

OUR COMMITMENT TO RESPECT

HUMAN RIGHTS



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1. FOREWORD OF THE MANAGEMENT BOARD

Human rights are the fundamental political, civil, economic, labor, social and cultural rights and freedoms to which every person is entitled. Respecting such rights is a key element of Boehringer Ingelheim’s sustainability strategy “Sustainable Development – For Generations”.

In accordance with our mission statement, we are committed to our patients, our employees, our stakeholders, and the communities we serve, as well as to our company, to make a successful long-term contribution to the sustainable development of society.

The values of our mission statement: respect, trust, empathy, integrity and passion are at the heart of everything we do. Respecting human rights and contributing to their realization is fundamental to our long-term corporate success and an expression of these values.

Our goal is to enable both our employees and our suppliers to respect the standards set out in this document in all their decisions. In doing so, we support them in implementing appropriate processes to respect human rights.



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2. OUR COMMITMENT TO RESPECT HUMAN RIGHTS

Boehringer Ingelheim is a global innovation driver for products and therapies in the fields of human pharmaceuticals and animal health. In addition to the safety and high quality of our products, compliance with the internationally recognized human rights and related environmental standards is a central element of our corporate responsibility.

We are continuously expanding our commitment to human rights, the protection of employees and the environment, while complying with all applicable legal requirements, such as the German Act on Corporate Due Diligence Obligations to prevent Human Rights Violations in Supply Chains (Supply Chain Due Diligence Act, or LkSG).

This policy statement describes the respective measures we take at Boehringer Ingelheim within our business activities and along our global supply chains.



Boehringer Ingelheim is committed to respecting the internationally recognized human rights. In doing so, we are guided by the following internationally recognized standards for corporate responsibility to respect human rights:



UN Guiding Principles on Business and Human Rights



UN Universal Declaration of Human Rights



International Labor Organization (ILO) Declaration on Fundamental Principles and Rights at Work



Prohibition of child labor



Prohibition of forced labor & all forms of slavery



Prohibition of discrimination



Strengthening the freedom of association



Compliance with occupational health and safety



Payment of adequate wages



Prohibition of unlawful eviction



Prohibition of violation of human rights through the use of security forces



Minamata Convention on Mercury



Stockholm Convention on Persistent Organic Pollutants (POPs Convention)



Basel Convention on the Export of Hazardous Waste

We always comply with applicable local laws. In cases where the international recognized human rights are restricted by local laws, we strive to promote the principles behind the international standards to the extent possible without conflicting with local laws. Where local laws exceed international standards, we comply with such laws.

Patients are always our focus. Even in challenging situations, our responsibility for their well-being and access to healthcare is our highest priority.

3. SCOPE AND OUR EXPECTATIONS

The principles set forth herein apply to our own operations and all Boehringer Ingelheim employees company-wide, including all subsidiaries, as well as to our suppliers.

To ensure the well-being and protection of all our rightsholders – including our employees, workers, suppliers, and local communities – it is essential that all above mentioned parties act in accordance with the norms and standards listed in this policy statement.

In addition to our employees, we also expect our suppliers to commit to the established guiding principles and to implement appropriate processes to respect human and environmental rights (see page 4 and 5).

This also includes the responsibility to pass on this expectation to their respective suppliers and, if requested, provide information on how the stated principles are complied with. A description of these obligatory expectations can be found in the [Supplier Code of Conduct](#).



4. OUR APPROACH TO MANAGING HUMAN RIGHTS AND ENVIRONMENTAL RISKS

4.1 Governance

The overarching governance of human rights due diligence at Boehringer Ingelheim lies within our Ethics & Compliance function. The company’s Human Rights Officer reports to the Chief Ethics and Compliance Officer. She regularly informs BI’s Board of Managing Directors as well as BI’s Sustainability Executive Committee on the implementation status of the human rights strategy.

An internal task force was established for the implementation and further development of the human rights strategy. The aim is to have a steady exchange between departments responsible for managing or affected by specific human and environmental rights aspects.



4.2 Risk analysis

Our risk management’s goal is to create the greatest possible transparency of our supply chains. This enables us to continuously monitor and manage risks that arise in the areas of human and environmental rights.

export of hazardous waste. In addition to environmental protection and occupational safety issues, social standards and non-compliance with adequate wages were identified as risks in our own business area.



In 2020, we identified risk areas in our own business area and supply chain as part of an initial analysis. In 2022, we then conducted a more in-depth risk analysis including supply chain mapping to identify human rights and environmental risks. As a result, we identified priority topic areas based on their potential severity and our ability to influence them.

The risk analysis to identify human rights and environmental risks will be continued annually at a minimum from 2023, plus continuously developed, and the results reported annually to our management.

The greatest risks were identified in our external supply chains, particularly in the following areas: non-compliance with occupational health and safety, unequal treatment in employment, withholding adequate wages, upholding freedom of association, soil, water and air pollution, and the

4.3 Preventive measures

In order to prevent violations of human and environmental rights as best as possible, we take appropriate preventive measures. These include the issuing of this policy statement. It is reflected in other corporate policies, such as our Code of Conduct, Supplier Code of Conduct, EHS Policy and in our global Boehringer Ingelheim standards regarding risk assessment and audits of third parties. We already take human rights and environmental criteria into account during our selection process.

As a member of the Pharmaceutical Supply Chain Initiative (PSCI), we are committed to sustainable supply chains in the production of pharmaceuticals. As part of this, we are working on the development of industry standards relevant to human rights, which we use for our own training as well as for our suppliers. Our management approach for suppliers, which focuses on risk-based control measures, is also based on the principles of PSCI.

4.4 Grievance mechanism and remediation

Boehringer Ingelheim promotes a ‘speak up’ culture, which is explicitly endorsed by the company’s management. Potential compliance violations or violations of human or environmental rights can be reported by employees as well as by external parties via the company’s ‘speak up’ portal. The name of the reporting person, unless reported anonymously, and the information provided will be treated confidentially.

In cases where we cause or contribute to actual human rights violations through our business activities, we will implement effective remedial measures.



4.5 Review of effectiveness

We will review the effectiveness of our due diligence measures both in our own business operations and in our supply chains on an annual and ad hoc basis. We will use these findings to continuously develop our approach to respecting human rights.



5. OUTLOOK AND REPORTING

We continuously work on optimizing and further developing our due diligence processes in order to prevent, eliminate or reduce human rights violations.

This year, we will further deepen our human rights risk analysis. We will incorporate the results into Boehringer Ingelheim's relevant business processes, in particular into our management approach for suppliers.

Starting in 2024, we will report annually on our progress on our corporate website www.boehringer-ingelheim.com.



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