

## BAUSCH HEALTH MODERN SLAVERY STATEMENT

This Modern Slavery Statement has been prepared on behalf of Bausch Health Companies Inc. and Solta Medical Corporation (the 'Company') for the period of 1 January 2023 through 31 December 2023. This statement sets out the steps that the Company has taken to mitigate the risk of modern slavery occurring in our business or our supply chain.

This statement is intended to satisfy the requirements of Canada's *Fighting Against Forced Labour and Child Labour in Supply Chains Act*, the *California Transparency in Supply Chains Act*, and similar other legislation that may apply to the Company in other markets (collectively, the "Supply Chain Transparency Legislation").

We believe in the fundamental respect for human rights of all stakeholders and local communities in which the Company conducts business. We fully support the intent of the Supply Chain Transparency Legislation, and we oppose human trafficking and slavery in all forms. We work to the highest professional standards to ensure that we comply with all laws and regulations applicable to the Company.

The Company is committed taking appropriate steps to tackle modern slavery (including slavery, servitude, forced or compulsory labour and human trafficking), both within our own organisation and within our external supply chain. We expect our suppliers to conduct business abiding by all applicable laws, rules, and regulations. We also monitor our labour force and supply chains to identify and rectify any areas of concern, which may include terminating business relationships with organisations that knowingly engaged in practices that constitute modern slavery.

No human rights violations by the Company or any director, officer, employee, or person doing business on our behalf will be tolerated. All employees have an obligation to conduct business with integrity, including respecting human rights.

### **1. Description of the Organisation's Structure, Activities and Supply Chains**

Bausch Health Companies Inc. is a global diversified pharmaceutical company enriching lives through our relentless drive to deliver better health outcomes. We develop, manufacture and market a range of products, primarily in gastroenterology, hepatology, neurology, dermatology, medical aesthetic devices, international pharmaceuticals, and eye health, through our controlling interest in Bausch + Lomb. Our ambition is to be a globally integrated healthcare company, trusted and valued by patients, HCPs, employees and investors.

Bausch Health Companies Inc. is listed on the New York Stock Exchange and Toronto Stock Exchange. In Canada, the Company also operates under Bausch Health, Canada Inc. The Company's Canadian head office is located in Laval in the province of Québec. The US headquarters are located in Bridgewater, New Jersey. The Company employs approximately 950 employees in Canada and approximately 1,800 employees in the United States as of the date of this report.

Bausch Health in Canada operates two manufacturing sites for Pharmaceutical Drug Products, which we sell in Canada and Worldwide. One facility is located in Laval QC and one in Steinbach

MB. We also import finished dosage forms from Contract Manufacturers to sell in Canada, the United States and elsewhere. These products are manufactured in various foreign markets. Our Aesthetic Medical Devices are produced primarily in our factory in Bothell, Washington.

For our pharmaceutical internal manufacturing operations, we procure Active Pharmaceutical Ingredients and excipients from various well-established manufacturers, qualified by relevant government authorities, and located all around the world. Packaging components such as bottles, cartons, and boxes are sourced principally from Canadian and US manufacturers who have relevant ISO certifications.

We also subcontract the manufacturing of certain Drug Products, which we then import and sell in Canada and/or the United States. Some of the Drug Products dossiers belong to the Company, while others are licensed from contract manufacturers. We buy from large contract manufacturing organizations who, aside from the Company's oversight, are also regularly audited by competent government authorities including Health Canada and the FDA.

Lastly, for our SOLTA aesthetic device business, we procure electro-mechanical components mostly from suppliers located in the United States, with electronic components sourced primarily from Asia.

We have undertaken a risk-based approach to managing human rights risks in our supply chain, which focuses primarily on the Company's direct suppliers. Over the coming years, we are committed to evaluating ways to monitor these risks in our indirect supply chain, which generally represents much smaller spend levels for items like lab supplies, services and spare parts.

Section 3 below explains our due diligence process in relation to forced labour and child labour for the direct spend suppliers from whom we buy Active Pharmaceutical Ingredients, Excipients, Packaging, Electro-Mechanical components and Contract Manufacturing services in connection with our manufacturing and sale of Drug Products and SOLTA Aesthetic Devices.

## **2. Policies in Relation to Forced Labour and Child Labour**

As a leading specialty pharmaceutical company, we are steadfastly committed to doing the right thing for patients, for our employees, and for our communities. We have developed and implemented comprehensive policies that are designed to mitigate modern slavery risks, including but not limited to:

- The Bausch Health Code of Conduct, with a dedicated section on Human Rights and Modern Slavery;
- Our Supplier Standards of Conduct;
- Our Business Ethics Reporting Policy;
- Our Global Anti-Bribery Policy; and
- Our Global Human Rights Policy.

Copies of these documents are available for review at:

<https://www.bauschhealth.com/ESG/ethics/policies-and-Procedures/>

These policies apply to all Company's employees, officers, and directors. All employees complete mandatory training on our Code of Conduct on an annual basis. The training includes a section on human rights that advises employees about the risks of forced labour and child labour, as well as the mechanisms for reporting any potential violations.

The Company is committed to adhering to the highest standards of ethics and integrity in all our interactions with patients, healthcare providers, customers, fellow colleagues and other key stakeholders. The Company vigorously enforces these policies and will take prompt and appropriate action, up to and including termination of employment or other relationship, of those found to be in violation.

We are committed to conducting our business activities in compliance with human rights laws globally and adhering to the basic human rights principles outlined in the United Nations Universal Declaration on Human Rights. In accordance with our global Code of Conduct, we respect internationally protected human rights and demand fair and respectful treatment of people inside and outside the Company. Our standards are also consistent with:

- The International Labor Organization (ILO) Declaration on Fundamental Principles and Rights at Work, and
- The OECD Guidelines for Multinational Enterprises.

In addition, in most countries where the Company conducts business, there are relevant local laws that overlap with our international human rights requirements, including criminal laws and laws regarding child labour, freedom of association, equality of economic opportunity, accessibility and accommodation, and compensation. We will adhere to such applicable local laws and international requirements. In the event of potential conflicts arising between internationally recognized human rights and national legislation in the countries in which we operate, we are committed to the highest ethical standards in compliance with all applicable laws and internal rules and procedures.

### **3. Due Diligence Processes in Relation to Forced Labour and Child Labour**

Bausch Health Companies Inc. is a life sciences company that follows pharmaceutical good manufacturing practice ("GMP"), relevant ISO standards, and all applicable regulations pertaining to its pharmaceutical and medical device development, manufacturing, sales, and marketing activities. These include strong supplier quality management processes for all direct materials suppliers to ensure they follow all applicable laws.

We use five processes in our supply chain due diligence to evaluate, monitor and prevent modern slavery among our direct suppliers:

- Our oversight starts with our quality management system, which includes regular audits of Direct Material suppliers where our auditors are trained to identify and escalate potential modern slavery violations. Audit frequency and supplier selection is determined according to good manufacturing practice "GMP" and relevant medical

devices rules. Audits can be for surveillance, qualification, or for cause. The Company may conduct these audits directly or it may use a third party.

- Our Master Services and Supply Agreements with third party suppliers include provisions requiring compliance with all applicable law, rules, and regulations as well as with our internal policies such as our Code of Conduct (inclusive of its human rights provisions) and Global Anti-Bribery Policy. We have recently supplemented these policies with a Supplier Code of Conduct, which reinforces our requirements regarding the protection of human rights.
- When the Company procures goods or services via a purchase order, the documentation includes our standard Terms and Conditions, which require the supplier to warrant that all goods and/or services have been produced or performed in compliance with all applicable laws and regulations, including human rights laws and regulations.
- We use a risk alert tool, which monitors our key direct suppliers in the area of supply chain disruption and compliance for labour practices & human rights. We receive alerts if a supplier is the subject of an enforcement investigation, litigation, or negative news pertaining to potential labour or human rights violations. No material issues were identified during the reporting period of 2023 related to forced and child labour.
- We utilize functionality in SAP that allows us to identify and automatically block any supplier that appears on a sanctioned list, including sanctions arising from human rights violations. The system automatically blocks the creation of any purchase order, meaning we cannot buy anything from such vendor.

We have begun a comprehensive process of analyzing the direct suppliers who provide goods and services related to the Active Drug Products we sell in Canada and the United States, which are either made in our internal plants or purchased as finished products from contract manufacturers. As of December 31, 2023, the majority (but not all) of these suppliers were actively monitored in our risk alert tool and were operating under supply agreements that contain our current terms and conditions. We are making progress toward remediating gaps with respect toward any suppliers who are not actively monitored or whose contracts do not have our current terms and conditions. All suppliers receive the latest T&Cs with any new purchase orders, and they are all screened against our sanction screening tools.

We prioritize our supplier oversight efforts based on several factors, one of which is the geography in which each supplier operates. Most of our Active Pharmaceutical Ingredients are sourced from the EU, US, and Canada where modern slavery risk is less prevalent than in certain developing markets. We have a smaller number of Drug Products with Active Pharmaceutical Ingredients coming from higher-risk markets, including India and China. We have conducted additional diligence on these entities to confirm that they comply with Good Manufacturing Practice GMP, that they have adequate internal policies addressing modern slavery risks, that they are not subject to sanctions, and that they have a reputation for behaving in a manner consistent with our standards. We are in the process of performing a similar review for certain Asia-based suppliers who provide electronics used in our SOLTA medical device products.

In 2024, we will further develop our supply chain due diligence processes as mentioned earlier to strive to identify emerging risks and work upfront with our suppliers on any identified gaps. To do so, we have engaged the services of a global Corporate Social Responsibility rating company called “EcoVadis” to conduct individual sustainability performance assessments of our supply chain partners, including labour and human rights scores. EcoVadis is a leading online document-based sustainability rating platform. This platform permits companies like ours to assess, monitor and benchmark the sustainability performance of our supply chain. We will obtain score cards for all our suppliers with improvements areas we can address together with them. This will allow us to produce Modern Slavery Dashboards showing our supplier compliance and actions plans. In addition, our detection capabilities will be improved with a new EcoVadis 360 Watch Findings to identify new and emerging forced labour and child labour risks. This initiative is an integral component of the Bausch Health Environmental Social and Governance (ESG) compliance program, and we expect all suppliers (in phases) to undertake the assessment.

To date, we have not identified any credible evidence of forced or child labour in our supply chain and we have not needed to implement any remedial action.

#### **4. Risks of Forced Labour and Child Labour**

As mentioned above, we have a five-part due diligence process that we use to evaluate, monitor and prevent modern slavery for our direct suppliers. In assessing the modern slavery risks in our supply chain, we recognize that the degree of risk can be impacted by the supplier’s country or region of origin, the types of products that they manufacture, or a variety of other factors.

Within our existing supplier base, we believe that our suppliers located in developing markets carry a higher risk of human rights violations than those who operate in other markets from which we source products (generally Canada, the United States and Western Europe). We are cognizant of recent examples of human rights violations in the Asian IT Hardware and Clothing industries, among others. We also consider that the Chemical and Electronic Industries in which many of our suppliers operate have a heightened risk profile (see e.g., <https://www.walkfree.org/global-slavery-index>) since they might use lower skilled and more vulnerable members of the workforce. We are also cognizant that entities operating in a lower-risk geography market might incorporate goods or services from downstream supply chain suppliers located in higher risk countries or regions.

Among our active direct suppliers, we have identified ten to fifteen entities who carry the highest risk, all of whom are involved in one of the following activities: manufacturing of Active Pharmaceutical Ingredients, contract manufacturing, or production of electromechanical components. We have rigorously vetted these entities and we ensure they receive enhanced oversight under our ongoing due diligence processes. We are also aware that they are regularly audited by relevant authorities. To date, the Company has not identified forced labour or child labour involving these or any other direct suppliers of the Company.

We believe that we have undertaken appropriate actions to mitigate the risk of modern slavery among these entities, as well as among others in our operations. However, we are committed to further strengthening our due diligence process in 2024 and beyond. Our 2024 initiatives include expanding our use of the Ecovadis tools, and completing further risk-based supplier stratification

and assessments based on product type, raw material or commodity type, locations of production, and identity of tier one supplier.

## 5. Grievance Mechanisms and Remediation

Our Business Ethics Reporting Policy is designed to make it easy for reporters to make disclosures, without fear of any detrimental treatment. The Company maintains an independent Hotline that allows its worldwide employees to provide a confidential way to raise concerns of unethical conduct, including those related to supply chain. It consists of toll-free telephone lines that are available anytime — 24 hours a day, seven days a week in over 100 languages, and an online reporting service at <https://hotline.bauschhealth.com>. It is operated by an external independent firm. Concerns may be raised anonymously.

The scope of the Hotline covers all corporate values and principles of our Code of Conduct, including human rights and modern slavery matters, in accordance with the applicable legislation in each country. The Hotline is available to suppliers and external stakeholders within each market in which we operate.

Complaints received via the hotline are handled according to an established process. After submitting a report through the vendor's website, complainants automatically receive an acknowledgment of receipt, as well as a report key and password that allows them to track the status of their complaint at any time.

All cases reported via the hotline will be investigated. The complainants can be contacted for this purpose if they have agreed to be contacted. Depending on the severity of the case, appropriate action will be taken. Confidentiality is guaranteed, along with protection against discrimination or punishment for those who submit reports in good faith.

## 6. Effectiveness of Measures Taken

To date, we have not identified any credible evidence of forced or child labour in our supply chain, nor have we received grievances from internal or external stakeholders. As such, we have not needed to implement any remedial action.

We have not identified any loss of income to vulnerable families resulting from measures taken to eliminate the use of forced labour or child labour in our activities and supply chains.

## 7. Conclusion

The Company is committed to maintaining the highest standards for the protection of human rights, as well as preserving the health and safety of our value chain workers. We expect the same from our suppliers. The Company continually reviews its processes and policies to help ensure we effectively mitigate all modern slavery, human trafficking and related risks.

**Attestation and Approval:**

*In accordance with the requirements of the Fighting Against Forced Labour and Child Labour in Supply Chains Act, 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.*

*I further attest that I have authority to bind Bausch Health Companies Inc. in connection with its compliance with the Act.*

*David Alexander*

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**David Alexander**

**Chief Compliance & Ethics Officer**

On Behalf of the Compliance Management Committee of Bausch Health Companies Inc.

**Date:** May 30, 2024