

Pfizer 2022 California and UK Modern Slavery Statement

 **Pfizer** Breakthroughs that change patients' lives

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Introduction

This Modern Slavery Statement (**Statement**) is for the period from 1 January 2022 to 31 December 2022 and has been prepared pursuant to both 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 human rights in the supply chain.

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

In this Statement, “Pfizer” refers to Pfizer Inc. and its subsidiaries.

This Statement details the actions we have taken to assess and help address modern slavery risks in our operations and supply chains.

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.

Our Purpose and Values

At Pfizer, our purpose—Breakthroughs that change patients’ lives—is rooted in achieving social good. We know that when we succeed, our breakthroughs can potentially have life-changing effects. We aim to be the solution for illnesses from widespread infectious diseases to conditions with historically unmet need. Pfizer is mindful of the urgency of our mission, as the world fights against the spread of deadly new diseases and struggles with inequities in health outcomes among populations. Our goal is to leverage partnerships and programs to allow quick and widespread access to our breakthrough medicines and vaccines across all corners of the world.

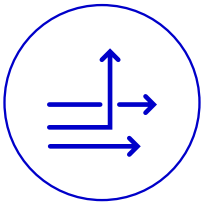
In 2022, more than 1.3 billion patients around the world were treated with our medicines and vaccines.¹ Pfizer continued our commitment to reach vulnerable populations where there is demand through a pledge to make available at least 2 billion doses of the Pfizer-BioNTech COVID-19 vaccine to low- and middle-income countries through 2022. As of the end of 2022, Pfizer met the demand for the vaccine from these markets, delivering nearly 1.7 billion doses to 112 countries, including South Africa, Kenya, Rwanda, Jordan, Ukraine, Dominican Republic, Honduras, Indonesia, Vietnam, and Malaysia—among many others. We also continue to work closely with COVAX and partners like the U.S. Government and European Union to supply the vaccine to meet current global demand in low- and middle-income countries. Pfizer remained the top supplier to COVAX in 2022, contributing around 30% of their total supply— nearly 600 million doses of the Pfizer-BioNTech COVID-19 vaccine. Pfizer also supports bilateral donations between governments to help ensure access.

¹ The patients treated metric is calculated from Pfizer and third-party datasets. Figures may be limited given the coverage provided by external sources. (e.g., calendar duration, geographic and product coverage). Numbers are estimates and in some cases use global volume, daily dosage and number of treatment days to facilitate calculations. Methodologies to calculate estimates may vary by product type given the nature of the product and available data. Patients taking multiple Pfizer products may be counted as multiple patients towards total. Numbers include estimated patient counts from U.S. Patient Assistance Programs, ex-U.S. access & affordability programs, product donations and Global Commercial Access Partnerships (this does not include An Accord for a Healthier World). Historical estimates may periodically be subject to revision due to restatements in the underlying data source.

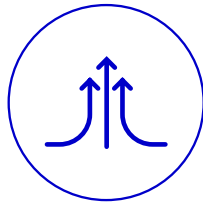
Our Values

To help fully realize our purpose, we have established a clear set of expectations regarding “what” we strive to achieve for patients and “how” we plan to achieve those goals.

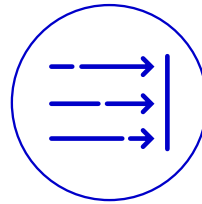
The “how” is represented by four simple, powerful values:



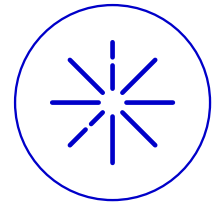
Courage



Excellence



Equity



Joy

For the second year in a row, in March 2023, Pfizer was named one of the world's most ethical companies by Ethisphere. This list is a recognition of companies which demonstrate a commitment to ethical business practices through programs that positively impact employees, communities, and broader stakeholders, and contribute to sustainable and profitable long-term business performance.²

Human Rights and Modern Slavery

Pfizer is committed to conducting business in an ethical and responsible manner. This includes respecting internationally recognized human rights throughout our operations and supply chains. Human rights are fundamental rights and freedoms to which all people are entitled, regardless of race, sex, nationality, ethnicity, language, religion, or any other status. These rights are enshrined in the International Bill of Human Rights³ and other international treaties and instruments, including the International Labour Organization's Declaration on Fundamental Principles and Rights at Work. 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.

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 including child 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 prohibits the use of all forms of forced, bonded, indentured, or compulsory 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. In 2021, Pfizer rolled out 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. Pfizer also continues to have active modern slavery working groups, consisting of members from various functions including legal, procurement, Global Health & Social Impact, and Global Environment, Health and Safety.

² <https://ethisphere.com/2022-worldsmoethical-news/>

³ The International Bill of Human Rights consists of the Universal Declaration of Human Rights, the International Covenant on Economic, Social and Cultural Rights, and the International Covenant on Civil and Political Rights and its two Optional Protocols.

Our Structure, Operations and Supply Chain

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

Our Company – Global Snapshot⁴

36

manufacturing sites worldwide

More than

185

countries and territories in which Pfizer supplies products

Approximately

83,000

employees around the world

Our Operations

Our global manufacturing and supply network includes sites across various countries in addition to our research and development, commercial, and logistics operations. Our global manufacturing and research and development sites can be found [here](#).

Our sites operate according to Pfizer's policies and procedures including those outlined in this Statement. In particular, our Environment, Health & Safety (**EHS**) policies include topics such as workers' rights, health and safety, the protection of the environment, and labor and human rights practices of suppliers of materials and services. We regularly monitor and review our sites' performance to help ensure our standards of conduct meet the high expectations we set for ourselves. Our EHS Policy and more information on our EHS governance can be found [here](#). More information about Pfizer's standards for our direct operations can be found below in the Policies & Governance section of this Statement.

Our Supply Chain

At Pfizer, responsible supply chain management is core to how we do business. We operate within a framework of principles aligned with ethical, social, and environmental responsibilities to help ensure sustainability of our business and the communities in which we operate.

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. We are committed to using suppliers that demonstrate strong performance in EHS management.

⁴As of 31 December 2022.

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

Our Operations

For the reasons described below, we believe that the risk of modern slavery in our operations is low.

- 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 small 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.

Supply Chain

In assessing 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 of their sector risk or geography. Based on internal assessments and the guidance of a number of international bodies, the following categories within our supply chain have an increased modern-slavery risk, irrespective of geographic location or the specific supplier:



We consider the above sectors to have a heightened risk profile due to their use generally of lower-skilled workers (possibly some on temporary visas, which may further increase the potential risk), often with limited ability to negotiate their wages and rights in the workplace. Another factor that contributes to modern slavery risk generally in some of these sectors is the potential for modern slavery in the upstream supply chain. Additionally, some of our suppliers have a global footprint and, accordingly, could potentially present a higher risk of modern slavery due to operating in higher risk regions. Accordingly, Pfizer is currently focusing on suppliers within the above-listed sectors and targeted high-risk regions as identified by modern slavery risk indices, e.g., the [Global Slavery Index](#). The next section describes the steps Pfizer is taking to address these risks.

Actions taken to assess and address the modern slavery risks

Policies and Governance

We set high standards for our internal sites and external partners guided by our governance processes to support responsible supply chain management designed to help safeguard the safety and quality of everything we produce. Our evaluation extends to assessing EHS and sustainability performance, including labor and human rights reviews. Our collaborations with our key suppliers are focused on improving sustainability, compliance with laws, and alignment to our [Supplier Conduct Principles](#) and the Pharmaceutical Supply Chain Initiative (PSCI) [Principles for Responsible Supply Chain Management](#). Pfizer maintains a modern slavery program as described in this Statement which outlines our risk management approach in our operations and our supply chain.

Pfizer continued to apply our global corporate labor and ethics standard for our supplier base which includes modern slavery mitigation measures. This risk-based governance process commenced in 2021. 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 manufacturing supply chain includes a risk-based assessment process that results in a supplier risk score. Pursuant to the standard, suppliers that are determined to have an elevated risk are subject to a governance process which will either appoint the supplier on the basis of an agreed action plan with the supplier to mitigate identified risks or Pfizer will seek an alternative supplier.

And as noted above, Pfizer also continues to have an active modern slavery 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 modern slavery commitments.

Audits

Globally, Pfizer audits the potential for EHS and labor and ethics risks, including modern slavery, in its direct material supply chain globally. Labor 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. The auditors follow PSCI standard audit protocols, which include standard labor and ethics criteria and involve interviews with employees, contracted staff, and management. In 2022, Pfizer conducted a combination of 116 remote and on-site supplier EHS audits, with 98 of these including labor and ethics audits. We share our observations with suppliers and ask them to establish action plans to mitigate identified risks, and we continue to monitor their implementation of agreed actions. As part of this audit process two suppliers were identified that did not meet Pfizer's expectations primarily related to workplace safety concerns, resulting in Pfizer not pursuing business with those suppliers.

Human Rights Policy

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. In line with the UN Guiding Principles on Business and Human Rights (UNGP), Pfizer's Human Rights Policy 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. Internal training has been provided to relevant functions on Pfizer's Human Rights Policy.

Additionally, as noted in our previous modern slavery statements, Pfizer's human rights commitments are outlined in Pfizer's Blue Book Code of Conduct which is updated periodically (see pages 27 and 28 at <https://www.pfizer.com/about/responsibility/compliance/code-of-conduct>). Code of Conduct training is assigned to all new colleagues upon hire and to existing colleagues regularly. The training includes a certification to confirm that colleagues agree to abide by the Code of Conduct and that they understand their responsibility to report and have reported any potential violations of law, regulations, ethical standards or Pfizer 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 has a well-established Supplier Conduct Position Statement and Supplier Conduct Principles. We continue to encourage our suppliers to support our Supplier Conduct Principles or adopt their own codes that include expectations similar to ours.

- [Download Pfizer's Supplier Conduct Position Statement](#) (PDF)
- [Download Pfizer's Supplier Conduct Principles](#) (PDF)

Among other things, the Supplier Conduct Principles ask suppliers 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.

Anti-Bribery and Anti-Corruption

The risk of human rights violations often increases in cases and in locations where the risk of corruption is higher. 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 anti-corruption laws and regulations. Our policies and procedures address direct and indirect activities that present corruption risk, including 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 abide by [Pfizer's International Anti-Bribery and Anti-Corruption Business Principles](#).

Additional information about Pfizer's Compliance and Ethics Program is available at on Pfizer.com.⁵

Contract Clauses

Pfizer has modern slavery clauses in all standard global agreements 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.

⁵ See <https://www.pfizer.com/about/responsibility/compliance/anti-bribery-and-anti-corruption>.

External Engagement

Pfizer is a co-founder and active member of 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 labor practices. PSCI's Principles for Responsible Supply Chain Management regarding labor state that suppliers shall not use forced, bonded, indentured, or child labor.

Pfizer is a member and contributor to various PSCI committees including the Human Rights and Labor, Operations (including Governance), Audit, Environmental, Scope 3, Process Safety, Worker Safety and Occupational Hygiene committees. We also chair the Environmental and Operations Committees and, in 2022, a Pfizer India-based colleague was appointed to and joined the Board of the PSCI. We actively encourage our direct material suppliers to participate in capability-building conferences and webinars.

In 2022, the Human Rights and Labor subcommittee of the PSCI, of which Pfizer is an active member, focused its activities on supplier human rights training and capability building. This included a day-long focus on Human Rights, Labor and Ethics training at the PSCI Supplier Conference in India in September 2022. The committee also developed foundational training materials for supplier members relating to the following topics: freely chosen employment; child labor and young workers; non-discrimination; fair treatment; wages, benefits, working hours; freedom of association; governance and management systems; and implementing the UNGP. The training per topic included the following information: basic definition of the human right in question, what it looks like in practice; prevalence of issues associated with this human right around the world and in the pharmaceutical industry specifically, monitoring for human rights issues in a supplier's operations and/or supply chain, what a supplier needs to do to prevent and/or remedy cases of those specific human rights issues, measures the supplier should take to prevent and/or remedy cases, a case study, and where to find further information.

Additional information about PSCI and its activities can be found here: <https://pscinitiative.org/home>.

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.

Additional information about Pfizer's environmental, social, and governance (**ESG**) priorities are set out in Pfizer's 2022 ESG Report⁶ and 2022 Annual Report.⁷

⁶ https://www.pfizer.com/sites/default/files/investors/financial_reports/annual_reports/2022/files/Pfizer_ESG_Report.pdf

⁷ https://www.pfizer.com/sites/default/files/investors/financial_reports/annual_reports/2022/

Raising Concerns

Leaders and management are dedicated to fostering a culture in which all colleagues can ask questions, raise concerns, and report potential misconduct without fear of retaliation. We measure colleague comfort and awareness about raising concerns, including awareness of our whistleblower policy, through the confidential Pfizer Pulse Engagement Survey sent to all colleagues annually. The results are used to focus our leadership communications, training, and other proactive efforts to drive our ethical culture.

Many channels exist for colleagues, contingent workers, and the public to raise questions and report concerns, including the Compliance Helpline (a third-party operated public hotline available by phone or web, with anonymous reporting where allowed under local law), the Compliance Division (through email, phone, fax and colleagues), management, and our Open Door Policy (i.e., whistleblower policy), which 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.

In addition, 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.

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 any 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. 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.

Pfizer’s [Code of Conduct](#) – which is publicly and internally accessible online – sets out the different reporting mechanisms described above (see page 9).

<p>Compliance Division Contact the Compliance Division directly to ask questions, present ideas, or raise concerns. The Compliance Division website includes additional policies, procedures, and resources.</p>	<ul style="list-style-type: none"> Your Compliance Division contact corporate.compliance@pfizer.com Compliance Division Website: http://integrity.pfizer.com +1-212-733-3026 +1-917-464-7736 (secure fax) 235 East 42nd Street, New York, NY 10017
<p>Helpline The Compliance Helpline provides a way to report concerns or get advice, 24 hours a day, 7 days a week, 365 days per year. Anonymous reporting is available in many locations, subject to local laws.</p>	<ul style="list-style-type: none"> Visit pfizer.ethicspoint.com to make a report Visit helpline.pfizer.com for local phone numbers Visit raisingcomplianceconcerns.pfizer.com for information for your location In the U.S.: 1-866-866-PFIZ (7349)
<p>Office of the Ombuds Pfizer’s Office of the Ombuds provides a safe, informal place where colleagues can confidentially get information and guidance to help address and resolve work-related issues. Conversations with the Office of the Ombuds are “off-the-record” and not disclosed to anyone unless they involve a risk of physical harm.</p>	<ul style="list-style-type: none"> U.S.: +1-855-PFE-OMBD (1-855-733-6623) or Ombuds@pfizer.com Ex-U.S.: Ombuds@pfizer.com Visit Ombuds.pfizer.com for more information and local phone numbers

Additionally, the Pfizer Resilience Center is available globally with 24-hour contact for any issue that concerns an immediate violence or threat or other serious situation.

Further Due Diligence

Rubber Gloves

As reported in last year's modern slavery statement, Pfizer has been following the United States Customs and Border Protection (**USCBP**) Withhold Release Orders (**WROs**) against multiple disposable rubber glove companies in Malaysia, including highly specialized types of gloves used at various Pfizer sites. The WROs apply to U.S. entities, however we instruct all of our sites globally to not purchase any gloves from entities subject to the WROs. This is an industry-wide issue that is not unique to Pfizer, as the vast majority of disposable gloves used in the U.S. are manufactured in Malaysia by these manufacturers.

In response to the investigation by the USCBP, in 2021 Pfizer initiated inquiries with our distributors and certain vendors of gloves subject to WROs. Our distributors developed alternative sources of supply for rubber gloves and completed the transition in 2022.

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 2022 Modern Slavery Statement was approved on 13 December 2023 by the directors of the following entities:

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

James Pearson

Director, Pfizer Limited

13 December 2023

