



Modern Slavery Act Statement

For the year ending 31 December 2023

Submitting entities: AstraZeneca UK Limited (UK), KuDOS Pharmaceuticals Limited (UK), MedImmune Limited (UK), MedImmune UK Limited (UK), Alexion Pharmaceuticals Limited (UK), Alexion Pharmaceuticals Inc, AstraZeneca Pharmaceuticals LP, Amylin Pharmaceuticals LLC, MedImmune LLC
A separate statement will be submitted by AstraZeneca Holdings Pty Limited (Australia) CAN 066 876 962 and AstraZeneca Pty Limited (Australia) CAN 009 682 311.

Where "AstraZeneca" is referred to throughout the document this is an umbrella term which includes all of AstraZeneca including the Rare Disease Unit ("Alexion"), where "Core AstraZeneca" is specified this refers to the AstraZeneca business excluding Alexion.

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.

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

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 Standard on [Expectations of Third Parties](#).



Alexion has a Vendor Code of Conduct which provides information to third parties who work with us about our commitment to ethics and compliance and the standards with which we expect all third parties to comply. Amongst other things, the [Vendor Code of Conduct](#) requires suppliers to comply with applicable labour laws and regulations and to treat workers with dignity and respect. Alexion are due to adopt AZ policies so in 2024 the Vendor Code of Conduct will be replaced by the Expectations of Third Parties.

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.

Our business

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. In 2023 we had an active presence in some 85 countries and sold our products in approximately 125 countries. Our innovative medicines are used by millions of patients worldwide.

To drive our science, we have disease-area focused R&D organisations in each of our therapy areas that that are responsible for discovery through to late-stage development and working to realise the potential of our pipeline to deliver sustainable growth. We have Commercial regions that align product strategy and commercial delivery, while our Operations function develops, manufactures and delivers our medicines in 16 countries around the world.

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 89,900 employees, but we also use contractors and labour agents in sourcing a highly skilled workforce.

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. As of 2023 the top 95% of AstraZeneca spend is with ~3,300 suppliers of which ~500 are small businesses. 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. For more information on our business structure, workforce, and operations please refer to our annual report.

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

Alexion is in the process of adopting AstraZeneca due diligence processes for human & labour rights which will be completed by the end of 2023.

We work to develop and maintain good relations with local workforces and work closely with our recognised national trade unions. We also regularly consult with employee representatives or, where applicable, trade unions, who share our aim of retaining key skills and mitigating job losses. According to our internal Human Rights survey carried out in 2022, 45% of countries in which AstraZeneca operates have a relationship with trade unions. Where trade unions do not exist in an area of operation, 95% have established arrangements to engage similarly with their workforce. The reduction in number of countries with relationships with trade unions from the numbers recorded in our 2020 report, resulted from a misunderstanding of the question in the 2020 survey.

Our policies

AstraZeneca does not tolerate modern slavery or human trafficking in any part of our business or our supply chains. The AstraZeneca Human Rights Statement asserts 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. The AstraZeneca Expectations of Third Parties policy and Alexion Vendor Code of Conduct also inform our third parties that we do not tolerate the use of child labour and forced labour by third parties.

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.

Training and risk awareness

In 2023 we delivered a global risk awareness module to all employees in risk gatekeeping roles in Operations, Human Resources and Compliance. The awareness training explained how to spot the signs of modern slavery, detailed the high-risk activities for the company and clarified the internal escalation process for concerns



related to this risk. This training has also been made available to third parties. As of November 2023, the training has been rolled out to 3,246 and has a completion rate of 93%.

All AstraZeneca employees receive an annual Code of Ethics training. Rolled out globally in October 2023, we expect the course to be completed by 100% of active AstraZeneca employees by year end.

Our live internal social media platform reached 399 voluntary members who share information and champion risk awareness and mitigation in the business.

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.

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 that we do business with. The applicable standards and requirements for third parties are entrenched in our Global Standard: Expectations of Third Parties.

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 that our suppliers and other third parties do 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 'Expectations'.

Risk management

The Core AstraZeneca business has a Third Party Risk Management (3PRM) process in place to identify and assess potential risks connected with our suppliers, which is explored further below. This includes human and labour rights as a standalone risk area and assesses risks such as forced or bonded labour, child labour, wages and benefits, hours/rest period and leave, collective bargaining, grievance procedures, discrimination and harassment.

The potential risks posed to workers are continuously evolving and may have been exacerbated by increasing geopolitical tensions. We continuously review our approach to assessing risk in our global supply chains to take account of emerging challenges and updated information sources.

We work to ensure our strategies and efforts to mitigate environmental issues do not negatively impact other human rights.

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.

In line with the requirements of the Corporate Sustainability Reporting Directive CSRD, in October 2023 we initiated a double materiality assessment to fully understand how the business is impacted by sustainability in addition to how AstraZeneca's activities impact society and the environment.

The areas of our business which are highest inherent risk for human rights and modern slavery issues continue to be construction, temporary resources,



recruitment, facilities, logistics, hotels, the use of human biological samples, and sourcing of agricultural products and electronic components which are generally used to make or deliver our products to patients. These activities combined with the use of the Global Slavery Index geographic ratings help us identify, assess and monitor high-risk engagements with third parties.

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 and labour rights principles. These factors determine which third-party engagements are deemed high-risk requiring a deeper level of assessment. Where necessary, third parties are required to answer specific questions about the policy, procedures and controls they have in place to manage human & labour rights risks on AstraZeneca's behalf, including audits.

The Core AstraZeneca 3PRM process will be rolled out to Alexion for all new third parties and third parties due for re-screening by the end of Q2 2024. In the meantime, Alexion will be utilising the Core AstraZeneca human & labour rights due diligence module to assess all new engagements, this solution will be running from December 2023.

Our 3PRM Framework consists of processes, associated systems and outsourced support to deliver greater levels of automation, control and expertise. Migration from the previous 3PRM process occurs in line with the regular review of existing suppliers which is annually for high-risk suppliers and every three years for low and medium risk suppliers.

The 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.

Since initial implementation, 3PRM processes and systems have benefited from continuing cycles of constant improvement, the objectives have been:

- To make the process as accessible as possible for colleagues and suppliers and remove barriers to engagement.
- Allow users to understand where they are in the process and clearly see any outstanding actions.
- Increase capacity to ensure a fully supported 'helpdesk' capability to assist with enquiries or issues.

These initiatives have had the benefit of shortening timescales for execution, early identification of where issues are arising and improved reporting on performance.

The changes we have implemented, and ongoing improvements have been recognised by the Chartered Institution of Procurement and Supply, winning the 'Best Approach to Risk Mitigation in 2023' cross industry excellence awards.

In 2023, 10,837 third parties were assessed through our 3PRM process, 8,063 of these were new assessments with 2,774 of these being reassessments of existing third parties. Of the 386 engagements with high risk of modern slavery, 40 assessments were reviewed through the second line compliance assurance process. We did not reject any engagements at onboarding due to



human and 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.

Alexion will be incorporated into the second line compliance assurance process in 2024 following alignment with the Core AstraZeneca Due Diligence process.

In 2023, we continued our engagement with Slave Free Alliance (Hope for Justice) and have also participated in working groups with peer multinationals to benchmark our approach to risk identification and mitigation.

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 undertook a review of our human rights programme with Slave Free Alliance. We are working to pull together a cross-functional project team to address the gaps identified which will include updating and refining our human rights policy and strategies as well as working to implement the new human rights legislation with particular focus on the EU Corporate Sustainability Due Diligence Directive and Corporate Sustainability Reporting Directive.

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 takes any such reports seriously and investigates all concerns raised, seeking to resolve matters in accordance with our Code of Ethics and applicable law.

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 prioritization process by both internal and external stakeholders, including suppliers and non-governmental organizations. We commit to monitor our human rights performance, set targets, and share challenges and outcomes publicly. The annual [AstraZeneca Sustainability Report](#) discloses this information and since 2022 has incorporated Alexion.

As Signatories to 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 an internal labour rights survey every two years in the countries where we operate. In 2022, we launched another global Human Rights Labour Review, which focused on the ILO's core themes, including freedom of association and collective bargaining, child labour, discrimination, working hours and wages. In 2022 we incorporated questions about family friendly leave to support addressing global inclusivity in this area.

In response to the report coming out of the 2022 Human Rights Survey the HR Leadership Team agreed to address the four countries without an Employee Assistance Programme or equivalent by the end of 2023, and to encourage each HR Director to review the family leave options within their local market to identify opportunities for more inclusive leave policies aligned to local regulations.



In addition to the survey we also analyse our wage data with the Fair Wage Network who aim 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.

Our analysis of the updated data base of the Fair Wage Network, which was issued in response to the cost of living crisis, demonstrated that all employees are paid a fair wage with a small number of exceptions that have now been addressed. No further action is proposed and a further analysis will be completed in 2024.

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 BSR's Human Rights Working Group a global, cross-industry network of businesses focused on human rights challenges and sharing best practices.

Ongoing compliance and supplier monitoring

For the reporting year ending 31 December 2023, over 9,000 third party assessments were conducted through our Third-Party Risk Management process. In this time period, there were no recorded cases of human rights violations including related to trafficking or slavery among the third parties surveyed.

As part of the 3PRM process, all in-scope assessments underwent screening to identify any negative findings in the public domain. For this reporting period, one finding connected to human and labour rights was identified. This finding related to a third party who was accused by a US thinktank of connections with forced labour. We are undertaking a business transparency exercise with the third party to fully understand the risks and accuracy of the report.

In 2023 we received a report that a number of red flags were raised during our standard background screening for five IT contractors hired via a third party. Following investigation into the welfare of these contractors the report was found to be unsubstantiated but did highlight some areas for improvement in the due diligence carried out on Tier 2 and beyond suppliers when onboarding contractors. We continue to work with the third party in question to improve these processes.

Following an internal investigation in 2022 which discovered that single use gloves that may have been manufactured using forced or bonded labour were previously in use within our organisation for a period of three months, we have continued to work with our key supplier and their end-to-end supply chain for single use gloves. This work has resulted in driving actions to reduce the risk of recurrence including on-site audits of manufacturing locations in Asia; ESG reviews of these suppliers; implementation of supply chain transparency and ethics tools. We are working with local partners and recognised experts to advocate and drive change in the industry.



AstraZeneca's Global Ethics & Compliance function performs second line monitoring of Third-Party Risk Assessments through sample review to assure that all forms of risk, including human and labour rights risks, have been correctly identified and mitigated as appropriate. Our second line monitoring identified 21 engagements that required more in-depth review by a contract manager as a result of risks not being appropriately mitigated.

Our governance group which has oversight of our Third Party Risk Management process, and includes senior leaders in Procurement, Finance and Compliance functions, is informed of any third parties exited as a consequence of human and labour rights risks identified through due diligence.

We continue to undertake enhanced due diligence on carbon offset projects, working with external SME's to ensure we fully understand the local risk profile and are not contributing to other issues in our efforts to reach carbon zero. This has led to collaborations with project management companies to increase awareness of human and labour rights topics and risks in relation to climate projects which will subsequently be used across all projects including non-AstraZeneca projects.

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.

Our Global Procurement function uses sustainability performance assessments to rate our top 95% of suppliers by spend using the EcoVadis platform, which rates our suppliers' Environment Social and Governance (ESG) performance against four themes: Environment, Labour & Human Rights, Ethics, and Sustainable Procurement. The Labour & Human Rights theme includes the elements of Child Labour, Forced Labour & Human Trafficking, Inclusion & Diversity, Discrimination & Harassment and Supplier Diversity. Higher ESG ratings via the EcoVadis platform should correlate strongly with lower risk Human Rights and Labour issues.

As of December 2023, 70% of our spend is with suppliers who have completed an EcoVadis ESG assessment, 85% of these suppliers have achieved the overall target score of 45 or more for the Human Rights and Labour assessment category.



Our objective is to ensure that our top 95% of suppliers by spend are reporting via EcoVadis by 2025. We will continue to work with suppliers to address any gaps identified with tracked action plans. If this is not achievable, we will work towards moving business to alternative suppliers where this is feasible.

We have worked to implement responsible sourcing initiatives with particular focus on sourcing of solar panels and mitigating the risks of modern slavery. Enhanced due diligence has been added to our RFP (request for tender) process, contract clauses have been updated obliging transparency, reporting and supply chain due diligence and educational materials have been produced.

Further steps

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

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and Section II (14) of the Australian Modern Slavery Act 2018 S.B. 657, § 2, subd. (j) of The California Transparency in Supply Chains Act and constitutes the AstraZeneca Group's slavery and human trafficking statement for the financial year ending 31 December 2023. In particular, it covers the following AstraZeneca Australian entities with an annual turnover of over AUD100m, and the following UK legal entities with an annual turnover of over £36m:

- AstraZeneca UK Limited (UK)
- KuDOS Pharmaceuticals Limited (UK)
- MedImmune Limited (UK)
- MedImmune UK Limited (UK)
- Alexion Pharmaceuticals (UK)
- Alexion Pharmaceuticals Inc
- AstraZeneca Pharmaceuticals LP
- Amylin Pharmaceuticals LLC
- MedImmune LLC

This statement has been approved by the AstraZeneca Board of Directors.



A handwritten signature in black ink, appearing to read 'P. Soriot'.

Pascal Soriot
Chief Executive Officer
AstraZeneca PLC
February 2024


CONFIDENTIAL

May 24, 2024

To Whom it May Concern

Re: Modern Slavery Act Statement 2023

In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in the report for the entity or entities listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.


[Gena Restivo \(May 24, 2024 09:51 EDT\)](#)

Gena Restivo
Vice President, Corporate Affairs & Sustainability
I have the authority to bind AstraZeneca Canada Inc.






Report Attachment

Final Audit Report

2024-05-24

Created:	2024-05-24 (Eastern Daylight Time)
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