

Forced Labour in Canadian Supply Chains

At Biogen, we are committed to good corporate citizenship. This includes upholding human rights and ensuring that modern slavery (in all its forms) is not tolerated within our global business or our supply chain. Biogen has a zero-tolerance approach to modern slavery wherever we conduct business around the world.

This statement describes Biogen's global commitment, approach and measures taken to combat modern slavery and human trafficking. This report, prepared pursuant to Canada's Fighting Against Forced Labour and Child Labour in Supply Chains Act (the "Act"), pertains to Biogen Canada Inc. The above-mentioned entities hereby report to the Minister of Public Safety and Emergency Preparedness on the steps taken during their previous financial year ended December 31, 2023 to prevent and reduce the risk that forced labour or child labour is used at any step of the production of their goods, in Canada or elsewhere, or of goods imported into Canada thereby. This document sets out the steps taken by Biogen Canada to comply with the Act and to support its goals. As detailed below, Biogen Canada use a combination of staff education and training, internal policies and procedures and partnership with specialist third parties to uphold and enforce standards relating to the requirements of the Act.

Organization, structure, business and supply chains

Founded in 1978, Biogen is a leading biotechnology company that pioneers innovative science to deliver new medicines to transform patient's lives and to create value for shareholders and our communities. We apply deep understanding of human biology and leverage different modalities to advance first-in-class treatments or therapies that deliver superior outcomes. Our approach is to take bold risks, balanced with return on investment to deliver long-term growth.

With approximately 7,500 employees worldwide, Biogen operates globally including our global headquarters in Cambridge, Massachusetts, USA; international headquarters in Zug, Switzerland; and a world-class manufacturing facility in Research Triangle Park, North Carolina, USA. Our products are distributed worldwide, and we also make use of contract manufacturing organizations (CMOs) and external suppliers for product inputs and packaging.

Policies related to slavery and human trafficking

Biogen is committed to conducting business in accordance with the highest degree of integrity and in compliance with applicable laws, which includes recognizing and respecting human rights. Biogen prohibits all forms of slavery and human trafficking within our supply chains and business operations.

In every country in which we operate, Biogen follows all laws, regulations, and international conventions related to human rights, including the *International Labor Office Tripartite Declaration of Principles Concerning Multinational Enterprises and Social Policy* and the *Organization for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises*. Our human rights position is also guided by the *U.N. Universal Declaration of Human Rights* and *U.N. Guiding Principles for Business and Human Rights*.

This commitment is reflected through our [Code of Business Conduct](#) and [Human Rights Position Statement](#) which together set forth our code of ethics and expectations regarding responsible business conduct. These documents provide information about the standards of integrity that Biogen requires all employees, officers, and subsidiaries to follow, including standards relating to fair treatment and diversity, anti-harassment and bullying, child labor, and human trafficking.

Biogen expects that our suppliers adhere to the Code of Business Conduct, which provides guidance and requirements for doing business with Biogen. In addition, suppliers are also required to comply with the terms and conditions of applicable contracts and purchase orders entered into by both parties. Each supplier doing business with Biogen under

these terms and conditions agrees it will comply with all applicable laws and regulations in its performance of the contract. Biogen does not at this time require a separate certification in addition to these contractual provisions.

Areas of business risk for slavery and trafficking

While we have owned operations, contract manufacturers, suppliers, and sales and distribution in numerous countries around the world, the large majority of our operations and supply chain partners are located in more economically developed countries that our own and independent assessments (such as the U.S. Department of State's *Trafficking in Persons* report) have found to be at lower risk for human rights violations including slavery and human trafficking.

Due diligence process, performance indicators, and effectiveness related to slavery and trafficking in our own business and supply chain

Biogen monitors the environmental, social and governance risks of our supply chain, including human-trafficking risks, based upon the industry in which we operate and the geographic locations where we conduct business and/or obtain materials and services. We do this through a process of reviewing country risk profiles for corruption and human trafficking risks published by independent third-party expert organizations, and providing added diligence on specific areas or suppliers as needed based on this assessment. Our risk assessment process indicated very low risk of human rights issues or violations in our supply chain. A summary of our due diligence process, key performance indicators, and results of this supply chain risk assessment is reported annually in our [Corporate Responsibility Report](#).

In addition to our own due diligence process, Biogen is a member of the Pharmaceutical Supply Chain Initiative (PSCI), an organization made up of leading global pharmaceutical companies that focuses on increasing the capabilities and responsibility of our supply chains. The PCSI has developed and shared with industry suppliers our Principles for Responsible Supply Chain Management, which include prohibitions against forced and child labor, along with other expectations regarding responsible labor, governance, and environmental practices. More details on the PSCI and these Principles can be found at <https://pscinitiative.org/home>.

Training and capacity building on slavery and human trafficking prevention

All Biogen employees are trained on our Code of Business Conduct upon hire and undergo mandatory annual refresher training thereafter. This training includes information about our issue reporting hotlines and other tools, and familiarizes our team with the system that allows us to address, resolve, and track any human rights or other issues that may arise.

Biogen also provides information and training to its Global Procurement Team directly involved with the selection of new suppliers and the ongoing management of current suppliers. This training covers the assurance of ethical business practices by our suppliers and will be completed over the course of the 2024 financial year.

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General Manager, Canada

Biogen Canada Inc.