



## **MODERN SLAVERY ACT STATEMENT – 2024 for Elanco UK AH Limited**

pursuant to the Modern Slavery Act 2015  
for the financial year ended 31 December 2024

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Elanco Animal Health and its affiliates are 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 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 over 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.

Elanco’s global approach to sustainability and managing our most important environmental, social and governance (ESG) matters is a framework of commitments and actions which represent the areas we believe are most important to our customers, employees, investors and other stakeholders. We are driving our 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 brings to life Elanco’s vision of Food and Companionship Enriching Life (more information can be found at [www.elanco.com](http://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](#).



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](#).

Elanco aims to comply with all applicable laws and regulations relevant to our business area in all countries where we operate, not just the UK. The local affiliate has in place a group of individuals involved in 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 sets out on its website its Ethical Foundation and an outline of its Ethics and Compliance Program: <https://www.elanco.com/en-us/about-us/governance/e-and-c>. Further, Elanco describes its sustainability commitments, corporate responsibility and ESG efforts on its website as follows <https://www.elanco.com/en-us/sustainability>, including Elanco's historic and most recently published ESG Reports.

The Group has implemented global policies regarding human rights and ethical interactions with external parties in the Elanco Code of Conduct and the Business Partner 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. These policies can be found on Elanco's ESG reporting website: <https://www.elanco.com/en-us/sustainability/esg-reporting>.

## **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 governance actions:** 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 (<https://www.elanco.com/en-us/sustainability/esg-reporting>), including Elanco's most recently published ESG Report.

- 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 behaviours 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.

The Company's suppliers are made aware of the Business Partner Code of Conduct and are referred to the Elanco supplier website (<https://www.elanco.com/en-us/suppliers>), which houses the Business Partner Code of Conduct and other policies and guidelines applicable to all suppliers.

**Third party due diligence:** As part of Elanco's anti-corruption and third-party management pro-gram, 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.

Elanco's expanded supplier due diligence process is on-going, and in 2024, Elanco continued to focus on risk exposure analysis by mapping country and industry in Elanco's supply chain, including human rights risks. Elanco's work with IntegrityNext has provided the structure needed for supply due diligence review. In 2024 and into early 2025, Elanco conducted a comprehensive risk analysis for 15,000 suppliers, evaluating various factors such as the supplier's location, industry, and any negative media coverage. As part of this initiative, 750 suppliers (representing 80% of supply chain spend) will complete an ESG questionnaire, developed in partnership with Integrity Next. The questionnaires include requests to upload human rights supporting policies.

Through this assessment, we identified 26 companies with potential risk exposure or gaps. We successfully implemented corrective measures (remedy) for all but a small number of companies. For each of these cases, we have established targeted action plans and engaged in ongoing dialogue with the suppliers to enhance their ESG scores and mitigate associated risks. To date, no remediation measures for experienced loss have been taken.

Additionally, Elanco acquired a manufacturing facility and related assets, in Speke, UK on November 15, 2024. Because of the recent closing date, these assets are not currently included in the IntegrityNext platform 2024 due diligence review but will be incorporated into Elanco's overview throughout 2025.



**Reporting:** Elanco's approach to human rights is outlined in its annual ESG disclosures, and in required jurisdictions, including the United Kingdom, Norway and Australia, through annual modern slavery act statement(s) or report(s) explaining how Elanco addresses modern slavery risks. A Forced Labor 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 anonymous hotline/reporting line called Elanco Integrity Line that is referenced in: (a) the Elanco Code of Conduct; (b) published on its internal websites for staff; and (c) published externally in the Business Partner Code of Conduct, Elanco's external websites and on the Elanco supplier website ([www.elanco.com/en-us/suppliers](https://www.elanco.com/en-us/suppliers)). Elanco staff, suppliers and third parties with whom Elanco contracts are encouraged to promptly "speak up" and report any known or suspected violation(s) of the law, the Elanco Code of Conduct, the Business Partner Code of Conduct, Elanco Ethics & Compliance policies and procedures, or other policies or concerns.

The Elanco Integrity Line is a convenient, confidential and anonymous way for Elanco staff, suppliers and third parties to report without fear of retaliation/reprisal. Elanco also has in place systems and policies to protect whistleblowers. Country specific telephone numbers are listed on Elanco's websites. The Company's staff and suppliers are informed of the Elanco Integrity Line through training, the Elanco Code of Conduct and the Business Partner Code of Conduct.

**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 has established and will continuously improve 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 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 will continue to focus on risk exposure analysis by country and industry in Elanco's supply chain, including human rights risks.
- 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 Elanco's Global Investigations Oversight Committee. Complaints to regulators are (and will continue to be) reported 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.



## 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 2024. It was reviewed and approved by the Board of Directors of Elanco UK AH Limited on 12 June 2025.

Elanco UK AH Limited, \_ \_\_\_\_\_

DocuSigned by:  
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Matthew Frost, General Manager, Elanco UK and ROI

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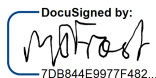
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Elanco UK AH Limited

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## Carbon Copy Events

## Status

## Timestamp

## Witness Events

## Signature

## Timestamp

## Notary Events

## Signature

## Timestamp

## Envelope Summary Events

## Status

## Timestamps

Envelope Sent

Hashed/Encrypted

6/18/2025 12:10:23 PM

Certified Delivered

Security Checked

6/19/2025 6:55:15 PM

Signing Complete

Security Checked

6/19/2025 6:56:00 PM

Completed

Security Checked

6/19/2025 6:56:00 PM

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## Status

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To contact us by email send messages to: [gate\\_john@elanco.com](mailto:gate_john@elanco.com)

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