

2025 Forced Labor, Child Labor, Human Rights, and Decent Working Conditions Regulatory Disclosures



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Introduction

This Statement is for the period from January 1, 2025, to December 31, 2025, and has been prepared pursuant to the *Australian Commonwealth Modern Slavery Act*, *California Transparency in Supply Chains Act*, *Canadian Fighting Against Forced Labour and Child Labour in Supply Chains Act*, *Norwegian Transparency Act*, and *UK Modern Slavery Act* (collectively, the **Acts**). This Statement describes our approach to human rights due diligence, as required by the *Norwegian Transparency Act*, and also outlines our approach to the specific issue of forced and/or child labor as required under the *California Transparency in Supply Chains Act*, *UK Modern Slavery Act*, *Canadian Fighting Against Forced Labour and Child Labour in Supply Chains Act*, and the *Australian Modern Slavery Act 2018*. Additionally, this Statement serves as our notice that, while certain Pfizer entities are subject to the child labor provisions of the *Swiss Code of Obligations Section 221.433 (the Ordinance on Due Diligence and Transparency in relation to Minerals and Metals from Conflict-Affected Areas and Child Labor)*, such entities are exempt from the due diligence and reporting obligations thereunder as Pfizer complies with internationally equivalent regulations (i.e., Convention No. 182, Convention No. 138 and the ILO-IOE Child Labour Guidance Tool for Business and the Organisation for Economic Co-operation and Development (**OECD**) Due Diligence Guidance for Responsible Business Conduct). We prepared a single statement because we generally follow the same policies and procedures globally to address and mitigate human rights risks in our operations and supply chain. However, not all of our group companies are subject to the Acts mentioned above.

In this Statement, “**Pfizer**,” “**we**,” “**us**,” and “**our**” refers to Pfizer Inc. and its subsidiaries, unless stated otherwise.

This Statement details the actions we have taken to assess and respect fundamental human rights, including the right to freedom from forced labor and child labor and the right to decent working conditions, in our operations and supply chains.

As used in this Statement, the following definitions are used.

- “**Fundamental human rights**” are internationally recognized human rights pursuant to, among other things, the International Covenant on Economic, Social and Cultural Rights, the International Covenant on Civil and Political Rights and the International Labour Organization’s (**ILO**) core conventions on fundamental principles and rights at work (**Core Conventions**).
- “**Modern slavery**” encompasses forced labor, prison labor, indentured labor, bonded labor, debt servitude, state imposed forced labor, human trafficking, forced marriage, and other similar conduct commonly thought of as modern slavery. For purposes of this Statement, child labor, as defined below, is included within this definition of “modern slavery.”
- “**Child labor**” means labor or service provided or offered to be provided by persons under the age of 18 and that: (1) are contrary to applicable child labor laws; (2) are provided or offered to be provided under circumstances that are mentally, physically, socially, or morally dangerous to the persons providing the labor; (3) interfere with their schooling by depriving them of the opportunity to attend school, obliging them to leave school prematurely or requiring them to attempt to combine school attendance with excessively long and heavy work; or (4) constitute the worst forms of child labor as defined in Article 3 of the ILO’s Worst Forms of Child Labour Convention (Convention No. 182).
- “**Decent working conditions**” are work conditions that safeguard fundamental human rights and health, safety, and the environment, while providing a living wage.

About Pfizer

Pfizer is a research-based, global biopharmaceutical company. We apply science and our global resources to bring therapies to people that extend and significantly improve their lives through the discovery, development, manufacture, marketing, sale, and distribution of biopharmaceutical products worldwide. We work across developed and emerging markets to advance wellness, prevention, treatments and cures that challenge the most feared diseases of our time. We collaborate with healthcare providers, governments and local communities to support and expand access to reliable, affordable healthcare around the world.

Pfizer is headquartered in New York and has operations around the world. As of December 31, 2025, Pfizer had approximately 75,000 employees around the world.

Pfizer operates 36 manufacturing sites¹ worldwide in addition to research and development, commercial, and logistics operations. Our sites operate according to Pfizer's policies and procedures, including, but not limited to, those outlined in this Statement. The performance of Pfizer's sites is monitored and regularly reviewed to help ensure our standards of conduct meet our expectations as we aim to deliver breakthroughs for patients. Our operations allow us to supply our medicines and vaccines to approximately 200 countries and territories.

Additional information about Pfizer's responsible business growth strategy is set out in Pfizer's [Annual Review](#) and [Impact Report](#).

Our Supply Chain

At Pfizer, responsible supply chain management is an important part of how we do business. We have high standards and expectations for our internal and external partners guided by a governance process to help promote responsible supply chain management. Compliance with regulatory standards is the foundation of our risk mitigation and a crucial component of providing the world with a reliable supply of safe and effective medicines and vaccines.

Pfizer has a broad network of internal sites and external suppliers that work together to enable the research, development, and manufacture of medicines and vaccines that deliver breakthroughs that change patients' lives. Pfizer's supply chain supports the research, development, and manufacturing process by providing flexibility and access to technologies necessary to meet our commitment to patients. For example, Pfizer's manufacturing division uses suppliers to produce and warehouse selected materials and products to expand the capacity of our network. Where possible, we use multiple suppliers to minimize risk of supply interruptions of essential medicines and have a global supply chain that can reallocate supplies quickly, across borders, to maintain supply and address shifting needs across the world.

¹ As of December 31, 2025.

Human Rights

Pfizer is committed to conducting business in an ethical and responsible manner. This includes respecting fundamental human rights throughout our operations and supply chains. Pfizer is also committed to acting in line with the OECD Guidelines for Multinational Enterprises. Pfizer is proud to have been one of the early signatories to the United Nations (UN) Global Compact, an initiative that calls on companies to align strategies and operations with universal principles on human rights, labor, environment, and anti-corruption, and to take actions that advance societal goals. In honoring our commitment, we seek to prevent and mitigate adverse human rights impacts in our global operations and supply chains, and remediate adverse human rights impacts we may cause or contribute to.

In line with the UN Guiding Principles on Business and Human Rights (UNGPs) and OECD Guidelines for Multinational Enterprises, Pfizer's human rights approach focuses on addressing risks that could have the most severe impact on people: our patients, our colleagues, the workers of our suppliers and business partners, and the communities in which we operate. Our initiatives to respect human rights extend throughout our operations, from lab to patient, including our numerous local and global third-party vendors.

As a biopharmaceutical company, the right to health is of paramount importance. Other salient human rights are the principle of non-discrimination; the right to privacy; freedom from slavery and forced labor; the right to enjoy just and favorable conditions of work; the right to a safe workplace; and the right to a clean, healthy, and sustainable environment. Pfizer's human rights strategy, including the procedures described herein, seeks to address these salient rights.

Pfizer prohibits the use of all forms of modern slavery, including forced labor and child labor, in our supply chain and business operations.

As discussed below, Pfizer uses a global corporate labor and human rights standard as the keystone of our governance process to assess its supplier base, with a focus on modern slavery. The standard includes requirements for mitigating potential risk of harm to people arising from violation of human rights and labor standards.

Risk Areas in Pfizer's Operations and Supply Chain

Our Operations

For the reasons described below, we believe that the risk of adverse human rights impacts, including working condition violations and modern slavery, for our business operations is low.

- We maintain robust human resources, environment, health, and safety (EHS), and compliance functions.
- Our employees generally are hired on a regular full-time basis, rather than being temporary, seasonal, or migrant workers.
- The contractors we engage directly as part of our operations are generally in highly skilled and professional roles. Where we retain service providers in areas that are less highly skilled (e.g., landscaping, cafeteria, cleaning, garment services), we require service providers to satisfy due diligence checks prior to formal engagement and include clauses requiring compliance with law and prohibition of modern slavery in our standard supplier and service provider contracts.
- To the extent our manufacturing sites may engage workers (e.g., machine operators and technical roles such as engineers and scientific roles) through a recruitment agency, we have arrangements with only a select number of recruitment agencies that are required to satisfy due diligence checks prior to formal engagement and with clauses prohibiting modern slavery in our standard supplier and service provider contracts.
- Except for those engaged in a formal apprentice or internship program, everyone working in our operations is 18 years or older.
- All our employees are paid in excess of minimum wage.

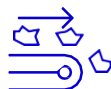
External Supply Chain

Because responsible supply chain management is core to how we do business, Pfizer aims to partner with external suppliers that are committed to operating their businesses in a responsible and ethical manner, including respecting the rights of the individuals they employ. Our supply chain includes a broad range of direct suppliers from various locations and industries, including those generally considered to have an increased prevalence of, and vulnerability to, adverse human rights impacts by virtue of their inherent sector risk or geography. In seeking to assess our connection to human rights impacts and decent working conditions in our supply chain, we consider the potential for our business to cause, contribute to, or be directly linked to adverse impacts, as defined in the UNGPs.

Based on a global internal assessment performed by Pfizer, considering published civil society and NGO studies and other thought leadership, the following categories within our supply chain are considered to have increased risk of adverse human rights impacts, including forced and child labor, irrespective of geographic location or the specific supplier:



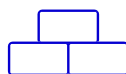
Freight & Shipping



Raw Material Supply



Packaging



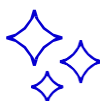
Building & Construction Services and Materials



Electronics and Telecommunications, including IT hardware



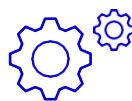
Garment Supply



Industrial Cleaning Services



Personal Protective Equipment (PPE)



Manufacturing



Accommodation and Food Services



Waste Management

We consider the above sectors to have heightened risk due to their use of lower-skilled workers, often with limited ability to negotiate their wages and rights in the workplace. We also recognize that the risks of adverse impacts – and specifically modern slavery – are heightened where our business partners rely upon migrant workers (possibly on temporary visas) and other workers who are particularly vulnerable to exploitation. We also consider that some of our suppliers have a global footprint which could potentially present a higher risk of human rights violations due to operating in higher risk regions.

Taking the above and, more generally, the contents of this Statement into account, the highest potential risk area related to adverse human rights impacts is modern slavery in our supply chain, where modern slavery could potentially occur without our knowledge and in violation of our policies. While we believe that our existing policies and procedures assist us to mitigate against this risk at our direct suppliers, modern slavery becomes increasingly difficult to assess beyond the first tier of our supply chain, where we may in some cases be several levels removed from the potential impact to workers and we are taking steps to address this through flow down contractual provisions. This Statement discusses Pfizer's efforts to conduct due diligence to assess and address risks of adverse human rights impacts, including modern slavery, and mitigate those risks.

Our supplier management program focuses on external suppliers that play an active role in the production of our products, including suppliers related to our raw materials, drug substance, and drug product supply, warehousing and distribution, contract manufacturing and packaging, and services conducted on Pfizer manufacturing premises (collectively our "Product Suppliers").

Actions Taken to Assess and Address Risks related to Human Rights and Decent Working Conditions

Pfizer is committed to conducting business in an ethical and responsible manner, which includes seeking to prevent and mitigate adverse human rights impacts. Our approach to human rights risks is informed by international standards, industry best practice, and expert assessment.

Governance and Risk Management

Our established risk-based evaluations for Product Suppliers, and other external suppliers deemed to be high-risk, assess EHS and sustainability performance, including labor and human rights. When assessing whether a Product Supplier is high-risk for adverse human rights impacts, we consider the supplier's geography, industry, and other proprietary and public domain information. For example, we use Modern Slavery Risk Indices (e.g., the [Global Slavery Index](#)) to inform risk assessments and focus on suppliers from high-risk jurisdictions.

Our collaborations with suppliers are focused on improving sustainability, compliance with laws, and alignment to our Supplier Conduct Principles and the Pharmaceutical Supply Chain Initiative's (PSCI) Principles for Responsible Supply Chain Management (each of which are described below).

Pfizer applies a global corporate labor and human rights standard for our supplier base and uses a risk-based governance process. The standard includes measures intended to mitigate potential risks of harm to people in connection with violations of human rights and labor standards. The program for Pfizer's Product Suppliers includes a risk-based assessment process that results in a supplier risk score. Product Suppliers that are determined to have an elevated risk (e.g., risks related to EHS, labor and human rights) are subject to a governance process which may result in Pfizer requiring the supplier to mitigate identified risks. This would be accomplished through the development of corrective action plans designed to improve the supplier's operations and procedures. If the supplier does not comply with the agreed corrective actions, Pfizer may seek an alternative supplier.

Pfizer has a dedicated, cross-functional forum, the Human Rights Working Group, consisting of members from various functions including legal, risk management, procurement, and safety and environmental operations. This working group is responsible for driving a cohesive and systematic approach to human rights risk management, governance throughout Pfizer and Pfizer's value chain, and supporting implementation of the actions set out in this Statement.

Policies

Pfizer has established policies designed to mitigate adverse human rights risks in our business and supply chain. We expect all our employees and suppliers to be aware of, and comply with, their obligations set out in our policies. As needed, Pfizer reviews and updates its policies and procedures related to fundamental human rights.

Code of Conduct

Pfizer's [Code of Conduct](#) – the Blue Book – describes how we operate and guides the ethical decisions we make. All employees and certain contractors are required to adhere to these standards. The Code of Conduct specifically covers our commitment to our core value of equity and respecting human rights and is publicly available in over 30 languages.

Code of Conduct training is assigned to all new colleagues upon hire and to existing colleagues regularly. The training system is designed to allow for escalation if an employee fails to complete training within the set timeline. The training includes a certification to confirm that colleagues are familiar with and agree to abide by the Code of Conduct and that they understand their responsibility to report and have reported potential violations of law, regulations, ethical standards, or Pfizer policy.

Human Rights Policy

In line with the UNGPs and the ILO's Core Conventions, Pfizer's [Human Rights Policy Statement](#) focuses on addressing risks that could have the most severe impact on people. Our commitment to respect human rights extends throughout our operations, including our third-party vendors. The Human Rights Policy Statement expressly indicates that Pfizer prohibits the use of all forms of forced and child labor in our supply chain and business operations.

Internal training is provided to relevant functions on Pfizer's Human Rights Policy.

Pfizer's Human Rights Policy Statement and more about Pfizer's commitment to human rights can be found at our [Human Rights webpage](#).

Supplier Conduct Position Statement

Pfizer's [Supplier Conduct Position Statement](#) states Pfizer's aim to partner with external suppliers that are committed to operating their businesses in a responsible and ethical manner, respecting the rights of the individuals whom they employ, and helping protect the environment. Pfizer strongly encourages all its supply partners to support Pfizer's [Supplier Conduct Principles](#) (which are aligned to the PSCI [Principles for Responsible Supply Chain Management](#)²) or adopt their own codes which include similar expectations.

Among other things, our Supplier Conduct Principles strongly encourage Pfizer's suppliers (regardless of the product or service provided) to:

- At a minimum, operate in full compliance with all applicable laws, rules, and regulations.
- Conduct their business in an ethical manner, acting with integrity.
- Not use forced, bonded or indentured labor, or involuntary prison labor, or take part in human trafficking or any form of modern slavery.
- Not use child labor, and more specifically, limit employment of young workers below the age of 18 to non-hazardous work and only employ young workers above a country's legal age for employment or the age established for completing compulsory education.
- Provide a workplace free from discrimination.
- Provide a workplace free of harassment and harsh and inhumane treatment.
- Pay workers according to applicable wage laws and agreed employment contracts, including minimum wages, overtime hours, and mandated benefits.
- Respect the rights of workers as set forth in local laws, to associate freely, join or not join labor unions, seek representation, and join workers' councils.
- Cascade these principles to their supply partners.

The Supplier Conduct Position Statement warns that failure to comply with the Supplier Conduct Principles and/or failure to correct non-complying situations are grounds for business relationship termination.

Additional Policies

Pfizer also has an Equal Opportunity Policy, reiterated in the Blue Book, and an [Environmental, Health and Safety Policy](#), each of which support our commitment to respect fundamental human rights.

Contract Clauses

Pfizer has clauses prohibiting adverse human rights impacts, including modern slavery, in all standard Pfizer Inc. global agreement templates for procuring goods and services, including representations and warranties regarding a third party's knowledge of modern slavery in its operations and supply chain, rights to audit, notification obligations, and obligations to operate in a manner consistent with Pfizer's Supplier Conduct Principles as well as the PSCI Principles for Responsible Supply Chain Management.

² PSCI, an organization of pharmaceutical companies, established the Principles for Responsible Supply Chain Management to aide pharmaceutical suppliers in establishing sustainable business practices, including ethical and responsible labor practices. Additional information about PSCI and its activities can be found here: <https://pscinitiati.ve.org/home>.

Supplier Management and Audits

Pfizer seeks to ensure that our Product Suppliers demonstrate strong performance in the management of EHS and human rights risks. We assess the EHS and human rights performance of our Product Suppliers by performing a combination of desktop and onsite audits on a periodic basis. Based on the level of risk of a Product Supplier, and their performance during past audits (if applicable), Pfizer assigns the Product Supplier a schedule for how often it needs to complete EHS and human rights audits. Labor and human rights audits are also completed for Product Suppliers on an ad hoc basis, as we deem appropriate.

Our labor and human rights audits integrate evaluation of human rights considerations aligned with SA 8000.³ Labor and human rights audits are completed by independent third-party auditors engaged by Pfizer in high-risk jurisdictions and by internally trained Pfizer colleagues in other instances. The auditors follow the PSCI's standard audit protocols, which include standard labor and human rights criteria and involve interviews with employees, contracted staff, and management. Audit outcomes are used to drive continuous improvement in both performance and compliance. We share our observations with the suppliers and ask them to establish corrective action plans to mitigate identified risks. Where we can, we also help suppliers to reduce risk with targeted training and coaching. As applicable, we continue to monitor suppliers' implementation of agreed actions.

In 2025, Pfizer assessed EHS and sustainability performance for 77 supplier facilities through a combination of remote and on-site audits. The scope of these audits included labor and human rights assessments. Overall, 453 observations were made as part of these audits, of which 20 related to labor and human rights.

As noted above, rather than immediately terminating suppliers that do not meet all our supplier expectations, we generally seek to continue to work with suppliers who are amenable to improvements and change to help prevent harm to the employees of such suppliers. This approach is consistent with the UNGPs and helps prevent the loss of income to the most vulnerable workers and families.

The results of these audits/assessments are factored into our supplier risk management process to help inform our selection of companies that are responsible, ethical, and reliable partners, in addition to reducing Pfizer's potential risk of business interruption to our global supply chain.

Raising Concerns

Pfizer is dedicated to fostering an open-door culture in which all colleagues can ask questions, raise concerns, and report potential misconduct without fear of retaliation. Our internal Open Door Policy (i.e., our whistleblower policy) encourages colleagues to present ideas, ask questions, and raise concerns. Retaliation against anyone who seeks advice, raises a concern, reports misconduct, or provides information in an investigation is strictly prohibited. We measure colleague comfort and awareness about raising concerns, including awareness of our whistleblower policy, through the confidential enterprise Pfizer Pulse Engagement Survey sent to all colleagues annually. The results are used to focus our leadership communications, training, and other proactive efforts to foster our purpose-driven culture and encourage speaking up.

Pfizer colleagues, contingent workers, those in our supply chain, and the public can ask questions and report concerns via the following channels:

- The [Compliance Helpline](#), a third-party operated public hotline available by phone and online, 24 hours a day, every day. The Compliance Helpline is available in over 30 languages and is accessible from, among other places, our [Business-to-Business: Partner Resources](#) website. Employees, suppliers, and other third parties can report a concern or get information or advice anonymously (where permitted by law).⁴
- Contacting [Pfizer Compliance](#) through email and phone. Pfizer Compliance investigates known or suspected violations of company policies and applicable laws.
- For employees, internal human resources reporting procedures.
- Our Office of the Ombuds is a resource to support Pfizer colleagues with information and guidance to help them resolve work-related issues. Pfizer's Ombuds is informal, independent, and neutral, and is not an advocate for any party, but an advocate for fair process.

³ SA 8000 is an international certification standard that encourages organizations to develop, maintain and apply socially acceptable practices in the workplace.

⁴ EU Note: For more details on what information Pfizer collects and how it uses the information in the context of the Helpline, as well as for more information about your rights, please see the [Compliance Helpline Guidance & Privacy Notice](#). Furthermore, in certain EU countries, Pfizer also offers local reporting channels. For more information see <https://www.pfizer.com/about/responsibility/compliance>.

Pfizer's [Code of Conduct](#) and our [Ethics and Compliance webpage](#) set out the different reporting mechanisms described above. Employees of suppliers are encouraged to report any or all violations of the Supplier Conduct Principles.

Additionally, the Pfizer Resilience Center is available globally on a 24-hour basis to all colleagues and contingent workers for security issues.

Pfizer takes seriously reports of known or suspected violations of company policies and applicable law; our goal is to respond promptly to all questions and reported concerns. We aim to identify and address potential inappropriate conduct as early as possible, prevent future recurrences, and inform continuous improvement. We investigate all referable compliance issues (**RCIs**) – significant potential, suspected, or actual violations of law or policy, including alleged or potential human rights violations and modern slavery. For RCIs where there is a substantiated violation, we institute individual discipline where appropriate, including measures such as coaching, warnings, and termination. Our compliance investigations process also includes analysis of the root cause of substantiated RCIs. After investigation, we work with accountable stakeholders to implement corrective and preventive actions. Pfizer has a process to escalate certain significant matters to the management Executive Compliance Committee, and the Regulatory and Compliance Committee and the Audit Committee of the Pfizer Board of Directors.

External Engagement

Through our engagement with PSCI and Pfizer-hosted engagements, we actively encourage our Product Suppliers to participate in capability-building conferences and webinars, including human rights considerations for their operations and their supply chains.

In addition, Pfizer is a co-founder and active member of PSCI. Pfizer colleagues currently sit on several PSCI working committees and topics teams including Audits, Capability and Projects, Human Rights, Health & Safety, and Environment. In 2025, Pfizer colleagues also supported PSCI capability-building initiatives by serving as speakers at supplier conferences.

Pfizer is also a long-standing member of Business for Social Responsibility (**BSR**), an organization that works with its global network of leading companies to create a just and sustainable world. Pfizer is an active contributor to BSR's Human Rights Working Group (**HRWG**). The BSR HRWG is a collaborative initiative convening companies supporting each other on implementing the UNGPs. Practitioners in the group represent more than 50 cross-industry companies partnering to advance and refine human rights programs at each participant company.

Annex A: UK

Each of the reporting entities named below (the **Reporting Entities** (in this section) or **Pfizer UK**) are required to prepare a statement under the UK Modern Slavery Act.

- Pfizer Limited
- Pfizer Development Services Limited
- Pfizer R&D UK Limited

The Reporting Entities, each of which is a company owned by Pfizer Inc., come within Pfizer's global compliance program which is discussed throughout this Statement. This Statement relates to all of Pfizer's activities in the UK. References to "we", "us", or "our" in this annex refer to the Reporting Entities.

About Pfizer UK

Pfizer UK has over 1,720 employees⁵ who perform roles from a variety of fields and functions including science, medical, regulatory affairs, sales and marketing, health economics, research and development, software development as well as administrative services.

Pfizer UK's Supply Chain

Our most important suppliers are our related Pfizer entities that supply us with medicines and vaccines that are distributed in the UK. These sites operate according to Pfizer's policies and procedures including those outlined in this Statement.

Pfizer UK's non-related direct suppliers generally reflect those of Pfizer (as described in this Statement).

Risks of Modern Slavery in Pfizer UK's Operations and Supply Chain

We believe that modern slavery risks in the Reporting Entities' own workforce are low for the reasons discussed earlier in this Statement. The highest and lowest modern slavery risks of the Reporting Entities mirror that of Pfizer and are also discussed earlier in this Statement. The policies and steps described earlier in this Statement that Pfizer has taken, which are designed to assess, mitigate, and manage the risk of modern slavery, including forced labor and child labor, are applicable to Pfizer UK.

Approval

In accordance with the UK Modern Slavery Act and guidance thereunder, and solely for purposes of compliance with that Act, this Statement was approved on 16 April 2026 by the directors of each of the Reporting Entities.

Solely for purposes of the UK Modern Slavery Act, this Statement was signed by James Pearson, a director of each of the Reporting Entities, on 16 April 2026.

James Pearson

Director, Pfizer Limited

⁵ As of December 31, 2025.

