

# CENCORA'S FORCED LABOUR IN CANADIAN SUPPLY CHAINS ACT DISCLOSURE STATEMENT

## **Our structure, activities and supply chains**

Cencora, Inc., on behalf of its Canadian subsidiaries (collectively, "Cencora"), which supply goods and services in Canada, is committed to prohibiting modern slavery, human trafficking, including forced labour and child labour, in its business and supply chain. This disclosure statement is pursuant to the *Fighting Against Forced Labour and Child Labour in Supply Chains Act (Act)* and describes the steps that Cencora is taking in support of that commitment.

As an industry leader with over 46,000 team members, we touch nearly every aspect of the pharmaceutical supply chain and recognize that our responsibility includes conducting our business ethically and with uncompromising integrity. We work hard every day to ensure that all applicable laws, regulations and applicable industry standards are followed, and we expect the same from others in our supply chain.

We serve our customers through a geographically diverse network of distribution service centers and other operations in the United States and select global markets. The Canada business drives innovative partnerships with manufacturers, providers, and pharmacies to improve product access and efficiency throughout the healthcare supply chain.

## **Our policies and due diligence processes in relation to forced labour and child labour**

### Code of Ethics and Business Conduct

Our Code of Ethics and Business Conduct provides the foundation for our business culture and underscores our commitment to conducting our business with integrity, accountability and respect for applicable laws. Our Code provides guidance for our employees, suppliers and other business partners on the ethical principles that apply to all of our business activities and relationships. The Code reflects our zero-tolerance policy on ethical violations, and compliance with the Code and all applicable laws and regulations is a condition of employment at Cencora.

The foundation of our Code is the obligation to comply with all applicable legal requirements, including those relating to workplace safety and human rights. Our Code includes specific references to the prohibitions against modern slavery and human trafficking.

### Supplier Code of Conduct

Our Supplier Code of Conduct sets forth the basic expectations with respect to various ethics and compliance matters that we have established for our suppliers, agents, vendors, subcontractors and other business partners that provide goods or services to, or on behalf of Cencora. Many of our suppliers are required by contract to comply with applicable laws and provide us with written certifications that reflect their commitment to abide by the ethical principles set forth in our Supplier Code of Conduct. Cencora is engaged in various initiatives to expand the number of third-party suppliers that are required to provide such contract commitments and certifications.

### Due Diligence Processes

Cencora has devoted substantial resources to conducting due diligence and compliance audits of its key business partners, including certain third-party suppliers and other vendors. In certain circumstances, these procedures include physical site visits and background checks.

We have a corporate sanction screening program that screens all vendors and suppliers for government sanctions, regulatory and anti-bribery and corruption violations, including any infractions of forced labour and/or child labour.

In addition, we have a targeted due diligence program for third parties that provide goods or services on behalf of Cencora. We continue to assess the extent of any exposure we may have to modern slavery or human trafficking risk in our supply chain. Based on the results of these risk assessments, we will establish appropriate due diligence and auditing procedures with third-party suppliers.

### **Steps Cencora has taken to assess and manage the parts of our business and supply chains**

Cencora takes ethics and compliance concerns seriously. Cencora utilizes a third-party vendor to monitor certain categories of suppliers on compliance matters and other social, environmental, or ethical incidents. All reports of potential violations of the Code of Ethics, Company policy and procedures or applicable laws and regulations are fully and confidentially investigated in a timely manner.

Cencora has an auditing, monitoring, and risk assessment process that enables us to assess the effectiveness of our Compliance Program and to identify new potential risks, test existing controls, and implement remediation as needed. The Chief Compliance Officer periodically evaluates the effectiveness of the Compliance Program, approves an audit plan, and allocates resources to audit compliance risks and operational compliance across Cencora. Each year, we update the Code of Ethics to reflect new developments in regulations, policies, and laws in alignment with our business objectives and company structure.

### **Measures taken to remediate any forced labour or child labour or loss of income to the most vulnerable families**

To date, we have not identified any forced labour or child labour in our activities or supply chains and have therefore not taken any remediation measures.

### **Training Cencora provides to employees on forced labour and child labour**

Cencora team members receive annual training on our Code of Ethics and related ethics and compliance policies, which informs our commitment to stopping the use of forced and child labour in our supply chain.

### **Cencora assesses its effectiveness in ensuring that forced labour and child labour are not being used in our business and supply chains**

Suppliers are expected to continually improve their ethics and compliance management systems by setting performance objectives, executing implementation plans and taking necessary corrective actions for deficiencies identified by internal or external assessments, audits, inspections and management reviews.

Cencora has established various mechanisms through which employees and business partners can report concerns about compliance issues to the company without fear of retribution. One such mechanism is ethics reporting managed by an outside vendor which enables employees and third parties to report concerns about compliance issues relating to Cencora's activities on a confidential basis, and reporters can remain anonymous if they wish. All reports are investigated in a timely manner. We also have a strong network of experienced compliance officers, privacy professionals, auditors and investigators, and other assurance function partners who support our compliance work across 50 countries.

This disclosure statement is issued pursuant to the Act for the financial year ended 30 September 2023.

The Report was approved pursuant to subparagraph 11(4)(b)(ii) of the Act by the Board of Directors of Cencora, Inc.

**The business entities covered by this report:**

World Courier of Canada Inc., AmerisourceBergen Specialty Group Canada Holdings, Inc., AplusPharma Ltd., Cameron Stewart LifeScience Canada Inc., HealthForward Inc., Innomar Pharmacy (BC) Inc., Innomar Pharmacy (SK) Inc., Innomar Pharmacy Inc., Innomar Strategies Inc., Pharma One Corporation.

In my capacity as a Director of Cencora, Inc., and not in my personal capacity, I make this attestation in accordance with the requirements of the Act.

In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in the report for the entity or entities listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate and complete in all material respects for the purposes of the Act, for the financial year ending September 30, 2023.

- Full name: Steven H. Collis
- Title: Chairman, President and Chief Executive Officer of Cencora, Inc.
- Date: May 21, 2024

- Signature: 

I have the authority to bind Cencora, Inc.