

# 2023 Forced Labor, Child Labor, Human Rights and Decent Working Conditions Regulatory Disclosures



Breakthroughs that change patients' lives

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# Introduction

This Statement is for the period from 1 January 2023 to 31 December 2023 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*, *UK Modern Slavery Act*, and *Norwegian Transparency Act*. This Statement describes our approach to human rights due diligence, as required by the Norwegian Transparency Act, and also lays out our approach to the specific issue of modern slavery 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. 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,” and “our” refers to Pfizer Inc. and its subsidiaries.

This Statement details the actions we have taken to assess and respect fundamental human rights, including the right to freedom from slavery and forced labor (for purposes of this Statement, the phrase “modern slavery” includes child labor) and 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, and other similar conduct commonly thought of as modern slavery. For purposes of this Statement, child labor is included within the definition of “modern slavery.”
- “**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, 2023, Pfizer had approximately 88,000 employees<sup>1</sup> around the world.

Pfizer operates 37 manufacturing sites<sup>2</sup> worldwide in addition to research and development, commercial, and logistics operations. Our sites operate according to Pfizer's policies and procedures, including 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. We have quality management systems in place that include a culture of integrity and quality, governance, policies and procedures, training, monitoring and oversight, including of third parties, to help enable quality, compliance, safety, and manage risk 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 environmental, social, and governance (ESG) priorities are set out in Pfizer's [2023 Impact Report](#) and [2023 Annual Review](#).

## Our Supply Chain

At Pfizer, responsible supply chain management is at the core of how we do business. We set high standards for our internal and external partners guided by set governance processes to help ensure responsible supply chain management. This helps ensure the safety and quality of everything we produce. We see compliance with regulatory standards as the foundation of risk mitigation and a crucial component of providing the world with a reliable supply of safe and effective medicines and vaccines.

While our most important suppliers are our related Pfizer entities that supply us with medicines and vaccines that are distributed worldwide, a network of external suppliers is essential to enable 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 supplement internal as well as external facilities. We use multiple suppliers to minimize risk of supply interruptions of essential medicines and we've established parallel supply chains throughout the U.S. and Europe to manufacture our most critical vaccines. Our supply chain has built-in flexibility to support resiliency, extra inventory, an increased workforce, and multiple suppliers.

<sup>1</sup>As of December 31, 2023, including Seagen colleagues. Pfizer completed its acquisition of Seagen Inc. in December 2023.

<sup>2</sup>As of December 31, 2023.

# 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 Organisation for Economic Co-operation and Development (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 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 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, seek to address the aforementioned salient issues.

Pfizer prohibits the use of all forms of forced, bonded, indentured, or compulsory labor and child labor in our supply chain and business operations. We recognize that the risks of modern slavery are heightened where our business partners rely upon migrant workers and other workers who are particularly vulnerable to exploitation. We conduct due diligence to assess and address risks of modern slavery in our own operations and in our supply chain. Pfizer uses a global corporate labor and human rights standard for our 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 risks of adverse human rights impacts, including working condition violations and modern slavery, for our business operations are low.

- We maintain robust human resource, 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.
- 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 modern slavery clauses in our standard supplier contracts.
- Except for those engaged in a formal apprentice or internship program, everyone working in our operations is 18 years or older.
- All of 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 whom they employ. Notwithstanding this, our supply chain includes a broad range of direct suppliers from various locations and industries, including those generally considered at higher risk for adverse impacts by virtue of their sector risk or geography. In seeking to assess the risks related to fundamental human rights, decent working conditions, and modern slavery in our supply chain, we consider the potential for our business to cause, contribute to, or be directly linked to the adverse impact, as defined in the UNGPs.

Based on a global internal assessment performed by Pfizer, taking into account published civil society and NGO studies and other thought leadership, the following categories within our supply chain are considered to have increased risk of human rights violations, including modern slavery, irrespective of geographic location or the specific supplier:



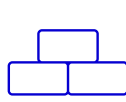
Freight & Shipping



Raw Material Supply



Packaging



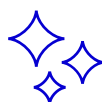
Building & Construction Services and Materials



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 generally 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 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 and, accordingly, 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, we believe that the highest potential risk area related to modern slavery is 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 could exist in our supply chain, particularly in extended tiers of our supply chain from which we may in some cases be several or more levels removed.

Our supplier management program focuses on 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 (the "Product Suppliers").

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

As noted above, 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

We set high standards for our internal sites and external partners guided by our governance processes to support responsible supply chain management. Our established risk-based evaluations for Product Suppliers, and other suppliers deemed to be high-risk, assess EHS and sustainability performance, including labor and human rights reviews. When assessing whether a Product Supplier is high-risk, 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 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., EHS and labor and human rights risks, are subject to a governance process which may result in the supplier being required by Pfizer to develop corrective actions to improve their operations and procedures and/or mitigate identified risks. If the supplier does not comply with the agreed corrective actions, Pfizer may seek an alternative supplier.

Pfizer has an active labor and human rights working group, consisting of members from various functions including Legal, Procurement, Global Health & Social Impact, and Global EHS. This working group is responsible for implementing the actions set out in this Statement, developing further actions, and monitoring Pfizer's labor and human rights commitments.

## Policies

Pfizer has established policies designed to mitigate human rights violations 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 decisions we make. All employee and certain contractors are required to adhere to these standards. The Code of Conduct specifically covers our commitment to 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 a 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 patients, our employees, the workers of our business partners, and the communities in which we operate. Our commitment to respect human rights extends throughout our operations, from lab to patient, including our diverse global supply chain of numerous local, third-party vendors. The Human Rights Policy Statement expressly indicates that Pfizer prohibits the use of all forms of modern slavery in our supply chain and business operations.

Internal training has been 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 here: <https://www.pfizer.com/about/responsibility/human-rights>.

## 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 the Pfizer [Supplier Conduct Principles](#) (which are aligned to the Pharmaceutical Supply Chain Initiative's (PSCI) [Principles for Responsible Supply Chain Management](#)<sup>3</sup>) or adopt their own codes which include similar expectations.

Among other things, the Supplier Conduct Principles ask suppliers (regardless of the product or service provided) to:

- 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.
- Not use child labor, and more specifically limit employment of young workers below the age of 18 to non-hazardous work and when young workers are above a country's legal age for employment, or the age established for completing compulsory education.
- Provide a workplace free of harassment and discrimination.
- Provide a workplace free of harsh and inhuman treatment.
- Pay workers according to applicable wage laws, 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.

The Supplier Conduct Position Statement warns that failure to comply with the Supplier Conduct Principles, 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 modern slavery clauses in all standard global agreement templates for procuring goods and services, including representations and warranties regarding a third party's knowledge of modern slavery in its supply chain, rights to audit, notification obligations and obligations to follow Pfizer's Supplier Conduct Principles as well as the PSCI Principles for Supply Chain Management.

<sup>3</sup>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://pscinitiative.org/home>.



# Supplier Management and Audits

Pfizer seeks to ensure that our Product Suppliers demonstrate strong performance in the management of EHS risks. We assess the EHS 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 audits.

We also require certain Product Suppliers to complete labor and human rights audits. Labor and human rights audits are completed for Product Suppliers located in high-risk jurisdictions and 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.<sup>4</sup> 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 2023, Pfizer assessed EHS and sustainability performance for 109 supplier facilities through a combination of remote and on-site audits. The scope of these audits included labor and human rights assessments. Overall, 878 observations were made as part of these audit of which 88 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 additional harm to the employees of such suppliers. This approach helps prevent the loss of income to the most vulnerable families. This approach is also consistent with the UNGPs.

The results of these audits/assessments are factored into the supplier selection process. We aim to select companies that are responsible, ethical, and reliable partners, in addition to reducing Pfizer's potential risk of business interruption to our global supply chain. After suppliers are selected and onboarded, they are expected to comply with Pfizer's guidelines and Supplier Conduct Principles.

## 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 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 by our policy that protects whistleblowers. 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.

Many channels and resources exist for colleagues, contingent workers, those in our supply chain, and the public to raise questions and report concerns, including:

- 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. Employees, suppliers and other third parties are able to report a concern or get information or advice anonymously (where permitted by law).
- Contacting the Compliance Division through email, phone and fax. Our Compliance Division 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 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.

<sup>4</sup>SA 8000 is an international certification standard that encourages organizations to develop, maintain and apply socially acceptable practices in the workplace.

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 to all colleagues and contingent workers with 24-hour contact for issues that concern an immediate violence or threat or other serious situation.

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 Executive Compliance Committee, the Regulatory and Compliance Committee, and the Audit Committee of the Pfizer Board of Directors.

## External Engagement

We actively encourage our direct material suppliers to participate in capability-building conferences and webinars.

In addition, Pfizer is a co-founder and active member of PSCI. Pfizer colleagues currently sit on the PSCI board and lead PSCI working committees to various PSCI committees including Audits, Capability and Projects, Human Rights, Health & Safety, and several Environmental committees (e.g. Process Safety, PIE & AMR, and Decarbonization). In 2023, 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 HRWG is a collaborative initiative convening companies supporting each other on implementing the UNGP. Practitioners in the group represent more than 50 cross-industry companies partnering to advance and refine human rights programs at each participant company.

# Annex: Canadian Fighting Against Forced Labour and Child Labour in Supply Chains Act

Pfizer Canada ULC / Pfizer Canada SRI (**Pfizer Canada**) is required to submit a statement under the Canadian Fighting Against Forced Labour and Child Labour in Supply Chains Act (the **Canadian Act**).

Pfizer Canada is a company owned by Pfizer Inc. and comes within Pfizer's global compliance program which is discussed throughout this Statement. This Statement relates to all of Pfizer's activities in Canada.

## About Pfizer Canada

Pfizer Canada has approximately 1,067 employees, with approximately 95% of Pfizer Canada employees hired on a permanent basis and 5% on fixed term contracts.<sup>\*</sup> Pfizer Canada's employees perform roles from a variety of fields and functions including science, medical, regulatory affairs, manufacturing, sales and marketing, health economics, research and development, software development, and enabling and supporting functions as well as administrative services.

In Canada, for FY23, there was one commercial office in Kirkland, Quebec, and one manufacturing site in Brandon, Manitoba, that exports to Ireland and Italy.

## Pfizer Canada's Supply Chain

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

Pfizer Canada's non-related direct suppliers generally reflect those of Pfizer (as described in this Statement) and provide materials and services such as raw materials, freight and logistics, packaging, and labor.

## Risks of Forced and Child Labor in Pfizer Canada's Operations and Supply Chain

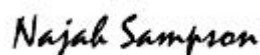
We believe that the risks of forced and child labor in Pfizer Canada's own workforce are low for the reasons discussed earlier in this Statement. The risks of forced and child labor at Pfizer Canada mirror that of Pfizer and are also discussed earlier in this Statement. The policies and steps described earlier in this Statement that Pfizer has taken, which are designed to assess, mitigate, and manage the risk of forced labor and child labor, are applicable to Pfizer Canada.

## Approval

This Statement was approved pursuant to subparagraph 11(4)(b)(i) of the Canadian Act by the Board of Directors of Pfizer Canada.

In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in this Statement for the entity or entities listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate and complete in all material respects for the purposes of the Canadian Act, for the reporting year listed above.

Najah Sampson  
Director, Pfizer Canada Board of Directors  
May 29, 2024



I have the authority to bind Pfizer Canada ULC / Pfizer Canada SRI.

<sup>\*</sup>As of December 31, 2023.

