



Walgreens Boots Alliance Business Partner Declaration of Compliance

October 2018

It is our (Walgreens Boots Alliance) intention to source from suppliers who can satisfy our standards with regard to labor and welfare conditions, health and safety, anti-corruption and environmental management or who have given a commitment to achieve these standards within an agreed timeframe. Sourcing Responsibly is our approach to achieving these standards with suppliers, the principles of which are set out below.

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.

Action required:

- Read the following information;
- Sign below to confirm you have your own policies and procedures in place that at a minimum meet these requirements.

Business Ethics

We will comply with the laws of all the countries where we do business. We are committed to ensuring compliance with the principles of the United Nations Universal Declaration of Human Rights and, specifically, we support and respect international human rights within our Group's sphere of influence. We are committed to ensuring that we are not complicit in human rights abuses. We specifically focus on:

- *Terms and Conditions* – respecting 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. Issues under this section can include not being able to join a trade union or be represented in a dialogue with management over conditions.
- *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* – use of 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* – 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. Most countries have employment laws to govern this, however in some countries these laws are not enforced.
- *Age* – adhering to labor standards on age. Millions of children around the world work to support their families. It becomes a problem when it involves children in dangerous, exploitative or illegal work. Ethical issues



on age can also relate to discrimination on the basis of age.

- *Health and safety* for all employees, and people involved in the supply chain. Everyone has the right to work in a safe and healthy environment. Unfortunately many workplaces around the world are hazardous and put people's health at risk.
- *Sustainable development and Environmental protection* –ensuring that business is conducted sustainably without damaging the environment. However in some countries awareness of environmental issues is low. Environmental problems such as pollution, water contamination etc. can happen anywhere, but the risk increases in countries where the law is weak or poorly enforced.

Environmental Policy

We regard the care of the environment as an integral part of running a responsible and successful business. We therefore conduct our business activities in a way that reduces as much as is reasonably possible the direct and indirect impact on the environment, while at the same time promoting those practices which protect the environment and support sustainable development.

We are fully committed to ensuring full regard is made of the impact our operations may have on the environment both at a group and local level.

In carrying out our business activities we endeavor to:

- Ensure appropriate use of resources and materials.
- Minimize waste and encourage re-use and recycling.
- Ensure safe handling and disposal of products.
- Maintain environmental management systems.
- Communicate our commitment to the environment across our Group.

Health and Safety Policy

We continue to promote a positive health and safety culture throughout our Group. We have a duty to employees, customers and others involved in our businesses (contractors, suppliers etc.) to make sure our retail outlets, warehouses and offices are safe places to work. We view standards of health and safety required by law as only a minimum. We continuously seek to exceed legal requirements by:

- Having operational safety policies for each business and ensuring their effective implementation through local business teams.
- Ensuring health and safety is given the same importance as all other business matters and that it is not cash constrained.
- Seeking best practice throughout our businesses by, among other things, identifying work place hazards, prioritizing risks, and in ensuring we have appropriate control measures in place to minimize those risks.
- Fostering a culture where health and safety is always on the agenda.
- Continuously reviewing risk assessments and accident statistics for businesses across our Group to sustain a culture of prevention.
- Ensuring that health and safety training is provided for employees so that they can fulfil health and safety responsibilities and duties allocated to them. We believe that excellent health and safety standards contribute to the development of our employees, our key resource, and lead to excellent business performance.



Privacy of Personal Information

We are committed to protecting the privacy and confidentiality of the personal information of our customers and employees. Such personal information may only be collected, accessed, used, disclosed, transferred and maintained (collectively, "Process") in a secure, ethical manner and in accordance with all applicable laws and regulations ("Privacy Laws"). We only permit Processing of personal information in accordance with the foregoing principles, and if necessary for authorized business purposes, and we strictly prohibit Processing of such information for personal knowledge or gain. You confirm you will not pass personal information to a third party without prior specific or general written authorisation from us. You therefore warrant and undertake that you will only Process personal information you obtain from or on our behalf in a secure manner, in accordance with all applicable Privacy Laws, and only as necessary to provide authorized services to us. You further warrant and undertake that you have and shall maintain adequate policies, procedures and processes, including workforce training, to protect the privacy and security of the personal information of our customers and employees and to ensure that you only Processes such information as provided in this Declaration of Compliance. At the end of the provision of services we will decide whether the personal information should be deleted or returned to us, and that you will delete any existing copies unless you have a legal obligation to store such personal information

Please tick this box if you are Processing Personal Data (as defined by the General Data Protection Regulation 2018) as part of the contracted services. If you have ticked this box please complete the Record of Data Processing form on page 5.

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 (collectively "ABAC Laws").

We do not permit bribery in any form, regardless of differing business cultures and traditions in the countries in which we conduct our business.

"Bribery" and "Bribes" are defined as follows: as a general matter, a bribe is an offer to pay, a payment, a promise to pay, or the authorization of payment of something of value whether directly or indirectly, for an improper purpose. Such improper purposes include influencing any act or decision of a government official in his or her official capacity or to secure any other improper advantage in order to obtain or retain business. Such improper purposes also include inducements or rewards for obtaining favorable treatment, and gaining any commercial, contractual, regulatory or personal advantage. A bribe is also the act of receiving something of value under similarly improper circumstances. Apart from money, bribes can occur in a variety of contexts, including loans, gifts, travel and entertainment, the hiring of certain relatives and political and charitable contributions.

We are committed to upholding all laws relevant to countering bribery and corruption in all jurisdictions in which we operate, including the implementation of the necessary processes, policies and procedures to prevent bribery being committed on our behalf.

Bribery is illegal, and we continue to adopt an approach of zero tolerance to bribery and corruption. You therefore warrant and undertake that:

- you shall not engage in any activity, practice or conduct which (i) would constitute an offense under any ABAC Laws (ii) could implicate us in an offense under any ABAC Laws or (iii) is otherwise contrary to any ABAC Laws;
- you have, and shall maintain in place, adequate procedures designed to prevent any person from undertaking any conduct that would give rise to an offense under any ABAC Laws;



- you and each of your employees, directors, officers, subcontractors, agents and representatives that shall do anything on your behalf in relation to:
 - your selection as the supplier; or
- the performance of your obligations to us, has not taken, and shall not take, in the name of, for the account of or on behalf of us, any actions in furtherance of (and it has not omitted to and shall not omit to take any action preventing):
 - an offer, payment, gift, promise to pay or give, or authorization of the payment or giving of any money or anything else of value to any public official or to any other person or entity; or
 - the request for, agreement to or acceptance of any payment, gift, money or anything else of value, in each case, which constitutes a breach of any ABAC Laws;
- you shall keep accurate and detailed books, accounts, and records on all business activity conducted pursuant to your relationship with us; and
- from time to time, and with reasonable request, you shall confirm in writing that you have complied with these undertakings and shall provide access to such people and/or information reasonably requested by us in support of such compliance.

On behalf of I confirm that we can meet the same or similar requirements, agree to give the warranties, as detailed in the standards above, and that I have authority to sign this document on behalf of my company.

Signature.....

Name.....

Jobtitle.....

Date.....



Record of Data Processing

Name of Supplier:

Name of WBA entity: Internal Information and to be completed by Walgreens Boots Alliance

Nature of Services:

Date of completion of this record:

Data subjects

The personal data transferred concern the following categories of data subjects (please specify e.g. customers, patients, employees, etc):

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Types of Personal Data

The personal data transferred concern the following categories of data (please also specify and state whether any sensitive or "special category" personal data is processed e.g. race, ethnic origin, political opinion, religious beliefs, trade union membership, genetics, biometrics, health, sex life, sexual orientation etc):

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Processing operations

The personal data transferred will be subject to the following basic processing activities (please specify the scope, nature and purpose of processing e.g. describe the nature of the services relating to personal data):

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Duration

The personal data transferred will be subject to the above processing activities for (please specify period of time):

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