
Pfizer 2020

California and UK Modern Slavery Statement

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Introduction

This statement is for the period from 1 January 2020 through 31 December 2020 and is provided pursuant to the California Transparency in Supply Chains Act and the UK Modern Slavery Act. We prepared a single statement because we generally follow the same policies and procedures globally to address modern slavery.

In relation to Pfizer companies operating in the UK, this statement has been prepared on behalf of Pfizer Limited and its associated companies:

- Hospira UK Limited
- John Wyeth & Brother Limited
- Pharmacia Limited
- Pfizer Development Services Limited
- Pfizer R&D UK Limited

In this Statement, “Pfizer” refers to the global group of companies owned by Pfizer Inc.

Modern Slavery is a global problem affecting an estimated 40 million people or more worldwide. Modern Slavery means exploitative practices including human trafficking, slavery, slavery-like practices, servitude, forced labour, debt bondage, the worst forms of child labour, and deceptive recruiting for labour services.

‘Breakthroughs That Change Patients’ Lives’

Pfizer’s purpose is creating ‘Breakthroughs That Change Patients’ Lives’. This is more than just improving patients’ conditions – we work to dramatically change their lives, and the lives of those they touch, for the better. Every day, we work to advance wellness, prevention, treatments and cures that challenge the most feared diseases of our time.

At Pfizer, our purpose is more important now than ever. As we work to meet patient and societal needs, we are committed to acting ethically, thoughtfully, and responsibly and to doing business with suppliers and partners that share this same commitment.

With the entire purpose of why we do business to improve people’s lives for the better, we have a strong commitment to working on making sure this purpose extends out to all the ways we work. We are committed to conducting business in an ethical and responsible manner and ensuring that all businesses we work with have the same commitment.

This Statement details the actions Pfizer has taken to assess and address modern slavery risks in our operations and supply chain as well as outlining our plans going forward.

Our Structure, Operations and Supply Chain

Pfizer Inc. is global company with its headquarters in New York and operations around the world.

Our Company – Global Snapshot¹



Our Operations

Our global manufacturing and supply network includes over 40 sites across six continents in addition to our research and development, commercial, and logistics operations. More information about Pfizer's standards for our direct operations can be found in the Policies & Governance section.

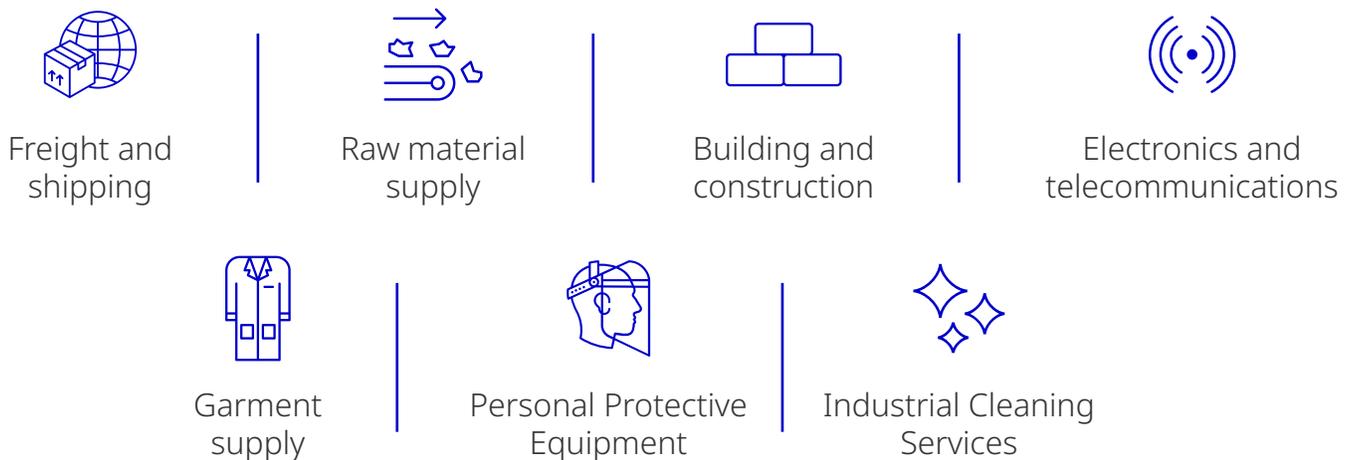
The majority of Pfizer's employees are hired on a regular basis, and the contractors we engage as part of our operations are generally in highly skilled and professional roles. Manufacturing sites may also engage operators through a recruitment agency. We have arrangements with only a small select number of recruitment agencies which are required to satisfy due diligence checks prior to formal engagement and agree to our modern slavery clauses in our contracts. For the reasons described in this paragraph, we believe that the risk of modern slavery in our global operations is low.

¹ As at December 2020.

Our Supply Chain

In seeking to identify the modern slavery risks in our supply chain, we consider the potential for our business to cause, contribute to, or be directly linked to modern slavery. Our supply chain includes a broad range of direct suppliers from various locations and industries, including those generally considered a higher risk for modern slavery by virtue or geography.

Based on an internal assessment, the following categories within our supply chain could potentially have increased modern slavery risks irrespective of geographic location:



We understand that the risk profile of the above sectors is heightened by the potential of these industries to use lower skilled workers with limited ability to negotiate their wages and rights in the workplace.

We also acknowledge the risk of modern slavery in the downstream supply chain for certain of these sectors, including for example, uniforms and corporate merchandise, the lithium batteries in laptops and smartphones, food and beverages provided through onsite cafeteria services, and hospitality services used for travel or off-site events.

Additionally, we acknowledge that our suppliers have a global footprint and, accordingly, could potentially be exposed to modern slavery due to operations in higher risk jurisdictions.

Pfizer is currently focusing on targeted high-risk areas as identified by the Global Slavery Index and is taking steps to address these risks as described in more detail in the next section.

Actions taken to assess and address the modern slavery risks

Pfizer is committed to conducting business in an ethical and responsible manner, which includes respecting internationally recognised human rights. 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, labour, environment, and anti-corruption, and to take actions that advance societal goals. In honouring our commitment, we seek to prevent and mitigate adverse human rights impacts we may inadvertently cause or contribute to. Wherever we can, we also seek to advance human rights. Our approach to human rights risks is informed by international standards, industry best practice, and expert assessment.

Policies and Governance

Pfizer has established policies designed to mitigate modern slavery risks in our business and supply chain. We expect that all our employees and suppliers are aware of, and comply with, their obligations set out in our policies.

Pfizer's Blue Book – our Code of Conduct – describes how we operate and guides the decisions we make, and each employee and contractor is required to adhere to these standards. The Blue Book specifically covers our commitment to Equity and respecting human rights ([see page 27: Blue Book](#))

Pfizer fully supports the principles of the Universal Declaration of Human Rights, the International Labour Organization Declaration on Fundamental Principles and Rights at Work, and the UN Guiding Principles on Business and Human Rights. As a signatory of the United Nations Global Compact, we also have committed to support the ten principles on human rights, labour, environment, and anti-corruption, including calling for the elimination of all forms of forced and compulsory labour and the effective abolition of child labour.

In line with the UN Guiding Principles on Business and Human Rights, Pfizer's human rights policy focuses on addressing risks that could have the most severe impact on people: our patients, our colleagues, the workers of our business partners, and the communities in which we operate. Our responsibility to respect human rights extends throughout our operations, from lab to patient, including our diverse global supply chain of numerous local, third-party vendors. Please see Pfizer's [Human Rights Policy Statement](#).

During 2020, Pfizer developed a corporate labour and ethics standard for our supplier base with a focus on Modern Slavery. The scope of this standard includes suppliers and supplier categories that provide the following types of materials and services to Pfizer: direct materials, drug substances, and drug products; warehousing and distribution; contract manufacturing organizations; and services conducted on Pfizer manufacturing premises

(including contracted labour services). The standard establishes program governance including assuring that labour and ethics risk is appropriately identified, managed, escalated, and reduced. This risk-based governance process is being implemented in 2021.

External Engagement

Pfizer is a co-founder and active member of the Pharmaceutical Supply Chain Initiative (PSCI), an organization of pharmaceutical companies that has established a set of principles to aide pharmaceutical suppliers in establishing sustainable business practices, including ethical and responsible labour practices. PSCI's Principles regarding labour state that suppliers shall not use forced, bonded, indentured, or child labour. Pfizer is a participant on PSCI's Human Rights and Labour Committee. In 2020 the Committee developed responsible sourcing guides for 14 raw materials and presented member training and information on emerging Human Rights and Labour regulations. The PSCI Principles are available online at: <https://pscinitiative.org/resources>.

Supplier Conduct Position Statement

Pfizer strongly encourages our suppliers to support our Supplier Conduct Principles or adopt their own codes which include expectations similar to ours. Failure to comply may result in business relationship termination.

Among other things, the Supplier Conduct Principles expect suppliers to:

- operate in full compliance with all applicable laws, rules and regulations.
- conduct their business in an ethical manner, acting with integrity.
- commit to upholding the human rights of workers and to treat them with dignity and respect, including adhering to express prohibitions against the use of forced, bonded or indentured labour, and child labour; and
- provide a safe and healthy work environment.
- [Download Pfizer's Supplier Conduct Position Statement \(PDF\)](#)
- [Download Pfizer's Supplier Conduct Principles \(PDF\)](#)

Audits

Pfizer audits the potential for Environment, Health and Safety (EHS) and labour and ethics risks, including modern slavery, in its direct material supply chain globally. Labour and ethics audits are completed by independent third-party auditors engaged by Pfizer in high-risk jurisdictions and by internally trained Pfizer colleagues in other instances. Audits conducted to date have not identified significant modern slavery risks at our direct material suppliers. In 2019, Pfizer conducted 102 Supplier EHS audits, with 34 of these including Labour and Ethics audits. Due to COVID-19, on-site supplier audits in 2020 were limited and alternative risk monitoring processes (e.g., remote audits) were developed and implemented.

To the extent areas of noncompliance are identified during audits, we require corrective action by the supplier.

Anti-Bribery and Anti-Corruption

Corruption is a red flag for modern slavery risks.

Pfizer has extensive international anti-bribery and anti-corruption policies and procedures in place to help ensure that employees comply with all anti-bribery and corruption legislation, including but not limited to the U.S. Foreign Corrupt Practices Act of 1977, the U.K. Bribery Act, the Australian Commonwealth Criminal Code, the People's Republic of China Criminal Law, and the laws of the other countries that have signed the United Nations Convention Against Corruption (UNCAC).

These policies and procedures cover, among other things, employees' interactions with government officials and non-U.S. healthcare professionals, as well as third parties that provide goods or services to Pfizer. These policies and procedures are reinforced through anti-corruption training and tested through periodic auditing and monitoring. Where appropriate, third parties are required to undergo anti-corruption due diligence and auditing, follow Pfizer's internal anti-bribery and anti-corruption policies and procedures, receive anti-corruption training and/or abide by Pfizer's International Anti-Bribery and Anti-Corruption Business Principles.

Raising Concerns

Pfizer provides multiple channels for colleagues, contingent workers and the public to raise concerns. The Compliance Division investigates all significant potential, suspected or actual violations of applicable law or company policy.

In line with Pfizer's Open Door policy and our value of courage, colleagues can report human rights violations or concerns to any level of leadership within the company, human resources, legal, or compliance. The Compliance Helpline, operated by specially trained third-party representatives, also provides a way to report concerns, anonymously in many cases. All reports are handled promptly and confidentially. Retaliation against any employee who seeks advice, raises a concern, reports misconduct, or provides information in an investigation is strictly prohibited.

Colleagues may also reach out to the Office of the Ombuds for information and guidance to help address and resolve work-related issues. Pfizer's Office of the Ombuds offers a place where employees at any level can get information and guidance to help them address and 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.

There are various methods and resources to report compliance concerns, for both employees of Pfizer, and also for the public. The Compliance Helpline is available to call 24 hours a day, every day of the year and is operated by specially trained third-party representatives and offered in multiple languages. There is also a portal to obtain assistance or report online. Both of these methods have the option to remain anonymous if local laws allow.

Further to this, for any issue that concerns an immediate violence or threat or other serious situation, the Pfizer's Global Security Operations Centre is available with 24 hour contact.

Contract Clauses

Pfizer has a modern slavery clause in our standard global agreements for procuring goods and services.

Training

All Pfizer employees globally must complete training on Pfizer's Bluebook and Anti-Bribery and Anti-Corruption. Although outside the reporting period, in 2021, procurement colleagues supporting our manufacturing and supply operations were required to take training on our Labour and Ethics Standard. In addition, our colleagues in audit, labour and ethics program oversight, human rights, and Legal will be trained on SA8000, an auditable certification standard that encourages organizations to develop, maintain, and apply socially acceptable practices in the workplace.

Response to COVID-19

Being one of the largest biopharmaceutical companies in the world, Pfizer needs to sustain continuity of supply to ensure patients continue to have uninterrupted access to medications. We recognise that this critical need carries with it potential for increased modern slavery risks in our supply chain.

Relationships/Communications with Suppliers

Pfizer worked with our vendors that were facing hardship as a result of COVID-19. Some of the ways in which Pfizer sought to alleviate hardship, which may have contributed to mitigating modern slavery risks, included:

- Working with small businesses and when needed, reduced the agreed payment terms to assist with continuing cash flow
- Ensuring that no supplier contracts were unilaterally terminated or varied as a result of supplier delays arising from the COVID-19 pandemic
- Assisting critical suppliers in demonstrating they were essential by providing letters and documentation to ensure they were able to remain in operation
- Continuing to pay our contractors including any period(s) when they were unable to work due to COVID-19

Collaboration with External Stakeholders

As COVID-19 was unfolding, Pfizer was in a position to be able to leverage our knowledge and ability as an industry leader, to work with external stakeholders to take actions to help address various emerging supply and labour risks, including:

- Working with government, wholesalers and industry bodies to ensure equitable distribution of medicines
- Supply chain colleagues assessing at-risk products on a weekly basis to monitor and mitigate potential supply disruptions
- Labour hire agencies with staff working for Pfizer were contacted to help ensure they provided special leave provisions during this time if they needed to quarantine

Protection of Our Workforce

During 2020, our pandemic preparedness and response was a primary focus. Our comprehensive pandemic response plan incorporates guidance issued by external health authorities and is designed to keep on-site workers at our manufacturing and research sites safe and healthy. A task force of senior leaders oversees implementation of the plan, which has been instrumental in protecting our workforce and helping ensure a continued supply of medicines and vaccines to patients. Key actions included:

- Enabling working from home for those colleagues who can work remotely, allowing site populations to be reduced and facilitate social distancing best practices
- Daily self-assessments of health status before accessing a Pfizer site
- Providing personal protective equipment, including appropriate facial coverings at all Pfizer sites
- Increasing sanitation stations (including hand sanitizers) throughout our sites
- Increasing cleaning frequencies, using U.S. Environmental Protection Agency-registered disinfectants, with an increased focus on all high-traffic and high-touch areas
- Immediately activating contact outreach and the targeted disinfection of work areas on notification of a potential COVID-19 case
- Distributing resources, including regular all-colleague communications, providing status updates and reminders of COVID-19 preventative actions.

UK Modern Slavery Act Signature

In accordance with the UK Modern Slavery Act and guidance thereunder, and solely for purposes of compliance with that Act, this 2020 Modern Slavery Statement was approved on 30 June 2021 by the directors of the following:

- Pfizer Limited
- Hospira UK Limited
- John Wyeth & Brother Limited
- Pharmacia Limited
- Pfizer Development Services Limited
- Pfizer R&D UK Limited

James Pearson

Director, Pfizer Limited

30 June 2021

