

Modern Slavery Act Statement

For the year ending 31 December 2025



Submitting entities: AstraZeneca UK Limited (UK), KuDOS Pharmaceuticals Limited (UK), MedImmune Limited (UK), MedImmune UK Limited (UK), Alexion Pharmaceuticals Limited (UK), AstraZeneca Holdings Pty Limited (Australia), AstraZeneca Pty Limited (Australia), Alexion Pharmaceuticals Australasia Pty Limited (Australia), AstraZeneca AS (Norway), AstraZeneca AG (Switzerland), Alexion Pharma GmbH (Switzerland), Evinova AG (Switzerland), AstraZeneca Ireland Ltd Swiss Branch, AstraZeneca Germany GmbH (Germany), California, Alexion Pharmaceuticals Canada Corporation and AstraZeneca Canada Inc.

AstraZeneca PLC serves as the parent company of the AstraZeneca group which includes companies in various countries including the submitting entities listed above.

Our commitment

AstraZeneca is committed to respecting all human rights and eliminating modern slavery and human trafficking in our business and to the fullest extent possible in our supply chains. AstraZeneca supports and adheres to the principles set out in the UN Declaration of Human Rights and the Organisation for Economic Co-Operation and Development (OECD) Guidelines for Multinational Enterprises and are a signatory to the United Nations Global Compact (UNGC). Our Code of Ethics prohibits modern slavery and guides our global operations.



Our business

This statement is made in accordance with Australia's *Modern Slavery Act 2018*, California's *Transparency in Supply Chains Act 2010*, Canada's *Fighting Against Forced Labour in Supply Chains Act 2023*, Germany's *Supply Chain Due Diligence Act 2023*, Norwegian *Transparency Act 2022*, Article 964j-k of Switzerland's *Code of Obligations and the Ordinance on Due Diligence and Transparency in relation to Minerals and Metals from Conflict-Affected Areas and Child Labour 2023* and the United Kingdom's *Modern Slavery Act 2015*.

This statement is jointly made on behalf of the AstraZeneca entities that report under the aforementioned legislation. In preparing this disclosure, we engaged owned and controlled companies and consulted key representatives across Procurement, Employee Relations, Corporate Affairs, Finance, Compliance, and Legal. This collaborative process enabled knowledge sharing between global and local teams, particularly on human rights and modern slavery mitigation, informing the development of this statement.

Our business operations

AstraZeneca is a global, science-led biopharmaceutical company that focuses on the discovery, development, and commercialisation of prescription medicines in Oncology including Haematology, Rare Disease (Alexion), and BioPharmaceuticals, including Cardiovascular, Renal & Metabolism, Respiratory & Immunology, and Vaccines & Immune Therapies. In 2025 we had a direct presence in 80 countries and sold our products in 125 countries; our 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 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 15 countries around the world.

We are headquartered in Cambridge, UK, and have major hubs in Sweden and the United States. We employ a highly skilled permanent and part-time workforce of approximately 96,100 employees supplemented by contractors and labour agents.

The information below is provided in accordance with legislative requirements in the following countries:

- In **Germany**, AstraZeneca GmbH has more than 1,224 employees working in our headquarters in Hamburg and across Germany in field service functions.
- AstraZeneca operates three entities in **Australia**; AstraZeneca Holdings Pty Limited, AstraZeneca Pty Limited and Alexion Pharmaceuticals Australasia Pty Limited. AstraZeneca Holdings Pty Limited is the parent company of AstraZeneca Pty Limited and has a holding company role. AstraZeneca Pty Limited is the operating company. AstraZeneca Pty Limited and Alexion Pharmaceuticals Pty Limited do not own or control any other entities. In Australia, we separate our activities into two areas: supply and manufacturing, and marketing. Our supply and manufacturing facility, located in North Ryde, Sydney is one of the largest manufacturers of pharmaceuticals in Australia. In 2025, we manufactured \$US130 million of respiratory products of which approximately 99% were exported to countries such as China, Japan, Egypt, Saudi Arabia, Vietnam and Indonesia. We are also key partners for leadership and technical capability within the Asia Pacific operations network.

AstraZeneca employs 1,001 people in Australia. Broadly these roles fit into the following categories: 542 employees in commercial roles, 369 employees in operational roles and 90 employees in clinical roles. 947 are full-time employees while 54 are part-time employees. There are no casual employees in AstraZeneca Australia.

- AstraZeneca AS, based in Oslo with 101 employees, is one of **Norway's** largest pharmaceutical companies focusing on medical, regulatory, sales and marketing activities for the AstraZeneca group pharmaceuticals in Norway. Medicines are manufactured and distributed by other companies in the AstraZeneca Group.
- AstraZeneca AG, based in Baar with over 270 employees, has been present in **Switzerland** for nearly 50 years, ranking among the country's top pharmaceutical companies. Medicines are manufactured and supplied from global AstraZeneca sites, primarily UK, Sweden, France and USA.

Our supply chain

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. In 2025, AstraZeneca worked with ~67,000 third parties.

AstraZeneca has suppliers in 135 countries, with ~48% based in USA, UK, China, Germany, Sweden, Japan, France and Brazil. The top 95% of AstraZeneca spend is with ~6,000 suppliers of which ~558 are small businesses. Many of our business-critical operations have been outsourced to third party providers. For more information on our business structure, workforce, and operations please refer to our annual report.

AstraZeneca's Australian operations have approximately 800 suppliers with over 94% located in Australia. Outside Australia, the supply chain includes suppliers in USA, UK, Canada, Denmark, Germany, Hong Kong, Ireland, Italy, India, Japan, Netherlands, Poland, Singapore, Spain, Switzerland, Thailand and New Zealand. We generally maintain global suppliers in stable long-term engagements while our local suppliers are usually more short term and changeable.



Our policies

Our [Human Rights Statement](#) asserts our responsibility to respect the rights of all people, reflecting our continued commitment to ethical practices. 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. Our employment policies detail our **high standards of employment practice**. We also support the ILO's standards regarding child labour and minimum working age. In 2025, we updated our corporate website to reflect our commitment to responsible recruitment and ensuring we operate a "no recruitment fee" policy.

We foster an environment that supports physical and mental health to make people feel safe, energised and inspired, which not only benefits our workforce and productivity but is an investment in the communities in which we operate. Our [Global Safety, Health and Environment \(SHE\) Standard](#), supported by a framework and training, sets minimum requirements for all employees.

Our standards comply with all current national and international laws, regulations and codes to prevent trafficking and slavery in our own business operations. When there is a divergence between our standards and national laws, we adhere to the highest standard and require our suppliers and partners to do the same. In 2025, we launched a Global Standard on Human Rights which outlines our expectations and responsibility to respect human rights at every level.

We work to develop and maintain good relations with local workforces and work closely with recognised national trade unions. We 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 2024, 29% of countries in which AstraZeneca operates have a relationship with trade unions. Where trade unions do not exist in an area of operation, 100% of countries have established arrangements to engage similarly with their workforce.

Our Values & Third-Party Relationships

Sustainability at AstraZeneca is How we do business. Our Values are the foundation of our Code of Ethics. We are guided by our Values and invest in our people to create long-term value, resilience and trust by operating responsibly, ethically and with robust governance. The principles and Values contained in our Code of Ethics also apply to our suppliers and all other third parties with whom we do business and are embedded in our [Global Standard: Code of Conduct for Third Parties](#). We require suppliers to uphold internationally recognised human rights, foster respect and equal opportunities, and prohibit any form of forced or involuntary labour.

In 2025 we re-launched our Third-Party Code of Conduct for Third Parties to provide practical guidance and promote best practice across our supply chain. The revised Code has been shared with suppliers and supported by training for internal and external stakeholders. It is publicly available on our website and referenced in all Purchase Orders and Contracts. Modern slavery clauses are embedded in contracts, ensuring ethical compliance and enabling corrective action where required.

Risk management

AstraZeneca's Third-Party Risk Management (3PRM) process identifies and assesses supplier risks including human and labour rights issues such as forced or bonded labour, child labour, wages and benefits, hours of work/rest period and leave, collective bargaining, grievance procedures, discrimination and harassment. Front-end screening includes adverse media checks, and for services with elevated risk, we evaluate internal controls prior to approval.

Risk ownership sits with the first line of business, ensuring accountability for decisions to engage third parties and responsible management of associated risks. Where modern slavery risks are identified through due diligence, mitigations plans are proposed and documented in the risk register.

Our salient risks remain third party and contingent labour and sourcing of raw materials/indirect supplies such as lab consumables. Risk assessments, conducted with external experts, consider country context, internal documentation and stakeholder input. We recognise that new acquisitions may increase risk until AstraZeneca's standards and policies are adopted.

- **Third-party workers** face elevated risks of exploitation due to limited legal protections and complex employment arrangements. Areas identified as highest risk include manufacturing, distribution (including logistics and warehousing), and construction/capital projects, where visibility into recruitment practices and worker conditions is limited.
- Modern slavery risks in **construction** are elevated due to widespread sub-contracting and labour hire practices that reduce transparency. Risks also extend to supply chains for building materials, fittings and manufactured products. AstraZeneca conducts construction projects globally, from large-scale build to smaller refits, with all agencies and suppliers subject to our 3PRM. In 2025 we partnered with an external expert to assess labour rights risks on a major construction project, resulting in practical recommendations to strengthen third-party capabilities. We also

launched a project to review practices across the construction lifecycle, with completion expected in 2026.

- AstraZeneca's **distribution** network includes markets without an AZ legal entity, where distributors manage product delivery, site security, staffing and marketing. We provide modern slavery training to distribution partners. A dedicated project will deepen our engagement with the logistics sector to strengthen industry-wide understanding of Modern Slavery risks, with implementation starting in 2026.
- Our global **manufacturing** operations rely on contractors and labour agencies. We apply a due diligence process to assess and manage modern slavery risks. While pharmaceutical manufacturing involves combining active ingredients with excipients, visibility into upstream supply chains remains limited. We continue to improve transparency through technology and stronger supplier relationships.

Within our supply chain we have identified two areas of focus as particularly high risk for modern slavery; raw material sourcing and indirect supply chains.

- Our **indirect supply chain**, including consumables and electronics, carries documented human rights risks including forced and child labour, poor working conditions, wage theft and environmental harm. While direct suppliers are assessed through 3PRM, visibility beyond tier one remains limited. We work with approved vendors to strengthen due diligence and modern slavery mitigations. We have also launched a project to review human rights risks in the **medical device** supply chain, supporting the Health equity pillar of our updated Sustainability Strategy. This comprehensive assessment spans the full product lifecycle, from raw materials to end of life and will deliver actionable recommendations in 2026 to enhance risk management and supply chain resilience.

- The **raw material** supply chain in the pharmaceutical industry includes a broad range of materials used for active pharmaceutical ingredients, packaging and devices, with many of them sourced in high-risk locations and through activities associated with modern slavery risks. Many of the supply chains for our materials, especially those of natural origin such as minerals and forestry and agricultural commodities, are complicated and can involve a range of companies, often many tiers removed from suppliers with whom we engage directly. We continue to work with our suppliers to drive action across our supply chain while improving our transparency and traceability, supported by credible certification bodies and partnerships with NGOs. Read more in our published [approach to sustainable use and sourcing of raw materials](#).

The following information is provided in line with legislative requirements in the following countries:

- Australia has low modern slavery risk from a geographic perspective. Facilities management, capital projects, consumables and excipients for manufacturing have been assessed as the areas of our tier one procurement that have the highest risk of modern slavery. **AstraZeneca Australia's** capital projects and expansions generally focus on the delivery and installation of new manufacturing and related equipment. Construction activities are a vital part of such projects and help to create new spaces or reconfigure existing spaces within the facility to house the plant. The AstraZeneca Australia facility and the equipment within it are sophisticated, of a high value and high technology nature, and based in Australia which all reduce the inherent risk in these projects.
- AstraZeneca's operations in Germany are low risk for modern slavery both within our own operations and the local supply chain. **AstraZeneca Germany** has implemented local risk analysis and risk management processes for its operations and supply chain, reporting on the results. Human Rights risks within AstraZeneca Germany and its supply chain are analysed by assessing country and industry risks, benchmarking against those identified for the broader pharmaceutical industry. Risk is further analysed using criteria such as likelihood, severity, scope and irreversibility of the potential violation. To assign a final risk score, existing preventive and remedial measures are reviewed and rated for effectiveness. The Country President in Germany is ultimately responsible for managing these risks within the German business. An LkSG (German Supply Chain Act) taskforce has been set up consisting of expertise from Legal, Procurement, Human Resources and Safety, Health & Environment. This taskforce is responsible for risk analysis, the effectiveness of preventive and remedial mitigation measures and reporting and documentation. Alexion Germany is not currently in scope for LkSG.



Third party due diligence

AstraZeneca applies a risk-based approach when assessing third parties, using activity and geography-based factors to identify and mitigate human and labour rights risks. The areas of the business that pose the highest inherent risk for human rights and modern slavery issues are determined using internal expertise and external benchmarking on higher risk industries. High-risk engagements undergo enhanced due diligence, including targeted questionnaires aligned with local labour laws and International Labour Organisation (ILO) conventions covering freedom of association, forced labour, child labour, equal remuneration, discrimination and occupational safety and health. We also assess whether companies have moved from policy to action by requesting information on the controls they have in place to ensure compliance.

In 2025, we optimised our 3PRM process and technology to increase automation and enable more proportionate risk assessments through ongoing monitoring, adverse media screening and verification of implementation of agreed-upon mitigation measures. Globally, 9,918 third parties were assessed in 2025, including 8,727 new and 1,191 reassessments. Of 293 engagements flagged as high risk for modern slavery (including four in Australia), 89 underwent second line compliance review. No engagements were rejected at onboarding; instead, we worked collaboratively with vendors to strengthen their controls where risks were identified.

In response to evolving legislation, we launched a project with external experts in 2024 to assess the full implications and opportunities for the AstraZeneca group. We've initiated a second project to explore an automated solution for mapping our value chain. This will not only improve visibility of human rights risks but also help mitigate potential supply chain disruptions and proactively identify emerging threats such as climate related events.

In 2025, we utilised specialist local auditors to perform risk-based audits based on activity and geographic location following the Pharmaceutical Supply Chain Initiative principles. Findings, primarily related to labour rights (i.e. excessive

working time including overtime and failure to ensure weekly rest periods) are currently being addressed.

Where issues are identified, we work with the third party to set an action plan and require evidence of resolution prior to re-audit. Re-audit is conducted within three years except for critical findings where reaudit is completed within 12 months. We also rely on clauses in our contractual agreements including audit finding resolution, right to termination and expectations of third parties to drive improvement or exit, depending on the severity of the issue.

We undertook a specific research initiative to better understand human rights risks in clinical studies which identified informed consent as a key area of concern. We continue to collaborate with peer organisations to strengthen our due diligence processes and promote ethical standards in clinical research.

Training and risk awareness

In 2025, the Modern Slavery Working Group, comprising representatives from Sustainability, Employee Relations, Recruitment, Compliance, and Procurement continued quarterly meetings to share insights and raise awareness of human rights topics across the organisation. We updated our **mandatory Modern Slavery training**, which is delivered biennially to functions with elevated exposure to human rights risk. The updated training was launched in November in five languages and is accessible to all employees via our online learning platform.

All AstraZeneca employees also complete annual **Code of Ethics** training. Rolled out globally in October 2025, we expect the course to be completed by 100% of active AstraZeneca employees by year-end.

We continue to embed modern slavery risk into the Global Standard and associated guidance on **Managing SHE risks** in construction and contractor safety, requiring sites to deliver modern slavery training as part of the orientation of all workers on site.

Further management

We include modern slavery as an aspect of our human rights agenda. We commit to monitor our human rights performance, set targets, and share challenges and outcomes publicly. The AstraZeneca Annual Report discloses this information and since 2022 has incorporated Alexion.

As Signatories to the United Nations Global Compact (UNGC) 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 the AstraZeneca Annual Report.

In 2024, we conducted a global Human Rights Labour Review, focused on ILO core themes, including freedom of association and collective bargaining, child labour, discrimination, working hours and wages and added questions about worker voice. Results were positive, with no material gaps identified.

We also partner with the Fair Wage Network to benchmark wages against living wage standards globally. Our review confirmed that all employees

are paid a fair wage, with any exceptions identified scheduled for resolution as part of our annual review process.

Collaboration and partnerships

We are members of the 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, human and labour rights, health, safety, environment and related management systems.

In 2025, 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.

We are active members of BSR's Human Rights Working Group, a global, cross-industry network of businesses focused on human rights challenges and sharing best practices. Through BSR's Healthcare and Human Rights Forum we are collaborating with peer organisations to develop a human rights due diligence framework for the Right to Health. In 2025, we also joined BSR's Sustainability Due Diligence Roundtable to further strengthen our approach.



Ongoing compliance and supplier monitoring

In 2025, we conducted 9,918 third party assessments through 3PRM, with no recorded cases of human rights violations, trafficking, slavery or child labour. All in-scope assessments were screened for adverse media and no new negative findings related to human or labour rights were identified. We investigated two separate concerns; one audit related and one raised through internal channels which were not substantiated following established protocols to ensure appropriate oversight and due diligence. AstraZeneca's Global Ethics & Compliance performed second line monitoring, reviewing 77 engagements requiring deeper oversight. We continue regular supplier engagement to uphold our ethical standards, support innovation and strengthen long-term competitiveness.

Supplier ESG performance is assessed via EcoVadis, covering Environment, Human & Labour Rights, Ethics, and Sustainable Procurement. As of October 2025, 80% of spend is with suppliers completing EcoVadis assessments; 91% achieved the target score for human & labour rights, an 11% improvement since 2024. Through the Responsible Health Initiative (RHI), we invited suppliers scoring below 45 to participate in training on human rights and modern slavery. 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.

Grievance mechanisms

AstraZeneca maintains a confidential, retaliation-free whistleblowing process for employees, third parties and the public. We encourage good-faith reporting of human and labour rights concerns, including modern slavery and human trafficking within AstraZeneca and our supply chain. Reports can be made anonymously via www.AZethics.com or internally through line management, HR, Legal or Compliance; Global Compliance can also be contacted by email or post. All reports are logged in AZethics, our 24/7 web portal and hotline operated by an independent provider, with multilingual support. Our Global Investigations team triages cases and engages relevant experts. Our grievance mechanism aligns with UN Guiding Principle 31. Expectations are communicated across our value chain through our [Third-Party Code of Conduct](#) and contractual terms. Any act or threat of retaliation is a serious violation of our Code of Ethics.

In 2025, our due diligence processes identified no substantiated cases of modern slavery; accordingly, no income remediation for forced or child labour was required. We continued to assess indicators throughout the year and investigate as appropriate. Internally, we are proactively taking measures to ensure our remediation efforts will be adequate if we identify a substantiated case of modern slavery.



Further steps

AstraZeneca will continuously improve practices to identify and eliminate modern slavery or human trafficking, including creating SOPs to support our Global Standard on Human and Labour Rights and provide greater clarity on topics such as remediation.

In 2026 AstraZeneca will continue leveraging EcoVadis ratings to identify suppliers with elevated human and labour rights risks. Our focus will be on collaborating to implement corrective action plans aimed at strengthening governance and enhancing human rights performance.

Internal collaboration continues between Global Compliance, Global Procurement and Business Development to refine our approach to human rights due diligence for acquisitions and joint ventures. This will enable us to implement a more tailored due diligence process, allowing us to better assess these types of deals and understand the associated risks with new partnerships.

This statement covers the following AstraZeneca entities including Australian entities with an annual turnover of over AUD100m:

- AstraZeneca UK Limited (UK)
- KuDOS Pharmaceuticals Limited (UK)
- MedImmune Limited (UK)
- MedImmune UK Limited (UK)
- Alexion Pharmaceuticals (UK)
- AstraZeneca Holdings Pty Limited (Australia)
- AstraZeneca Pty Limited (Australia)
- Alexion Pharmaceuticals Australasia Pty Limited (Australia)
- Alexion Pharmaceuticals Canada Corporation (Canada)
- AstraZeneca Canada Inc (Canada)
- AstraZeneca Germany GmbH (Germany)
- AstraZeneca AS (Norway)
- AstraZeneca AG (Switzerland)
- Alexion Pharma GmbH (Switzerland)
- Evinova AG (Switzerland)
- AstraZeneca Ireland Ltd Swiss Branch

The AstraZeneca PLC Board of Directors has approved this statement.



A handwritten signature in black ink, appearing to read 'P. Soriot', positioned to the left of the printed name and title.

Pascal Soriot
Chief Executive Officer
 AstraZeneca PLC

29 January 2026