



ENVIRONMENTAL, SOCIAL AND GOVERNANCE (ESG) POLICY STATEMENTS

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Policy statements effective from January 27, 2025

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These policy statements are reviewed annually by the Walgreens Boots Alliance (WBA) Environment, Social and Governance (ESG) Committee and Policy Governance Committee. The ESG and Policy Governance Committees consist of members of the WBA senior leadership team which includes the Chief Operating Officer International, WBA Chief Administrative Officer International, Corporate Secretary, Global Chief Compliance and Ethics Officer, Executive Vice President and Chief Human Resources Officer, SVP and Managing Director, Boots, Global Controller and Chief Accounting Officer, Executive Vice President and Global Chief Legal Officer, Senior Vice President and Chief Corporate Affairs Officer, , Executive Vice President and President, Walgreens Retail and Chief Customer Officer WBA Vice President ESG & DE&I International, and Vice President Sustainability & HR Business Planning.

These policy statements apply to all Segments, Businesses, and Global Functions.

In addition, WBA requires companies in which WBA has a controlling interest and all parties acting on behalf of WBA or its subsidiaries, including consultants, agents, suppliers, intermediaries, or representatives to uphold the principles outlined in this policy and to develop specific policies, procedures and standards to that end.

The Nominating and Governance Committee has overall responsibility for ESG at WBA. The Audit Committee has responsibility for the relationship with our auditors, currently Deloitte, and has oversight of governance and reporting requirements. The WBA Finance team chooses our ESG assurance partner based on our financial auditors.

All businesses within WBA need to have a designated ESG Lead and Champion. Training is mandatory for the designated ESG Leads and ESG Champions. Specialist training is undertaken on latest innovations, regulations and thinking. For others where ESG is part of a broader role, training is encouraged but is not mandatory.

The Company aims to ensure the seamless transition or integration for any business partner and entity acquired¹ by the Company and to quickly and effectively establish ESG data and reporting standards compliance and alignment to all ESG policies. There are four key phases:

1. In the first year of an acquisition, the acquired company is required to report on the documented Healthy and Inclusive Workplace metrics following the definitions document provided by Global Accounting;
2. The year after acquisition, the acquired company is required to report on all areas of ESG (Healthy Community, Healthy and Inclusive Workplace, Sustainable Marketplace, Healthy Planet);
3. The acquired business must produce a signed certification provided by Global Accounting. The business' Chief Financial Officer or highest-ranking finance officer, Chief Human Resource Officer or highest-ranking HR officer, and ESG Champion all need to sign the document;
4. The business must appoint an official ESG Champion prior to submission of their first ESG data pack. The ESG Champion is not required to hold an ESG title or serve in the capacity of an ESG role within the business. This role includes sign-off on Q3 and Q4 data packs and compilation of the business' annual ESG Targets.

The ESG Champion for the acquired entity will be responsible for alignment to the above process and will provide feedback and compliance updates to the VP, ESG and DEI, International or VP Sustainability & HR Business Planning (U.S.) depending on geographic location.



Corporate and Community Giving Policy Statement

Walgreens Boots Alliance believes that relationships with organizations make a positive impact on the lives of our neighbors, our local communities, our planet, and our society. In line with our Environmental, Social and Governance (ESG) community goals, we partner with organizations that support the physical and mental health wellbeing and vitality of the communities we serve and of vulnerable communities around the world, that enable young people to achieve their potential, that work to fight cancer, and that combat hygiene poverty. We have a strong focus on health equity.

We engage with communities through frequent dialogue, response to their needs and incorporation of their feedback on our programs. We communicate the results and impacts of our partnerships and programs, and regularly review our initiatives.

Our partnerships aim to empower our customers and energize our employees to give back and to have an impact on the health, wellbeing, and vitality of the communities we serve and of vulnerable communities around the world.

Walgreens Boots Alliance partners with qualifying organizations that meet our purpose, values and ethical standards, as laid down in the [WBA Code of Conduct and Ethics](#). We support these qualifying organizations with financial (e.g., sponsorship, product donations) and non-financial donations (e.g., employee volunteering) as well as through fundraising activities. Organizations are selected by WBA businesses and donations are permitted only if the following requirements are met:

- It is clear and agreed how and where the donation will be used to support the qualifying organization's bone-fide mission.
- The qualifying organization has a specific focus on at least one of the following:
 - improving access to health, educational and wellness programs; or
 - improving the standard of care and quality of life for patients and consumers through medical research, treatment, or services for specific diseases; or
 - civic and community outreach; or
 - WBA's long term ESG goals (please refer to <https://www.walgreensbootsalliance.com/environmental-social-governance>);
or
 - emergency or disaster relief.
- The purpose, values and ethics of the qualifying organization are in line with Walgreens Boots Alliance's ESG strategy, long term ESG goals, and/or business interests.
- Donation requests from the qualifying organization provide sufficient detail to assess that the contribution will be used solely for reasonable and necessary costs that are directly related to its charitable mission.

When a relationship with a qualifying organization is considered strategic in nature, a strategic partnership may be formed. Regularly, our businesses review their written agreements with strategic partners to ensure that clear ambitions and targets remain in place and carry out a performance review including an assessment of the social impact of the partnership.



Environment Policy Statement

Walgreens Boots Alliance regards the care of the environment as an integral part of running a responsible and successful business. We therefore seek to conduct our business activities in a way that reduces as much as is reasonably possible our direct and indirect impacts on the environment, while at the same time promoting practices that help to protect the environment and support sustainable development. Walgreens Boots Alliance is committed to reporting annually on environmental, social and governance issues and progress.

Walgreens Boots Alliance is committed to ensuring that due consideration is given to the impact our operations have on the environment at all levels. Walgreens Boots Alliance has in place a WBA Governance and Oversight Policy with a dedicated section for Environmental that includes expectations for every location, function, department and team members related to the management of environmental matters and to drive ongoing improvements even when it exceeds local legislative requirements¹. In addition, the Company maintains environment-related objectives that are tracked and monitored and cascaded to each business to align with local objectives and initiatives. Each operating segment is responsible for continuously demonstrating its management of environmental matters. Monthly reports are provided to select WBA executives, offering insights into environmental incidents across operating segments.

In carrying out our business activities, Walgreens Boots Alliance endeavors to:

- engage in due diligence processes, including environmental, as it relates to mergers, acquisitions divestiture activities, and new business initiatives;
- responsibly source the materials, water and energy that we use – we hold suppliers and vendors for our owned brand products and our goods not for resale to our own environmental standards;
- promote and encourage re-use and recycling where practical, and ensure responsible management of any unavoidable waste materials;
- minimize impacts from emissions or wastes that cannot be avoided;
- provide our people access to environmental management systems, information and resources to manage and support our objectives;
- be transparent and open with our customers and other stakeholders;
- regularly consult with internal and external stakeholders to seek feedback on our performance in areas where we have environmental and social impact; regularly complete internal and external environmental audits;
- seek to continually improve the environmental performance of our operations;
- ensuring compliance with relevant environmental laws and regulations;
- seek to educate and empower our customers on key environmental issues such as waste and carbon emissions reduction by introducing new innovations and solutions such as recycling schemes and online healthcare services.

¹Given the global footprint of our operations, local legislative requirements will vary by market



Health and Safety Policy Statement

As a global leader in pharmacy-led, health and wellbeing retail, Walgreens Boots Alliance puts safety at the heart of its business. Walgreens Boots Alliance is committed to the safe dispensing of medicines, to the sale of high-quality health and beauty products and to the wholesaling and distribution of products in a safe environment, including through when providing healthcare services through our Walgreens Health segment.

Walgreens Boots Alliance is also committed to conducting its worldwide business operations with the utmost concern for the health and safety of all team members, customers, business partners, contractors, and the general public. A safe work environment is a shared responsibility of the Company and each employee.

Walgreens Boots Alliance fully recognizes its duties under the relevant health and safety regulations in the countries in which it operates. The Company strives always to achieve best practice in health and safety management. Walgreens Boots Alliance has in place a WBA Governance and Oversight Policy with a dedicated section for Health & Safety that includes expectations for every function, department and team member related to the management of health and safety matters and to drive ongoing improvements even when it exceeds legislative requirements. Each operating segment is responsible for continuously demonstrating its management of health and safety. Monthly reports are provided to select WBA executives, offering insights into health and safety incidents across each operating segment. Walgreens Boots Alliance strives to apply high quality, appropriate risk-based standards of management and control throughout the Company worldwide to ensure that anybody in contact with our operations, services and products is safeguarded.

Walgreens Boots Alliance encourages open dialogue and constructive feedback from all stakeholders to ensure the achievement of best practice in the management of health and safety in all business operations.

Each Business is required to have in place comprehensive formal governance processes for health and safety matters in the business operations for which it is responsible. New employees, including pharmacists and pharmacy techs are required to complete annual health and safety trainings based on their local requirements. WBA has systems in place to monitor training requirements and completion compliance.



Human Rights Policy Statement

Walgreens Boots Alliance recognizes that it has a responsibility to respect human rights, and this is a core part of our corporate sustainability mission. We are committed to respecting and upholding the dignity, wellbeing and human rights of every individual affected by our business activities including our customers, employees, workers in our supply chain and local communities.

This commitment applies to all Walgreens Boots Alliance affiliates and extends to respecting all internationally recognized human rights as set out in:

- the International Bill of Human Rights; and
- the core labor standards recognized by the International Labour Organization (ILO), as set out in the ILO Declaration on Fundamental Principles and Rights at Work.

Consistent with our commitment to respect ILO core labor standards, we respect freedom of association and the right to collective bargaining. We support the elimination of all forms of forced or compulsory labor, the effective abolition of child labor and the elimination of discrimination in respect of employment and occupation. Additionally, we are committed to respecting the ILO conventions on labor standards on working hours and health and safety of workers.

We also respect the rights of individuals belonging to groups or populations that may be particularly vulnerable to adverse human rights impacts, including indigenous persons; women; children; national, ethnic, religious, and linguistic minorities; LGBTQ+ people; persons with disabilities and migrant workers and their families.

In meeting our responsibility to respect human rights, we consider relevant international human rights standards including the United Nations (UN) Guiding Principles on Business and Human Rights and the Organization for the Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises. We are also a signatory of the UN Global Compact.

We are committed to working collaboratively with our stakeholders and other businesses on human rights to inform our approach.

Embedding respect for human rights

We take appropriate steps to ensure our commitment to operating with respect for human rights is reflected in all relevant aspects of our business operations and is integrated in key company policies and procedures, including our Code of Conduct and Business Ethics and our Ethical Trading Standards.

We aim to identify, assess and manage the human rights impacts of our business activities based on the operational context, our leverage and business relationships. To this end, our primary focus is on our own operations, suppliers and business partners, although we aim to also prevent and



mitigate adverse human rights impacts throughout our value chain. We recognize that human rights may be impacted by many different business activities, therefore we require our businesses and segments to carry out appropriate due diligence to identify human rights risks and impacts. Where national law and international human rights standards differ, we will follow the higher standard; where they are in conflict, we will adhere to national law, while seeking ways to respect international human rights relevant to our operations.

Remedy

We do not tolerate, nor condone, human rights abuses in any part of our business and supply chain and will fully investigate any alleged breaches of human rights. We place importance on the provision of effective remedy wherever human rights impacts occur through company-based grievance mechanisms. We encourage anyone who works for or on behalf of Walgreens Boots Alliance to speak up, without fear of retaliation, about any complaints or concerns they may have in relation to human rights. We expect our suppliers and business partners to make the same commitment.

We commit to promoting a grievance mechanism for colleagues to raise complaints or concerns. We would never impede access to state-based judicial or non-judicial mechanisms for individuals or communities who feel their human rights have been impacted.



Product Testing Policy Statement

No animal testing is undertaken by Walgreens Boots Alliance.

For our own product brands:

- We do not conduct animal testing on products, or on ingredients used in these products;
- We do not commission animal testing on these products or on ingredients used in these products.

Some local markets reinforce this commitment to no animal testing through certification to recognized consumer-facing 'cruelty-free' standards.

Until satisfactory replacements are available, and all regulatory authorities stop requiring animal tests, we recognize that other companies may continue to carry out some animal testing in order to meet certain regulatory requirements and to protect the health of consumers.

As a result, suppliers of ingredients, components and finished goods used in Walgreens Boots Alliance may have to or continue to carry out tests on animals. Recognizing that it is necessary to develop validated alternative methods, we give financial and technical support to the development and introduction of alternative methods.



Product Transparency Policy Statement

Walgreens Boots Alliance endeavors to sell safe, effective, accessible and affordable retail products, and to market and communicate their benefits responsibly. Customers trust us to provide them and their families with products that are safe for their intended use.

We seek to address safety concerns with high priority. We follow three principles in our communications with consumers:

- Building trust through responsible practices and through transparent communication, both directly to consumers and indirectly through other key stakeholders and thought leaders;
- Selling products that are diligently analyzed for compliance with all applicable laws and regulations, and accompanied by appropriate information on their intended use, including any significant risks associated with that use;
- Helping consumers better understand what is in the products we sell, and being transparent about the ingredients, nutritional value and health and beauty properties of those products, communicating openly through product labels, our websites, leaflets and/or other means.



Walgreens Boots Alliance Responsible Chemical Management Strategy Policy Statement

Scope:

WBA is committed to responsible chemicals management¹ and goes beyond regulatory requirements by adopting positions on unregulated chemicals such as prohibiting, eliminating, substituting or restricting chemicals in products where we have identified a cause for concern.

WBA has replaced the current Restricted Substance List (RSL) with an updated [WBA Restricted Substances List](#).

The WBA Restricted Substances List contains chemicals of concern that must not be intentionally added, to any WBA product. Additionally, it also lists Chemicals of Concern that require specific restrictions on their use to ensure the safety of the consumer and/or the environment.

The WBA Restricted Substances List takes into account all of the following parameters:

- Potential to cause harm to the consumer and/or the environmental in both the short and long term;
- Sustainability credentials of the chemical;
- Future regulations to prohibit or restrict a chemical;
- Consumer insights into the use of a chemical;
- Potential for regrettable substitution² and the need for safer and effective alternatives.

The WBA Restricted Substances List also contains those chemicals identified by WBA that (i) require action to prohibit or restrict within a defined time period, or (ii) do not as yet have a formal WBA decision on whether to prohibit or restricted but will be closely monitored with a view to adding to the WBA Restricted Substances List at a future date

The WBA Restricted Substances List is subject to continuous review and will consider new and emerging scientific and regulatory information with the aim of keeping it up to date and relevant at all times. WBA will annually measure and report progress against compliance to the Chemical Action List.

The safety of our customers and the environment in which we live is at the core of WBA and we aim to provide our consumers with chemical information that is comprehensive, understandable, and meaningful in order to enable them to make informed choices. Beginning with our formulated Cosmetic (Baby, Beauty, Personal Care) and Household Cleaning products, we provide the consumer with an accurate list of all the intentionally added ingredients present, with the ultimate aim of avoiding generic terms such as “parfum”/“fragrance” wherever possible, either on their respective product labels and/or via digital channels, as appropriate.

WBA pursues a long-term goal of providing our consumers with more information on the chemicals used within other product categories.



WBA strongly encourage its suppliers to investigate safer alternatives where they are using a chemical listed within the WBA Chemicals Action List. Additionally, we actively encourage our suppliers to obtain credible third-party certifications, for example EPA Safer Choice, Cradle to Cradle Certified[®], Blue Angel or Nordic Swan, that allows our consumers to find more sustainable products.

WBA supports the principles of Green Chemistry and looks to collaborate with partners, both within and outside of the value chain to innovate and develop safer and non-regrettable alternatives to chemicals of concern.

¹ This policy applies to all formulated Cosmetic (Baby, Beauty and Personal Care) and Household Cleaning products sourced for retail sale by all of WBA's Segments and Businesses and any entity in which the Company has a controlling interest, all cross-Segment Functions and the Global Function(s).

² Regrettable Substitution: "Substituting use of a toxic chemical in a product or process with another toxic chemical. Regrettable substitutions occur when decision-making is based on an insufficient amount of data on, or minimal attention paid to, the safety of the chemical substitute."



Anti-Bribery and Anti-Corruption Policy Statement:

Walgreens Boots Alliance (“WBA”) strives to maintain high ethical standards and requires 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.

Bribery and corruption can have serious consequences for our communities and company. As a result, WBA’s reputation, and that of its employees, relies on recognizing potential warning signs related to bribery and corruption; refusing to tolerate bribery or any other form of corruption; and speaking up to report potential violations of the Company’s ABAC Policy or any other related concern.

Core Principles:

- We do not pay bribes or make other improper payments. WBA will not (directly or indirectly) offer, promise, authorize, facilitate, or give a bribe, kickback, or other improper payment to any healthcare professional, private individual, charitable / non-profit / non- governmental organization, company, government official, or any other party;
- We do not accept bribes or other improper payments. WBA will not (directly or indirectly) authorize, accept, or agree to accept any kind of bribe, kickback, or other improper payment;
- We conduct risk-based due diligence prior to entering into relationships with third-party vendors, agents, and other partners;
- We permit only modest and appropriate business courtesies that meet the standards and requirements outlined in the Company’s ABAC Policy;
- We prohibit facilitation payments;
- We maintain accurate corporate books and records and proper internal accounting controls over all of the Company’s transactions;
- Our team members are obligated to report any concern or any suspected violation of the Company’s ABAC Policy.