

Biogen Anti-Slavery and Human Trafficking Statement

At Biogen, we are committed to good corporate citizenship. 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. In addition, this statement is intended to address any applicable disclosure requirements of the Modern Slavery Act 2015 (United Kingdom), the California Transparency in Supply Chains Act of 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.

Organization, structure, business, and supply chains

At Biogen, our mission is clear: we are pioneer in neuroscience. Biogen discovers, develops and delivers innovative therapies worldwide for people living with serious neurological and neurodegenerative diseases. Founded in 1978, as one of the world's first global biotechnology companies by Charles Weissmann, Heinz Schaller, Kenneth Murray and Nobel Prize winners Walter Gilbert and Phillip Sharp, today Biogen has the leading portfolio of medicines to treat multiple sclerosis, has introduced the first and only approved treatment for spinal muscular atrophy, and is at the forefront of neuroscience research programs in Alzheimer's disease and dementia, multiple sclerosis and neuroimmunology, movement disorders, neuromuscular disorders, pain, ophthalmology, neuropsychiatry, and acute neurology.

With approximately 7,000 employees worldwide, 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 Hillerod, Denmark. 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, child labor and human trafficking.

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 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 3rd party expert organizations and providing added diligence on specific areas or suppliers as needed based on this assessment. Our risk assessment process for 2018 indicated very low risk of human rights issues or violations in our supply chain. A summary of our due diligence process, key performance indicators, and results of this supply chain risk assessment is reported annually in our [Corporate Social Responsibility 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 PCSI 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 <https://pscinitiative.org/home>.

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 its Global Procurement Team directly involved with the selection of new suppliers and the ongoing management of current suppliers.

Michel Vounatsos
Director and Chief Executive Officer
Biogen Inc.


Signature

28th June 2019
Date