

## Allergan Ltd

### Modern Slavery Act Transparency Statement for the year ended 31 December 2022

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 Organisation

Allergan is a subsidiary of AbbVie Inc., a global, research-based biopharmaceutical company formed in 2013 following separation from Abbott Laboratories. Following the acquisition of Allergan plc in May 2020 by AbbVie Inc, Allergan successfully completed the complex Allergan integration process on April 1<sup>st</sup> 2022.

#### 2. 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.

#### 3. 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. 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.

#### 4. Commitment and Policies

Allergan's Commitment to Human Rights outlines the human rights issues that are most salient for our business. In it, we explicitly commit to complying with laws and practices that prohibit child labour, forced, bonded, or indentured labour, involuntary prison labour, human trafficking and unfair wages and benefits. This commitment and other workplace commitments are supported by our employment policies. As part of our commitment to preventing, mitigating, and remedying any adverse human rights impacts across our value chain, we seek to ensure that slavery and human trafficking do not enter our product supply chains or any part of our business. We have corporate policies addressing the need for a safe and fair working environment where the rights of those who work for and with us are respected.

#### Code of Conduct

In 2020 Allergan adopted the AbbVie Code of Conduct for its employees which sets out the commitment to comply with all applicable laws, rules and regulations, including those related to human trafficking and modern slavery.

# Allergan Aesthetics

an AbbVie company

Allergan's business partners are required to acknowledge and comply with the Code and conform to Allergan's standards of conduct.

## Training and Communication

The importance and spirit of the Modern Slavery Act 2015 as an explicit part of Abbvie's Code of Conduct and it is communicated to each employee and business partner, 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

No complaints or allegations of the modern slavery or human trafficking have been reported to the independent Allergan. 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.

## Expectations of Suppliers

Our suppliers are integral to the success of our company. While we cannot control all actions of our suppliers, we expect suppliers to treat their employees with dignity and respect and to comply with all legal and regulatory requirements pertaining to the fair and equitable treatment of employees.

### Due Diligence

While AbbVie and Allergan remain separate legal entities, their respective Human Resources functions verify work eligibility during the hiring process and continue to conduct annual audits to ensure compliance with minimum wage and age requirements.

Further, employees and contractors are required to promptly report any known or suspected breach of AbbVie's Code of Business Conduct or other illegal or unethical behaviour. We offer a number of resources such as our confidential [Ethics and Compliance Helpline](#), a telephone and web-based hotline maintained by a third party for the purpose of gathering information regarding compliance and ethics concerns. Therefore, if there are any concerns relating to a breach of AbbVie's Code of Business Conduct, these can be raised in confidence and without fear of retaliation.

Verifications are also carried out to ensure all UK-based employees and contractors have the right to work in the UK.

More broadly, we continuously scan the landscape for signals of potential human rights risk, by monitoring media reports and other sources of information in countries where we have operations or suppliers. When signals of potential risk are detected, we investigate further.

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## Accountability

Any employee or contractor discovered to be involved in inappropriate conduct or in violation of our Code of Business Conduct, our policies, our procedures and/or applicable laws or regulations, is subject to corrective action, up to and including termination of employment. Additionally, if Allergan becomes aware of any actions or conditions not in compliance with our Supplier Code of Conduct, we may seek corrective action.



Nicholas Hudson, Director  
For and on behalf of Allergan Limited