

Summary of Follow-Up Results

Below is a summary of a follow-up on sustainability requirements for a supplier to Sweden's regions. The summary reflects the results of the audit as well as activities carried out as a result. It has been updated continuously as new activities related to the follow-up have been conducted, until all potential non-conformities have been addressed and the follow-up is considered complete. For questions regarding the summary, please contact the Regional Office for Sustainable Procurement.

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Log

Last updated

2025-02-20

General Information

Supplier	Gilead Sciences Sweden AB
Regions with Agreement	Region Stockholm
Risk Area	E - Pharmaceuticals/Antibiotics
Product	AmBisome Liposomal
Type of Follow-Up	Digital office audit
Requirements	Sustainable supply chains and environmental requirements
Audit Date	2024-12-12
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Audit Results

Summary of the Audit

The supplier has been cooperative and transparently provided information in accordance with the terms of the agreement.

In terms of the sustainable supply chain requirements, the supplier has some policies and routines in place that support compliance with the framework agreement. The supplier has demonstrated a clear division of responsibilities and has forwarded the commitments both to employees and in their supply chain. However, the supplier needs to update their Code of Ethics to fully meet the policy commitment requirement. Moreover, the supplier did not demonstrate systematic risk analysis, monitoring or deviation management in accordance with the requirements laid down by the framework agreement.

The supplier has a well-established systematic environmental work and meets all the environmental requirements laid down by the framework agreement.

Audit Results

Sustainable Supply Chains	Assessment*
1. Policy commitment	
2. Forwarding of commitment	
3. Division of responsibilities	
4. Risk analysis	
5. Monitoring	
6. Deviation management	
7. Access to production facilities	
Environmental Requirements	Assessment *
1. Certificate	
2. Environmental policy	
3. Environmental investigation	
4. Environmental goals and action plans	
Explanations	
Deviation	

Compliance with requirements

*For a detailed description, see Appendix 1. Deviations

Next Actions

Action plan will be followed up through a digital office audit.

Appendix 1 - Deviations

Sustainable Supply Chains

Deviation	Policy commitment: Gilead's Code of Ethics does not cover the terms and conditions of the framework agreement (point 1 of this requirement). Although the code contains some provisions that support compliance with the requirement, the code must be updated to include, preferably explicitly, commitments to all the conventions and legislation listed in the framework agreement. Moreover, Gilead should include a commitment to minimising discharge of active pharmaceutical ingredients (API) during manufacturing processes.
Supplier's Action	Gilead is committed to all terms and conditions of the framework agreement and this is demonstrated by a various number of different Gilead policies, standards, and memberships. This being said, a gap analysis will be carried out on the Code of Ethics in relation to the specific points raised to ensure all terms and conditions of the framework agreement are reflected in this overarching policy. Required amendments will be incorporated in the Code of Ethics for approval by the U.S Board of Directors at the earliest opportunity in 2025.
Timeline	3Q2025
Deviation	Risk Analysis: The company did not demonstrate systematic risk analysis in line with points 1-4 in this requirement.
Supplier's Action	Gilead will assess its approach to risk analysis and make it more systematic in line with points 1-4 of this requirement, including: (1) conduct a risk analysis to identify, define and assess potential high risk operations in the AmBisome supply chain and identify how risks will be prioritized. Gilead will evaluate leveraging the Pharmaceutical Supply Chain Initiative (PSCI) Self-Assessment Questionnaire and Audit Report Template (e.g. Human Rights and Labor) or similar questionnaire to identify risks; (2) identify high risk operations for AmBisome and discuss such risks during annual Business Review Meeting with concerned CMOs and/or as risks arise; and (3) define internal risk criteria scorecard based on severity. Evaluate use of internal vs. external tools that can support systemic risk analysis. Evaluate use of external consultant.
Timeline	2Q2025
Deviation	Monitoring: The company did not demonstrate systematic risk identification or follow-up of compliance in line with points 1-2 in this requirement.
Supplier's Action	Gilead will assess and re-define its current approach, and will define a systematic and risk-based approach and mechanisms (monitoring or other) to assess ESG compliance in Gilead's own business and the AmBisome supply chain.

	Gilead will define the criteria based on which suppliers will be selected for monitoring based on identified risks from information in self-assessment questionnaires or other sources. Gilead will evaluate use of internal vs. external tools that can support its monitoring activities.
Timeline	3Q2025
Deviation	Deviation management: The company is not able to report whether any deviations regarding compliance with the terms have occurred during the contract period in accordance with point 1 of this requirement. The company lacks systematic deviation management in accordance with point 2 of this requirement.
Supplier's Action	Gilead will assess its current procedures to ensure a systematic approach to deviation management. Gilead will define a process for systemic deviation management/ handling deviations in one's own operation and in the AmBisome supply chain based on the severity of deviation(s). Gilead will evaluate use of tool that can support deviation management.
Timeline	3Q2025