



Supplier Code of Conduct

It is our intention to source from suppliers who share our high standards with regard to labor and welfare conditions, health and safety, anti-bribery and corruption and environmental management.

Procurement decisions are made on the basis of ethical standards, quality, service, price, delivery, best value and other similar factors. We will observe high ethical standards in all our dealings with suppliers. Any corrupt, improper or unethical behavior in dealings with suppliers is prohibited.

Walgreens Boots Alliance expects its suppliers to operate in accordance with the core principles outlined in this document. Our Supplier Code of Conduct is based on internationally recognized standards including the Ethical Trading Initiative Base Code and the International Labor Organization conventions and recommendations, which in turn are based on the United Nations Universal Declaration of Human Rights and Convention on Rights of the Child.

Core Principles of Supplier Conduct

- Laws and Regulations - we will comply with the applicable laws and regulations of all the countries where we do business.
- Terms and Conditions of Employment – we will respect human rights, fair treatment and freedom of association. Everyone has the right to choose where, for whom and in what position they choose to work and when to leave a job. We respect and uphold the right of workers in conformity with local law to voluntarily determine whether or not to be represented by labor organizations of their own choosing and where represented by a union to bargain collectively in accordance with the appropriate local laws.
- Discrimination, harassment and retaliation – we are opposed to discrimination in any form. There must be no discrimination or harassment during recruitment or employment. Suppliers must not retaliate against workers following grievance procedures or for otherwise opposing an unlawful employment practice.
- Modern slavery and human trafficking – we are opposed to any form of convict, bonded, forced, indentured or other illegal labor, any form of slavery or human trafficking, or any other similarly prohibited conduct.
- Wage and benefits – we will give fair wages and working hours. Everyone has the right to be paid fairly for the work that they do, and to work reasonable hours. We expect that all workers are allowed at least one day off in a seven day period or at least two days off in any fourteen day period.



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- Age – we will adhere to all applicable labor laws, regulations and the International Labour Organization Conventions on child labor. Young people under 18 must not be expected to carry out activities that are potentially hazardous or harmful to their health, safety and development.
- Health and safety – we will adhere to all applicable health and safety laws and regulations. We expect suppliers to ensure that workers work in safe conditions and that employer-provided living quarters are safe, hygienic and do not compromised the dignity of workers. We promote a positive health and safety culture.
- Sustainable development and environmental protection – we recognize our responsibility to the environment and seek ways to operate sustainably without damaging the environment.
- Data privacy – we place the utmost importance on ensuring the integrity of data and the protection of our customers, patients, employees and Company information. We are committed to protecting the privacy and confidentiality of the personal information of our customers and employees.
- Anti-Corruption and Bribery - We strive to maintain high ethical standards and require our employees and others doing business with us to comply with all applicable Anti-Bribery and Corruption (“ABAC”) laws and other regulations that prohibit bribery, solicitation of bribery and the payment of kickbacks. These laws include the US Foreign Corrupt Practices Act, the UK Bribery Act and ABAC laws and regulations in all countries where we conduct business.

Zero-Tolerance Violations

We have a zero-tolerance approach for serious violations of our core principles of supplier conduct, including without limitation, in relation to child labor, indentured/forced labor, corporal punishment, slavery and human trafficking and acts of bribery (“Zero Tolerance Violations”). WBA’s policy on zero-tolerance violations is to terminate the business relationship with the site where the violation occurred and to suspend the supplier and its other sites pending a full investigation of the supplier and its supply chain. If the supplier is directly implicated in the zero tolerance violation, or if further violations are found, the business relationship with the supplier will be terminated.

Openness to Assessments and Audits

We expect suppliers to be open and transparent to our assessment of their compliance with our Supplier Code of Conduct.



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Management Systems

We expect suppliers to maintain an effective management system and complete set of records in order to be able to demonstrate that it adheres to the core principles set out in this statement.