Modern Slavery Act Statement

2025

This statement addresses the fiscal year 2025 (from January 1st to December 31st, 2025), in compliance with the requirements of the United Kingdom Modern Slavery Act (2015), the Australian Modern Slavery Act (2018) and the California Transparency in Supply Chains Act (2010). It sets out the steps taken by Bayer AG and its relevant affiliates ("Bayer"), namely in the United Kingdom: Bayer public limited company and Bayer CropScience Limited; and in Australia: Bayer Australia Limited, Bayer CropScience Pty Limited, Imaxeon Pty Limited, and Monsanto Australia Pty Limited.

Science for a **better life**

Introduction

We (the "Bayer Group", "Group", "Bayer" or "our / the company") stand for respecting human rights in everything we do and will not turn a blind eye to any violation of human rights. We recognize the increase of modern slavery violations worldwide[1] and acknowledge our responsibility to conduct human rights due diligence to prevent, mitigate and remedy risks and violations. We are committed to respecting and fostering human rights within our own business activities and in business relations and to reporting transparently on the results of our activities in this area. This Statement builds upon our earlier Modern Slavery Act Statements and summarizes our activities to combat modern slavery and human trafficking in 2025.

The term 'human rights', as used in this Statement, includes modern slavery, human trafficking, forced and child labour.

Bayer is a founding member of the UN Global Compact (UNGC) and respects the Universal Declaration of Human Rights and the International Covenants on Civil and Political Rights and on Economic, Social and Cultural Rights of the United Nations. Our human rights due diligence is based on the human rights due diligence principles described in the UN Guiding Principles on Business and Human Rights (UNGPs) and the OECD Guidelines for Multinational Enterprises. The UNGPs are considered to be among the most important international standards for preventing and addressing actual and potential human rights harm in connection with business activities, such as modern slavery. We are committed to respecting these principles along the entire value chain and within our scope of influence worldwide. We also support the Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy of the International Labor Organization (ILO), and the latter's core labour standards.

Our commitment to act responsibly along the entire value chain forms a core element of our sustainability strategy and encompasses our commitment to respect human rights. We acknowledge that the implementation of human rights due diligence is a continuous process that must be constantly adapted and improved. With our Human Rights Policy, we define the human rights requirements within the company. This binding policy enables us to respect and foster human rights within our own business activities and in business relations. This policy applies to all Bayer employees worldwide and considers the engagement along the entire value chain, including our suppliers, business partners, customers, consumers, and local communities alike.
In addition to identifying, assessing, and addressing potential and actual human rights risks and violations, we also strive to contribute positively towards human rights. We have defined clear sustainability goals that make an important contribution to promoting self-determined living, exerting a positive influence on human rights. This is achieved not only by reducing our ecological footprint, but also by reaching many people in underserved regions with broader access to health care and nutrition. Please visit our 2025 Sustainability Statement (Ch. 4 Annual Report) and Impact Report for more information on our Sustainability Strategy.

1 ILO Report 2022: Global Estimates of Modern Slavery

I. Our operations and supply chains

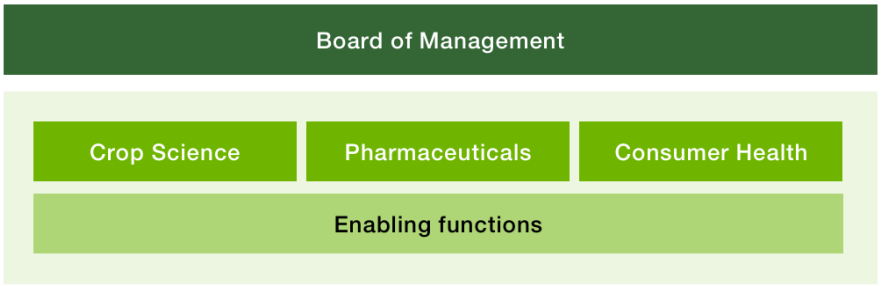
We are a life science company and a global leader in healthcare and nutrition. Our innovative products support efforts to overcome the major challenges presented by a growing and aging global population. Our work helps prevent, alleviate, and treat diseases, empower people to take better care of their own health needs, and also play a part in securing a reliable supply of agricultural products while respecting our planet's natural resources. Our activities are systematically guided by our mission: "Health for all, Hunger for none."

We aim to continuously enhance our company's earning power and create value for patients, farmers, consumers, shareholders, employees and society. Innovation, growth and sustainability are integral parts of our strategy.

Our operations

As the parent company of the Bayer Group, Bayer AG – represented by its **Board of Management** – performs the principal management functions for the entire enterprise. This mainly comprises the Group's strategic alignment, resource allocation, and the management of financial affairs and managerial staff, along with the management of Group-wide operational business of the Crop Science, Pharmaceuticals and Consumer Health divisions. The enabling functions support the operational business.

Structure of the Bayer Group in 2025



Crop Science is the world's leading agriculture enterprise by sales, with businesses in crop protection, seeds, and traits. We offer a broad portfolio of high-value seeds, improved plant traits, innovative chemical and biological crop protection products, digital solutions, and extensive customer service for sustainable agriculture. We market these products primarily via wholesalers and retailers or directly to farmers. Most of our crop protection products are manufactured at our own production sites. Numerous decentralized formulation and filling sites enable the company to respond quickly to the needs of local markets. The breeding, propagation, production and/or processing of seeds, including seed dressing, take place at locations close to our customers, either at our own facilities or under contract.

Pharmaceuticals concentrates on prescription products, especially for cardiology and women's healthcare, and on specialty therapeutics focused on the areas of oncology, haematology, ophthalmology and, in the medium term, cell and gene therapy. The division also comprises the radiology business, which markets diagnostic imaging equipment and digital solutions together with the necessary contrast agents. Our portfolio includes a range of key products that are among the world's leading pharmaceuticals for their indications by sales, for example in the areas of cardiology, oncology, women's healthcare, ophthalmology, and radiology. The division's prescription products are primarily distributed through wholesalers, pharmacies and hospitals.

Consumer Health is a world-leading supplier of nonprescription (OTC = over-the-counter) medicines for self-medication and self-care in terms of sales. Our portfolio comprises the categories nutritional supplements, allergy, cough and cold, dermatology, pain and cardiovascular risk prevention, and digestive health. The products are generally sold by pharmacies and pharmacy chains, supermarkets, online retailers, and other large and small retailers.

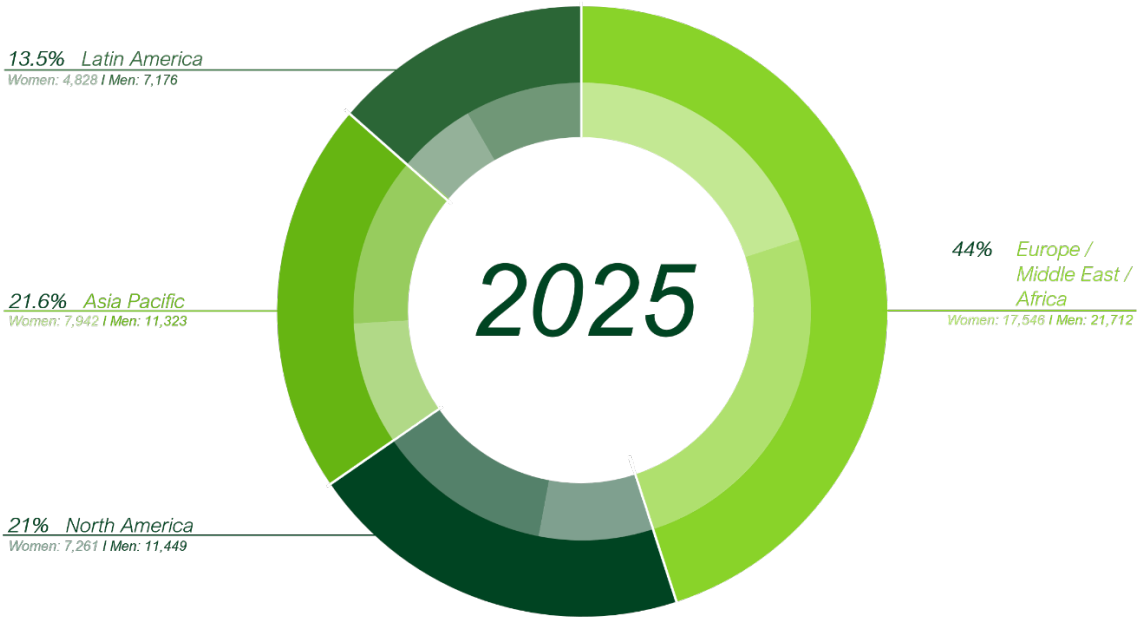
The **enabling functions**, such as Finance; Human Resources and Information Technology, serve as Group-wide competence centres and bundle business support processes and services for the divisions. Our Leaps by Bayer unit, which invests in disruptive innovations, also forms part of the enabling functions.

Our company has a global footprint. As of December 31, 2025, the Bayer Group comprised 272 consolidated companies in 80 countries. Its headquarters is in Leverkusen, Germany. Our total operating performance amounted to €45.6 billion in 2025. To learn more about Bayer please visit our website www.bayer.com.

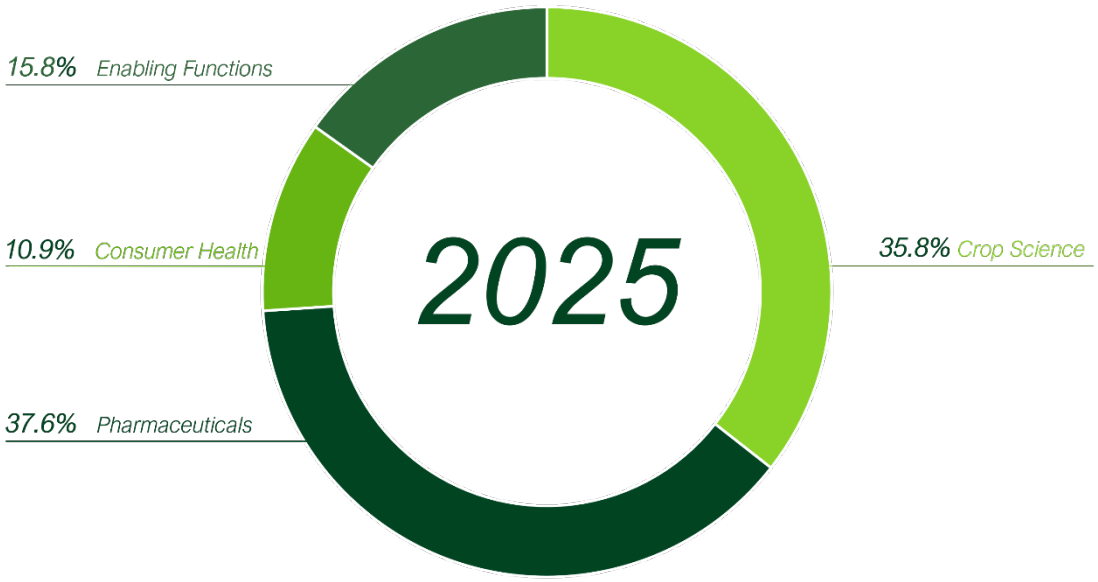
Our Employees

On December 31, 2025, Bayer employed 89,237 (2024: 94,081) people worldwide. In 2025, the Bayer Group hired 7,525 new employees (accounting for 8,6% of our workforce). The majority (44%) are employed in Europe / Middle East / Africa, 21.6% in Asia / Pacific and 21% in North America and 13.5% in Latin America. Our workforce includes only a small number of employees on temporary contracts (2.2%). To learn more about our workforce structure please see the Bayer Annual Report.

Employees by Region and Gender



Employees by Division



For further demographics, please visit our Impact Report

Fair treatment

The company aims to create a culture that is based on fairness and respect. As established in the Bayer Human Rights Policy, we are committed to respecting the human rights of our employees and therefore to fair and equitable treatment as a basic principle of our work environment. This includes observing Group-wide standards of conduct and protecting employees from discrimination, harassment, and retaliation. These standards are set out in our Code of Conduct, which was signed by the Board of Management. Bayer employees around the world are provided with guidance on how to comply with it.

Fair compensation

Bayer applies uniform standards to ensure that employees are fairly compensated throughout the Group. Our performance and responsibility-related compensation system combines a basic pay with performance-related elements, plus additional benefits. As a company, we exceed local market conditions with regard to compensation levels and pay at least a living wage or commit to bringing employees up to a minimum living wage via our next annual merit cycle. Adjustments based on continuous benchmarking make our compensation internationally competitive.

We attach great importance to equal pay for men and women in similar roles with similar experience, and to informing our employees transparently about the overall structure of their compensation.
Gender pay equity is one of the key pillars of the global diversity and inclusion strategy at Bayer. One key supporting initiative is the Group-wide measurement and analysis of the “unadjusted” gender pay gap. Further information on our approach to adequate wages can be found in the Sustainability Statement in the Annual Report 2025, S1 Own workforce.

Our supply chains

As a global company, Bayer procures services and materials from all over the world. In 2025, we had a total of 91,280 (2024: 87,893) suppliers. Our direct procurement materials include the categories of active ingredients, raw materials, intermediates, finished products and seeds. Services for research and development (R&D), marketing & distribution and administrative functions, along with materials required for our technical teams such as technical, engineering and infrastructural goods and services are important components of our indirect procurement portfolio. Bayer prioritises local purchasing wherever possible in order to respond promptly to the requirements of our sites and simultaneously strengthen local economies. In 2025, this applied to 75% (2024: 77%) of our procurement spend worldwide.

Geographical distribution of our suppliers and spend in 2025

Number of Suppliers per Country

	2023	2024	**2025**
Number of suppliers	85,895	87,893	91,280
of which from OECD countries	45,558	43,361	42,992
USA	11,883	11,245	10,824
Germany	6,790	6,317	7,096
Australia	843	764	707
Canada	807	816	812
United Kingdom	1,188	1,091	1,053
of which from non-OECD countries	40,355	44,532	48,290
India	10,430	11,230	11,889
Brazil	7,411	7,335	8,142
China	1,808	1,825	1,864
Other	20,722	21,825	26,395
Number of countries	147	143	140

Procurement Activities per Country in € Billion[1]

	2023	2024	**2025**
Procurement spend	22.7	19.8	19.6
Spend in OECD countries	17.6	15.6	15.3
USA	8.0	7.0	6.8
Germany	4.4	4.0	3.9
Australia	0.1	0.1	0.1
Canada	0.2	0.2	0.2
United Kingdom	0.5	0.5	0.4
Other	4.7	3.6	4.1
Spend in non-OECD countries	5.1	4.2	4.3
Brazil	1.5	1.1	1.1
China	1.1	0.8	0.9
India	0.9	0.8	0.9
Other	1.6	1.0	1.5

[1] Figures may not add up due to rounding

With regard to modern slavery, our analysis indicates that 8% (2024: 8%) of our purchasing volume is coming from countries with a high modern slavery risk in 2025. Further details on our human rights supply chain risks and their management can be found the chapter III, IV and V of this Statement.

II. Human Rights Management Approach

Our Human Rights Governance

Human rights are among the responsibilities of the Chairman of the Board of Management (CEO). The CEO is the Chief Sustainability Officer, and in this role, he is supported in the topic of human rights by the Public Affairs, Sustainability & Safety (PASS) Enabling Function. Bayer also has a Human Rights Officer who oversees risk management regarding human rights and reports to the Board of Management about his work. Our external Sustainability Council advises the Board of Management of Bayer and other functions in sustainability matters, including business and human rights. In this way we want to further enhance our engagement for human rights. The implementation of our human rights standards in business operations is regulated by Group regulations, processes, and management and monitoring systems. Given our company structure, human rights governance is managed through a globally led program by Bayer AG. The program considers business activities along the value chain of each of the reporting entities.

Our Human Rights Strategy

By 2030, we want to be industry-leading in our approach to human rights, based on our human rights strategy, which comprises three interlinking phases:

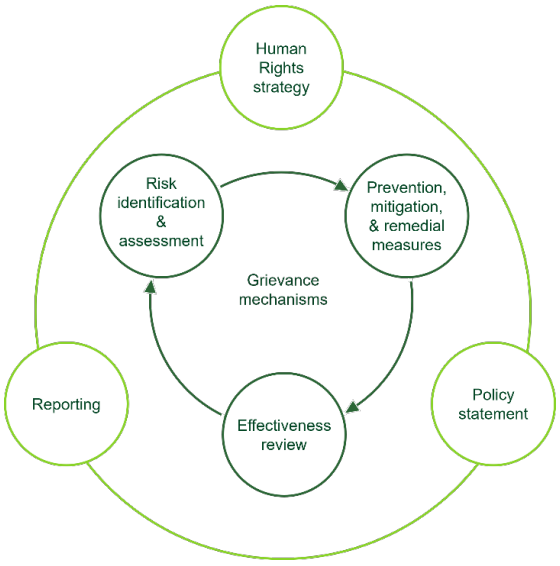
Definition of the framework: derivation of the human rights strategy based on an analysis of the status and risks in accordance with the UNGPs and OECD Guidelines, our mission "Health for all, Hunger for none" and the legal requirements such as those stemming from the German Supply Chain Due Diligence Act (SCDDA), the UK Modern Slavery Act, the Australian Modern Slavery Act, the Canadian Modern Slavery Act and the California Transparency in Supply Chain Act.

Operationalization and full integration: expansion of existing due diligence processes to address human rights risks

Strategic positive contribution: support for the respect of human rights in areas that concern our business

Guided by our Human Rights Policy and underpinned by our established governance structure, we are continuing to drive forward the implementation of our human rights strategy.

Human Rights Due Diligence in accordance with UNGPs and OECD at Bayer



We implement measures to respect human rights both within the company and along our entire value chain. Group regulations and processes, as well as management and monitoring systems, govern the implementation of human rights standards.

We are aware that the implementation of human rights due diligence is a continuous process that must be constantly adapted and improved. To ensure respect for human rights in the value chain in a targeted manner, Bayer operates according to a due diligence approach that is based on the UNGPs and OECD Guidelines for Multinational Enterprises.

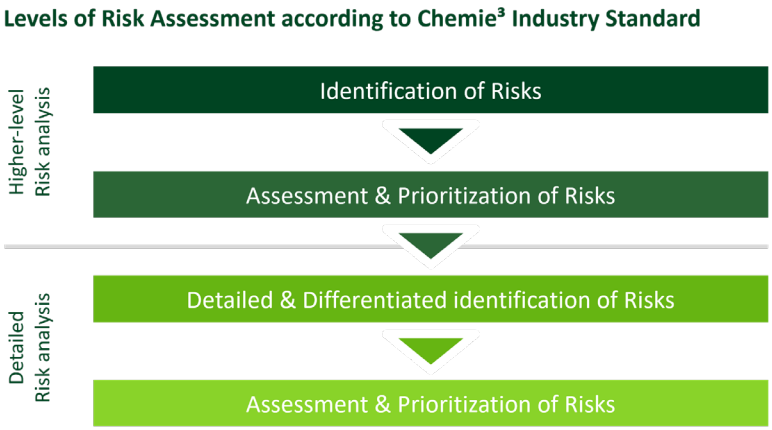
Guided by our human rights strategy and Group-wide management systems, our due diligence process comprises a policy statement, risk identification and assessment processes, prevention and mitigation measures, the implementation of remedial measures,

and measures for determining effectiveness and reporting, along with access to grievance mechanisms.

Our efforts and progress on strengthening our human rights due diligence efforts are reported in the Human Rights chapter of our Impact Report, in the social chapter of our Sustainability Statement (Ch. 4 Annual Report) and in the forthcoming chapters of this Statement.

III. Risk Identification and Assessment

We use a risk analysis to identify potentially adverse impacts of our business activity on human rights. In doing so, human rights risks are identified, evaluated, and prioritized, from an overarching risk analysis for the selected areas. Our risk analysis is aligned to the Chemie³ industry standard:



The analyses are conducted at least once per year and on an ad hoc basis. The results of the human rights risk analysis are communicated to relevant internal decision-makers and incorporated into the Bayer risk portfolio of our Groupwide, integrated risk management system in cases where the threshold values are exceeded. There, decisions on risk mitigation measures are also documented. The risk portfolio is regularly reviewed by the Bayer Assurance Committee[2]

Risks are identified and assessed at a superordinate level in a two-step process:

// The first step is to identify potential human rights risks that we could encounter, either through our business activities, products, and services, or in our value chain. For this purpose, we consider the human rights described in the International Bill of Human Rights and the core labour standards of the ILO. In doing so we consider the freedom from slavery, servitude and forced labour as well as protection against child labour.
// The second step is to assess these rights separately in terms of their risks with regard to their degree of severity (based on scope, scale and irremediability), materiality and likelihood of occurrence.

Salience and materiality

Two dimensions must be accounted for when managing human rights risks.

// The first comprises salient human rights issues, which refer to those human rights that can be most severely impacted by our activities and business relationships.

// The other concerns material human rights, which are those that are of great importance for our internal and external stakeholders.

[2] The Bayer Assurance Committee is an internal management board at Bayer AG responsible for overseeing corporate risks and control measures.)

In assessing human rights-related risks, we distinguish between gross and net risks. Gross risk refers to a risk a company can expect due to its business operations, the type and scope of its products and services along the value chain, excluding any governance measures (in other words prevention and mitigation measures). The net risk describes the gross risk, taking account of prevention and mitigation measures that have already been established.

First, we assess the respective gross risk and then the net risk, considering established prevention and mitigation measures.

This enables us to identify and assess the human rights that could be negatively impacted most significantly through our activities and business relationships in the upstream and downstream value chains (salient human rights) or that are of particular importance for our company (material human rights).

We have identified six priority issues:

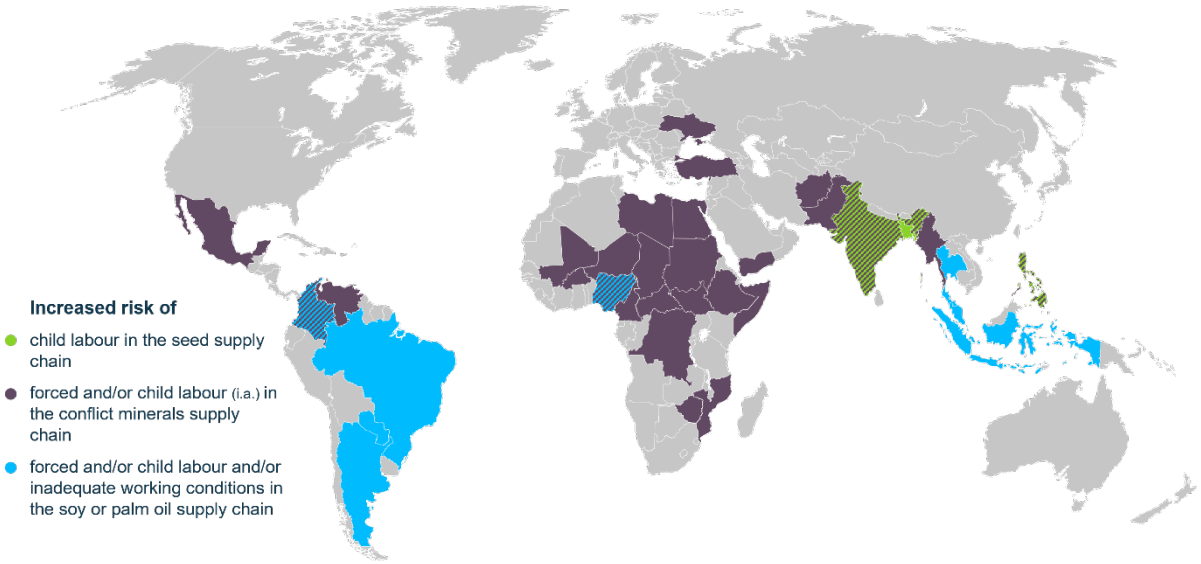
// Right to health
// Responsible use of natural resources
// Protection against child labour
// Right to freedom from slavery, servitude and forced labour
// Right to fair and favourable working conditions
// Right to freedom of association

Our Priority Human Rights Along the Value Chain

We are continuously putting a particular focus on addressing these priority issues. For more information on our Group-wide, integrated risk management process, please see our Impact Report.

Additionally, annually, we perform specific in-depth analysis in the form of risk classifications for our direct supply chain (further details on our management process to improve sustainability practices in the supply chain see chapter IV of this Statement) as we are connected to several million rightsholders – in other words people who are directly or indirectly impacted by our activities – through this. The sustainability supplier risk classification comprises the supplier's country and category risks including social standards (e.g., child labour, forced labour, working conditions). The risk categorization is based on internationally recognized classifications of country risks such as those applied by the World Bank and of category risks such as those employed by the United Nations. Those suppliers with a significant annual procurement spend of more than €0.5 million and a high sustainability risk classification as well as those of strategic relevance to Bayer must undergo a sustainability evaluation (Step 2: Supplier Nomination). In 2025, this process included 157 strategically important suppliers, making up around 32% of the total procurement spend, and 326 suppliers with a high sustainability risk and a significant procurement spend (>€0.5 million p.a.) of nearly 11% of the total spend.

Additionally, we identified further areas in our supply chain with a potential increased risk of human rights violations for which we have derived preventive measures accordingly (further details, see chapter IV of this Statement).



IV. Measures to address risks

We implement measures to ensure respect for human rights both within our own company and along our entire value chain. Group regulations, processes, and management and monitoring systems regulate the implementation of human rights standards within our own operations and the supply chain.

Our Group regulations – for own operations and supply chain

Bayer has documented its stance on human rights, including modern slavery, human trafficking and forced and child labour, in a globally binding Bayer Human Rights Policy, which defines the human rights requirements within the company and obligates us to respect and foster human rights within our own business activities and in business relations. Our commitment to respecting human rights extends to all Bayer employees worldwide and the entire value chain, comprising business partners, suppliers, contractors, customers, consumers, and local communities.

In 2025, guided by our Code of Conduct and supplementary to our Human Rights Policy, we followed specific standards and responsibilities for respecting human rights in existing rules and Group regulations. These included the Legal, Compliance and Insurance Policy, along with regulations on Digital Policy, and HSE management & HSE key requirements.

Additionally, we have a Supplier Code of Conduct in place that specifies what we expect of our suppliers and obligates them to fully respect human rights, including right to be free from slavery, servitude and forced labour as well as protection against child labour.

With respect to clinical trials, we strictly align ourselves to the Declaration of Helsinki, an ethical standard in place since 1964 that regulates medical research involving humans and other international ethical norms and standards (e.g. from the Council for International Organizations of Medical Sciences (CIOMS) and the International Council for Harmonization of Technical Requirements for Pharmaceuticals for Human Use (ICH). These principles are also specified in our Supplier Code of Conduct.

In our operation

Training for our Employees

We offer numerous ongoing training programs – partly on mandatory basis – to enhance employees' awareness of the importance of human rights in their day-to-day activities, including our employees with direct responsibility for our own workforce and our supply chains. In 2025, 88% of our employees received training on aspects of our Human Rights Policy in sessions totalling more than 233,000 hours. Those trainings cover e.g. fairness and respect at work principles (i.e. on how we expect our employees to conduct themselves fairly and in a compliant manner, and informs on when and how to speak up in case of observing non-compliant behaviour), health & safety (i.e. on explosion safety at our sites) or data privacy (i.e. on how to protect data). The issue of human rights continues to be an integral element of training measures for the management teams of our country organizations.

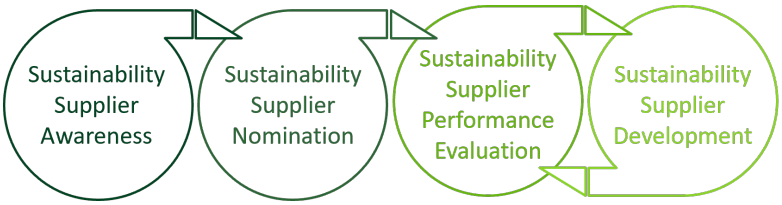
All employees are continuously strongly encouraged to complete the "Respecting Human Rights at Bayer" training course which includes the topics of modern slavery, forced labour, and child labour. It is available in nine languages: Chinese, English, French, German, Italian, Japanese, Portuguese, Russian, Spanish. With this training, we aim to enhance our employees' awareness of the importance of human rights in their day-to-day activities. Employees learn how to identify, analyse, and address cases of potential human rights violations. The training was developed with internal experts from the divisions, functions, and country organizations. This training has been awarded the Brandon Hall Bronze Award that especially highlighted the learner experiences delivered by the course. This course continues to be included in the development plans of employees working in areas with a higher risk of potential human rights infringements.

Internal training measures are accompanied by an internal learning platform on sustainability that also offers diverse learning materials on the respect for human rights, including the topic of modern slavery.

Furthermore, in 2025, several training and learning sessions were conducted. Our internal Human Rights Community[3] conducted learning sessions for different functions, e.g. Product Supply. The Procurement function conducted a learning session about Sustainability Risks, Rights & Responsibilities, and the Supervisory Board received dedicated Human Rights training.

In our supply chains

We have established a Bayer-specific four-step process to improve sustainability practices in the supply chain. This process is implemented through cross-functional cooperation between the Procurement and Public Affairs, Sustainability & Safety (PASS) functions (inclusive of health, safety and environmental protection (HSE) departments and Enabling Functions).



The sustainability landscape encompasses human rights topics including modern slavery, human trafficking and forced and child labour.

The four steps are:

1) Supplier Awareness: Raising awareness on our sustainability expectations by means of our Supplier Code of Conduct and contract clauses,
2) Supplier Nomination: Nominating and selecting suppliers for sustainability evaluation with the help of sustainability risk classifications (further details see chapter III of this Statement),
3) Supplier Performance Evaluation: Evaluating sustainability performance of selected suppliers through online assessments or on-site audits,
4) Supplier Development: Developing suppliers as needed. We monitor the performance developments by way of re-evaluations.

More details can be found in our Impact Report.

Our Supplier Code of Conduct (Step 1: Supplier Awareness)[4]

We expect our business partners, and particularly our suppliers and subcontractors, to fully respect human rights. Therefore our Supplier Code of Conduct (Code) is based on our Human Rights Policy, the principles of the UNGC and the core labour standards of the ILO. Our Code aims to strengthen our mutual understanding of how sustainability should be practiced in day-to-day business and including the expectation that our suppliers will seek to enforce the same principles within their own supply chains. It is made available to our suppliers before entering into contract and suppliers must already commit to our core principles upon registration. The code is available in 23 languages and covers the areas of ethics, labour & human rights, health & safety, climate & environment, quality, and governance and management systems. The chapter “labour & human rights” specifies that we do neither accept child labour nor slavery, servitude and forced or compulsory labour and human trafficking in our supply chains. The Code includes the legal requirements of the German Supply Chain Due Diligence Act (SCDDA), which sets out legal requirements in the supply chain for various environmental and human rights topics, including child labour avoidance and freely chosen employment. The Code is frequently reviewed and updated.

[3] In 2024, we introduced an internal global Human Rights Community which is tasked to support the operational level in questions of Human Rights.
[4] First step of the four-step management process to improve sustainability practices in the supply chain.

Training for our Suppliers (Step 1: Supplier Awareness; Step 4: Supplier Development)[5]

Aspects of modern slavery are also integrated in the training offering for suppliers as well as in the Bayer Supplier Code of Conduct Guidance which supplements our Supplier Code of Conduct. The guidance provides concrete examples of good practices, key expectations, and benchmarks which suppliers can use to practice in their daily business. Suppliers will find practical examples on how to address potential modern slavery, human trafficking, forced and child labour risks within their own operation.

In order to effectively address the wide-ranging challenges of a sustainable supply chain and to leverage synergies, Bayer is a participant in several industry initiatives, amongst them are “Together for Sustainability” (TfS) and the Enabling Child and human Rights with Seed Organizations (ECHO). Both initiatives were co-founded by Bayer. Furthermore, the “Pharmaceutical Supply Chain Initiative” (PSCI) and the International Seeds Federation (ISF).

The PSCI organized more than 40 training sessions and webinars for suppliers on various human rights, ethics and HSE topics in 2025. A global supplier conference and two face-to-face supplier capability-building conferences in China and India took place in 2025. These conferences were attended by more than 3,400 supplier representatives. Through the PSCI online resource library, our suppliers can use additional training materials, which are supplemented every year. Besides the information provided in the PSCI resource library and in webinars, training courses on Human Rights, Ethics as well as Health, Safety and Environment are provided on the e-learning platform Learnster, which allows organizations to create their own interactive and engaging courses. Via Learnster, both PSCI members and their suppliers have access to the PSCI catalogue of courses and can track progress against the PSCI maturity framework.

The TfS Academy is a practical-oriented learning environment for suppliers and Bayer procurement employees. It covers topics such as ethical aspects, conflict minerals, waste management and anti-corruption community. In 2025, around 150 suppliers participated in TfS training courses based on their sustainability performance and Bayer’s assessment plan. Amongst other topics the training courses dealt with labour and human rights guidelines.

[5] First and fourth step of the four-step management process to improve sustainability practices in the supply chain.

Management of particular risks in the supply chain

Type of Risks	Our action
Child labour risks in the seed supply chain	The risk of human rights violations is a fundamental risk in the seed supply chains and therefore also generally a risk for Bayer. One risk is child labour. We do not tolerate, nor will we ignore, child labour in our supply chain. Suppliers must avoid any sort of child labour in their business operations. We work to prevent child labour through the Child Care Program. Through our Child Care Program, Bayer has for years taken systematic action to prevent child labour in the seed supply chain. The program is established in India, Bangladesh, Indonesia, Thailand and the Philippines – the countries in which we identified the risk of child labour infractions. Through this program, we continuously raise awareness among our suppliers and clearly communicate our requirements. It involves systematic and repeated inspections of individual seed producers in their fields by local Bayer employees during the growing season. Since the growing season of 2021/22, we did not identify any cases of child labour in India, Bangladesh, Thailand, Indonesia or the Philippines. We report in more detail in Chapter 5.3 of our Impact Report. As we continue to monitor risk situations, we will adjust our programs accordingly to address or mitigate human rights violations in our seed supply chain.
Forced and/or child labour risks in the conflict minerals supply chain	As the procurement of minerals originating from unstable regions of the world can contribute to the financing of conflicts and the violation of human rights, we work to ensure that so-called conflict materials are procured responsibly. We are not sourcing minerals directly. As stated in our Supplier Code of Conduct, we expect that our suppliers ensure that products supplied to Bayer do not contain metals derived from minerals or their derivatives originating from Conflict-Affected or High-Risk Areas (CAHRAs). We continue to use the internationally recognized Conflict Minerals Reporting Template to survey our relevant suppliers in order to identify the use, sources, and origin of certain minerals in our supply chain. Suppliers who do not meet our requirements are immediately notified that these standards must be complied with, and suitable measures are initiated. As such, we implemented a robust development program for suppliers in the Conflict Minerals Verification Process in 2025. Our objective is to achieve a conflict-minerals-free supply chain. For this we have engaged with selected suppliers, and we are tracking improvements in their usage of metals originating from conflict regions. These are long-term efforts as the engagement goes far beyond our direct suppliers and we will continue the engagement throughout the upcoming years.
Forced and/or child labour risks and/or inadequate working conditions in the oil supply chain	Bayer does not source palm (kernel) or soy oil directly, but we use palm or soy oil derivates in a small number of our products. To promote the socially and environmentally responsible production of palm and soy oil, we are a member of the Roundtable on Sustainable Palm Oil (RSPO) and Round Table on Responsible Soy (RTRS). Their principles, both include strict requirements on child and forced labour as identified as risk in the production. Compared to our overall procurement spend, Bayer only sources a small number of palm (kernel) oil derivatives for our businesses (less than 1%). A detailed and comprehensive traceability of the origin of these already processed products is generally not possible. We started to transition our supply chain to mass balance certified sustainable palm oil in 2021. We aim for at least 90% of palm (kernel) oil derivatives purchased by 2029 to be covered. We invite all stakeholders to follow and support in this process (Strategic Sustainability Focus Areas). In terms of sustainable soy, we support the production of sustainable soy via the purchase of credits certified by the RTRS. Bayer has been a member of the RTRS board since 2017, and 100% of our purchases of soy derivatives are covered by RTRS credits. Since 2022, we have also significantly increased our efforts to gain more insights into the value chain, with the result that we can trace approximately 80% of our purchases of soy derivatives to a jurisdictional area. Further information about our food chain partnerships, certification, and projects with the RTRS can be found here.

V. Tracking and Reviewing Effectiveness of measures

We are constantly tracking the implementation of our measures to address human rights including modern slavery, human trafficking, forced and child labour risks and are continuously working on a concept for measuring the effectiveness of our human rights due diligence approach. The design of the individual measurement systems is being further advanced, taking into account established measurement systems such as supply chain monitoring.

In our operations

Internal Risk Controls

The Bayer Internal Audit department conducts independent, risk-based, and objective audit activities, employing a targeted and systematic approach in order to assess and help improve the effectiveness of corporate governance, risk management and monitoring processes. Audits are conducted by Bayer auditors and take place after an announcement.

Hence, we verify the observance of human rights at our sites partly by means of internal audits. Bayer's Internal Audit function conducts regular audits following the standards of the Institute of International Auditors (IIA). The annual audit planning follows a risk-based approach. These audits include among others the verification of our Human Resources processes, particularly concerning labour contracts, compliance with hiring requirements (including minimum age verification) of our permanent and temporary employees, and employees' working hours. Internal Audit also examines whether employees are paid a living wage (find more details on our continued approach to living wages in our Impact Report). Our procurement processes are audited as well, for example the commissioning of contractors.

A total of 78 audit reports were compiled in 2025, of which eight were preventive compliance program audits or incident-related investigations. For more details, please refer to our Impact Report.

In our supply chain

Evaluating supplier sustainability performance (Step 3: Supplier Performance Evaluation)[6]

We verify the respect of human rights by our suppliers, partly by means of online assessments (through EcoVadis) and on-site audits that also include interviews with the suppliers' management and employees. In doing so, we follow a risk-based approach and also consider suppliers with a strategic relevance (further details see chapter IV of this Statement). Our online assessments and on-site audits are carried out through qualified third-parties or Bayer auditors and take place after an announcement to the supplier. The online assessment criteria of EcoVadis – broken down into the areas of environment, ethics, labour and human rights, and sustainable procurement – correspond to the requirements of our Supplier Code of Conduct, and also consider country and industry-specific conditions and supplier size. In total, our service provider EcoVadis assessed 1,334 suppliers on our behalf in 2025.

In 2025, 100 audits were conducted at our suppliers by external or internal auditors. The audit criteria included both the specifications of our Supplier Code of Conduct including forced and child labour and the industry-specific requirements of industry initiatives such as TfS and PSCI.

Additionally, Bayer is now using an AI-powered web scraping tool to assess all suppliers with procurement spend exceeding €100,000 without any sustainability evaluation. This tool collects publicly available sustainability information, including certifications, accreditations, audits, decarbonization data, policies, sanctions, lawsuits and adverse news coverage.

[6] Third step of the four-step management process improve sustainability practices in the supply chain.

Assessment and audits of Bayer suppliers[1]

	2023	2024	2025
Sustainability assessments[2] via the EcoVadis platform	1,118	1,324	1,334
Sustainability audits[3] by external or internal auditors	134	131	100
Suppliers screen by AI[4]	-	-	11,886

[1] The online assessments of our suppliers that form part of a group generally take place at the parent-company level.
[2] Initial and reassessments of suppliers
[3] Initial and follow-up audits of suppliers
[4] AI-based screening as of 2025

Developing suppliers and further remedial measures (Step 4: Supplier Development)[7]

The online assessments and on-site audits are analysed and documented so that specific improvement measures can be defined as needed. In 2025, 123 suppliers were added to the development process. Some 50 suppliers have already completed the development and conducted a re-evaluation with a 92% (46 suppliers) rate of successful improvement. Some of the suppliers showed minor improvements and will continue the development cycle to achieve better performance in the future.

If critical results are recorded as a result of a serious violation or several major shortcomings are identified during a supplier's sustainability performance evaluation, specific improvement measures are then jointly defined. In 2025, critical results were determined for 12 suppliers (less than 1% of all assessed and audited suppliers). In these cases, we request that the suppliers remedy the identified weaknesses. We monitor the implementation of these activities through re-assessments or follow-up audits.

A key factor in this collaboration is helping our suppliers to improve their sustainability performance, including their performance in the area of labour practices and human rights. Here we focus both on remedying deficiencies and on collaborating on sustainability topics (further details see chapter IV of this Statement, Training for our Suppliers).

In general, we focus on improving suppliers that have poor sustainability performance through our supplier sustainability development approach. Suppliers are included in the development process based on their sustainability performance, their strategic importance for Bayer and their sustainability risk. The evaluation results are analysed, specific improvement measures are jointly defined with the supplier, and these are documented in an action plan. Bayer supports suppliers with capability-building activities and a monitoring process.

The development cycle is rounded off by a re-evaluation to verify the implementation of improvements. Bayer retains the right to terminate a supplier relationship if no improvement is observed during a re-evaluation.

In total, 953 (2024: 858) of the 1,434 (2024: 1,455) suppliers assessed via EcoVadis or audited via TfS or PSCI have improved their sustainability performance in 2025.

In 2025, we were not prompted to end any supplier relationship solely due to sustainability performance.

[7] Fourth step of the four-step management process to improve sustainability practices in the supply chain.

VI. Grievance Mechanisms

Trust serves as the foundation for our business activities and is crucial to our success. It requires a daily commitment to building awareness and ensuring compliance with laws, regulations and ethical principles. Integrity is a central element of our corporate culture and guides our actions. Our Code of Conduct serves as a compass for maintaining compliance with all applicable legal requirements. Therefore, we foster a culture of openness and transparency. We encourage employees and third parties to raise their concerns regarding compliance.

We conduct communication campaigns and offer ongoing training programs that cover compliance and human rights. For example, our annual, company wide “Speak Up” campaign, aims to foster an open reporting culture and communicates the various options for reporting compliance violations. This campaign involves regular information and communication at the global level to create an environment in which our employees can address compliance violations without reservations and thus put Bayer’s value concepts into practice. Also, the “Code of Conduct” Training raises awareness and guidance on when and how to speak up in case of observing non-complaint behaviour at the workplace.

Bayer manages its businesses responsibly and in compliance with the statutory requirements and regulations of the countries in which it operates. What we mean by compliance is the expectation of legally impeccable behaviour of our employees in their daily work as well from our suppliers. We do not tolerate any violation of applicable laws, codes of conduct or internal regulations. Suspected compliance violations, including violations of human rights, can be reported – anonymously if desired and if permitted by respective national law – through different channels.

Whistleblowers can report suspected compliance violations – anonymously if desired and if permitted by respective national law – to a global Speak Up Channel operated by an independent service provider. Every effort will be made to protect confidential information relating to a reported incident, and communication will be limited to a need-to-know basis only. Reports can be made by anyone either via webpage, Speak Up app, email to our Compliance department through Speak Up Inbox, as well as through a phone call made in the caller’s preferred language. The channel is also accessible to the general public.

The provider enables a complainant to check the status of the report submitted. This hotline is also mentioned in our Supplier Code of Conduct, where, additionally, we expect our suppliers to make an adequate complaint mechanism available to their stakeholders.

All cases are recorded according to uniform criteria throughout the Bayer Group and dealt with under the rules set forth in the Group Regulations on Legal, Compliance and Insurance, and Management of Compliance Incidents. As soon as a report is submitted, it is immediately forwarded to the responsible persons within Bayer for further investigation. Where an investigation confirms that a compliance violation has occurred, the company has a graduated set of measures at its disposal. These include a verbal warning or written reprimand, transfer to a different unit, cancellation of a planned promotion, a reduction in the short-term incentive payment, downgrading to a lower collectively agreed pay rate or managerial contract level, and ordinary or extraordinary termination. Bayer also reserves the right to assert further claims against the employee for cost reimbursement or damages and/or to initiate criminal proceedings.

Upon internal evaluation, a total of 929 suspected compliance violations were recorded in 2025. An actual compliance violation was confirmed and closed in 63% (as of December 31, 2025, subject to changes due to ongoing investigations) of the compliance-relevant investigations.

As of December 31, 2025, there were no confirmed cases of child labour, forced labour or human trafficking.

We continue to review our grievance mechanisms with a special focus on human rights. To further increase transparency and accessibility, we published an infographic that explains how complaints were managed. It clearly states that our grievance mechanism is suitable and able to address human rights issues, including child and forced labour, and all other forms of slavery.

Furthermore, in 2025, in accordance with legal obligations (e.g., the German Supply Chain Due Diligence Act) and Bayer's own commitment to continuously improving existing systems, a functional and accessibility test of the grievance mechanism, Bayer's Speak Up Channel, was conducted. The test focused on countries with a generally high human rights risk. Overall, the test confirmed the proper and intended functioning of the mechanism. At the same time, further areas for improvement were identified, which are now being addressed.

VII. Partnerships to foster dialogue on human rights

We engage in dialogue with stakeholders and actively participate in committees, initiatives, and partnerships to foster human rights:

Our Partnerships

Initiative or Committee	
Business for Social Responsibility (BSR)	We are part of the Business for Social Responsibility (BSR) initiative and its working group for human rights. The member companies from various industries discuss best practices, challenges, and experiences in implementing the UNGPs.
econsense	econsense is an exchange-platform for globally operating companies with a focus on sustainability topics - from environmental protection to human rights. We participate in this forum to learn about and share our best practices. Since 2022, we have sponsored the issue of business and human rights.
Enabling Child and Human Rights with Seed Organizations (ECHO)	Established by Bayer and other seed companies in 2019, ECHO is one of the biggest multi-stakeholder forums for the promotion of children's rights and decent work. In 2025, ECHO organized a walkathon to mark the World Day Against Child Labor with the goal of raising awareness about the issue.
Pharmaceutical Supply Chain Initiative (PSCI)	The Pharmaceutical Supply Chain Initiative (PSCI) is a non-profit membership organization with the aim to implement sustainable practices along the supply chains. It therefore offers e.g. learning platforms for suppliers and shares audit results through its platform with members.
Together for Sustainability (TfS)	Together for Sustainability (TfS) is an initiative of chemical companies with a focus on assessing, auditing, and improving sustainability practices in the supply chains.
International Seeds Federation (ISF)	Bayer engages with the International Seed Federation (ISF) through its sustainability and policy platforms and is an active member of ISF's Coordination Group on Environment and Social Responsibility (ESR), which highlights the role of the private seed sector in advancing environmental and social standards.

Bayer is also an active participant in the current discussion on due diligence with respect to human rights at the EU level.

VIII. Past Achievements and Future Key Points of Action

We know that the size of our business alone signifies that we must and can make a significant contribution to sustainable development. In the area of human rights, including modern slavery, human trafficking, forced and child labour, we continue to learn and continuously improve and adjust our processes.

Year	Activity	Status
Ongoing	Identification and assessment of our human rights risks	We are continuing the identification, assessment and monitoring of the human rights that could be most significantly negatively impacted through our activities and business relations in the upstream and downstream value chains (salient human rights) or that are of particular importance for our company (material human rights), see **chapter III Risk Identification and Assessment**.
Ongoing	Dedicated training on human rights	We implemented a dedicated human rights basic training course in 2021, which includes the topics of modern slavery, forced labour, and child labour. In 2025, several trainings and learning sessions were conducted. Our Human Rights Community conducted learning sessions for different functions, e.g. Product Supply. The Procurement function conducted a learning session about Sustainability Risks, Rights & Responsibilities, and the Supervisory Board received dedicated Human Rights training. For more information see **chapter IV Measures to address risks**.
2021 - ongoing	Development of a human rights strategy	We have strengthened our human rights strategy and governance, see **chapter II Human Rights Management Approach.** We will further drive its improvement and implementation.
2021 - ongoing	Review of our grievance mechanisms	We continue to review our grievance mechanisms with a special focus on human rights and accessibility.
2021 - ongoing	Strengthening sustainability supplier development	We started to conceptualize our supplier development, which we continue in 2025. **See chapter IV Measures to address risks** and **V Tracking and Reviewing of measures**.
2022 - ongoing	Strengthening our Human Rights Governance	We established an **ESG Committee within Bayer's Supervisory Board** to deal, among others, with social responsibility matters that include human rights. The **Board of Management introduced the position of a Human Rights Officer**, who oversees risk management as regards human rights and informs the Board of Management of the ongoing work. We strengthened our **external Sustainability Council by a business and human rights expert**, see **chapter II Human Rights Management Approach**. In 2024, we introduced an internal global Human Rights Community which is tasked to support the operational level in questions of Human Rights. In 2025 the community conducted specific Human Rights Topics in different functions.
2023	Incorporation of relevant human rights risks into the Bayer risk management process and addressing of human rights priorities	The results of the human rights risk analysis were incorporated into the Bayer Risk Portfolio of our Group-wide, integrated risk management process. In the coming months and years, we plan to put a particular focus on addressing these priority issues, see **chapter III Risk Identification and Assessment**.
2024	Update of our Human Rights Policy	In 2024, the policy was updated to reflect organizational changes and continues to include all obligations stemming from the German Supply Chain Due Diligence Act. The updated Human Rights Policy took immediate effect for all Bayer employees in April 2024.
2025	Update Supplier Code of Conduct	In December 2025 we updated the Supplier Code of Conduct, which sets out the legal requirements in the supply chain for various environmental and human rights topics, including child labour avoidance and freely chosen employment, we updated the Bayer Supplier Code of Conduct to include the new legal requirements, see **chapter IV Measures to address risks.**

Corporate Responsibility and Consultation

This statement was approved by the Chairman of the Bayer AG Board of Management and by the Boards of Bayer public limited company and Bayer CropScience Limited.

Signed

Bill Anderson
Chairman of the Board of Management (CEO),
Bayer AG

Emma Carter
Director,
Bayer public limited company and Bayer CropScience Limited