



## LEO Pharma's Modern Slavery Act statement 2024

LEO Pharma publishes this statement in accordance with the Canadian Fighting Against Forced Labour and Child Labour in Supply Chains Act.

The statement covers LEO Pharma A/S and LEO Pharma Inc. (Canada) and refers to the financial year January 1 – December 31, 2024. It describes the steps LEO Pharma has taken throughout the year to prevent the occurrence of modern slavery and human trafficking<sup>1</sup> in our operations and supply chains.

### OUR BUSINESS AND SUPPLY CHAINS

LEO Pharma is a global company dedicated to advancing the standard of care for the benefit of people with skin conditions, their families and society. We develop and deliver medical treatments to address the unmet medical needs of people living with skin diseases such as psoriasis, eczema, acne, and skin infections, and we help treat people suffering from thrombosis.

LEO Pharma helps more than 100 million patients annually and in 2024 we generated a revenue of EUR 1,668 million. Further information about LEO Pharma's business can be found in our [Annual Report](#).

LEO Pharma is headquartered in Denmark with a global team of 4,090 people. Our research and early development function is located in Denmark and further development operations largely located in Europe<sup>2</sup>. All of our manufacturing sites are located within Europe: Denmark (Ballerup and Esbjerg), France (Vernouillet), Ireland (Dublin and Cork), and Italy (Segrate). We also produce through contract manufacturing organizations (CMOs), which we consider as strategic suppliers. LEO Pharma works with 17 contract manufacturers and 13 API manufacturers, located in the USA, Canada, the EU, Japan, Switzerland, India, China etc.

Each year, we source goods and services from suppliers globally to develop, manufacture and distribute our medicines to patients. In 2024, we worked with 5,105 vendors. We screen all incoming new vendors and continuously monitor their activity to assess their risk level. Vendors may be classified as high, medium or low-risk based on LEO Pharma's internal assessment process. Out of 755 new vendors created in 2024, we identified 3 as being high-risk. This assessment process considers criteria such as the vendor's country of operation, LEO Pharma's operational dependency on the vendor, industry characteristics and LEO Pharma's expenditure.

### POLICIES AND GOVERNANCE

#### In our own operations

##### ***Our Code of Conduct and supporting policies***

LEO Pharma is committed to conduct business in a manner that respects internationally recognized human rights. As a participant of the UN Global Compact, we support and respect the protection of all human rights as described in the Universal Declaration of Human Rights, the International Bill of Human Rights, and the ILO Declaration on Fundamental Principles and Rights at Work.

Our commitment to respect and protect human rights applies to all LEO Pharma's locations and business operations worldwide, as expressed in the [LEO Pharma Code of Conduct](#) and in our [Human Rights Policy](#). This is further reinforced through our [Diversity & Inclusion Policy](#), ensuring equal opportunities and an inclusive culture at all levels of LEO Pharma's global operations.

Training on our Code of Conduct is mandatory for all LEO Pharma employees. We require all employees to comply with applicable laws, regulations and industry codes, international requirements as well as our supporting internal guidelines. Our Code of Conduct is approved by our Global Leadership Team and is available in 15 languages.

---

<sup>1</sup> When using the term 'modern slavery and human trafficking' we refer to all forms of slavery, servitude and forced and compulsory labor, and human trafficking.

<sup>2</sup> Additional development operations are located in: China (Shanghai), Japan (Tokyo), South Korea (Seoul) and USA (Madison).

Our commitment to human rights, including the prevention of modern slavery, is overseen directly by our Global Leadership Team, ensuring dedicated governance and leadership at the highest level of our organization.

### In our supply chain

#### **Sustainability Standards for LEO Pharma Business Partners**

We work to strengthen labor rights through safe and fair working conditions and promote respect for labor and human rights in our supply chains, as guided by the UN Guiding Principles on Business and Human Rights (UNGPs). The Sustainability Standards for LEO Pharma Business Partners specify our requirements and minimum expectations to our suppliers in relation to: *business ethics, human rights, labor rights, health and safety, environment, subcontractors and management systems* and is referenced in contractual agreements with suppliers.

The Sustainability Standards for LEO Pharma Business Partners are based on the [Principles from the Pharmaceutical Supply Chain Initiative \(PSCI\)](#) and guide our approach to supply chain due diligence and responsible management. Responsible supply chain management is implemented in procurement practices through our global procurement procedures. These include our global position on responsible supply chain management and Supplier Due Diligence Guidelines, which highlight the importance of working actively with our suppliers, to know the social and environmental impact in our supply chain and to promote the continuous improvement of practices.

In case of non-compliance in relation to Sustainability Standards for LEO Pharma Business Partners, our Global Procurement Center of Expertise confers with LEO Pharma's Risk & Compliance function to determine appropriate actions. LEO Pharma believes in cooperating rather than terminating business relationships, in alignment with the UNGPs.

## **DUE DILIGENCE**

### In our own operations

As part of our commitment to embed human rights due diligence practices across our business, we assess human rights risks related to our activities and those directly related to our business operations, products, and services.

In 2024, as part of our goal to create a healthy and safe work environment for all our employees, we took further steps to ensure a professional and emotionally safe environment where everyone can thrive and be productive. These steps involved releasing new global policies on anti-harassment and bullying, as well as re-issuing our Code of Conduct to include updated and expanded human rights and anti-bullying and harassment clauses.

LEO Pharma's latest human rights risk assessment allows us to identify areas within our business and value chain where potential adverse impacts need to be evaluated, so that the company can take action to address these adverse impacts and track the effectiveness of these efforts.

Human Rights due diligence is a dynamic process where maturity increases over time. The assessment is a first step to managing potential and actual risks in our value chain. We acknowledge that new, complex issues relating to human rights can arise, and commit to reviewing our governance approach, as well as our salient issues regularly and to identify appropriate actions.

To make sure we identify risks and manage these, we work towards integrating our human rights due diligence into relevant function level processes. LEO Pharma's Speak-Up Line, coupled with additional grievance reporting directed at line managers, gives employees and others associated with LEO Pharma the opportunity to report unethical behavior and serious concerns on a confidential basis.

To comply with applicable laws, rules, regulations, the LEO Pharma Code of Conduct and related guidelines, we monitor and follow up on compliance findings across our global organization.

### In our supply chain

Our responsible supply chain program outlines procedures to identify human rights risks in our supply chains.

In 2024, we continued our supplier risk screening with monitoring alerts for adverse media. It provides us with a better overview of the risks of modern slavery that our suppliers may pose and be disposed to. If we identify actual or potential adverse impacts and questions persist after initial desktop assessment, we engage with our suppliers through a self-assessment questionnaire, through which we ask our suppliers to provide evidence around their policies and processes. As part of our systematic screening of new suppliers, we evaluate all incoming suppliers based on frequency of purchase, dependency on the supplier, and the estimated spend. In 2024, we onboarded 755 new suppliers, of which a total of 146 suppliers underwent desktop assessment, and a further 46 suppliers were asked to complete self-assessment questionnaires.

## **RISK ASSESSMENT AND MANAGEMENT**

### **In our own operations**

Based on a human rights risk assessment conducted in 2021 and reaffirmed in 2023, we have identified the risk of modern slavery in our own operations to be low, due to 1) robust labor laws in countries of our operations, 2) the highly regulated nature of our industry, and 3) our employees undertaking work in highly controlled environments. We believe our policies and processes to be adequate for mitigating our determined level of risk.

### **In our supply chain**

In line with the UNGPs, LEO Pharma works to prevent contributing to any human rights violations in our supply chains. To identify human rights and modern slavery risks in our supply chain, we use country risk mapping, which is based on the Global Slavery Index (2024). We continued to focus on the locations with high risks for our mitigation efforts.

Our focus remains on building a structured approach to implement improvement plans for high-risk suppliers. In addition to the improvement plans, we established a social audit program as a mitigation, which follows the PSCI audit framework. We use our risk assessment tools to identify where a social audit is needed and conduct desk research to identify high-risk suppliers.

## **TRAINING AND CAPACITY BUILDING**

### **In our own operations**

All LEO Pharma employees are required to complete the e-Learning on our Code of Conduct that covers human rights topics. In 2024, 99% of employees completed the annual Code of Conduct training.

To prevent, identify, and remedy human rights and slavery risks within our supply chain, it is crucial to raise awareness in our own operations. Each year, we engage and train our Global Procurement department to strengthen their ability to handle potential risks of non-compliance to the Sustainability Standards for LEO Pharma Business Partners.

### **In our supply chain**

To strengthen our mutual understanding with our suppliers on how to respect human rights, we recommend our suppliers take the PSCI Principles e-learning when they respond to our self-assessment questionnaire and increase knowledge among them with the PSCI's webinar on risks of modern slavery and other materials.

## **GLOBAL GRIEVANCE MECHANISM**

### **In our own operations**

LEO Pharma's Speak-Up Line provides our employees and others associated with LEO Pharma the opportunity to report unethical behavior and concerns in a secure and confidential way. The service is available in multiple languages, 24 hours a day, 365 days a year. The Speak-Up Line can be accessed by web or telephone from anywhere in the world.

LEO Pharma employees have access to the Speak-Up Line through their desktop, LEO Pharma's intranet and corporate website.

In 2024, no verified cases reported through our Speak-Up Line were related to modern slavery or human trafficking.


More information on LEO Pharma's Speak-Up Line can be found on our [website](#).

### **In our supply chain**

In 2024, we did not find any incidents in relation to modern slavery in our supply chains.


In accordance with the requirements of the Fighting Against Forced Labour and Child Labour in Supply Chains Act (the “Act”), and in particular section 11 thereof, we attest that we have reviewed the information contained in the statement for the entity listed above. Based on our knowledge, and having exercised reasonable diligence, we attest that the information in the statement is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.

**LEO Pharma Inc.**

Per:  \_\_\_\_\_  
Name: Jill Archibald  
Title: General Manager, Canada  
Date: 28 May 2025


*Electronically signed by: Jill Archibald  
Reason: Accepted & Agreed  
Date: May 28, 2025 11:41 EDT*

**LEO Pharma A/S**

Per:  \_\_\_\_\_  
Name: Christophe Bourdon  
Title: Chief Executive Officer  
Date: 28 May 2025

*Electronically signed by: Christophe Bourdon  
Reason: Accepted & Agreed  
Date: May 28, 2025 15:03 GMT+2*

**LEO Pharma A/S**

Per:  \_\_\_\_\_  
Name: Philip Eickhoff  
Title: Executive Vice President  
Date: 28 May 2025

*Electronically signed by: Philip Eickhoff  
Reason: Accepted & Agreed  
Date: May 28, 2025 15:21 GMT+2*

We have the authority to bind LEO Pharma Inc.