

## **Slavery and Human Trafficking Statement for the 2018 Financial Year**

This statement is made by Allergan Holdings Limited and Allergan Limited ('Allergan') pursuant to its obligations under s. 54 of the Modern Slavery Act 2015.

### **1. Our business and supply chain**

Being a pharmaceutical company, the nature of our business operations and products places us at low risk of our business or supply chain involving exploitative labour practices. We operate in a highly-regulated environment, and both our supply chain inputs and our own manufacturing processes require high levels of technical skills and qualifications as well as conformity with defined quality standards.

### **2. Our commitment**

Allergan believes in leading with integrity. Our philosophy of responsible interaction, as set out in our Code of Conduct, underpins our commitment to conducting business adhering to the highest ethical standards and in compliance with laws and regulations, including the Modern Slavery Act 2015 and equivalent legislation in other jurisdictions. We are committed to working only with suppliers who share these values and comply with similar standards. As part of its commitment, in 2018 Allergan has undertaken certain actions, rolled out new policies and procedures and increased awareness of modern slavery and human trafficking issues across the organisation.

Allergan supports the principles contained in the Universal Declaration of Human Rights and is committed to respecting human rights in our own business and at every level of our supply chain.

### **3. Supply chain controls**

Allergan is committed to responsibly sourcing our inputs and complying with laws that require the disclosure of their use. We expect our suppliers to comply with highest ethical and quality standards in conducting their business.

Prior to engagement Allergan evaluates its suppliers through a risk-based assessment process. Such assessments may include supplier questionnaires, audits of supplier facilities, verification of licences and permits, etc. We keep these procedures under review, and we are planning to further develop our risk assessment and third party due diligence processes during 2018, particularly to introduce provisions specifically addressing modern slavery risk.

Allergan's supplier contracts and terms and conditions require a supplier to comply with all laws and regulations in relation to the supply of a service, material or product in question. Once onboarded, suppliers are subject to ongoing periodic due diligence, including audits (including of manufacturing sites) by the Internal Audit team, inspections and interviews to confirm compliance with supplier performance and quality standards. Allergan's audits have to date not identified risks or concerns of modern slavery or exploitative labour practices.

#### **4. Our supporting policies and procedures**

##### **Code of Conduct**

Allergan's Global Code of Conduct sets out the commitment to comply with all applicable laws, rules and regulations, including those related to human trafficking and modern slavery. Allergan's business partners are required to acknowledge and comply with the Code and conform to Allergan's standards of conduct.

##### **Policies and Procedures**

There is strong evidence to suggest a correlation between corruption and modern slavery, human trafficking and bad working conditions, so Allergan is focused on approaching its compliance policies as a whole. During the 2018 financial year, Allergan has introduced a number of new or revised policies that address modern slavery and related issues, including a Corporate Global Procurement Policy, a Corporate Policy on Anti-Bribery and Anti-Corruption, a Corporate Policy on Anti-Boycott, Trade and Economic Sanctions and a new Safety Policy.

Allergan keeps its policies under continuous review, and intends to introduce additional policy terms relating to modern slavery issues that will be rolled out during the course of 2019.

##### **Training and Communication**

The importance and spirit of the Modern Slavery Act 2015 as an explicit part of Allergan's Code of Conduct is communicated to each employee and business partner through Allergan's public website, as part of the induction of new starters, employees' periodic training, through the onboarding process for new suppliers and also through mandatory contractual terms with our business partners.

All Allergan employees participate in mandatory training on the Code of Conduct, applicable policies and standard operating procedures to ensure the compliance with defined requirements. This forms part of Allergan's compliance program that is based on the ethical decision making and top-level commitment to compliance.

##### **Monitoring and Review**

Allergan maintains an independent Integrity Action Line that allows its employees and suppliers to raise concerns of unethical conduct, including those related to supply chain. The hotline is available globally 24/7 via telephone and web-site options that are managed by an independent vendor. Where permitted by law, concerns may be raised anonymously to protect the reporter.

No complaints or allegations of the modern slavery or human trafficking have been reported to the independent Allergan Integrity Action Line in the 2018 financial year.

Allergan conducts regular Internal Audits, Compliance Reviews and other monitoring activities in relation to compliance. No allegations, signs or concerns of modern slavery or human trafficking have been identified.


This statement was approved by the Board of Allergan Holdings Limited and Allergan Limited on 16 April 2019.



**Paul Johnson, Director**

**For and on behalf of Allergan Holdings Ltd.**

**Dated: 16 April 2019**



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**For and on behalf of Allergan Ltd.**

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