



## **Sanofi Australia**

### **Modern Slavery Statement 2021**

#### **1. Introduction**

Sanofi Australia is part of a global biopharmaceutical company focused on human health and dedicated to supporting people through their health challenges. We prevent illness with vaccines, provide innovative treatments to fight pain and ease suffering. We stand by the few who suffer from rare diseases and the millions with long-term chronic conditions.

This statement refers to the financial year ending 31 December 2021 and sets out the steps we have taken to address modern slavery risks in our business and supply chains.

#### **2. Our structure**

Sanofi Australia consists of the following Sanofi companies:

- Sanofi-Aventis Australia Pty Ltd
- Sanofi-Aventis Healthcare Pty Ltd

We are a part of the Sanofi Group (Group) and our ultimate parent company is Sanofi S.A. Sanofi S.A. has its head office in Paris, France. With more than 100,000 people in 100 countries, Sanofi is transforming scientific innovation into healthcare solutions around the globe.

#### **3. Our business**

Sanofi Australia is organised into four business units: General Medicines including diabetes, cardiovascular and our mature medicines; Vaccines; Speciality Care including rare diseases, oncology, rare blood disorders, and immunology; and Consumer Healthcare.

We ensure the way we contribute to improving health is one which is both sustainable and responsible. We are convinced that each of us has an obligation to leave the world a better place for the next generation. Our contract with society is built within our organisation and our corporate responsibility strategy is embedded as part of our business strategy - locally, regionally and globally.

#### **4. Our supply chains**

Sanofi Australia is integrated into a global supply chain involved in the manufacture of active pharmaceutical ingredients, finished goods, devices and packaging through a global network of manufacturing sites and distribution centres. This network includes the procurement of goods and services from a large number of external contractors. In 2021, we spent around \$180M AUD with over 450 suppliers.

Sanofi Australia understands the global challenges related to modern slavery and works to minimise the risk of this being present in any part of our business, including all suppliers and the supply chain.

#### **5. Our Policies**

Sanofi Australia is required to comply with all Sanofi policies including our [Code of Ethics](#) which outlines our commitment to complying with national laws and regulations, including in the areas of human rights and labour law. Sanofi has also implemented the following policies that, among other things, promote respect for human rights:



- [\*Respect for the Individual\*](#) – fostering a workplace environment for our partners where personal dignity is respected;
- [\*Fighting Bribery and Corruption\*](#) – committing to fighting all forms of corruption;
- [\*The Suppliers' Code of Conduct\*](#) – ensuring that our contractors adhere to the fundamental principles of the International Labour Organisation, in particular those relating to forced labour, violence and harm, child labour, discrimination, working hours, pay, freedom of expression and equality of opportunity.

Additionally, Sanofi Australia has implemented the following local policies and procedures:

- [\*Sanofi Australia Modern Slavery Policy\*](#) – aimed at ensuring compliance with applicable Australian modern slavery legislation and reporting requirements;
- [\*Alerts Management Global Policy Appendix\*](#) and [\*Global Compliance Helpline\*](#) – aimed at encouraging internal reporting and whistleblower protection (e.g. through 'non-retaliation' assurance);
- [\*Domestic Violence Policy\*](#) – aimed at supporting employees, agents and contractors in the workplace to ensure that everyone has a safe working environment;
- [\*Recruitment Selection Policy\*](#) – sets out Sanofi's sourcing and recruiting framework and principles;
- [\*Appropriate Workplace Behaviour Policy\*](#) – aimed at ensuring that discrimination, harassment and bullying do not take place in Sanofi's operations;

The applicable Sanofi policies underpin our culture of zero tolerance attitude toward abuse of human rights within any part of our business or supply chains.

## **6. Due diligence processes for slavery**

In 2021, Sanofi Australia engaged a third party due-diligence and risk assessment service provider ethiXbase in order to enhance our ability to assess and address modern slavery risk in our supply chain in Australia.

As part of our initiative to identify modern slavery and mitigate associated risks in our business and supply chain, we undertake the following:

### **6.1 Our Employees**

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

Sanofi Australia complies with all applicable legislative requirements and employment standards relating to the payment of minimum wages. We believe that the risk of modern slavery in our directly employed workforce is low.

### **6.2 Our Suppliers**

#### **Supplier selection**

Sanofi Australia conducts due diligence on its suppliers where it considers there may be risk in line with its global Ethics & Business Integrity and other Risk Management directives.

The standard Request for Proposals/Tenders used by Sanofi Australia includes questions directed at assessing the risk of modern slavery in the prospective supplier's operations and the capacity to comply with the requirements of Australian legislation.



Sanofi Australia continually looks for new ways to further improve its vendor selection processes. This is an ongoing area of focus.

### **Existing suppliers**

In 2021, Sanofi Australia commenced using a modern slavery governance and reporting platform and questionnaire developed by ethiXbase to enhance Sanofi Australia's ability to assess and address the risk of modern slavery in its supply chain. Through the use of ethiXbase and its questionnaire, Sanofi Australia is conducting audits of various existing suppliers and this process is ongoing. The questionnaire includes enquiries pertaining to respect for human rights and compliance with modern slavery laws. Depending on the response to the questionnaire, representatives of Sanofi may ask the suppliers for more information or their participation in an interview. Additionally, based on the quality of the responses, Sanofi may choose to conduct a third party supplier audit.

In cases where potential issues as to particular suppliers are identified, Sanofi will undertake appropriate action dependent on the circumstances presented (and legal considerations), which may include, for example, working with the supplier to develop an improvement plan, or declining to continue the supplier relationship.

### **Contractual obligations**

Sanofi Australia's standard service agreements that may be provided to potential suppliers include an obligation that it will carry out any services in full compliance with all applicable laws (including laws prohibiting all forms of modern slavery (with a specific requirement to comply with the *Modern Slavery Act 2018 (Cth)*).

Sanofi Australia's standard service agreements also require suppliers to take reasonable steps to assess and address the risk of modern slavery in their operations and supply chains and to comply with Sanofi's Suppliers Code of Conduct (a copy of which may be accessed at <https://suppliers.sanofi.com>) which includes obligations in relation to respecting human rights (including prohibitions regarding forced labour, violence and harm, child labour, discrimination, working hours, pay, freedom of expression and equality of opportunity). In each case, Sanofi Australia reserves the right to audit to ensure compliance to our high standards on quality and ethical behaviour.

## **7. Training and Capacity Building**

As part of their employment conditions, all Sanofi Australia employees must agree to uphold Sanofi's Code of Ethics and training is provided throughout employment on topics relating to business ethics. Sanofi staff are also given Core Inclusion training and this includes the importance of respecting human rights in Sanofi's operations.

To ensure a high level of understanding of the risks of modern slavery in our supply chains and our business, we provide modern slavery training to the relevant staff members. Training content will be reviewed by Sanofi Australia on an ongoing basis.

## **8. Our effectiveness in combating slavery**

In order to address the potential areas for improvement in relation to the questionnaire issued in 2020, Sanofi Australia commenced using ethiXbase and an updated questionnaire.



Sanofi Australia is currently reviewing these updated questionnaire supplier responses and will implement the measures outlined in section 9 below where necessary during 2022 and if necessary 2023.

## **9. Further steps and remediation**

Following a review of the effectiveness of the steps we have taken in 2021 to ensure that we take reasonable steps to minimise the risk of modern slavery in our supply chains, we intend to take the following further remedial steps:

- continue to work with ethiXbase to enhance our auditing capabilities and look at ways to further incorporate their services into our vendor selection process;
- make further changes to our Modern Slavery Due Diligence Questionnaire to ensure it is as effective as possible; and
- work with suppliers to ensure modern slavery risk is minimised (this may include additional auditing, training, the implementation of an improvement plan or where appropriate ceasing the supplier relationship).

Sanofi Australia will take a continuous improvement approach to reviews of relevant systems, processes and training to ensure ongoing effectiveness.

## **10. Consultation process**

This statement has been prepared in consultation with our key teams that collaborate to deliver our labour rights risk identification, assessment and management processes for our own operations and supply chain. This includes the corporate responsibility; health & safety; human resources; ethics & business integrity; supply chain; procurement, and legal teams. This modern slavery statement is made by Sanofi Australia for the financial year ending 2021.

This Statement was approved by our Board of Directors on 25 June 2022.

A handwritten signature in black ink, appearing to read "Karen Hood".

Karen Hood – Country Lead Sanofi ANZ  
June 2022