

BOEHRINGER INGELHEIM

MODERN SLAVERY STATEMENT

FINANCIAL YEAR ENDING 31ST DECEMBER 2021

Boehringer Ingelheim Limited and Boehringer Ingelheim Animal Health UK Limited (“BI”) is deeply committed to combating slavery and human trafficking.

BOEHRINGER INGELHEIM LIMITED AND BOEHRINGER INGELHEIM ANIMAL HEALTH UK LIMITED'S STRUCTURE

We are a distributor of pharmaceutical and animal health products within the United Kingdom, Ireland, Malta, Gibraltar, the Isle of Man and the Channel Islands. We are a part of the Boehringer Ingelheim group of companies (“Group”), and our ultimate parent company has its head office in Germany. The Group operates globally with 175 affiliates with over 51,000 employees worldwide.

OUR BUSINESS

The focus of our family-owned company, founded in 1885, is clinical research, developing, manufacturing, selling and marketing approved medications of high therapeutic value for humans and animals.

OUR SUPPLY CHAINS

Our supply chain involves the manufacturing of products and the importation of these products into the UK via air or seaports, as well as the direct road transport from our manufacturing network to our central warehouse facility in the UK. Our products are then distributed to wholesalers, hospitals, pharmacies and retailers in the UK, Ireland, Malta, Gibraltar, the Isle of Man and the Channel Islands. All supply chain activities are governed by Good Distribution Practice principles and are in accordance with relevant UK and EU laws.

POLICIES

We have a global Supplier Code of Conduct which governs BI’s expectations for conducting business among the BI Group with its suppliers and employees. BI shares this Supplier Code of Conduct with suppliers and we include obligations to comply with this Supplier Code of Conduct in our agreements.

Under the Code of Conduct suppliers are required to:

- Operate in full compliance with all applicable laws, rules, guidelines and industry codes.

- Firmly adhere to ethical principles for labour, environment, health and safety, and management systems.
- Integrate, communicate and apply these principles in a manner consistent with their own Third Party programmes.
- Recognize the importance of diversity and inclusion by strict adherence to all local laws, regulations and policies specific to equal opportunity and non-discrimination.
- Ensure the workplace is free from violations of the law including any type of prohibited discrimination.
- Be aware and respectful of cultural differences, beliefs and the challenges associated with interpreting and applying these Principles globally; understand that the methods for meeting these expectations may vary and must be consistent with the local laws, values and cultural expectations of the different societies of the world.
- Integrate the principles into a continual improvement approach that improves awareness, sensitivity and inclusiveness which advances performance over time.

Our Supplier Code of Conduct specifically addresses Labour and Human Rights and requires 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. Besides, the 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.

For a copy of our Supplier Code of Conduct, please see our website:

[https://www.boehringer-
ingelheim.co.uk/sites/gb/files/documents/supplier_code_of_conduct.pdf](https://www.boehringer-
ingelheim.co.uk/sites/gb/files/documents/supplier_code_of_conduct.pdf)

We have in place a Speak Up SOP which sets out procedures for individuals to report compliance concerns. BI is committed to ensuring employees are able to report concerns in a safe environment. BI does not tolerate any forms of victimisation against

its employees. BI also has an anonymous reporting system for employees to report concerns without having to identify themselves.

BI has a zero-tolerance approach to slavery and human trafficking in our supply chain and across our business.

In 2021 we have adopted a new global Human Rights policy which confirms:

- BI are committed to respecting and contributing to the realisation of all human rights, prioritising those based on risk to people, including vulnerable or marginalised groups potentially impacted by our operations and business relationships.
- BI's business activities are based on the following international standards and guidelines: the Universal Declaration of Human Rights; the United Nations Guiding Principles on Business and Human Rights (UNGP); the Core Labour Standards of the International Labour Organization (ILO); the United Nations Convention on the Rights of the Child (UNCRC); and the Guidelines of the Organisation for Economic Co-operation and Development (OECD) for multinational companies.
- BI's human rights commitments are embodied in BI's Employee Code of Conduct.
- BI's membership in the Pharmaceutical Supply Chain Initiative (PSCI) which demonstrates efforts toward a vision for better social, health, safety and environmental outcomes in the communities where BI source.

DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING

As part of our initiative to identify and mitigate risks of modern slavery:

1. We require suppliers to agree to comply with our Supplier Code of Conduct and other contractual obligations relating to removing Modern Slavery risks. We also require all new suppliers to complete our standard Modern Slavery Questionnaire and we use the answers to this Questionnaire as part of our selection process for our suppliers.
2. If a Supplier is deemed to be a risk for Modern Slavery, we make further detailed enquiries of the relevant supplier. We also seek to ensure rights of audit from a Modern Slavery perspective are contained in our contracts with contracts.

Actions Achieved

As part of our Modern Slavery Programme for the financial year ending 31st December 2021, we have undertaken the following:

1. A comprehensive risk assessment of our suppliers and third parties piloting a third-party review of suppliers identified as high risk.
2. Created a self- assessment questionnaire to enable BI to evaluate the performance of high-risk suppliers.
3. Adopted a new Human Rights Policy.


Next Steps

The Board of Directors of Boehringer Ingelheim Limited & Boehringer Ingelheim Animal Health UK Limited have ultimate responsibility for the implementation of policies and procedures, including those relating to modern slavery and will continue to support the cross functional team for the financial year 2022.

SIGNATURE

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement.

Signed:

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Date:

Mr Uday Bose

Managing Director

Boehringer Ingelheim Limited & Boehringer Ingelheim Animal Health UK Limited

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Date:

Mr Benjamin Moynihan

Finance & Administration Director

Boehringer Ingelheim Limited & Boehringer Ingelheim Animal Health UK Limited

Signed:

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Date:

Mr Gerardus JM Ensink

Animal Health Director

Boehringer Ingelheim Animal Health UK Limited

Statement Dated: May 2022