with requirements of the German Supply Chain Act, European Union (EU) Corporate Sustainability Due Diligence Directive and other upcoming regulations.

In the future, we expect to begin actioning on identified business partner-specific engagement opportunities — enabling us to collaboratively improve social and environmental performance throughout our value chain.

ASSESSING EFFECTIVENESS & FUTURE ACTIONS

Elanco is aware that conducting human rights due diligence across both its own business operations and across its supply chain is an ongoing process. Elanco will continue to review, develop and evolve its efforts in this area, with a goal of continuous improvement. As part of this evolution, Elanco will (amongst other things) continue to consider what further steps should be taken with regards to assessing the effectiveness of its actions regarding prevention of modern slavery in its supply chain.

Elanco's current steps to assess effectiveness along with future planned actions are as follows:

- **Formal Human Rights program:** In 2023, Elanco launched a human rights program with an initial focus on suppliers. Our program team includes members from ESG and sustainability, legal, ethics

and compliance, HSE, human resources, procurement and supply chain. We expanded our executive oversight committee in 2024, to broaden governance of our efforts.

- **Global Human Rights Policy:** In 2023, Elanco launched a global [Human Rights Policy](#) which applies to Elanco and its direct and indirect subsidiaries, joint venture and affiliates worldwide. Elanco also expect its suppliers and other third parties working on Elanco’s behalf to commit to compliance with the principles set out in the Policy. The Policy outlines Elanco’s commitments and procedures, including due diligence specifications that apply to our own operation, supply chain and other business partners. The Policy draws upon guidance from important international guidelines such as the OECD Guidelines for Multinational Enterprises, the UN Guiding Principles on Business and Human Rights (including the ILO Declaration of Fundamental Principles and Rights at Work) and the PSCI Principles, as well as applicable local laws. The Policy sets out: (a) human rights principles that Elanco staff and suppliers are required to adhere to, including, prohibitions against forced labour, unlawful child labour and non-discrimination; (b) practices and procedures implemented to uphold these human rights principles, including contractual arrangements, due diligence, audits, risk analysis, supply chain management and training; and (c) reporting any known or suspected human rights violation(s) through an anonymous hotline without any retaliation/reprisal for reporting.
- **Third-party monitoring platform:** As detailed above, Elanco is evolving its supplier due diligence processes, by implementing an enhanced third-party monitoring platform. Elanco will use information gained from this platform to monitor expected practice among suppliers and business partners, and inform targeted engagement.
- **Monitoring and investigating complaints:** Elanco continues to monitor and investigate relevant complaints made to Elanco’s *IntegrityLine* compliance hotline and through other grievance mechanisms. Trends resulting from investigations are reported to Elanco’s global Investigations Oversight Committee. Complaints to regulators are (and will continue to be) reported internally via a formal notification to senior management (including legal) process.
- **Monitoring of relevant laws:** As human rights standards and laws continue to evolve, including the introduction of new or enhanced modern slavery and/or human rights legislation, Elanco will continue to monitor and keep abreast of legal developments in this area (and in the wider area of anti-corruption) and continue to review its actions to ensure it remains compliant with its legal obligations.
- **Training of key personnel:** Elanco will continue to ensure that its personnel in relevant functions are trained in modern slavery legislation and human rights requirements including awareness of risk and appropriate decision making and action.
- **Ongoing review:** Elanco will continue to review, benchmark and evolve its Ethics and Compliance program.
- **ESG Reporting:** Elanco publishes an annual ESG Report and a collection of issue briefs addressing Elanco’s oversight and managerial approach to Elanco’s most important ESG topics – including human rights and a responsible supply chain – refer: [Environmental, Social and Governance \(ESG\) Reporting \(elanco.com\)](#)

PROCESS AND APPROVAL

This Statement is made pursuant to the Modern Slavery Act 2018 and constitutes the modern slavery statement for both Elanco Australasia Pty Limited and Elanco Australia Holding Pty Limited for the financial year ending 31 December 2023. This Statement was produced in consultation with key functions and key leaders within Elanco.

This statement was reviewed and approved by the Board of Directors of each of Elanco Australasia Pty Limited and Elanco Australia Holding Pty Limited on 25 June 2024. The boards of each reporting entity have the same Board members.



Hendrik van der Walt, Director
Elanco Australasia Pty Limited
Elanco Australia Holding Pty Limited

25 June 2024