

AbbVie Deutschland GmbH & Co. KG

German Supply Chain Due Diligence Act (Lieferkettensorgfaltspflichtengesetz, LkSG) Policy Statement

Version 1.2, effective 15-Sep-2024

Our commitment to human rights

AbbVie believes in the inherent dignity of every human being and respects individual rights as set out in the Universal Declaration of Human Rights. We reflect these precepts in our company's fundamental principles and in our mission to address serious health challenges.

AbbVie supports the Universal Declaration of Human Rights and key tenets of the United Nations Guiding Principles on Business and Human Rights. While governments have a key role to respect, protect, promote and fulfill the human rights of their citizens, we recognize that companies share this responsibility to respect human rights within their own operations and through business relationships. AbbVie is committed to preventing, mitigating and remedying any adverse human rights impacts across our value chain.

AbbVie does not tolerate human rights abuses. We expect all AbbVie employees, contractors, subsidiaries, suppliers and business partners to abide by this commitment. AbbVie contributes to the realization of human rights through compliance with laws and regulations wherever we have operations, and through our policies, practices and programs.

Our commitment to human rights is supported by our policies on employment, ethics and procurement. These policies are designed to ensure that neither we, nor our suppliers or partners, engage in human rights abuses.

Scope

This policy statement for AbbVie Deutschland GmbH & Co. KG (AbbVie Germany) clarifies our fundamental commitment to respecting human rights and protection of the environment, which is already reflected in other company policies. These include the [Code of Business Conduct](#) and the [Supplier Code of Conduct](#), which apply to AbbVie worldwide. The principles set out here apply to our own business activities and all employees of AbbVie Germany. In addition, we also expect our suppliers and other business partners to comply with the principles set out here and to implement appropriate processes to respect human rights and protect the environment.

AbbVie Germany's Commitment to Human Rights and Environmental Sustainability

AbbVie Germany is committed to respecting human rights and environmental obligations as defined by the German Supply Chain Due Diligence Act (in German: Lieferkettensorgfaltspflichtengesetz, hereinafter referred to as "LkSG"). Our commitment to respecting human rights is based on the United Nations Universal Declaration of Human Rights and the International Labor Organization (ILO) Declaration on Fundamental Principles and Rights at Work. In addition, we also observe the UN Guiding Principles on Business and Human Rights.

Human Rights and Environmental Standards according to the LkSG

We are committed to respecting internationally recognized human rights and to observing them in our business activities and along our supply chains. This includes, in particular, the ban on child labor and forced labor, the ban on all forms of slavery, human trafficking and discrimination and the strengthening of freedom of association. We are also committed to compliance with labor protection laws, occupational health and safety, and payment of reasonable wages applicable at the respective place of employment. Furthermore, we are committed to the ban on environmental pollution, forced evictions and the use of security forces if their use involves the risk of violating or restricting human rights. In terms of environmental obligations, AbbVie Germany is guided by the Minamata Convention, the Stockholm Convention and the Basel Convention.

AbbVie Germany expects each of its own employees as well as each supplier and business partner to comply with these principles. Further expectations of its own employees are set out in the [AbbVie Code of Business Conduct](#), whereby expectations towards suppliers are documented in the [Supplier Code of Conduct](#) and in the [Germany Addendum to the Supplier Code of Conduct](#). Suppliers shall also address the expectation of compliance with these requirements with their own suppliers (which are equal to sub-suppliers for AbbVie Germany). Potential violations of these principles are referred to as risks.

Our risk management process to improve human rights and environment-related obligations

A LkSG risk management system has been implemented for AbbVie Germany, in which responsibilities and procedures for the implementation of the due diligence obligations. The Human Rights Office (“HROffice”) is responsible for monitoring and ensuring compliance with the due diligence obligations. Activities arising in this context can be delegated to respective functional areas within the organization. The effectiveness of the risk management system will be ensured through internal effectiveness checks at statutory intervals.

Risk analysis

AbbVie Germany conducts and reviews risks at least on an annual basis. These risk analyses are designed to identify potential risks pertaining to human rights and the environmental in our own business area and along our supplier base. The outcome of the analysis forms the basis on which prioritization of necessary measures is conducted.

Potential risks in our own business area are determined through policy and procedure reviews as well as self-assessments. Any identified risk is subsequently assessed based on scale, scope, remedy, and likelihood of occurrence. Additionally, possible findings from existing internal audits as well as received complaints are considered in the risk classification.

Overall, risks to humans and the environment in our own business area at AbbVie are being assessed as low. We will continue to focus of our current efforts in areas aligned with our global strategy on Equity, Equality, Diversity and Inclusion.

Risks along our supply chain are identified in a two-step approach. In the first step, the abstract risk based on general country, industry and volume risk is determined and assigned to a risk level. The required information is extracted from publicly available information and indices, such as reports from the German Federal Ministry of Labor and Social Affairs.

Suppliers who were assigned a higher abstract risk level will be included in a more detailed and individual actual risk assessment as a next step. The primary focus lies on suppliers of productive materials.

AbbVie Germany’s resources and endeavors will be focused on preventing, minimizing or eliminating the prioritized risks.

Preventive measures

Once potential risks in the own business area or at the direct supplier levels have been identified, appropriate preventive measures are implemented. Scope and content of the preventive measures depend on the specific risk profile and assessment of the own company or the direct supplier¹.

¹ Direct suppliers as defined in the LkSG.

For its own business, AbbVie Germany has established several preventive measures, including internal training for all employees to raise awareness of human rights and environmental obligations.

For direct suppliers, the preventive measures laid down by AbbVie Germany depend on criteria such as the risk profile.. One example is a supplier questionnaire which suppliers are requested to fill out based on the determined abstract risk profile. Furthermore, in the supplier selection process, AbbVie Germany will consider human rights and environment-related criteria as far as possible.

Remedial measures

If AbbVie Germany discovers that a violation of a human rights-related or environmental obligation has already occurred or is imminent in its own business area or at direct suppliers', it takes appropriate remedial action(s). The same applies to indirect suppliers of AbbVie Germany, if substantiated knowledge of violations of a human rights or environmental obligation has been obtained. The measures serve to prevent, stop or minimize the extent of the violation and are determined on a case-by-case basis, depending on the nature of the violation.

Complaint procedure

AbbVie Germany has established a complaints procedure to also report human rights and environmental risks as well as violations against human rights and environment-related obligations. Further details on the complaint procedure are published and accessible at <https://www.abbvie.de/unsere-verantwortung.html>

Documentation and reporting obligation

The due diligence obligations are documented and reported as required by the LkSG. The annual report is submitted to the competent authorities and published on this website.

Executive Management of AbbVie Deutschland GmbH & Co. KG

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(Note: Electronic signatures have been provided to the HROffice)