

# ASTRAZENECA GLOBAL POLICY

## SAFETY, HEALTH AND ENVIRONMENT (SHE)

**THIS POLICY SETS OUT HOW WE WILL MEET OUR COMMITMENT TO OPERATING OUR BUSINESS IN A WAY THAT PROTECTS PERSONAL HEALTH, WELLBEING AND SAFETY AND THE ENVIRONMENT.**

**IT DESCRIBES THE PRINCIPLES OF OUR COMMITMENT AND EXPLAINS THE MANAGEMENT SYSTEM REQUIREMENTS NEEDED TO IMPLEMENT THESE PRINCIPLES.**

### WHO IS THIS POLICY FOR?

**Everyone.** We all (including contract and temporary workers) have a responsibility to integrate safety, health and environmental considerations into our day-to-day work activity.

**Functional line managers** who have responsibility for ensuring appropriate SHE processes are in place for their teams.

**Regional, country or site managers** who have responsibility for ensuring appropriate SHE processes are in place within a Company site, business region, marketing company or other geography focused area.

**All members of AstraZeneca Group** must comply with the principles of this Policy and are responsible for establishing processes to manage SHE performance in a manner consistent with this Policy including periodically reporting to the Senior Executive Team on their SHE performance, risk profile and policy compliance status.

### KEY POLICY PRINCIPLES

We will maintain a level of SHE performance that:

- > Is amongst the leaders in the pharmaceutical industry.
- > Has the trust and respect of our staff and external stakeholders.
- > Goes beyond legal requirements when this can improve our SHE performance, enhance our reputation or otherwise deliver business value.

We will do this by:

- > Providing ways of working and a work environment that are safe for staff, visitors and others affected by our business, while working to prevent, or otherwise minimise the risk of, instances of workplace accidents and illnesses.
- > Promoting a healthy and energised workforce by encouraging and helping staff to take personal responsibility for their health and wellbeing and encouraging participation in programmes offered.

- > Preventing, or otherwise minimising the risk of, any harmful effects to the environment caused by our activities or products.
- > Working to continually improve the environmental sustainability of our business activities by using natural resources efficiently.

We will manage our SHE performance through actions, written procedures and systems that effectively:

- > Clarify personal accountabilities and responsibilities for integrating safety, health and environment (SHE) into our business activities.
- > Identify and manage the SHE risks associated with our activities and products, including opportunities to contribute to the Company's success.
- > Monitor, measure and continually improve our SHE performance.
- > Communicate openly and transparently with our stakeholders, both within and outside the Company.

## KEY POLICY PRINCIPLES CONTINUED

For more details about each of the above, see the sections that follow.

All members of the AstraZeneca Group must comply with the Principles of this Policy and are responsible for establishing processes to manage SHE performance in a manner consistent

with this Policy, including periodically reporting to the SET on SHE performance, risk profile and policy compliance status.

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## ACCOUNTABILITIES AND RESPONSIBILITIES

### PERSONAL RESPONSIBILITIES

All staff must take personal responsibility for their own wellbeing, health and safety; the wellbeing, health and safety of others; for protecting the environment; and for helping the Company continually improve its performance and reputation.

Accordingly, everyone must:

- > Understand the SHE aspects of your job and how that job affects the Company's overall SHE performance.
- > Take or request any training necessary for you to perform your job safely, lawfully and in a way that protects the environment.
- > Demonstrate SHE behaviours that are consistent with this Policy and identify and communicate ways to continually improve SHE performance.
- > Raise any concerns or issues regarding the SHE aspects of your job, the conduct of others or the Company's SHE performance with your managers, or through our Code of Conduct help line.
- > In matters relating to our SHE performance, be proactive, truthful, accurate and complete in keeping records, preparing, submitting and retaining documents. This will enable accurate ongoing assessment of our progress against targets and support transparent reporting of our performance to our stakeholders and others.

### BOARD AND SENIOR EXECUTIVE TEAM RESPONSIBILITIES

The AstraZeneca PLC Board of Directors is responsible for setting the direction for safety, health and environment management in the business and for making sure that we have a SHE policy that is fully integrated into our business activities.

Our Chief Executive Officer (CEO) is delegated authority from, and is accountable to, the Board of Directors for the Company's SHE performance.

The Operations Executive Vice President (EVP), reports to the CEO and Senior Executive Team (SET) and is responsible for making sure that all our business areas have the professional and financial resources and systems they need to comply with this policy. The EVP is also responsible for periodically reporting to the SET and the Board of Directors about our SHE performance, our risk profile and whether we are in compliance with the SHE Policy. NB. This oversight may differ across particular members of sections of the AstraZeneca Group.

Each member of the SET is responsible for making sure of the following within his or her business area(s):

- > Accountabilities and responsibilities for managing SHE risks are clearly defined, understood and communicated to all staff.
- > There are processes at a business and facility level that integrate SHE performance into business activities and help to make sure that we comply with this Policy.
- > There is access to the financial and staff resources needed to provide appropriate SHE advice and help achieve compliance with this Policy.

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## ACCOUNTABILITIES AND RESPONSIBILITIES CONTINUED

### FUNCTIONAL LINE MANAGEMENT RESPONSIBILITIES

If you are a line manager, you are responsible for:

- > Maintaining a safe and healthy workplace and identifying and understanding the specific SHE risks and requirements for your particular staff and teams.
- > Maintaining a reliable process for setting up, delegating responsibility for, and reviewing the effectiveness of risk-management decisions and controls.
- > Making sure your staff understand the full range of their SHE responsibilities and are trained against identified needs to perform their jobs safely, in a way that protects the environment and otherwise in line with this Policy and applicable laws, regulations and local procedures.
- > Making sure that visitors understand and follow any relevant local procedures for their own safety.
- > Supervising your staff, making sure that they take personal responsibility for managing the SHE risks associated with their roles, and that their performance against SHE responsibilities is built into the job appraisal and appointment process.
- > Making sure that any accidents, incidents and non-compliance with this policy are reported and investigated and that appropriate corrective action is taken.
- > Clarifying, and agreeing on, with site or regional management, the allocation of local SHE responsibilities, as described in the “Regional, Country or Site Management Responsibilities” section.

### REGIONAL, COUNTRY OR SITE MANAGEMENT RESPONSIBILITIES

If you are responsible for the management of a Company site, business region, marketing company or other geographic-focused area that is not subject to a legal requirement to formally delegate authority (eg, you are a regional Supply Vice President, Marketing Company President, Country Manager or Site Manager in such a region), you must, in coordination with the relevant functional line-management personnel, make sure that roles and responsibilities for SHE management are clearly defined and understood.

In particular, you must make sure that the following are in place:

- > A clearly defined, communicated and documented allocation of roles and responsibilities between site and functional line management.
- > Local SHE management processes that meet the requirements of this Policy.
- > Systems that identify, monitor and ensure compliance with this Policy and all our legal requirements, including defining who is locally accountable for ensuring compliance.
- > A workplace that is safe and healthy for all staff and visitors.
- > The necessary financial and staff resources to provide appropriate SHE advice to support and maintain the management processes.

If you are a Site Manager, you are also responsible for those risks arising from the physical assets (eg, utilities, natural hazards, physical security, etc). Where more than one function is operating on a site, you are also responsible for coordinating SHE Policy compliance activities, including emergency response management and improvement initiatives, with functional line management. Functional line managers retain accountability for managing the SHE risks, and improvement opportunities, within their direct control.

In territories where there is a legal requirement to formally delegate authority, functional heads and line managers must ensure that all such requirements are fully met and communicated.

### SHE STAFF RESPONSIBILITIES

If you provide SHE services, either locally or as part of a central SHE organisation, you are responsible for:

- > Providing the direction, technical support, guidance, programmes, training and other professional services that your business customers need to ensure compliance with this Policy.
- > Providing advice and support for risk assessment and management processes.
- > Maintaining and managing the reporting systems to monitor compliance with the requirements of this Policy.

## **SHE RISK MANAGEMENT AND LEGAL COMPLIANCE**

### **RISK MANAGEMENT ACTIVITIES**

SHE risks arise at both a functional and local level. We must make sure that SHE risks in the categories below are managed in a way that eliminates the threat or otherwise reduces it to an acceptable level and enables us to take advantage of opportunities to improve our performance. When considering the acceptability of a risk, we must consider the possible effects on people, the environment and our business (including the effect on reputation) and the likelihood of these consequences occurring.

Accordingly, within each function, line management, in coordination with site-level leadership and SHE staff must:

- > Identify the strategic and operational (workplace) SHE risks and the legal requirements arising from business activities.
- > Identify and maintain the control measures that are needed to manage these risks to an acceptable level.
- > Identify and manage the SHE risks associated with all changes that could affect the effectiveness of our risk controls, using formal change control procedures.
- > Identify who is responsible for ensuring that these risk controls remain effective and ensure that they are aware of their responsibilities.
- > Document these risks – at a functional, marketing company and site level – in a way that allows the risks to be integrated into business performance management. Registers of risk, and the effectiveness of controls, must be reviewed at least annually and significant business risks communicated upwards to the next management level.

### **RISK CATEGORIES AND MANAGEMENT REQUIREMENTS**

#### **Compliance with Legal and other requirements**

- > We must always comply with national and local laws, regulations and permits and take account of any regulatory guidance or advice that apply to our business activities. Legal compliance represents the minimum standard. Up-to-date registers of legal and other requirements must be maintained and be available at marketing companies and sites. Registers must include details of the controls necessary to maintain compliance.

#### **Workplace and community health and safety**

- > Certain business activities, including travel, can create hazards in the workplace or local community and pose risks to people, property and the business. Staff and line managers must manage these activities in a way that prevents, or otherwise minimises, the risk of accidents and illness, and helps individuals protect their health and wellbeing.

#### **Environmental performance**

- > Business activities with the potential to affect air or water quality; energy usage or climate change; waste generation; land use or biodiversity; or our consumption of natural resources must be managed to reduce adverse affects to the extent that is reasonably practical. Staff and line managers, including those purchasing goods and services for the Company, must work to:
  - Reduce the amount of energy and raw materials these activities use and the amount of waste they produce;
  - Manage any resulting emissions or wastes in ways that eliminate, or otherwise minimise the risk of, adverse affects on human health or the environment;
  - Identify and take advantage of opportunities that can improve the sustainability of our environmental performance, enhance our reputation and otherwise deliver business value.

#### **Product life cycle**

- > SHE risks may arise from developing, introducing, marketing, using and eventually disposing of products, together with the associated devices for delivering these drugs (eg, syringes) and packaging. Staff with responsibilities in these areas must understand and manage these risks throughout the product's lifecycle to protect human health and the environment and to take advantage of opportunities that can improve the Company's performance.

## **SHE RISK MANAGEMENT AND LEGAL COMPLIANCE CONTINUED**

### **Outsourcing, acquisition and divestment**

- > Functions, and those individuals responsible for making purchasing decisions, must make sure that our suppliers of goods and services embrace SHE standards that are consistent with our own. They must make sure that the SHE risks associated with activities to supply goods and services and to buy or sell property or businesses are understood and managed effectively.

### **Business continuity, emergency and crisis management**

- > Business continuity, emergency and crisis management involves identifying reasonably foreseeable future events that could negatively affect people, the environment or our business, and planning for these possible events.

Line managers at a functional, regional and local level must ensure that the emergency, crisis management and business continuity plans include potential SHE emergencies and that they are rehearsed periodically. The plans must also consider SHE risks arising outside the boundary that may impact on our business.

### **Other business risks**

- > We may face risks associated with natural disasters, local community matters, and changes to our facilities, business, organisations, processes or other issues. We must understand and manage these risks at a functional, regional and local level while protecting human health, the environment and our business performance.

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## **PERFORMANCE MONITORING, MEASUREMENT AND IMPROVEMENT**

### **OBJECTIVES AND PERFORMANCE MEASURES**

- > At a Company level, the SET will establish strategic SHE performance objectives for the business and related performance indicators and systems for measuring and reporting performance.
- > Each function will contribute to the Company's performance objectives by incorporating relevant performance measures and improvement programmes into its annual business plan and performance management processes.
- > At a Marketing Company, Regional or Site level, functional line management must, in cooperation with SHE support staff and site leadership, set performance objectives with associated performance indicators and measurements each year.

### **ACCIDENT AND INCIDENT INVESTIGATION AND LEARNING**

Line managers must make sure that trained individuals investigate, to an appropriate level, all SHE accidents, incidents and suspected cases of occupational illness, as defined by local or global procedures. The investigation must aim to identify the underlying causes of the event to enable the identification and introduction of actions that will help to prevent it from happening again. Learning from accidents and incidents must be communicated in ways that will help to prevent recurrence.

### **MONITORING AND AUDITING**

- > At a Company or functional level, we must maintain risk-based SHE audit programmes to provide reassurance to the Board and CEO that at a functional, site and supplier level, we are meeting the requirements of this Policy.
- > At a Regional or Site level, functional and local line management must implement audit or inspection programmes that monitor compliance with local laws and regulations and confirm the effectiveness of SHE management systems.
- > There must be processes in place that ensure that actions are taken to address the basic cause of any audit findings and that these actions are taken in a timely manner.

### **REPORTING**

At a Company or functional level, we must implement reporting systems to:

- > Monitor compliance with the SHE Policy.
- > Monitor and report progress against business improvement objectives and performance measures.
- > Report and investigate events, including all instances of legal non-compliance, that have, or could have, led to serious consequences for people, the environment or the business.
- > Share any significant lessons we have learned from SHE accidents, incidents and non-compliance across the organisation.

Functions must make sure that there are systems that make it possible for these requirements to be met locally; and make sure any global reporting procedures are followed.

## **PERFORMANCE MONITORING, MEASUREMENT AND IMPROVEMENT CONTINUED**

### **MANAGEMENT REVIEW AND IMPROVEMENT PLANS**

Each function must, at a business level and within the country or sites where it operates, carry out and document a review of its SHE performance each year. This must include a review of:

- > How effectively the local SHE management system used to implement the requirements of this Policy is working.
- > Compliance with this Policy and its associated procedures.
- > The results of auditing and monitoring activities.
- > Performance against business, functional and local improvement objectives.

The review must form the basis for an improvement plan that is included within functional and local business performance management activities.

### **SHE RECORDS AND DOCUMENTS**

All functions, Marketing Companies and Sites will keep and update SHE records as required by applicable laws or regulations. In addition, records of SHE training, SHE meetings, internal audits and inspections and other SHE management documents will also be kept. Documents will be identified, controlled and retained for the duration required by the Company's document retention and disposal schedule.

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## **COMMUNICATIONS**

### **WITHIN THE COMPANY**

Functions must make sure that within each or Region, Country or Site:

- > Up-to-date information about the SHE hazards of any materials being handled or any equipment being used is made available to staff in a form that is readily understood.
- > Local SHE procedures and other relevant SHE information are made available to all staff, including contract and temporary workers.
- > Staff are aware of, trained on and consulted about, matters relevant to their own health and safety and the SHE performance of the Company. Line managers must provide staff with the opportunity to discuss SHE issues, share learning and promote good practice.
- > Information relating to accidents and incidents is communicated.

### **OUTSIDE THE COMPANY**

Line management responsible for external communications must, with the assistance of SHE staff, make sure that:

- > Our customers, regulators and other stakeholders have access to the information they need to understand our SHE performance objectives and progress towards meeting those objectives.
- > We respond promptly to questions about our SHE performance or the SHE aspects of our business activities or products.

- > Our suppliers understand our SHE performance expectations and, where relevant to their relationship with us, have access to SHE information we hold. Relevant information may include the following:
  - Safety data sheets for our products;
  - Information about our product development and manufacturing processes relating to both normal operations and foreseeable emergencies;
  - Documents relating to the design, construction and operation of our assets;
  - Procedures relating to SHE working practices.
- > Suppliers provide the appropriate SHE information to meet the requirements of this Policy. This may include:
  - SHE information that they generate that relates to materials, products or services supplied to the Company;
  - Information relating to their own SHE performance.