

Alexion Pharma UK Ltd Modern Slavery Act 2015 Statement

Modern slavery statement for financial year ending 31 December 2017

Introduction

This statement has been prepared for the purposes of the Modern Slavery Act 2015 (“the Act”) in respect of Alexion Pharma UK Ltd. (referred to as “Alexion” / “we”).

References in the statement to “forced labour” means any conduct which is an offence under Part I of the Act including slavery, servitude, any type of forced or compulsory labour and trafficking for the purposes of exploitation.

Alexion does not tolerate forced labour either within our company or within our supply chains.

Alexion is a global biopharmaceutical company, which is headquartered in Boston, Massachusetts, USA, and has more than 2,500 employees worldwide.

We currently commercialize three products, Soliris[®], Strensiq[®] and Kanuma[®]. Our products are manufactured both in-house by our own facilities and by contract manufacturing organizations located in different countries. We distribute our products in approximately 50 countries around the world, either through our own affiliates or through distributors. More information about Alexion and our global footprint can be found on www.alexion.com.

Ethics and Compliance Program

Our Board of Directors and Executive Committee of Alexion Pharmaceuticals, Inc. have established an Executive-level Ethics and Compliance Program, led by our Chief Compliance Officer, Compliance Committee and compliance team. The Compliance Program reflects Alexion’s aim of operating in a manner that reflects high ethical standards and our commitment to complying with all applicable laws, regulations, other legal requirements and any applicable codes of practice in every country in which we operate.

As part of the Ethics and Compliance Program, we have put in place a number of initiatives to support our larger commitment to encouraging ethical, social and environmental responsibility. For instance, we have established a [Code of Ethics and Business Conduct](#) (“the Code”). The Code sets out the standards and expectations with which we expect all workers to comply and provides guidance to assist individuals to make good, ethical choices for Alexion and for our patients. Further information in respect of the Code can be found [here](#).

We also operate an Ethics and Compliance Helpline which provides a mechanism for staff and suppliers to ask questions or report concerns in respect of ethics and compliance issues. The Helpline is run by EthicsPoint, an independent, third-party provider. Further information about the Helpline is available [here](#).

We strive to only do business with partners who share our commitment to ethics and compliance standards, as outlined in the Code. We have adopted a Vendor Code of Conduct (“Vendor Code”) which provides information to third parties who work with us about our commitment to ethics and compliance and the standards with which we expect all third parties to comply. Amongst other things, the Vendor Code of Conduct requires suppliers to comply with applicable labour laws and regulations and to treat workers with dignity and respect. Further information about the Vendor Code can be found [here](#).

Approach to avoid forced labour

We have taken the following steps to assess and manage any risk relating to forced labour within our supply chain:

- We expect our key suppliers and distributors to comply with the Vendor Code and to place similar expectations on their respective suppliers.
- When entering into arrangements with suppliers, the suppliers undergo an approval process in which we assess them from a qualitative and economic perspective. As part of that assessment, we are alert for any indicators of forced labour.
- We may impose contractual obligations on suppliers under which they:
 - undertake to comply with our Vendor Code;
 - Undertake to comply with applicable laws, including employment laws, in their provision of goods and services to Alexion;
 - agree to permit us and third parties acting for us to inspect their facilities, records and practices, and to have access to their personnel and to audit their business for the purposes of ensuring that they comply with their obligations, including those with respect to forced labour;
 - impose obligations no less burdensome on their own suppliers.

Training

To ensure a high level of understanding of the risks of forced labour, we train our staff and suppliers periodically on the Codes, so that they can provide training to their staff and suppliers and providers.

Approval

Approved by the Board of Directors on October, 17th 2018

Director

Sean Richardson

Vivien Ruth Greer

Michael Ira Kenneth Elloian