



**BAUSCH HEALTH COMPANIES INC.
GLOBAL HUMAN RIGHTS POLICY**

September 1, 2024 – Version 002

**Effective Date: September 1, 2024
Version: 2
Policy No.: BHC-GL-CMP-SOP-002
Approved by: Chief Ethics Compliance Officer on
Behalf of the Compliance Management Committee**

GLOBAL HUMAN RIGHTS POLICY

1. Commitment to Global Compliance

Bausch Health Companies Inc and its worldwide affiliates (collectively, “**BHC**” or the “**Company**”) is committed to the protection of human rights. The Company supports and is committed to complying with the United Nations Universal Declaration of Human Rights and all human rights laws and regulations applicable to its business operations.

This policy applies to all Company personnel, including employees and consultants, as well as to the Company’s vendors, subcontractors and others who may act on the Company’s behalf anywhere in the world (“Personnel”).

2. General Requirements

2.1 Human Trafficking

BHC is committed to treating all employees and third parties with whom we interact with dignity and respect. We oppose all forms of slavery, servitude, forced labor and human trafficking. The Company prohibits modern slavery in its operations, in its supply chain, and by its business partners around the world.

As an organization that pursues contracts with the US Government, BHC periodically notifies its Personnel of the Government’s zero tolerance policy regarding human trafficking. Some examples of trafficking-related activities explicitly prohibited by the United States Government include: (i) engaging in severe forms of trafficking in persons, such as sex trafficking or the use of force, fraud or coercion to subject someone to involuntary servitude, peonage, debt bondage or slavery, (ii) procurement of commercial sex acts, (iii) using forced labor, (iv) using misleading or fraudulent recruitment practices, (v) using recruiters that do not comply with labor laws, (vi) charging employees recruitment fees, (vii) destroying or otherwise denying access to an employee’s identity or immigration documents; and (viii) if required by law or contract, failing to provide an employment contract, recruitment agreement or other required work document in writing. Additional information is available by visiting the website of the US State Department’s Office to Monitor and Combat Trafficking in Persons at <https://www.state.gov/bureaus-offices/under-secretary-for-civilian-security-democracy-and-human-rights/office-to-monitor-and-combat-trafficking-in-persons/>

BHC strictly prohibits all Personnel from engaging in any form of human trafficking, including but not limited to those listed above. Failure to respect anti-trafficking FAR provisions and this Policy may result in significant consequences including: (1) BHC being barred from government contracts, and (2) BHC Personnel incurring disciplinary action up to and including termination.

BHC also complies with all applicable laws regarding the employment of minors. BHC does not tolerate any form of exploitative child labor.

2.2 Diversity and Non-Discrimination

BHC is committed to the protection of the rights of women and minority groups in all aspects of its business activities. Our policies and processes are aligned to applicable non-discrimination laws, as well as to the principles set forth in the International Labor Organization Convention Concerning Discrimination in Respect of Employment and Occupation (1960).

We provide equal employment opportunities, and we comply with all applicable laws that prohibit employment discrimination on the basis of age, sex, gender (including pregnancy), race, ethnicity, disability, genetic information, national origin, sexual orientation, gender identity, religion, military or veteran status, or any other legally protected characteristic. All of our employment decisions are covered by this commitment, including recruiting, hiring, training, promotions, compensation, benefits, disciplinary actions, and terminations.

BHC is committed to attaining diverse representation at the Board of Directors, senior management, and workforce level. This commitment extends to, but is not limited to, ensuring appropriate representation of women and members of minority populations, and committing to principles of inclusion in the professional development and advancement of our personnel. We strive to recruit from diverse talent pools for all of our hiring decisions.

2.3 Pay Equity

BHC is committed to equitable pay practices across our workforce. We pay employees on the basis of their performance, experience, and responsibilities. Pay decisions are not influenced by employees' gender, race, or ethnicity.

We have systems in place to monitor and measure the propriety of our pay practices. We conduct periodic pay equity analyses for our US workforce. We also have systems and processes in place to investigate and remediate allegations of inequitable compensation practices.

2.4 Occupational Health and Safety

BHC is committed to providing a safe and healthy workplace and complies with applicable safety and health laws, regulations, and policies. We have appointed a Head of Global Environment, Health, Safety and Stability ("EHS+S") who is responsible for policies, procedures and risk assessments pertaining to occupational health and safety issues. He/she is responsible for overseeing the EHS+S audit program, including annual EHS+S audits, and regularly reporting findings to BHC management. We regularly engage with and train our employees

on EHS+S issues to continually improve health and safety in our workplaces, including the identification of hazards and remediation of health and safety issues.

We work to ensure our workplaces are free from violence, harassment, intimidation, and other unsafe or disruptive conditions due to internal or external threats.

2.5 Labor Standards and Freedom of Association

BHC adheres to, and we expect our suppliers to adhere to, the ILO Declaration on Fundamental Principles and Rights at Work. We maintain labor standards including hours, conditions, wages, and overtime pay practices that comply with the laws of the jurisdictions in which we operate. We have processes in place to ensure we are not requiring excessive hours of work or inadequate periods of rest and recuperation.

BHC provides compensation packages (including base salaries, medical and other benefits, and paid time off) that are competitive for the locations in which our workforce members work.

BHC respects our employees' freedom of association and their right to lawfully and peacefully associate, organize and bargain collectively, as permitted by applicable laws in the countries where BHC does business.

2.6 Supply Chain and Partners

BHC holds its suppliers, vendors, and partners to each of the standards enumerated above. We require our suppliers to adhere to relevant health and safety requirements of the jurisdictions in which they operate, to prohibit child labor, corporal punishment and forced labor conditions, and to prohibit discrimination on the basis of any legally protected characteristic.

Internal and appropriate external Company stakeholders are involved in the development, implementation, and evaluation of outcomes of the policy, including but not limited to third-party labor suppliers.

2.7 Conflict Minerals

On 22 August 2012, the U.S. Securities and Exchange Commission issued its rule on conflict minerals ("Conflict Minerals Rule") in accordance with Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act (the "Dodd-Frank Act"). The Dodd-Frank Act and related rules require certain companies to disclose the extent to which the products they manufacture or contract to manufacture contain conflict minerals sourced from the Democratic Republic of the Congo ("DRC") or adjoining countries. Conflict minerals include tantalum, tin, tungsten, and gold, which are used in many electronic components and medical devices specifically for patient safety and reliability.

As a multinational pharmaceutical and medical device company that develops, manufactures, and markets a broad range of branded pharmaceuticals, generic and branded generic pharmaceuticals, over-the-counter products, and medical devices, BHC promotes the traceability of these minerals and the transparency of our supply chain. BHC firmly believes that our customers should be fully informed about our products.

With respect to those limited aspects of BHC's business that manufacture or contract to manufacture products that do contain tantalum, tin, tungsten and/or gold, which are necessary for the safe functionality of the product, BHC endeavors not to purchase products that contain conflict minerals that directly or indirectly finance or benefit armed groups in the DRC or adjoining countries. Bausch Health expects its portfolio of suppliers to source conflict minerals only from responsible sources. We fully understand the importance of this issue to our customers and are committed to supply chain initiatives and overall corporate social responsibility and sustainability efforts that promote a supply chain that is free of conflict minerals that directly or indirectly finance or benefit armed groups in the DRC or adjoining countries.

3. Penalties and Consequences

All **Personnel** are responsible and accountable for adhering to this **Policy**. Violations of this **Policy** will be punished with discipline, up to and including termination for cause, and possible referral for prosecution, where appropriate or required.

4. Reporting Violations

The Company's Chief Compliance & Ethics Officer will be responsible for reviewing this **Policy** annually and revising it, when needed.

Personnel who become aware of a potential violation of this policy are required to report the matter immediately. Reports may be made to the Legal or Compliance & Ethics Departments or using the anonymous compliance hotline hotline.bauschhealth.com. Employees may also report human trafficking concerns to the National Human Trafficking Hotline at 1-888-373-7888.

The Company is committed to taking appropriate corrective action in response to any violation. No retaliatory action will be taken against any Personnel for raising concerns or claims made in good faith.

5. **References**

- Federal Acquisition Regulations (FAR) 52.222-50 “Combatting Trafficking in Persons” available at <https://www.acquisition.gov/far/52.222-50>
- State Department’s Office to Monitor and Combat Trafficking in Persons at <https://www.state.gov/bureaus-offices/under-secretary-for-civilian-security-democracy-and-human-rights/office-to-monitor-and-combat-trafficking-in-persons/>
- United Nations Universal Declaration of Human Rights available at <https://www.un.org/en/about-us/universal-d>
- ILO 1998 Declaration on Fundamental Principles and Rights at Work available at <https://www.ilo.org/media/267421/download>