

**BOEHRINGER INGELHEIM**  
**JOINT MODERN SLAVERY STATEMENT**  
**FINANCIAL YEAR ENDING 31ST DECEMBER 2021**

At Boehringer Ingelheim we are driven by the desire to serve mankind by improving human and animal health. Our passion comes from believing in the value of our work beyond its commercial potential. As a long-standing, successful, family-owned company we plan in generations.

Aiming to make significant contributions to health care, we focus on diseases which have so far not been satisfactorily treated. We innovate to make breakthrough therapies and life-enhancing improvements available to patients and to provide advanced, preventive animal healthcare.

Our values of Respect, Empathy, Trust and Passion form the foundation for how we work with our colleagues, stakeholders and the community. As a family-owned company, in all of our activities we feel responsible for our communities and are respectful of our resources. We are committed to sustainable development and work closely with communities to understand and meet their needs.

## **REPORTING ENTITIES**

This Joint Modern Slavery Statement is made pursuant to section 14 of the *Modern Slavery Act 2018* (Cth) by Boehringer Ingelheim Pty Ltd (ACN 000 452 308) (**BI**) on behalf of itself and the following reporting entities:

- Boehringer Ingelheim Animal Health Australia Holding Pty Ltd (ACN 623 185 311) (**BIAH Holding**); and
- Boehringer Ingelheim Animal Health Australia Pty Ltd (ACN 071 187 285) (**BIAH**).

Boehringer Ingelheim's Australian and New Zealand businesses utilise the same policies, processes, resources and systems to manage their supply chains. As a result, this Joint Modern Slavery Statement will provide a single, consolidated description of each reporting entity's actions to address modern slavery risks in their businesses and supply chains.

## **OUR STRUCTURE**

BI, BIAH Holding and BIAH are part of the Boehringer Ingelheim group. Boehringer Ingelheim is a research-driven global biopharmaceutical company which has a focus on developing innovative therapies in areas of high unmet medical need in human and animal health. The group is headquartered in Ingelheim, Germany and is one of the world's 20 leading pharmaceutical

companies. The ultimate parent company of the Boehringer Ingelheim group is C.H. Boehringer Sohn AG & Co. KG.

Each of BI, BIAH Holding and BIAH is an Australian proprietary company limited by shares. BI and BIAH do not own or control any other entities. BIAH is a subsidiary of BIAH Holding, which owns 100% of the shares of BIAH.

Together, BI and BIAH employ approximately 415 people in Australia.

## **OUR OPERATIONS**

### **BI – Human Pharmaceuticals**

In Australia, BI is a leading provider of innovative prescription medicines that improve the health and save the lives of Australian patients. Our Human Pharma division is underpinned by a broad portfolio across a range of therapeutic areas. Many of the company's products are standard treatments in Australian clinical practice. Boehringer Ingelheim's research into new medicines is focused on those of areas of science with significant medical need and where Boehringer Ingelheim can continue to innovate and lead the science. Boehringer Ingelheim's current research focus is in the key areas of CardioMetabolic diseases; diseases of the Central Nervous System; Immunology and Respiratory diseases; Oncology and Cancer Immunology and Retinal health. Boehringer Ingelheim's scientists are also contributing to the collective effort to fight COVID-19.

BI Australia also plays an important role in contributing to the company's ambitious global Clinical Trial program. Currently BI's Australian clinical research activities are focused on the key focus areas of oncology, respiratory, immunology and central nervous system diseases.

BI is committed to promoting the Quality Use of Medicines, ensuring that our medicines conform to the highest standards of safety, efficacy and quality; are supported by comprehensive technical and information services; our teams are professional in dealing with healthcare professionals, public health officials and consumers; and promote the quality use of medicines and principles within the Australian National Strategy for Quality Use of Medicines.

### **BIAH – Animal Health**

In Australia, BIAH is a leading provider of veterinary vaccines and medicines. BIAH develops, markets and distributes vaccines, parasiticides and pharmaceuticals that protect animals against disease and pain. BIAH's portfolio includes products for pets and horses as well as livestock such as swine, cattle and sheep.

BIAH also plays an important role in contributing to the company's global Clinical Trial Program. These efforts ensure that the products developed to protect Australian pets and livestock are safe and effective under local conditions.

BIAH is committed ensuring that our products conform to the highest standards of safety, efficacy and quality; are supported by comprehensive technical and information services; our teams are



professional in dealing with veterinary professionals, public health officials and consumers; and promote the responsible and appropriate use of our products.

## **OUR SUPPLY CHAIN**

BI and BIAH each operate an extensive global supply chain. Both supply chains include manufacturers of finished pharmaceutical products as well as manufacturers of the raw materials which are incorporated in finished pharmaceutical products. The raw materials of finished pharmaceutical products are active pharmaceutical ingredients (substances which cause the therapeutic effect of a product), excipients (substances which stabilise or balance the active pharmaceutical ingredient(s)) and other components such as packaging materials. Related companies in the Boehringer Ingelheim Group and independent third-party contractors manufacture BI and BIAH finished products as well as the necessary raw materials for BI and BIAH finished products.

BI's supply chain for its human pharmaceutical products includes manufacturing sites which are located in Germany, the United States of America, Italy, France, Greece, China, Spain, Mexico.

BIAH's supply chain for its animal health products includes manufacturing sites which are located in Australia, New Zealand, the United States of America, China, Brasil, Germany, Spain, France, Hungary, Italy, Mexico, Puerto Rico, Sweden, Switzerland.

Once the human pharmaceutical products and animal health products are imported into Australia, BI and BIAH utilize the services of freight forwarders to transport the products and store the products in warehouses.

## **RISKS OF MODERN SLAVERY PRACTICES IN OUR OPERATIONS AND SUPPLY CHAINS**

BI and BIAH maintain a well-established Environment, Health, Safety & Sustainability program. The Environment, Health, Safety & Sustainability program reflects BI and BIAH's commitment to ensure the health, safety and welfare of their employees, visitors and contractors working at their premises. Given the maturity of the Environment, Health, Safety & Sustainability program, BI and BIAH consider the risk of modern slavery occurring in its business to be extremely low.

BI and BIAH purchase finished pharmaceutical products. These finished pharmaceutical products incorporate raw materials (active pharmaceutical ingredients, excipients and other components such as packaging materials) from an extensive supply chain around the world. In some cases, BI and BIAH are multiple tiers away from third parties responsible for the manufacture of raw materials necessary for the finished pharmaceutical products.

BI and BIAH acknowledge that any multi-tiered global supply chain presents possible risks of modern slavery due to its significant reach and complex structure. In particular, the global structure of BI and BIAH's supply chains include suppliers which operate in a range of countries with varying labour laws, ranging from developing labour standards to mature labour practices. As a result, there is an inherent risk that suppliers located in developing countries may engage in modern slavery practices if these suppliers follow the local labour practices.

Despite this inherent risk, BI and BIAH believe the overall risk of modern slavery is low in their supply chains due to BI and BIAH's actions to assess and address modern slavery risks, as well as the Boehringer Ingelheim Group's policies which reflect the Group's firm position that any kind of modern slavery is incompatible with Boehringer Ingelheim's ethical basics. The Boehringer Ingelheim group expects its suppliers/contractors and their subcontractors to fight against any form of modern slavery.

## **OUR ACTIONS TO ASSESS AND ADDRESS MODERN SLAVERY RISKS**

### **Our Employee Commitment**

At Boehringer Ingelheim our Global Code of Conduct is the guide for our employees setting out the actions and behaviours expected both within the company and externally. It is designed to engage our employees and demonstrate how integrity is part of our DNA, and how every employee is accountable for their actions and entrusted to make decisions in line with the law and guided by our ethical principles at Boehringer Ingelheim.

Purchasing and Supplier Relations, Speak Up and Human Rights form key tenants of our Global Code of Conduct. Employees are regularly engaged and participate in regular training on both the Code of Conduct and our Speak Up channels. We also proactively communicate how to ask for help when they have questions or are unsure of what to do.

### **Supplier Engagement**

BI and BIAH recognize and expect adherence to exemplary ethical and professional conduct from their business partners. BI and BIAH expect their business partners to promote these responsibilities throughout their own operations and supply chain.

To that end, the Boehringer Ingelheim Global Supplier Code of Conduct is provided to all suppliers of BI and BIAH. This Supplier Code of Conduct sets out BI and BIAH's expectations for how suppliers should conduct business with BI and BIAH. Where necessary, BI and BIAH include in their agreements contractual obligations which require suppliers to comply with the Supplier Code of Conduct. A copy of the Supplier Code of Conduct is available at: <https://www.boehringer-ingelheim.com/corporate-profile/sustainability/supplier-code-of-conduct>.

In addition to general requirements for suppliers to comply with applicable laws, the Supplier Code of Conduct specifically addresses Labour and Human Rights. The Supplier Code of Conduct requires BI and BIAH suppliers to ensure that:

- Forced, bonded or indentured labour or involuntary prison labour or other kind of forced labour is not used in its supply chain.
- Employees shall not be required to surrender their passports or other legal document or pay fees to an employer or the supplier before commencing work.
- Child labour is not used. Employment of workers below the age of 18 shall only occur in non-hazardous work and when young workers are above a country's legal age for employment.
- Working environments are free from harassment and discrimination.



- Working environments are free from harsh and inhumane treatment.
- Workers are paid according to applicable wage laws, including minimum wages, overtime hours and mandated benefits.
- Suppliers shall respect the rights of workers, as set forth in local laws, to associate freely, join or not join labour unions.
- Workers shall be able to communicate openly concerns regarding working conditions with management without threat of reprisal, intimidation or harassment.

### **Due Diligence**

BI and BIAH follow a modern slavery due diligence process when onboarding new suppliers. BI and BIAH's modern slavery due diligence includes a screening process aimed at identifying key risk indicators of modern slavery to assess the risk of modern slavery occurring within a new supplier's business and supply chain. The screening process assesses the new supplier's industry, existing social and labour policies, past modern slavery violations, modern slavery audit programs, and grievance mechanisms in place. For new suppliers identified as potentially "*High Risk*", BI and BIAH implement measures to mitigate the risk of modern slavery, up to and including the discontinuance of the potential business relationship.

### **Remediation**

BI and BIAH are committed to conducting business with integrity and in compliance with applicable laws, regulations and company policies and procedures. BI and BIAH actively promotes a "Speak Up" culture and encourage employees and third parties to report any action or behaviour which is, or could be assumed to be, not in line with BI and BIAH's commitment, such as wrongdoing, misbehaviour, doubtful practices, or deviation from policies and procedures.

If employees and third parties do not feel comfortable or are not able to report concerns directly to BI and BIAH, employees and third parties may utilize Boehringer Ingelheim's global "Speak up" portal (available at <https://www.bkms-system.net/bkwebanon/report/clientInfo?cin=2BI9&c=-1&language=eng>). This portal allows employees and third parties to submit reports at any time via an internet-based system secured by a specialized vendor. The "Speak up" portal also offers the option for reports to be submitted anonymously if individuals do not wish to disclose their identity.

BI and BIAH take all reports of non-compliance seriously and addresses matters according to the nature of the report. If an investigation is deemed necessary, investigators will conduct an objective, thorough and timely investigation. Once an investigation is concluded, appropriate corrective action may be taken, depending on the findings. This may include a Corrective and Preventative Action plan to mitigate the risk of Modern Slavery occurring, or other actions up to and including the termination of the business relationship with the offending third party.

### **ASSESSING THE EFFECTIVENESS OF OUR ACTIONS**

BI and BIAH's primary method to assess the effectiveness of their actions to address modern slavery is to measure metrics from different reporting periods in relation to the number of high risk suppliers

engaged and the number of reports of potential non-compliance received via Boehringer Ingelheim's "Speak up" portal.

### **OUR CONSULTATION BETWEEN REPORTING ENTITIES**

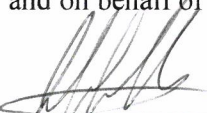
Boehringer Ingelheim's Australian and New Zealand businesses have established a Compliance Committee, which has responsibility to ensure compliance with legal and regulatory requirements and foster a culture of ethics and integrity within the local businesses. The Compliance Committee is comprised of local senior management, including leaders from BI and BIAH, and meets quarterly. The Compliance Committee is consulted regarding developments to Boehringer Ingelheim's local ANZ Human Rights Program, including reported occurrences of modern slavery, recurring modern slavery risks and the actions taken to address these modern slavery risks.

In preparing this Joint Modern Slavery Statement, the board of directors for each reporting entity covered by this Joint Modern Slavery Statement has been consulted and reviewed this Joint Modern Slavery Statement.

### **APPROVAL OF THIS JOINT MODERN SLAVERY STATEMENT**

This statement was approved by the boards of each of the three reporting entities covered by this statement. The boards of BI, BIAH and BIAH Holding each approved this statement on 24 March 2022.

Signed for and on behalf of **Boehringer Ingelheim Pty Ltd (ACN 000 452 308)**:

Signature:  \_\_\_\_\_

Name: Wes Cook

Position: Country Managing Director

Date: 25 March 2022

Signed for and on behalf of **Boehringer Ingelheim Animal Health Australia Holding Pty Ltd (ACN 623 185 311)**:

Signature:  \_\_\_\_\_

Name: Wesley Cook

Position: Country Managing Director

Date: 25 March 2022

Signed for and on behalf of **Boehringer Ingelheim Animal Health Australia Pty Ltd (ACN 071 187 285)**:

Signature:  \_\_\_\_\_

Name: Wesley Cook

Position: Country Managing Director

Date: 25 March 2022