

# Human Rights Policy

## 1 Purpose

Elanco Animal Health and its affiliates (“Elanco” or “the Company”) works in a complex legal and regulated environment. Upholding and advancing internationally-recognized human rights across our global operations and supply chain is an important component of Elanco’s business operations – as we strive to improve the health of animals, benefit our customers, strengthen our communities, and fulfill our employee promise of an inclusive culture.

## 2 Scope

This policy applies to Elanco and its direct and indirect subsidiaries, joint ventures and affiliates worldwide, and outlines the principles and procedures guiding our global commitment to human rights. Our approach draws upon guidance from important 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 Pharmaceutical Supply Chain Initiative (PSCI) Principles for Responsible Supply Chain Management, as well as applicable local laws.

We also expect our suppliers and other third parties working on Elanco’s behalf (collectively our “Business Partners”), to commit to compliance with the principles set out in this policy and to implement appropriate processes to respect human rights, including prohibitions on modern slavery, child labor and forced labor. When requested to do so, we expect our Business Partners to provide information on how they comply with these principles. These obligations and others are laid out in our [Business Partner Code of Conduct](#).

## 3 Policy

As a company with global operations, we are committed to legal and ethical conduct, and following all relevant laws and regulations in the jurisdictions in which we operate. We govern our business with the highest ethical standards, while creating a space where all employees feel safe, respected, empowered and invested to make a difference in society. Abiding by this policy is part of our performance management process for every employee. All officers, Board of Directors members and employees have a shared responsibility to conduct business the right way, every day.

The [Elanco Code of Conduct](#) highlights our core values of integrity, respect and excellence. It outlines our ethical principles and expectations for the way Elanco employees deliver on our promises, embrace our responsibilities, and hold one another accountable for our actions.

### 3.1 Human Rights Principles

Consistent with our Code of Conduct and Business Partner Code of Conduct, Elanco employees and our Business Partners shall abide by the following principles:

- **Anti-bribery:** We have zero tolerance for any form of bribery, corruption, kickback, or extortion in our operations or in our dealings with others. We do not offer, provide, authorize, or accept anything of value,

or give the appearance that we do, to inappropriately influence a decision or create an unfair advantage. Pursuant to our Anti-Bribery and Anti-Corruption Policy, Elanco complies with the requirements of the U.S. Foreign Corrupt Practices Act, the UK Bribery Law and any other country-specific anti-bribery and/or anti-corruption laws.

- **Child labor:** We comply with local minimum age laws and requirements in all jurisdictions and do not employ forced or unlawful child labor in any of our facilities or programs.
- **Development opportunities:** We are passionate about equipping employees with the skills to succeed in their roles. We provide employees regular performance feedback, as well as learning and development opportunities to help advance their careers.
- **Due diligence:** We conduct due diligence on new Business Partners based on an estimated spend threshold prior to beginning a business relationship. This includes anti-corruption due diligence on certain Business Partners who interact with or transact business on Elanco's behalf with animal health providers and government officials – as well as broad due diligence regarding multiple environmental, social and governance (ESG) topics, when appropriate. We then conduct ongoing monitoring of Business Partners for the appropriate topics throughout the term of our business relationship.
- **Equal opportunity and non-discrimination:** Elanco is committed to a culture of purpose – an inclusive safe harbor built upon mutual understanding, value and respect where employees can bring their whole selves to work and have the opportunity to grow. We adhere to fair employment practices and value diversity of thought, backgrounds, experiences, skills and perspectives. We promote equal opportunity for all and have zero tolerance for discrimination on the basis of race, color, age, pregnancy, gender, sexual orientation or gender identity, ethnicity, disability, religion, political affiliation, union affiliation, marital status or other dimensions of difference protected by law in the jurisdictions where we operate.
- **Forced labor:** We do not use or accept any form of forced or compulsory labor including any work or service delivered under threat of punishment, or prison, indentured, bonded or slave labor, or similar practices. We comply with all applicable working hours and paid leave laws or agreements in the jurisdictions in which we operate.
- **Freedom of association:** We respect the rights of workers to associate freely, join or not join labor unions or workers' councils and/or pursue collective bargaining agreements.
- **Privacy:** We responsibly manage the personal information entrusted to us, whether it belongs to an individual or an organization, as outlined in the [Elanco Global Privacy Notice](#).
- **Wages and benefits:** We comply with all applicable wage, overtime, and benefits laws. We invest in our workforce by offering competitive salaries, incentives, and benefits. We are committed to equitable, pay-for-performance compensation for all employees, and we benchmark annually to ensure our compensation and benefit programs remain competitive with our peers.

- **Workplace health, safety, and security:** Harassment or violence of any kind is forbidden in our workplace. We maintain security systems, processes, and teams to physically protect our people and assets. We maintain a workplace that promotes the safety and security of our employees and assets. All business units are required to adhere to our global health, safety and environment policy and associated operating standards – which align with internationally recognized management systems such as ISO45001, ISO14001, the American Chemistry Council Responsible Care Management System, the Occupational Safety and Health Administration Voluntary Protection Program, as well as PSCI.

### 3.2 Practices & Procedures Supporting Human Rights

We always comply with applicable national law. In cases where international human rights are restricted by local laws, we strive to promote the principles behind the international standards without conflicting with local laws. Where local laws exceed international standards, we will comply with them.

We utilize the following to uphold these human rights principles in our operations and supply chain:

#### ***Contractual arrangements***

Contract terms and the monitoring and reporting of Business Partner performance strengthens our ability to hold our Business Partners accountable for their human rights performance. Elanco's contracts typically contain provisions by which each contracting party undertakes to continuously comply with all applicable laws and regulations as well as our Business Partner Code of Conduct. In these contracts we seek to include commitments that support PSCI principles such as prohibitions on modern slavery, child labor and forced labor.

#### ***Disclosures***

In required jurisdictions, we also file annual modern slavery statement(s) or report(s) explaining how we address modern slavery risks or impacts. These statements are also posted on our global [ESG Reporting web page](#).

Human rights risks, if financially material, would be 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, in consultation with our Corporate Secretary and General Counsel.

#### ***Due diligence***

In alignment with the UN Guiding Principles on Business and Human Rights, we acknowledge that human rights due diligence helps us proactively identify and manage actual or potential human rights impacts. We assess and act on any findings, track responses, communicate how impacts are addressed and integrate learnings into ongoing managerial processes.

In our own operations, numerous policies and programs support the rights of our employees by promoting equal opportunity, a diverse and inclusive work environment, meaningful training and development programs, a safe and inclusive work environment, fair remuneration and quality benefits, and appropriate grievance mechanisms.

We conduct anti-corruption and other human rights due diligence prior to engaging in work with Business Partners that meet certain pre-determined criteria, and we continually monitor them for signs of forced labor. We also monitor Business Partners for red flags related to corruption and bribery; data privacy and protection; human rights; modern slavery; forced labor, child labor; fair labor; diversity, equity, and inclusion; employee safety and security; animal welfare; conflict minerals and environmental sustainability.

We are aware implementation of human rights due diligence across our own business operations and across our value chain is an ongoing process. We will review our strategic approach and measures with a goal of continuous improvement.

***Performance evaluation and audit***

Due to the highly regulated environment in which we operate, Elanco and many of our Business Partners are routinely audited and inspected by relevant authorities. PSCI audits assess performance against the [PSCI Principles](#), and their scope may include the areas of ethics, labor, health and safety, environmental protection, and management systems.

Elanco global specialist functions for ethics and compliance; ESG and sustainability; legal; health, safety, and environment; manufacturing and quality; procurement; supply chain and others provide ongoing monitoring of our human rights program and guidance to our business and employees. Various functions conduct or monitor audits and inspections of current and potential business partners.

***Risk analysis***

We incorporate the results of our various risk analyses into relevant business processes – in particular, our supplier management system. Where risks exist, we strive to implement suitable mitigating or preventive measures.

***Sourcing***

We recognize that in conflict-affected or high-risk areas, the mining and trade of certain minerals known as “conflict minerals” utilizes forced labor, generates other serious human rights abuses, corruption or funds armed or criminal groups. We source materials responsibly and through our Business Partner Code of Conduct expect our business partners to do the same – by conducting due diligence to confirm materials provided to us are not sourced from conflict-affected areas or contributing to human rights abuses, corruption, or the funding of armed groups.

***Supply chain management***

Through our PSCI membership, we are dedicated to responsible supply chain management and sustainable business practices across our owned and contracted network of facilities and in our relationships with business partners.

Elanco’s Business Partner Code of Conduct outlines our requirement that our Business Partners adhere to all applicable laws, articles of incorporation, regulations, and ordinances regarding national and international, cross-border anti-bribery and anti-corruption laws. The Business Partner shall ensure Elanco is not exposed to breaches of applicable anti-bribery and anti-corruption laws.

***Training***

Our annual required employee training includes anti-harassment and Code of Conduct training addressing many of the requirements of this policy. All employees are encouraged to Speak Up and report concerns without fear of retaliation.

## 4 How to Raise a Concern

At Elanco, we foster a culture of integrity and doing the right thing in the right way. We encourage all Elanco employees, customers, and Business Partners to report any known or suspected violation of our Code of Conduct or any ethics and compliance policies, including human rights violations. We do not tolerate retaliation in any form against persons who report a known or suspect violation in good faith.

- Elanco employees may raise concerns with any member of management, Human Resources, or a member of our ethics and compliance team.
- Elanco employees, customers and Business Partners can also raise a concern through Elanco’s established reporting channel, [IntegrityLine](#), which is available 24 hours a day, seven (7) days a week by telephone or online. It is a convenient and confidential way to report issues, concerns, or behaviors that could harm Elanco or those we serve. Reports may be made anonymously, where allowed by law.

We take each report seriously, responding timely and thoroughly to each allegation. Translation services are available. All matters raised are treated with confidentiality and urgency.

## 5 Policy Governance

We will follow applicable local laws on the designation of persons responsible for monitoring our human rights program and comply with local reporting obligations. Upon review and consultation with our General Counsel and Chief Compliance Officer, human rights violations within our operations and any remediation plans will be reviewed as appropriate with Elanco senior leaders and the Board of Directors.

## Approvals

Approver	Chief Compliance Officer	Owner	Head of Ethics and Compliance
Last Approved	November 2023	Policy Area	Ethics and Compliance
Effective	November 2023	Applicability	Global
Last Revised	November 2023	Next Review	November 2024