

## **Biogen Anti-Slavery and Human Trafficking Statement**

At Biogen, we have a long-standing commitment to corporate responsibility. This includes upholding human rights and ensuring that modern slavery (in all its forms) is not tolerated within our global business or our supply chain. Biogen has a zero-tolerance approach to modern slavery wherever we conduct business around the world.

This statement describes Biogen's global commitment, approach and measures taken to combat modern slavery and human trafficking, consistent with the United Nations Guiding Principles on Business and Human Rights, the Organization for Economic Co-operation and Development (OECD) Guidelines and International Labor Organization (ILO) Core Labor Rights Conventions. In addition, this statement is intended to address any applicable disclosure requirements of the Modern Slavery Act 2015 (United Kingdom), the Commonwealth Modern Slavery Act 2018 (Cth) (Australia), the California Transparency in Supply Chains Act 2010 (California, USA) and other similar laws and regulations, to the extent applicable to Biogen's global business activities or any portion thereof, relating to our efforts to combat modern slavery and human trafficking. Looking ahead, we are monitoring potential new requirements and are specifically considering the potential implications of the EU Draft Directive on Corporate Sustainability Due Diligence (released February 2022). This 2023 statement is intended to align only with current law.

### **Organization, structure, business, and supply chains**

Since 1978, Biogen has been a leading global biotechnology company that has pioneered multiple breakthrough innovations including a broad portfolio of medicines to treat multiple sclerosis, the first approved treatment for spinal muscular atrophy and two co-developed treatments to address a defining pathology of Alzheimer's disease. Today, Biogen is advancing a pipeline of novel therapies across neurology, neuropsychiatry, specialized immunology and rare diseases, while serving hundreds of thousands of people through our global footprint.

As we look to the future, we are inspired by the imperative of health access and health equity, the potential to expand our pipeline and portfolio and leveraging breakthroughs in science. We believe our business is a force for good through the patients we serve, the innovations we advance, the jobs we create and the communities we support. True to our purpose, we are continuing to serve humanity through science while advancing a healthier, more sustainable and equitable world.

With approximately 8,700 employees worldwide as of December 31, 2022, Biogen operates globally, including our global headquarters in Cambridge, MA, USA; international headquarters in Baar, Switzerland; and world-class manufacturing facilities in Research Triangle Park, NC, USA and Solothurn, Switzerland. Our products are distributed worldwide, and we also make use of contract manufacturing organizations (CMOs) and external suppliers for product inputs and packaging.

### **Policies related to slavery and human trafficking**

Biogen is committed to conducting business in accordance with the highest degree of integrity and in compliance with applicable laws, which includes recognizing and respecting human rights. Biogen prohibits all forms of slavery and human trafficking within our supply chains and business operations.

In every country in which we operate, Biogen follows all laws, regulations and international conventions related to human rights, including the *International Labor Office Tripartite Declaration of Principles Concerning Multinational Enterprises and Social Policy* and the *Organization for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises*. Our human rights position is also guided by the *U.N. Universal Declaration of Human Rights* and *U.N. Guiding Principles for Business and Human Rights*.

This commitment is reflected through our [Code of Business Conduct](#) and [Human Rights Position Statement](#), which together set forth our code of ethics and expectations regarding responsible business conduct. These documents provide information about the standards of integrity that Biogen requires all employees, officers and subsidiaries to follow, including standards relating to fair treatment and diversity, anti-harassment and bullying, human trafficking, and forced, compulsory, bonded or child labor.

Biogen expects that our suppliers adhere to the Code of Business Conduct, which provides guidance and requirements for doing business with Biogen. In addition, suppliers are also required to comply with the terms and conditions of applicable contracts and purchase orders entered into by both parties. Each supplier doing business with Biogen under these terms and conditions agrees it will comply with all applicable laws and regulations in its performance of the contract. Biogen does not currently require a separate certification in addition to these contractual provisions.

### **Areas of business risk for slavery and trafficking**

While we have owned operations, contract manufacturers, suppliers and sales and distribution in numerous countries around the world, the large majority of our operations and supply chain partners are located in more economically developed countries that our own and independent assessments (such as the U.S. Department of State's *Trafficking in Persons* report) have found to be at lower risk for human rights violations including slavery and human trafficking.

### **Due diligence process, performance indicators, and effectiveness related to slavery and trafficking in our own business and supply chain**

Biogen monitors the environmental, social and governance (ESG) risks of our supply chain, including human trafficking risks, based upon the industry in which we operate and the geographic locations in which we conduct business and/or obtain materials and services. We do this through a process of reviewing country risk profiles for corruption and human trafficking risks published by independent third party expert organizations and providing added diligence on specific areas or suppliers as needed based on this assessment. We currently work with EcoVadis, an international ESG rating platform, to enable us to better understand our supplier's environmental and social risk and performance aligned with international standards. We have not identified significant human rights risks in our own operations and we recently performed a human rights risk assessment of our critical tier 1 suppliers, and found no change from the previous determination that the risk of slavery, forced labor and human trafficking continues to be very low. We analyze risks to human rights violations in our supply chain each year, and a summary of our due diligence process, key performance indicators, and results of our supply chain risk assessments is reported annually in our [2022 ESG Report](#).

In addition to our own due diligence process, Biogen is a member of the Pharmaceutical Supply Chain Initiative (PSCI), an organization made up of leading global pharmaceutical companies that focuses on increasing the capabilities and responsibility of our supply chains. The PSCI has developed and shared with industry suppliers our Principles for Responsible Supply Chain Management, which include prohibitions against forced and child labor, along with other expectations regarding responsible labor, governance and environmental practices. More details on the PSCI and these Principles can be found at [PSCI \(pscinitiative.org\)](https://pscinitiative.org).

### **Training and capacity building on slavery and human trafficking prevention**

All Biogen employees are trained on our Code of Business Conduct upon hire and undergo mandatory annual refresher training thereafter. This training includes information about our issue reporting hotlines and other tools and familiarizes our team with the system that allows us to address, resolve, and track any human rights or other issues that may arise.

Biogen also provides information and training to our Global Procurement Team directly involved with the selection of new suppliers and the ongoing management of current suppliers.

Christopher A. Viehbacher

President and Chief Executive  
Officer

Biogen

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