AstraZeneca
Modern Slavery Statement for the year ended 31 December 2018

A. Our commitment
AstraZeneca is committed to operating with integrity and high ethical standards. This includes ensuring that our business respects human rights - a commitment reflected in our Code of Ethics, which is based on our Company Values and includes our global “Our Interactions” Policy.

“We run every part of our business with integrity, honesty, and transparency everywhere we operate. We do not allow modern slavery or human trafficking anywhere in our business. We uphold our standards of integrity in every situation, not allowing, asking, or enabling others to engage in prohibited conduct on our behalf. … We work only with qualified third parties who have a commitment to ethics and integrity consistent with ours…” AstraZeneca Code of Ethics, Page 3

Specifically, we are committed to ensuring that we identify and eliminate to the fullest extent practicable modern day slavery or human trafficking in our business.

Our standards comply with all current national and international laws, regulations and codes to prevent trafficking and slavery in our own business operations. Further, we require our contracting partners and those companies within our supply chain to do the same, as set out in our Global Standard on Expectations of Third Parties.

B. Our business
AstraZeneca is a global, science-led biopharmaceutical company that focuses on the discovery, development and commercialisation of prescription medicines, primarily for the treatment of diseases in three therapy areas - Oncology, Cardiovascular & Metabolic Diseases and Respiratory. The Company is also selectively active in the areas of autoimmunity, neuroscience and infection. AstraZeneca operates in over 100 countries and its innovative medicines are used by millions of patients worldwide.

Our science is led by our two biotech units which conduct discovery research and early-stage development from initial target selection to Phase II trial completion: the Innovative Medicines and Early Development Biotech Unit focuses on scientific advances in small molecules, nucleotides and other emerging technologies and drug discovery platforms; MedImmune is responsible for global biologics research. Both units are responsible for delivering projects to our Global Medicines Development unit for late-stage development.

Our Global Product and Portfolio Strategy group (GPPS) leads our therapy area activities for two of our three main therapy areas – Cardiovascular & Metabolic Diseases and Respiratory, as well as our portfolio of medicines in other disease areas. GPPS also serves as the bridge between our R&D and Commercial functions and works to provide strategic direction from early-stage research to commercialisation. Formed in April 2017, our Oncology Business Unit has direct responsibility for sales, marketing and medical affairs activities, and other commercial functions of our Oncology medicines at the global level, in the US and a number of European countries, including France, Germany, Italy, Spain and the UK.

We group our Commercial functions into Japan, and three Commercial Regions: North America (US and Canada); Europe; and International (Emerging Markets, Australia and New Zealand). Our Operations function plays a key role in the development, manufacturing, testing and delivery of our medicines to our customers.

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. Many of our business-critical operations including certain R&D processes, IT systems, HR, finance, tax and accounting services have also been outsourced to third party providers.

The Global Risk Owner for modern slavery and human trafficking is the Executive Vice-President Operations & IT who is a member of AstraZeneca’s Senior Executive Team, and their remit includes accountability for our Global Supply Chain and Global Procurement function. To support the EVP, we have dedicated internal compliance and audit teams responsible for reviewing the manner in which we manage all forms of risk, including employment principles.
C. Our policy

As set out above, AstraZeneca is committed to ensuring that there is no modern slavery or human trafficking in our supply chains or any part of our business. This commitment is enshrined both in our Values and in our relationships with third parties.

Our Values

AstraZeneca’s core Values require all our employees to operate with integrity and high ethical standards at all times along with respect for the individual and diversity: they require us to “do the right thing”.

Our Values determine how we work together and the behaviours that are integral to our drive for success. Our Values guide our decision making, define our beliefs and foster a strong AstraZeneca culture.

Our Code of Ethics 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. All AstraZeneca employees receive annual Code of Ethics training that explicitly raises awareness of the risks of slavery and human trafficking.

AstraZeneca supports and adheres to the principles set out in the UN Declaration of Human Rights, and our employment policies detail our high standards of employment practice. These internal policies and practices include respecting diversity and, as a minimum, complying with national legal requirements regarding wages and working hours. We also support the International Labour Organisation’s standards regarding child labour and minimum working age.

We have an established process and affiliated systems in place for employees to raise concerns and to protect whistleblowers from retaliation and identification. We encourage anyone to report in good faith any concerns regarding slavery and human trafficking, as well as any other compliance risks. AstraZeneca takes any such reports seriously and investigates all concerns raised, seeking to resolve matters in accordance with the Code of Ethics and applicable law.

Our relationships with third parties

The principles and values contained in our Code of Ethics also apply to our suppliers and all other third parties that we do business with. The applicable standards and requirements are entrenched in our Global Standard: Expectations of Third Parties.

We require our suppliers and other third parties to operate in line with internationally recognised human rights and promote and maintain a culture of respect and equal opportunities. This requires that our suppliers and other third parties do not use any form of forced, bonded, involuntary or indentured labour.

D. Risk management

AstraZeneca has a Third Party Risk Management process in place to identify and assess potential risks connected with our suppliers. This includes “Employment Principles” risks, including the risks related to slavery and trafficking (such as forced or bonded labour, underage employment, wages and benefits, hours/rest period and leave, collective bargaining, grievance procedures, non-discrimination and harassment).

We operate with a first line business accountability for managing the risks in any engagement with a third party, meaning that there is clear ownership of the decision to work with a third party within AstraZeneca. This allows us to ensure responsible management of each third party relationship.

Due diligence

When assessing third parties, AstraZeneca uses activity and geography based factors to identify, assess and document actions to mitigate risks to our Employment Principles. These factors determine which third party engagements are deemed high-risk requiring a deeper level of assessment. Where necessary, third parties are required to answer specific questions about the policy, procedures and controls they have in place to manage Employment Principles risks on AstraZeneca’s behalf, including audits.
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We automatically screen all third parties identified as high-risk for modern slavery, by utilising publicly available information to ensure we are aware of any history or concerns linking a third-party to poor labour practices. We also provide enhanced real-time guidance to employees during the due diligence process. In 2018 we have continued to engage with the Gangmasters and Labour Abuse Authority which regulates the Modern Slavery Act, to validate that our approach to identifying potentially high-risk third parties matched the wider trends being observed. We have also participated in seminars with peer multinationals to benchmark our approach to risk identification and mitigation. Through these engagements, we have validated that our highest risk activities continue to be Construction, Temporary Resources, Recruitment, Facilities, Logistics, and Hotels.

In 2018 we have engaged with a selection of our third-parties performing the highest risk activities on our behalf, in order to gain an even deeper understanding of how they identify, report and manage modern slavery risk within their own supply chains. We continually review our risk filters and procurement processes as a key area of continuous improvement.

Training

AstraZeneca provides employees, management and other relevant personnel with training on the Third Party Risk Management process, which includes training on slavery and human trafficking risks in our supply chain. In 2018 we delivered training to targeted employees in Commercial Markets.

E. Ongoing compliance and supplier monitoring

For the year ending 31 December 2018, over 10,000 third party assessments were conducted through our Third Party Risk Management process. In this time period, there were no recorded cases of human rights violations including trafficking or slavery among those third parties approved for use.

AstraZeneca’s Global Compliance function performs second line monitoring of Third Party Risk Assessments through sample review to assure that all forms of risk, including Employment Principles risks, have been correctly identified and mitigated as appropriate.

Our governance group which has oversight of our Third Party Risk Management process, and includes senior leaders in Procurement, Compliance and Legal functions, receives a quarterly summary of those third parties exited as a consequence of Employment Principles risks identified through due diligence.

In addition to the risk management process outlined above, we continue to meet with our suppliers on a regular basis to ensure that they adhere to our ethical standards, drive innovation and help us build a long-term competitive advantage.

F. Further steps

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the AstraZeneca Group’s slavery and human trafficking statement for the financial year ending 31 December 2018, also covering the following legal entities with an annual turnover of over £36m:

AstraZeneca UK Limited
KuDOS Pharmaceuticals Limited
MedImmune Limited
MedImmune UK Limited

This statement has been approved by the AstraZeneca Board of Directors

Pascal Soriot
Chief Executive Officer
AstraZeneca PLC

February 2018