



## **2025 Report made in accordance with *The Fighting Against Forced Labour and Child Labour in Supply Chains Act***

### **Introduction**

This report is made in accordance with the requirements of *The Fighting Against Forced Labour and Child Labour in Supply Chains Act* (hereinafter referred to as the "Supply Chains Act"), on behalf of sanofi-aventis Canada Inc. and Sanofi Pasteur Limited, companies operating and carrying on business within Canada ("Sanofi Canada"). This report is for the period from January 1, 2024, through December 31, 2024, and sets out our due diligence measures related to the prohibition against forced and child labour within our business and supply chains.

### **Sanofi Canada's Structure, Business and Supply Chains**

Sanofi Canada is part of an innovative global healthcare company, driven by one purpose: we chase the miracles of science to improve people's lives. We provide potentially life-changing treatment options and life-saving vaccine protection to millions of people globally, while putting sustainability and social responsibility at the centre of our ambitions.

Sanofi Canada consists of the following companies providing goods and services and carrying on business within Canada:

- Sanofi Pasteur Limited
- sanofi-aventis Canada Inc.

Sanofi Canada's business includes the following areas: Vaccines (Sanofi Pasteur Limited), and General Medicines including diabetes, cardiovascular and established medicines, and Specialty Care, including immunology, multiple sclerosis, oncology, and rare blood disorders and diseases (sanofi-aventis Canada Inc.). Sanofi Canada's site is located at 1755 Steeles Avenue West, Toronto, Ontario, Canada M2R 3T4. Our site has 24-hour security, and no contractors can enter the premises without having a badge, reducing the risk of non-authorized persons performing labour on-site.

Sanofi Canada is committed to operating responsibly and sustainably in Canada. We have a strong focus on corporate social responsibility (CSR), including initiatives related to employee well-being, health and safety, community engagement, and environmental sustainability.

Sanofi Canada is integrated into a global supply chain involved in the manufacturing of active pharmaceutical ingredients, finished goods, devices, and packaging through a global network of manufacturing sites and distribution centres. This network includes the procurement of goods and services from a large number of external contractors.

## Our Policies

Sanofi Canada is required to comply with all Sanofi policies including our **Code of Conduct** which outlines our commitment to complying with applicable standards, laws and regulations in the areas of human rights and labour law. In particular, within our Code of Conduct, the following categories are addressed:

- *Respecting and Upholding Human Rights at Work* – respecting human rights in accordance with the United Nations Guiding Principles on Business and Human Rights (UNGPs), the Organization for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises and applicable International Labour Organization (ILO) Conventions throughout our activities and those of our business partners. Our commitments comprise supporting the right of children to a childhood free of work responsibilities by prohibiting the employment of young persons under the age of 15 and that of young persons aged 15-18 for hazardous work, as well as strictly prohibiting all forms of forced, bonded, indentured, or compulsory labour including modern slavery and human trafficking.
- *Respect for People, Fostering Psychological Safety and Wellbeing* – fostering a workplace environment for our partners where personal dignity is respected and extending respect to all people through our commitment to the United Nations (UN) Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights, and the ILO Declaration on Fundamental Principles and Rights at Work alongside ILO Fundamental Conventions;
- *Fighting Bribery and Corruption* – committing to fighting all forms of corruption;
- *Engaging Business Partners* – only engaging with suppliers who adhere to our Code of Conduct and Suppliers Code of Conduct; and
- *Speak-Up Helpline* - aimed principally at our employees, but also available to suppliers, which encourages reporting any wrongdoing, including extending to human rights violations. Reports made through the Speak-Up Helpline are fully investigated and appropriate remedial actions are taken.

Sanofi's global **Human Rights Due Diligence Factsheet** aims to implement specific Sanofi commitments regarding the prevention of forced and child labour in Sanofi's activities. This Standard is applicable to all Sanofi corporate functions, regions, countries, and divisions worldwide. Additionally, Sanofi's global **Sustainable Procurement Factsheet** and **2024 Sustainability Statement** outline sustainability requirements which have been systematically embedded in the different steps of our supplier selection processes, including supplier onboarding, tenders, and monitoring through audits and assessments.

Sanofi's **Suppliers Code of Conduct** commits suppliers to comply with the fundamental principles of the ILO, particularly those relating to child labour, forced labour, working hours, pay, discrimination, and freedom of association. Suppliers are also expected to ensure their own suppliers comply with the requirements in the Suppliers Code of Conduct.

## **Sanofi Canada Employees**

All employees who work for Sanofi Canada are background checked, having their identity, qualifications and previous work history verified as a condition of employment. We verify employees' right to live and work in Canada. Regular audits are made of employees who have only a temporary right to remain. Sanofi Canada ensures that all employees are paid at least minimum wage in accordance with applicable provincial wage standards.

## **Sanofi Canada Suppliers**

Sanofi engages with suppliers based on objective criteria, including demonstrated competence and a record of integrity consistent with Sanofi Code of Conduct, while ensuring fair and non-discriminatory procurement practices. Prior to their selection, Sanofi undertakes risk-based due diligence on suppliers. For example, the standard Request for Proposals used by Sanofi Canada may include a questionnaire pertaining to potential suppliers' economic, social, and environmental performance and an acknowledgment by potential suppliers that they agree to comply with the Suppliers Code of Conduct. Select suppliers may be required to complete a questionnaire every two years and if they have not done so, or if their responses are inadequate, appropriate remedial actions are taken, which can include no longer permitting the supplier to provide services to Sanofi Canada.

In addition, Sanofi Canada's Services Agreement and Purchase Order Terms and Conditions provided to suppliers include an obligation to carry out any services in full compliance with all applicable legislation, regulations, codes of practice, and other requirements of any relevant government or governmental agency. Sanofi Canada's Purchase Order Terms and Conditions require a supplier to undertake to respect the principles specified in the Suppliers Code of Conduct during the performance of the Purchase Order and require suppliers to set up sufficient internal procedures and policies necessary to guarantee compliance with these principles. In each case, Sanofi Canada reserves the right to audit to ensure compliance with our high standards on quality and ethical behaviour.

Sanofi Global Procurement assesses the extent to which its suppliers can be considered a business or procurement risk. This assessment depends on various factors including, for example, the nature of the goods and/or services supplied and/or their country of origin. Suppliers who fall into certain business or procurement risk categories relating to human rights can be asked to complete specific supplier assessment questionnaires. In cases where potential issues from particular suppliers have been identified, Sanofi takes appropriate action dependent on the circumstances presented.

Sanofi utilizes controls that include regular monitoring, training, auditing, and other assessments to help detect, prevent, and remediate actual or potential non-compliant activities by suppliers. Sanofi communicates to suppliers the requirements we expect them to adhere to. Sanofi undertakes cross-functional collaboration in the lifecycle management of suppliers and enables suppliers, when faced with a potential non-compliant situation in connection with Sanofi business, to report it via the Speak-Up Helpline.

No incidents of forced labour or child labour have been identified at Sanofi Canada through our internal risk mapping.

### **Review of Performance**

Review of Sanofi's performance regarding the supplier selection process (including those arising from reports received via the Speak-Up Helpline), due diligence on third parties, and training, are discussed, and changes are implemented, as needed, between local and global procurement teams.

### **Training and Capacity Building**

As part of their employment conditions, all Sanofi Canada's employees must agree to uphold our Code of Conduct and training is provided as part of on-boarding. In addition, every year, Sanofi employees are requested to complete global compliance learning, to address fundamental topics in the field of compliance and business integrity. Such topics have included fighting bribery and corruption, conflicts of interest and ethical decision-making.

Senior site management was informed about the Supply Chains Act and the obligations created thereunder. Select Sanofi Canada employees in supply chain and procurement functions received training about the Supply Chains Act, which included an overview of the law, its obligations, and Sanofi's due diligence processes and policies in place in relation to forced and child labour.

Each of our employees is expected to uphold our Code of Conduct as we strive to continually maintain the highest standards of CSR. Sanofi Canada understands the global challenges related to forced and child labour and works to ensure that this is not present in any part of our business, including all suppliers and the supply chain.

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In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in the report for the entity or entities listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.

### **SANOFI-AVENTIS CANADA INC.**

  
stephanie veyrun-manetti (May 15, 2025 13:22 EDT)

**Name:** Stéphanie Veyrun-Manetti

**Title:** General Manager Specialty Care and Country Lead Canada

**Date:** May 16, 2025

I have the authority to bind sanofi-aventis Canada Inc.

In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in the report for the entity or entities listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate

and complete in all material respects for the purposes of the Act, for the reporting year listed above.

**SANOFI PASTEUR LIMITED**

*Kate Winchester*

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**Name:** Kate Winchester

**Title:** Site Head, Toronto Manufacturing and Supply - Vaccines

**Date:** May 16, 2025

I have the authority to bind Sanofi Pasteur Limited