



MODERN SLAVERY ACT STATEMENT – 2023 for Elanco UK AH Limited

pursuant to the Modern Slavery Act 2015
for the financial year ended 31 December 2023

Elanco Animal Health and its affiliates is committed to conducting business with integrity, complying with all legal requirements and ethical standards, while supporting initiatives that advance animal care and improve animal health outcomes. As a global U.S. publicly traded animal health company, Elanco works in a complex legal and regulated environment. Elanco employees, together with its suppliers and third parties, have a shared responsibility to act legally, ethically and abide by the Elanco values of **Integrity, Respect and Excellence**.

This statement is made pursuant to the Modern Slavery Act 2015 Section 54(1), which requires commercial organisations which supply goods or services in the UK and have a minimum total turnover of GBP 36 million per year to prepare a slavery and human trafficking statement for each financial year.

ELANCO GROUP'S OPERATIONS

Elanco UK AH Limited (the “**Company**”), with its registered business seat at Form 2, Bartley Way, Bartley Wood Business Park, Hook, RG27 9XA, UK is part of the Elanco Group (the “**Group**”) and its ultimate parent company is Elanco Animal Health Incorporated (“**Elanco**”). Elanco is headquartered in Indiana, US and is listed on the New York Stock Exchange (NYSE: ELAN).

Elanco is a global leader in animal health dedicated to innovating and delivering products and services to prevent and treat disease in farm animals and pets, creating value for farmers, pet owners, veterinarians, stakeholders, and society as a whole. With nearly 70 years of animal health heritage, Elanco is committed to helping its customers improve the health of animals in their care, while also making a meaningful impact on local and global communities. Elanco distributes its products to veterinarians, retailers, wholesalers and distributors, food animal producers and pet owners in over 90 countries, including the UK.

As a global U.S. publicly traded animal health company, Elanco works in a complex legal and regulated environment. Elanco employees, together with its suppliers and third parties, have a shared responsibility to act legally, ethically and abide by the Elanco values of Integrity, Respect and Excellence.

Elanco’s Healthy Purpose™ – our global approach to sustainability and managing our most important environmental, social and governance (ESG) matters – is a framework of commitments



and actions built on four interconnected pillars: Healthier Animals, Healthier People, Healthier Planet and Healthier Enterprise – which represent the areas we believe are most important to our customers, employees, investors and other stakeholders. We are driving a Healthier Enterprise by managing our environmental footprint and integrating the management and oversight of ESG issues – such as human rights and modern slavery – throughout our operations. Elanco’s approach to sustainability is built on the four interconnected pillars of Healthier Animals, Healthier People, Healthier Planet, and Healthier Enterprise. These represent the areas most important to customers, employees, investors, and other stakeholders, bringing to life Elanco’s vision of Food and Companionship Enriching Life (more information can be found at www.elanco.com).

The Group maintains a long-standing practice of complying with local minimum age laws and requirements and does not employ child labour, or forced or compulsory labour, in any of its facilities globally. For more information on this, please review the Group’s current Environmental, Social & Governance (ESG) Report at:

[Environmental, Social and Corporate Governance \(elanco.com\)](http://www.elanco.com)

The Group is committed to ensuring that its supply chains are free from slavery or human trafficking and has enacted an Elanco Business Partner Code of Conduct at:

[Elanco | Suppliers](#)

Elanco aims to comply with all applicable laws and regulations relevant to our business area in all countries where we operate and not just the UK by the local affiliate and has in place a group of individuals involved with ensuring such compliance. Following the implementation of the Modern Slavery Act 2015, the Company can state that it is committed to maintaining and enforcing systems and controls effective in ensuring modern slavery cannot take place anywhere within its own business or in various companies forming its supply chain.

ELANCO’S SUPPLY CHAINS

The Company’s supply chains include the following:

- research and development activities, including clinical trials;
- production inputs including raw materials, packaging materials and laboratory chemicals;
- contract manufacturing agreements;
- distribution arrangements;
- facility construction and maintenance;
- Information Technology goods and services; and



- sales, marketing, general & administration goods and services.

The Company contracts with vendors in a number of countries. The Company is committed to promoting responsible practices that will continuously improve social, health, safety and environmentally sustainable outcomes for our supply chains. Elanco is a participant in the industry group Pharmaceutical Supply Chain Initiative (“PSCI”) and has adopted the PSCI principles for responsible supply chain management. The PSCI principles are designed to align with the principles of the United Nations Global Impact; they represent high-level expectations set for industry suppliers in the areas of ethics, labour, health and safety, the environment and related management systems. The Company’s Business Partner Code of Conduct reflects the intent of the PSCI principles (<https://pscinitiative.org/home>).

The Company has continued to formally adopt measures to assess its supply chain, including a third-party risk management assessment as well as standard contract language that requires supplier to adhere to PSCI practices. The Company reserves the right to terminate its relationship with a non-compliant supplier.

RELEVANT ACTIONS AND PRACTICES IN THE COMPANY’S OPERATIONS AND SUPPLY CHAINS

Elanco sets out on its website its Ethical Foundation and an outline of its Ethics and Compliance Program: [Ethics & Compliance \(elanco.com\)](#). Further, Elanco describes its sustainability commitments, corporate responsibility and ESG efforts on its website as follows: [ESG Reporting \(elanco.com\)](#), including Elanco’s most recently published ESG Report.

The Group has implemented global policies regarding ethical interactions with external parties, a business partner code of conduct as well as an employee code of conduct which include Elanco’s commitment to ensure ethical behaviour and compliance with all applicable laws and regulations in all parts of our global supply chains and in any part of our own business.

- The Company carries out regular staff training through online training courses that are required annually and continues to review training options and that appropriate provision is made as required in respect of modern slavery and human trafficking issues.
- The Employee code of conduct encourages Company staff to report known or suspected issues, concerns, or behaviour that could harm the Company or those it serves and reiterates that retaliation for whistleblowing is not tolerated. The Company also has in place systems and policies to protect whistle blowers through an anonymous hotline for any concerns.



Elanco will use the following key performance indicators to measure how effective the Company's anti-slavery measures are in ensuring that slavery and human trafficking is not taking place in any part of the Company's business or supply chains:

- ensuring that all staff in all relevant functions have been trained in anti-slavery and human trafficking requirements, in terms of awareness of risk, appropriate decision-making and swift action;
- ensuring all suppliers, with which the Company contracts, have been made aware of the Company's Supplier Code of Conduct.

OECD guiding principles: Elanco adheres to the OECD guiding principles for human rights and expects its business partners to abide by these guidelines and local laws, when applicable, regarding modern slavery, child labour, forced labour and other rights. As part of Elanco's Human Rights program evolution, in 2023 Elanco developed a comprehensive human rights policy drawing on guidance from international guidelines, such as the OECD Guidelines for Multinational Enterprises, the UN Guiding Principles on Business and Human Rights (including the ILO Declaration of Fundamental Principles and Rights at Work) and the PSCI's Principles for Responsible Supply Chain Management.

Business Partner Code of Conduct: Elanco has a globally applicable Business Partner Code of Conduct ("Business Partner Code"), which outlines Elanco's expectations for suppliers to act legally, ethically and abide by the Elanco values of integrity, respect and excellence. The Business Partner Code is publicly available at: [Elanco | Suppliers](#) and is published in ten different languages.

The Business Partner Code provides that third party business contacts of Elanco are responsible for ensuring their employees are aware of and comply with the Business Partner Code and that they hold their own supplier/s and other third parties to the same standards. The Business Partner Code provides that Elanco adheres to the OECD guiding principles for human rights and expects all business partners to abide by these guidelines and local laws, when applicable, regarding modern slavery, child labour, forced labour and other rights.

Through contractual provisions, Elanco requires third parties to abide by its Business Partner Code. The Company's suppliers are referred to the Elanco supplier website, which houses the Business Partner Code, on purchase orders issued to all suppliers.

Third party due diligence: As part of Elanco's anti-corruption and third-party management program, Elanco is committed to compliance with anti-corruption and anti-bribery laws globally. Elanco conducts anti-corruption due diligence (ACDD) on third parties with whom Elanco does business and that meet certain pre-determined criteria. ACDD helps Elanco ensure the third party is trustworthy and shares a commitment to doing business the right way. Elanco utilizes robust



third-party solutions to manage this process. These systems are designed to mitigate risk by identifying potential “red flags” that may signal issues related to corruption, before such in-scope suppliers are onboarded and during the course of our contracted business relationship. Additionally, Elanco is in the process of on-boarding an additional third-party platform to support Elanco in monitoring topics such as human rights and modern slavery.

Reporting: Elanco’s approach to human rights is outlined in its annual ESG disclosures. In required jurisdictions, including the United Kingdom, Norway and Australia, Elanco also files annual modern slavery act statement(s) or report(s) explaining how Elanco addresses modern slavery risks. A Forced and Child Labour Report is also published in Canada. Material human rights risks are identified in additional corporate disclosures, such as Form 10-K filed with the United States Securities and Exchange Commission – or as required by other jurisdictions.

Additionally, Elanco submits various reports to regulatory authorities, as required, including where applicable in relation to employment practices and conditions, such as reporting on gender pay equity. More information on the Company’s gender pay gap report for the UK can be found on Elanco’s website here: [We are Elanco \(my.elanco.com/en_gb\)](https://my.elanco.com/en_gb)

Reporting of Concerns: Elanco has an Elanco Integrity Line which is published in its Business Partner Code (on Elanco’s websites) and on the Elanco Supplier Portal (www.elanco.com/en-us/suppliers). Business Partners are encouraged to contact the Integrity Line if they observe actions which are not aligned with Elanco’s commitments, and the commitments required of its business partners or if they have any questions or concerns. The Integrity Line is a convenient, confidential and anonymous way for Elanco business partners to report issues. Country specific telephone numbers are listed on our websites ([IntegrityCountsV3](#)) and translation services are available in most languages.

Specialist functions and auditing: Elanco has global specialist functions, including Legal, Ethics & Compliance, Health, Safety & Environment (HSE) and Quality who provide specialist advice and guidance to the Elanco business and its employees. Various of these functions conduct audits and inspections of key suppliers. In addition, due to the highly regulated business in which Elanco operates, Elanco and many of its suppliers are audited and/or inspected by relevant authorities. Elanco also has an internal audit function, which audits its own functions and processes internally.

OUTLOOK

Elanco is aware that conducting human rights due diligence across both its own business operations and across its supply chain is an ongoing process. Elanco will continue to review, develop and evolve its efforts in this area, with a goal of continuous improvement. As part of this evolution, Elanco will (amongst other things) consider what further steps should be taken with regard



to assessing the effectiveness of its actions regarding prevention of modern slavery in its supply chain. This includes matters such as:

- Elanco is in the process of establishing a formal human rights program, including a global human rights policy, an executive oversight committee and a core program team including representatives from Elanco's ESG, Legal, Ethics & Compliance, HSE, Procurement, Supply Chain functions. Elanco intends to establish an internal human rights governance committee, with representatives from departments such as: legal; ethics & compliance; ESG and sustainability; procurement; human resources and health, safety and environment to oversee due diligence activities and support the executive management to effectively monitor the business's impact on human rights and the environment.
- As part of this program Elanco redeveloped and in November 2023, implemented a new comprehensive global Human Rights Policy. The Elanco Human Rights Policy sets out: (a) all the human rights principles that Elanco staff and suppliers are required to adhere to, including, prohibitions against forced labour, unlawful child labour and non-discrimination; (b) practices and procedures implemented to uphold these human rights principles, including contractual arrangements, due diligence, audits, risk analysis, supply chain management and training; and (c) reporting any known or suspected human rights violation(s) through an anonymous hotline without any retaliation/reprisal for reporting.
- As noted previously, the expanded supplier due diligence process is under way, and in 2024, Elanco will continue to focus on risk exposure analysis by country and industry in Elanco's supply chain, including human rights risks. In this regard, since the supplier due diligence process is ongoing, as of the date of this report, the Company has not identified any risks, or taken any measures to remediate: (a) forced labour or child labour; or (b) the loss of income to the most vulnerable families that results from any measure taken to eliminate the use of forced labour or child labour in Company's activities and supply chains.
- Elanco will continue to monitor and investigate relevant complaints made to Elanco's *IntegrityLine* compliance hotline and through other grievance mechanisms. Trends resulting from investigations will continue to be reported through to Elanco's global Investigations Oversight Committee. Complaints to regulators are (and will continue to be) reported on internally via a formal notification to senior management (including legal) process.
- Elanco will continue to review, benchmark and evolve its Ethics and Compliance program.
- Elanco is in the process of reviewing their procurement template contracts and, as part of this process, will be updating them to ensure they contain appropriate provisions regarding modern slavery, human rights, and sustainability (including related audit and monitoring rights).



- As human rights standards and laws continue to evolve, including the introduction of new or enhanced modern slavery and/or human rights legislation, Elanco will continue to monitor and keep abreast of legal developments in this area (and in the wider area of anti-corruption) and continue to review its actions to ensure it remains compliant with its legal obligations.
- Elanco will continue to ensure that its personnel in relevant functions are trained in modern slavery legislation and human rights requirements including awareness of risk and appropriate decision making and action.
- As outlined above, Elanco requires its supplier sites to confirm their compliance with Elanco's standards (including those set out in its Business Partner Code of Conduct and the PSCI Principles), which include standards on human rights.
- Elanco publishes an annual ESG Report and a collection of issue briefs addressing Elanco's oversight and managerial approach to Elanco's most important ESG topics – including human rights and a responsible supply chain – refer: www.elanco.com/en-us/sustainability/.



Declaration

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the Company's slavery and human trafficking statement for the financial year ending 31 December 2023. It was reviewed and approved by the Board of Directors of Elanco UK AH Limited on 5 June 2024.

Elanco UK AH Limited, 5 June 2024

A handwritten signature in black ink, appearing to read "Chris Lewis", is written above a horizontal line.

Christopher Lewis, CFO Elanco UK/ROI