

COMPANY  
POLICY

**CSL VIFOR**  
MODERN SLAVERY  
STATEMENT

## COMPANY POLICY

### Introduction

This statement is made on behalf of the Vifor Pharma Group of companies, including but not limited to, Vifor Pharma UK Limited and Vifor Fresenius Medical Care Renal Pharma UK Limited.

In 2022, Vifor Pharma Group was acquired by CSL Limited and is therefore in this statement referred to as CSL Vifor. As this statement relates to the financial year prior to the acquisition, it is issued separately and in relation to CSL Vifor only. A joint modern slavery statement, to be issued by the parent company CSL Limited, will cover financial year 2022 and will be published next year.

At CSL Vifor, we recognize our responsibility as a global pharmaceutical company and employer and are committed to fight modern slavery in all its various forms and to ensure that all necessary steps are taken that slavery and human trafficking is neither occurring in our supply chain nor anywhere in our worldwide organization. We have implemented guidelines and processes to educate and sensitize suppliers on this important topic to help ensure that they uphold the principles in this statement. We make sure employees have access to relevant material and keep sensitizing them on the topic by appropriate means.

This statement is made pursuant to section 54(1) of the UK Modern Slavery Act 2015 and outlines the steps we have taken during the financial year 2021 and our ongoing planned efforts to ensure that modern slavery is not occurring in our supply chains or our organization.

### Our Organization and Business Operations

CSL Vifor is a fully integrated specialty pharmaceutical company headquartered in Switzerland with its registered seat in St. Gallen and operational headquarters in Zurich.

We operate across three franchises: nephrology, iron and cardio-renal. Active in over 100 countries, CSL Vifor researches, develops, manufactures and markets pharmaceutical products worldwide. We have a manufacturing site in Switzerland, plus a network of affiliates and partners offering broad market coverage all over the world.

### Our Supply Chain

Our supply chain is centrally organized and operated from locations in Switzerland, with support from our local affiliates and partners.

CSL Vifor sources the raw material for manufacturing the active pharmaceutical ingredient for our products from different countries all over the world. More specifically for each franchise:

1. as a world leader in iron therapy, we source the

necessary iron (III) chloride from different suppliers located in Europe. The active pharmaceutical ingredient is manufactured in Switzerland and subsequently shipped to our partners and contract manufacturers in Europe and Turkey for the manufacturing of the finished product;

2. for our cardio-renal franchise, we source the raw materials mainly from suppliers located in Asia. The active pharmaceutical ingredient is then manufactured in Europe and the finished product in Europe and North America.
3. with respect to our nephrology franchise, depending on the product, the raw materials are sourced either mainly from suppliers located in Europe and Japan or from suppliers located in the United States, China or India. The active pharmaceutical ingredient is then manufactured in Europe and the finished product by our contract manufacturers in Europe and North America.

For all franchises, the finished products are then distributed either by our warehouses located in Switzerland, or warehouses operated by contract manufacturers or third-party logistic providers to our affiliates and partners worldwide.

CSL Vifor's Technical Operations team is mainly responsible for managing and monitoring the whole supply chain, from sourcing the raw materials to the distribution of the finished products to our affiliates and partners.

For certain products and/or countries, our local supply chain team is responsible for supply chain activities relating to the distribution of the products.

### Our Policies & Actions on Preventing Modern Slavery

As a CSL Group Company, CSL Vifor adheres to the CSL's Code of Responsible Business Practice ("Code"). The Code defines the standards of behavior expected of all our employees and third parties (e.g. contractors, suppliers and distributors).

Our Code:

- recognizes the right of every child to be protected from economic exploitation (i.e., child labor);
- supports the right of every employee to be legally employed;
- allows employees the right to seek representation (i.e. from a trade (labor) union or employee association) without fear of intimidation, reprisal or harassment;
- ensures employees receive payment that meets or exceeds the legal minimum wage in all jurisdictions;
- prohibits less favorable treatment of a person on the basis of gender, age, race, religion, disability and sexual orientation;
- forbids the solicitation, facilitation or any other activity in connection with modern slavery or human trafficking; and
- requires that no engagement with CSL Vifor should deprive individuals of their freedom.

The Code has been made available to all employees.

## COMPANY POLICY

CSL Vifor's SpeakUp Policy encourages all CSL Vifor's employees, directors, contractors, customers, suppliers and associates to report potential misconduct or improper state of affairs or circumstances in relation to CSL Vifor, an employee, officer, consultant or contractor of CSL Vifor. All reports made under the SpeakUp Policy are received and treated sensitively and seriously and will be dealt with promptly, fairly and objectively.

When entering into a business relationship, CSL Vifor's internal rules and regulations require a thorough due diligence process based on a risk-based approach, taking into account, for example, the domicile country of the potential partner and the type of service to be provided for CSL Vifor. For example, we recognize that some countries within our supply chain and certain parts of it pose a higher risk of modern slavery than others and we ensure that the appropriate further due diligence is undertaken accordingly. If a supplier passes the due diligence, we enter into an agreement obliging the supplier to adhere to all applicable laws and regulations and giving us the right to audit the supplier for their compliance.

In addition, we have a group wide Supplier Code of Conduct which is binding upon our suppliers and which requires our suppliers to adhere to applicable labor laws and regulations. Our Supplier Code of Conduct has a dedicated section on the importance of preventing modern slavery, obliging suppliers to address this issue in their organization and supply chain. In addition, we strive to include further warranties in our supply agreements that require our suppliers to confirm that they have taken the necessary steps to prevent modern slavery in their organization and supply chain.

Throughout 2020 and 2021, we conducted a Human Rights Base Assessment, analyzing core elements of our business and determining areas in which human rights aspects, including modern slavery elements, could be of importance. The Assessment consisted of a rough risk categorization of CSL Vifor's countries of operation and of interviews with experts from relevant functions: Compliance, HR, Partner Business, Procurement, Clinical Trials, Supply Chain and Quality. The Assessment did not show any critical areas and indicated that we have adequate processes in place which help to safeguard that human rights, including modern slavery aspects, are respected within the company's direct area of control. CSL Vifor decided to build on the insights gained and introduced appropriate measures, including the development of a human rights statement, comprising also forced labor and modern slavery aspects.

### Our Staff

CSL Vifor advocates freedom of employment, which means all work should be done voluntarily. No employee should be forced to work against their will through coercion, mortgages, unreasonable contracts or curbs on their freedom. CSL Vifor does not use child or forced labor and we do not tolerate working conditions or forms of treatment that violate national and/or international laws and customs. Every manufacturing site has its own written policy to make sure that all relevant local regulations and labor standards at the manufacturing site are adhered to.

If employees of CSL Vifor learn about events of modern slavery either within CSL Vifor or in their interaction with affiliates and partners, they are encouraged to immediately report such events so that appropriate investigations and actions can be taken. CSL Vifor introduced a whistleblower hotline that allows employees to report irregularities relating to modern slavery, through a helpline. The whistleblower hotline was implemented in 2017.

In the event that our investigations show that any form of modern slavery indeed has happened, or still happens within our supply chain, we immediately require our suppliers to take the necessary steps to eliminate modern slavery from its organization. Depending on the seriousness of the supplier's violations, CSL Vifor may also terminate the business relationship.

### Next Steps

Following the acquisition by CSL Limited, Vifor Pharma Group will integrate into the CSL Group's modern slavery risk management and mitigation framework, further strengthening our efforts to prevent any type of modern slavery within our supply chain. We will also continue to sensitize employees and suppliers by appropriate means.

CSL Vifor has a zero-tolerance approach when it comes to modern slavery and human rights violations. We have developed and implemented effective and efficient processes and policies, ensuring that modern slavery does not occur within our organization or our supply chain and that human rights are always respected, no matter where in the world we are doing business. We will continue monitoring these means and further improve them as appropriate and in view of the upcoming integration in CSL Group's overall human rights framework.

### Hervé Gisserot

General Manager

Signed on behalf of CSL Vifor  
Glattbrugg, December 2022