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Chemical Policy Statement and Restricted Substances List

Walgreens Boots Alliance is committed to continuing to drive transparency and proactive chemicals management for the products we sell, starting with our owned brands, in order to enable us to develop more sustainable products and to ensure consumers continue to be provided with meaningful product sustainability and safety information.

Where ingredients are regulated we expect all our suppliers to comply with regulation. In addition to meeting relevant regulatory requirements in the markets we operate in around the world, Walgreens Boots Alliance will monitor progress against this Chemicals Management Policy Statement and will communicate progress annually in our Corporate Social Responsibility (CSR) Report which is available on our website.

Supply Chain Transparency: Walgreens Boots Alliance will strive for increased levels of visibility into the chemicals used in the products we sell, starting with our owned brands.

- Walgreens Boots Alliance will pursue a long-term goal of full ingredient transparency, including generic terms such as ‘fragrance,’ for Walgreens and Boots owned brand and exclusive consumer retail formulated products in the baby, beauty, personal care, and household cleaning product categories. Annually, we will measure and report our progress toward fuller ingredient disclosure.
- Walgreens Boots Alliance aims to continually improve product transparency and will add additional product categories to achieve a more comprehensive impact over time.

Chemicals Management for More Sustainable Products: Walgreens Boots Alliance will collaborate with partners across the value chain to help develop and implement practices and tools that facilitate the management of chemicals in order to offer more sustainable products. Beginning with Walgreens and Boots owned brand and exclusive consumer retail formulated products in the baby, beauty, personal care, and household cleaning product categories, we will utilize our own Restricted Substances and Chemical Stewardship Lists – as described below - which are in turn informed by third-party stakeholder and regulatory chemical lists.

- Walgreens Boots Alliance Restricted Substances List: The restricted Substances List identifies chemicals that are prohibited from use. - It is our intent to work collaboratively with our suppliers to address these identified chemicals of concern and to facilitate the elimination of these materials through reformulation of products, by the end of 2021. In moving to eliminate these substances, we encourage suppliers to select ingredients identified as Safer Chemicals by the U.S. Environmental Protection Agency (EPA) Safer Choice program, or to use EPA Safer Choice criteria or ChemSec safer alternatives marketplace to evaluate and select safe substitutions. Annually, we will report the percentage of owned brand products in these product categories that do not contain chemicals on our Restricted Substances List.
- Walgreens Boots Alliance Chemical Stewardship List - We have a well-developed list of chemicals that we are monitoring and that, over time, we are looking to prohibit and/or restrict across our product portfolio. This list will be used to update our Restricted Substances List.
We also expect suppliers of third party formulated products to monitor the use of chemicals identified on our Restricted Substances List.

**Transparent and Meaningful Communication**: We aim to provide consumers with chemical information that is comprehensive, understandable, and meaningful in order to enable them to make informed choices.

- Walgreens Boots Alliance will continue to list intentionally added ingredients in all Walgreens and Boots owned brand and exclusive consumer retail formulated products in the baby, beauty, personal care, and household cleaning product categories on their respective product labels.
- Walgreens Boots Alliance encourages all suppliers of formulated products to endeavor to publicly disclose intentionally added ingredients (either on package labelling or digitally).
- Walgreens Boots Alliance will work to enable consumers to make informed choices by encouraging suppliers to obtain credible certifications (including third-party certifications such as EPA Safer Choice and Cradle to Cradle Certified) and will make it easy for consumers to find these more sustainable products.
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 and our society. In line with our Corporate Social Responsibility (CSR) community goals, we partner with organizations that support the health, wellbeing and vitality of the communities we serve and of vulnerable communities around the world, that enable young people to achieve their potential and that work to fight cancer.

We engage with communities through frequent dialogue, respond to their needs and incorporate 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 child poverty and health and other key areas.

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 Business Ethics. We support these qualifying organizations with financial (e.g. sponsorship) 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;
  - WBA’s long term CSR goals (please refer to https://wbaworldwide.wba.com/web/corporate-responsibility); or
  - emergency or disaster relief.
- The purpose, values and ethics of the qualifying organization are in line with Walgreens Boots Alliance’s CSR strategy, long term CSR 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.

In certain cases, 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.
Diversity, Equity and Inclusion Policy Statement

Walgreens Boots Alliance regards diversity, equity and inclusion as key drivers in our vision to be the first choice for pharmacy, wellbeing and beauty for people and communities around the world. We recognize the significant impact diversity, equity and inclusion have on our overall global business strategy. We leverage the diverse experiences and perspectives of our workforce to serve our customers and patients around the globe and to drive superior business performance. We also believe in equal opportunity and our team members must treat one another with courtesy, dignity and respect, regardless of race, color, national origin, ethnicity, pregnancy and maternity, age, gender, disability, marital status, sexual orientation, religion or belief. Our DEI Vision is to keep diversity, equity and inclusion at the center of everything we do, by:

- promoting and maintaining a culture of integrity, dignity and mutual respect;
- recruiting, retaining, engaging and developing a high performing and engaged workforce with diverse backgrounds, abilities, perspectives and beliefs;
- building a culture of innovation through inclusion;
- prioritizing accessible work environments and providing equal opportunities for all;
- building valued partnerships with external organizations to advance our diversity, equity and inclusion efforts; and
- connecting small and diverse-owned businesses with opportunities to partner with Walgreens Boots Alliance.

Walgreens Boots Alliance employees, customers, patients and partners reflect many diverse cultures and values represented across the globe. Fostering an inclusive work environment positions us to leverage different ways of thinking and working to be successful.
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 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 Global Health, Safety and Environmental Policy that includes expectations for each business related to the environment. 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.

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

- 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 support our objectives
- be transparent and open with our customers and other stakeholders
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 in its pharmacies, to the sale of high quality health and beauty products and to the wholesaling and distribution of medicines in a safe environment.

Walgreens Boots Alliance is also committed to conducting its worldwide business operations with the utmost concern for the health and safety of all employees, temporary workers, 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. Where appropriate, the Walgreens Boots Alliance Health and Safety and Environmental Committee disseminates best practice and drives ongoing improvement, even when it exceeds local regulatory requirements. 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 Division, Business, cross-divisional function and Corporate function is required to have in place comprehensive formal governance processes for health and safety matters in the business operations for which it is responsible.
Human Rights Policy Statement

Walgreens Boots Alliance recognises 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 labour 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 labour standards, we respect freedom of association and the right to collective bargaining. We support the elimination of all forms of forced or compulsory labour, the effective abolition of child labour and the elimination of discrimination in respect of employment and occupation. Additionally, we are committed to respecting the ILO conventions on labour standards on working hours and health and safety of workers.

We also respect the rights of individuals belonging to groups or populations which may be particularly vulnerable to adverse human rights impacts, including indigenous persons; women; children; national, ethnic, religious and linguistic minorities; LGBT+ 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 divisions 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 recognised 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 analysed for compliance with all applicable laws, 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.