

## **BOEHRINGER INGELHEIM LIMITED**

### **MODERN SLAVERY STATEMENT DATED: 1 NOVEMBER 2019**

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, and Gibraltar. 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 146 affiliates with over 47,700 employees worldwide.

#### **OUR BUSINESS**

The focus of our family-owned company, founded in 1885, is researching, developing, manufacturing and marketing new 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 and Gibraltar. All supply chain activities are governed by GDP 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 is not used in its supply chain.
- Employees are not charged fees by the supplier or anyone else to work there.
- Child labour is not used.
- 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.

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

<https://www.boehringer-ingenheim.co.uk/sites/gb/files/files/suppliercodeexternaljune16.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.

## **DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING**

As part of our initiative to identify and mitigate risks of modern slavery, we require supplies 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 Modern Slavery Questionnaire, and use these answers to this Questionnaire as part of our selection process for our suppliers.

We have set up a cross functional team to establish and maintain our Modern Slavery Programme in the UK. The members of this team include employees from our Legal, Purchasing, and our Environmental and Health and Safety department. These individuals have also received training on Modern Slavery by an external training company.

As part of our Modern Slavery Programme, we have carried out a risk assessment of our suppliers and third parties we work with, and categorised them into three categories, Low, Medium or High, depending on our assessment of the risk of Modern Slavery. We are also using a third party auditing supplier to conduct a pilot to review a selection of these High Risk suppliers.

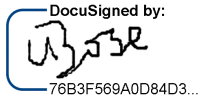
## **COMPLIANCE AND ETHICS**

We have a dedicated Ethics & Compliance Committee, which consists of the following members:

- Managing Director
- Finance & Administration Director
- Medical Director
- Head of Legal and Compliance
- Ethics & Compliance Officer
- Human Resources Director
- Director of Animal Health
- Meril Pirbright Site Director
- Director of Communications

## 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:  Date:

Mr Uday Bose  
Managing Director  
Boehringer Ingelheim Limited & Boehringer Ingelheim Animal Health UK Limited

Signed:  Date:

Mr Benjamin Moynihan  
Finance & Administration Director  
Boehringer Ingelheim Limited & Boehringer Ingelheim Animal Health UK Limited

Signed:  Date:

Mr Rick Butson  
Animal Health Director  
Boehringer Ingelheim Animal Health UK Limited