



Corporate Policy

Human /// *Rights Policy*

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Respecting human rights is a macrosocial task that everyone – governments, companies, and individuals – must take responsibility for. We at Bayer believe that we must strive for a better tomorrow and as such, are fully committed to respecting human rights in all our business operations worldwide, along our entire value chain, and all Divisions and Functions. As a global company and guided by our vision “Health for all, Hunger for none”, we believe that this is an essential requirement for sustainably developing our business.

Our commitment to respecting human rights is based on the United Nations Guiding Principles on Business and Human Rights (UNGPs), which recognize the distinct human rights responsibilities of states and businesses as well as the OECD (Organisation for Economic Co-operation and Development) Guidelines for Multinational Enterprises.

We recognize that, in principle, all our activities and business relationships can impact the entirety of human rights – positively and negatively – and that human rights due diligence is a continuous process. It is our aspiration to improve the lives of everyone through our medicines and nutrition, which contribute to the achievement of the Sustainable Development Goals (SDGs), particularly SDGs 1 (No Poverty), 2 (Zero Hunger), 3 (Good Health & Well-Being), 8 (Decent Work and Economic Growth), and 13 (Climate Action).

Our commitment to respect human rights in all our business operations worldwide, along our entire value chain, and all Divisions and Functions guides our decision-making and constructive engagement both internally and externally. We are committed to ethically and lawfully conducting business in full compliance and recognize our responsibility to remedy under the UNGPs and applicable laws.

Due to the utmost importance of human rights for Bayer this Corporate Policy applies to the entire Bayer Group and provides guidelines for all our activities worldwide.

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Introduction



2.1 Objective

This Corporate Policy sets and communicates our responsibilities, expectations, and commitments regarding human rights along Bayer's entire value chain. It also serves as a guide to all Bayer employees to further enshrine respect for human rights and corresponding behavior in our corporate culture. Additionally, it constitutes as guideline for occasions that may pose a risk to human rights. As such, this Corporate Policy demonstrates our commitment to respect human rights internally and externally and the special significance human rights related matters have to the entire Bayer operations. It complements our existing commitment to human rights which is reflected in other Corporate Policy¹.



2.2 Scope and Target Group

This Corporate Policy applies to all Bayer employees worldwide, including their internal interactions and for interactions with Bayer external business partners, (direct and indirect) suppliers, contractors, customers, consumers, local community members, and government officials.

¹ Please see section 4.1 for a list.



3.1 Our Commitment

Our commitment to respect human rights is based on the UNGPs, which recognize the distinct human rights responsibilities of states and businesses as well as the OECD Guidelines for Multinational Enterprises. This commitment includes internationally recognized human rights as defined by the International Bill of Human Rights and the International Labour Organization's (ILO) Declaration on Fundamental Principles and Rights at Work. The International Bill of Human Rights consists of the following instruments:

- // Universal Declaration of Human Rights (UDHR)
- // International Covenant on Civil and Political Rights (ICCPR)
- // International Covenant on Economic, Social and Cultural Rights (ICESCR)

We always act in compliance with national law. In case of conflict between national law and international standards we follow the higher standard.

Our commitment encompasses respecting human rights along the entire global value chain including all Bayer employees and their interactions with Bayer business partners, (direct and indirect) suppliers, contractors, customers, consumers, local community members and government officials. It also applies to third parties acting on behalf of Bayer or conducting business in facilities owned or operated by Bayer and its subsidiaries. As a global company this is an essential requirement for sustainably developing our business.

Specific standards and responsibilities to respect human rights are outlined in the following:

- // [Corporate Policy No. 1000](#) "Bayer Societal Engagement (BASE) Principles" includes a set of societal rules, a guiding framework, and a message to the public to illustrate our core values.
- // [Corporate Policy No. 1002](#) "Sustainability" outlines our commitment to sustainability and illustrates the integral incorporation of sustainability in our vision, values, strategy and operations.
- // [Corporate Directive No. 1958](#) "Security & Crisis Management" sets a holistic, global, and binding Governance framework and defines the guiding principles of the security and crisis management system for Bayer.
- // [Corporate Policy No. 1986](#) "Corporate Compliance Policy" outlines Bayer's principles of business conduct.
- // [Corporate Policy No. 2055](#) "HSE Management and HSE Key Requirements" demonstrates Bayer's strong commitment to Health, Safety and Environment (HSE) and provides a framework for the HSE management system.
- // [Corporate Policy No. 2090](#) "Fairness and Respect at Work Policy" supports Bayer employees and managers in their efforts to create a fair and respectful work environment.
- // Our [Product Stewardship](#) standards form the basis for securing our business operations through the implementation of stewardship measures and by demonstrating quality management and compliance throughout the product life cycle.
- // The [Supplier Code of Conduct](#) sets forth key social, ecological, and ethical standards that we expect our suppliers and subcontractors to share. To help our suppliers practice sustainability in their daily business, we have developed the [Supplier Code of Conduct Guidance](#)
- // [Corporate Policy No. 1915](#) "Data Privacy" explains the general principles that govern the management and protection of personal data at Bayer. We are committed to protecting the privacy and personal data of all stakeholders. We inform individuals when collecting and processing their personal data, allowing them to make informed decisions and exercise their rights. [In compliance with applicable laws and regulations, we collect and process personal data for specific and legitimate business purposes only and secure such data against unauthorized access.](#)
- // [Corporate Directive No. 3020](#) "Bioethical Principles" outlines the role of Bioethics at Bayer and defines our common ethical standards concerning Research & Development related innovations. It promotes awareness to bioethical benefits and risks, defined clear guiding values and particularly spotlights ethical standards in highly sensitive areas of our human health and agricultural business activities.

Additionally, we develop responsible and innovative practices, including but not limited to the development, testing and implementation of products and services enabled by Artificial Intelligence (AI). It is our position, that AI can only benefit humankind if used responsibly. Therefore, we are committed to deploying AI in a responsible way that is respectful of human rights.



3.2 Our Approach

We recognize that our activities and business relationships can potentially impact human rights – positively and negatively – and that human rights due diligence is a continuous process. Human rights standards guide our decision-making and constructive engagement both internally and externally. In line with the UNGPs, we apply a risk-based approach that also covers current legislation, and builds on existing (internal) processes:

- // We have a risk management system in place that enables a comprehensive risk analysis at least once a year, and ad-hoc, when necessary.² The risk analysis makes human rights risks visible along our entire value chain and enables the identification and prioritization of actual and potential human rights impacts based on the UNGPs and additional materiality aspects. Complementary in-depth risk analyses for identified risk areas are carried out as required.
- // The results from said analysis/analyses are communicated to the Board of Management and further relevant decision makers who are responsible for the integration of identified risks into relevant processes. This enables the development of joint action plans as well as an expedient response in our own operations and our entire value chain, to address and minimize human rights risks and negative impacts. The management of direct suppliers on sustainability matters including human rights and environment, is described in our [approach on improving sustainability practices in the supply chain](#) consisting of four steps from raising awareness based on our Supplier Code of Conduct and contract clauses, to sustainability risk classification, risk-based performance evaluations to development if needed.

- // The human rights risk management approach is subject to continuous monitoring and improvement: Respective responsible persons monitor the implementation of our commitment along the entire value chain and measure the effectiveness of the taken measures to address human rights risks and derive improvement measures where necessary.
- // At Bayer we have different measures in place to build capacity and provide training for our employees and business partners (i.e., “Respecting Human Rights at Bayer” web-based training available to all employees worldwide in several languages).
- // This Corporate Policy shows how we communicate our commitment to human rights and how we assess, monitor and continuously improve our performance on the matter. We document our efforts continuously and summarize our efforts and yearly progress on human rights due diligence within our [Sustainability](#) and [Annual Report](#) as well as within further reporting obligations, such as our [Modern Slavery Act Statements](#).

We engage with civil society groups and stakeholders on ‘business and human rights’ topics. This includes topics involving our company, our products and services, our entire value chain, and our various sponsorships, through which we demonstrate our respect of and for human rights as well as manifest our commitment to human rights in our company culture. Furthermore, we also engage in cross-sector dialogue and collective action to further advance human rights and create valuable synergies.

Additionally, we consistently seek to contribute to the achievement of the SDGs, including but not limited to SDGs 1 (No Poverty), 2 (Zero Hunger), 3 (Good Health & Well-Being), 8 (Decent Work and Economic Growth), and 13 (Climate Action).

² Ad-hoc analyses are carried out if we expect a significantly changed or significantly expanded risk situation (in the supply chain).



4.1 Covered Rights and Obligations

This Corporate Policy addresses corporate and individual decisions and actions which may directly or indirectly affect internationally recognized human rights. We have identified priority risk areas that are relevant across Bayer operations, products and services, and business relationships. Said identified risk areas are based on internationally recognized human rights and reflect relevant human rights topics considering our corporate values and the result of diligent risk analyses that are subject to regular evaluation and updates, whenever necessary³.

Our commitment to respect human rights encompasses rightsholders along the entire value chain, including:

- // Our own employees
- // Our suppliers' employees (direct and indirect suppliers)
- // Our customers and consumers
- // Other potentially affected stakeholders

The human rights issues relevant to our suppliers are specified in our [Supplier Code of Conduct \(Code\)](#). The Code is based on this Corporate Policy and we expect our suppliers to adhere to the principles set forth in the Code and to address these principles further down the supply chain.

The following human rights issues capture our identified human rights priorities.

- | | |
|-----------------------------------|--------------------------|
| // Child Labor | // Inclusion & Diversity |
| // Forced Labor | // Health & Safety |
| // Freedom of Association | // Patient Safety |
| // Working Time, Wages & Benefits | // Environment |
| // Discrimination & Harassment | // Security |

4.1.1 Child Labor

We prohibit the use of child labor, as defined in the ILO Conventions No. 138 (Minimum Age Convention) and No. 182 (Worst Forms of Child Labor Convention). Children must not be hindered in their development. In case young workers are employed they must not do work that is mentally, physically, socially or morally hazardous or interferes with their schooling. Their health and safety must be protected by appropriate measures.

4.1.2 Forced Labor

We prohibit the use of any form of modern slavery, servitude and forced or compulsory labor, including bonded labor, indentured or involuntary prison labor and any form of human trafficking. As being committed to the ILO Conventions No. 29 (Forced Labor Convention) and No. 105 (Abolition of Forced Labor Convention), the Protocol of 2014 to Convention No. 29, we commit to identifying and addressing any form of modern slavery in our operations and in our value chains.

We summarize our efforts and yearly progress to prevent and combat forced labor in our [Modern Slavery Act Statement](#).

4.1.3 Freedom of Association

We respect the rights and freedom of employees to join organizations of their choosing. These organizations may engage in collective bargaining according to applicable legal regulations. We commit to the principles set forth in the ILO Conventions No. 87 (Freedom of Association and Protection of the Right to Organise Convention) and No. 98 (Right to Organise and Collective Bargaining Convention).

At all Bayer sites worldwide, employees have the right to elect their own representatives according to local laws and regulations and we are committed to constructive and open dialogue with our employees and their representatives, as well as to the involvement of work councils and trade unions according to local laws and regulations. Employees who act as representatives shall be neither disadvantaged nor favored in any way.

³For further information on the risk analysis see section 3.2.

4.1.4 Working Time, Wages & Benefits

With our compensation, benefits, and working conditions, we aim to provide an adequate standard of living for our employees and their families.

We support and respect the right to rest and leisure of our employees in balancing their work and private lives, including applicable leave and flexible working conditions. Alongside providing attractive compensation for their work, Bayer contributes to the financial security of current and former employees.

We compensate employees on both permanent and temporary employment contracts, above the statutory minimum wage in the respective countries, paying at least a living wage. We commit to the principle of equal remuneration for equal work as defined in the ILO Convention No. 100 (Equal Remuneration Convention).

We are committed to full compliance with applicable wage, working time, overtime, and benefits laws and regulations.

4.1.5 Discrimination & Harassment

Fair and equitable treatment is a fundamental principle of our [Corporate Policy No. 1986](#) “Corporate Compliance Policy” and [Corporate Policy No. 2090](#) “Fairness and Respect at Work.” We foster a work environment where each of us can perform best, innovate, and develop.

We are fully committed to fair and respectful treatment in our own operations, value chain and local communities and commit to the ILO Convention No. 111 (Discrimination Convention). Our commitment is defined by the following expectations:

- // Everyone will be treated fairly and not discriminated against
- // None will be subjected to any harassment or other unprofessional and disrespectful behavior
- // Everyone is free to share their concerns in good faith, without fear of retaliation

No person is to be unfairly disadvantaged, favored or prejudiced because of protected characteristics such as age, disability, ethnic origin, family status, gender, gender expression, gender identity, involvement in an employee representative body, national origin, physical characteristics, pregnancy, religion, sexual orientation, skin color, social origin, union membership, volunteering, or any unlawful criterion under applicable law.

4.1.6 Inclusion & Diversity

We are committed to fostering, cultivating, and preserving a culture of inclusion and diversity where each of us can bring our whole selves to work. We embrace and encourage our employees’ unique identities and believe that our talent is one of our most valuable assets.

The collective sum of individual differences, life experiences, knowledge, innovation, self-expression, unique capabilities, and time that our employees invest in their work represents a significant part of, not only our culture and reputation, but Bayer’s achievement as well.

4.1.7 Health & Safety

We want to grow Bayer as the healthiest and safest place to work and are committed to maintaining compliance with all applicable laws and regulations. We respect and care for the safety, health and wellbeing of our employees, contractors, visitors, and neighbors around the world. This also includes the health and safety of everyone who uses our products as outlined in our [Product Stewardship](#) standards.

We are committed to fostering a healthy and safe working environment. This includes access to safe drinking water, sanitation, hygiene at the workplace, as well as access to programs on physical and mental wellbeing.

For more information, see our [Corporate Policy No. 2055](#) “HSE Management and HSE Key Requirements” and the Bayer [WASH Pledge](#) Guiding Principles.

4.1.8 Patient Safety

Trust in Bayer to provide effective solutions in improving the quality of peoples’ lives is underpinned by our commitment to providing medicines, medical devices and other therapies that can prevent, alleviate, and treat diseases. We have a comprehensive pharmacovigilance (PV) process which constantly monitors drugs and devices throughout their whole lifecycle as well as the effect they have on patients.

The safety of patients included in clinical trials conducted by us, or contracted Clinical Research Organizations (CROs), is of highest concern. Research in humans is conducted according to strict scientific and ethical principles and to uniform global standards. These standards are followed in accordance with regulatory requirements and local, as well as international laws and regulations, which are incorporated in respective Bayer regulations.

We base the implementation of all clinical studies on the Good Clinical Research Practice (GCP) of the World Health Organization (WHO), the Guidelines of the International Conference on Harmonization (ICH) and on the Declaration of Helsinki.

4.1.9 Environment

We recognize our responsibility to respect the environment and are aware of the potential impact of our products, production and procurement activities on the environment and their associated impact on humans. We have processes in place to monitor, control and document the achievement of objectives to continuously reduce our potential impact on the environment. We commit to the Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and their Disposal, Minamata Convention on Mercury, and Stockholm Convention on Persistent Organic Pollutants (POPs). For more information on the management of environmental risks, see our [Corporate Policy No. 2055](#) “HSE Management and HSE Key Requirements”.

We aim to use natural resources responsibly, in so doing promoting biodiversity and thus recognizing the diversity of species, the diversity of ecosystems, and genetic diversity. We are committed to the objectives of the United Nations’ Convention on Biological Diversity (CBD) and the UN Global Compact’s CEO Water Mandate.

For more information, see our positions on [water](#), [biodiversity](#), [climate](#), [deforestation](#), and [Product Stewardship](#).

4.1.10 Security

We are committed to the protection of our employees, sites, products, intellectual property and reputation against security threats, crime, and crisis events. We want to create a working environment in which employees can work safely and without fear, whether in the office, on site or travelling. In emergency and crisis situations, ensuring the safety and security of our employees and neighbors is our top priority.

Security personnel – whether Bayer employees or third-party provider – must respect the human rights of the individuals they encounter while on duty. They must behave in a defensive manner and attempt to solve security related issues with non-violent means. For situations where defensive force is necessary, security personnel are appropriately trained in the use of force consistent with international standards, including the [Voluntary Principles on Security and Human Rights](#). Use of torture, excessive force, cruel, inhuman, or degrading treatment or injury to life or limb, as well as impairment of the right to organize and the freedom of association are not accepted.

Defending the fundamental right of employees to be secure and free from fear in their daily working environment and thus the commitment to the respect of human rights is outlined as one of the key objectives of the Security function in [Corporate Directive No. 1958](#) “Security & Crisis Management”.



4.2 Local Communities and Vulnerable Groups

4.2.1 Local Communities

We continuously strive to monitor and address the impacts of our value chain on the neighbors and local communities of our sites. We strive to create positive impacts through local engagement and investment in science and education, health, social needs, and community projects.

4.2.2 Vulnerable Groups

Consistent with international human rights standards, we are constantly alert to the specific needs of disadvantaged or vulnerable groups across our value chain, from indigenous peoples to individuals and groups who might benefit from Bayer innovations. We collaborate with organizations to increase access to health and nutrition, adhering to and raising standards, and by investing in education.

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Grievance & Remedy

Employees may contact any of the following to raise a concern in connection with or with regard to a potential infringement of human rights: manager/supervisor, department head, Law, Patents & Compliance (LPC), Compliance Officer, Internal Audit, Human Resources or our Human Rights Officer. In addition, employees can file a report to a central inbox, which is internally promoted and centrally managed by the Global Compliance Department.

Moreover, with the Bayer Compliance Hotline, we offer an additional grievance mechanism operated by a third-party provider and accessible to Bayer employees and external stakeholders, including contractors, suppliers, as well as their employees, customers, and others. Concerns in connection with or with regard to a potential infringement of human rights can either be filed via the [Internet](#) in the language preferred by the rightsholder or by making a [call](#) which is answered by trained and independent call handlers.

The Compliance Hotline is designed to protect confidentiality and anonymity in compliance with applicable local laws and can be reached 24/7. All cases are documented according to uniform criteria throughout the Bayer Group and managed under the rules set forth in our [Corporate Policy No. 2029](#) "Management of Compliance Incidents". External stakeholders are provided with comprehensive information on [Bayer's website](#).

We are committed to conducting business in an ethical and lawful way and recognize our responsibility to remedy under the UNGPs and applicable laws. We seek to listen, take concerns seriously, and respectfully engage in dialogue to provide effective remedy where we have caused or contributed to adverse human rights impacts. We will take appropriate remedial action without undue delay to prevent, end or minimize the extent if we discover that a violation of a human rights-related obligation has already occurred or is imminent in our own operation or at a supplier.

Wherever we find human rights impacts to which we are directly linked through our business relationships, we work with our suppliers or business partners to address and prevent them in line with international standards.

6

Roles & Responsibilities

Human rights are among the responsibilities of the Chairman of the Bayer Board of Management in its role as Chief Sustainability Officer (CSO). The CSO is responsible for the implementation and continuous improvement of Bayer's commitments on human rights described in this Corporate Policy. The CSO is supported as regards the topic of human rights by the Public Affairs, Science, Sustainability & Health, Safety and Environment (PASS & HSE) Enabling Function. PASS & HSE provides the Group-wide human rights governance and partners with the respective representatives of the Divisions and relevant Functions (i.e., Human Resources, Procurement, Internal Audit & Risk Management, LPC) – as well as Senior Bayer Representatives (SBRs) and Country Division Heads (CDHs) who are responsible for their decision-making processes and business practices in terms of respecting human rights.

Furthermore, Bayer has a Human Rights Officer, responsible for monitoring the human rights risk management. The Human Rights Officer leads a regular exchange with the Board of Management, reporting on human rights related activities and presenting updates at least once a year, and ad hoc when necessary. Additionally, an advisory and decision Committee, chaired by the Human Rights Officer, consisting of relevant decision-makers responsible for human rights relevant areas, reviews potential human rights risks and approves mitigation and prevention plans. This Committee also reviews options for action relating to any actual or imminent human rights violations and provides guidance for remedial actions.

Finally, it is the task of each individual employee of Bayer to behave in accordance with this Corporate Policy.

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Implementation Measures & Training

Human rights are an interdisciplinary topic that cover wide-ranging areas of responsibility. The Enabling Function, PASS & HSE, is responsible for the roll-out of this Corporate Policy with the support from key Enabling Functions and divisional teams at Regional and Country level. Communication on this updated Human Rights Policy is provided to all Bayer employees by PASS & HSE. All new Bayer employees receive details on our human rights commitments as part of their onboarding activities. The Human Rights Policy is communicated to the Works Council (by PASS & HSE) and the content relevant to our direct suppliers is communicated to our suppliers by means of our Supplier Code of Conduct. The Human Rights Policy is publicly accessible on our Human Rights [website](#).

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Abbreviations

AI	Artificial Intelligence
BASE	Bayer Societal Engagement Principles
CBD	Convention on Biological Diversity
CDH	Country Division Head
CEO	Chief Executive Officer
CRO	Clinical Research Organizations
CSO	Chief Sustainability Officer
GCP	Good Clinical Research Practice
HSE	Health, Safety and Environment
ICCPR	International Covenant on Civil and Political Rights
ICESCR	International Covenant on Economic, Social and Cultural Rights
ICH	International Conference on Harmonization
ILO	International Labour Organization
LPC	Law, Patents & Compliance
OECD	Organization for Economic Co-operation and Development
PASS & HSE	Public Affairs, Science, Sustainability & Health, Safety, Environment
POPs	Persistent Organic Pollutants
PV	Pharmacovigilance
SDGs	Sustainable Development Goals
SBR	Senior Bayer Representative
UDHR	Universal Declaration of Human Rights
UN	United Nations
UNDP	United Nations Development Programme
UNGPs	United Nations Guiding Principles on Business and Human Rights
WASH	Water, Sanitation and Hygiene
WHO	World Health Organization



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