

# Modern Slavery Statement

Ethypharm Group\* ("hereinafter "Ethypharm" or "Company") is committed to putting effective systems and controls in place to safeguard against any form of modern slavery, servitude, human trafficking and forced labour and has zero tolerance to any form of these practices taking place within our business. As part of the pharmaceutical industry, Ethypharm recognises that it has a responsibility to take a robust approach to slavery and human trafficking and is absolutely committed to acting ethically and with integrity and transparency in all our business dealings and have put effective systems and controls in place to safeguard against any form of modern slavery taking place within our business or in our supply chain.

This statement is made in accordance with section 54 of the Modern Slavery Act 2015 and is guided by the UN Universal Declaration of Human Rights and the conventions of the International Labour Organisation particularly relating to forced or compulsory labour.

The risks of occurrence of modern slavery within Ethypharm are considered low due to the nature of the workforce and the strength of our on-boarding training, internal policies, and procedures on business and ethical conduct. These policies and procedures set out our guiding principles and establish that in performing job duties Ethypharm employees should always act lawfully and ethically.

These policies and procedures are available to all employees and include:

- **Whistleblowing policy:** The Company encourages all its workers to report any concerns related to the direct activities, or the supply chains of, the organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The organisation's whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation.
- **Code of conduct:** The Company's code of conduct makes clear to employees the actions and behaviour expected of them when representing the Company. The Company strives to maintain the highest standards of employee conduct and ethical behaviour throughout its business and in managing its supply chain. The guidelines detailed in the code of conduct apply to all Company personnel, whether permanent or on fixed term contracts and including agency staff, contractors and workers employed via distributors to deliver services to the Company, its directors and all Company-related transactions.
- **Recruitment/Agency workers:** As part of our recruitment policy, we conduct background checks upon employment to comply with regulations on work permits, visas, and the right to work in the UK legally. This also involves a screening process, background checks and confirmation of qualifications. When we use an agency to provide workers we use only specified, reputable employment agencies to source labour and we always verify the practices of any new agency before accepting workers from that agency.

- **Dignity at Work:** The Company encourages and maintains a professional and friendly working environment where everyone is free to work without harassment, victimisation or bullying for any reason and where everyone in the workplace is treated with dignity and respect. The policy applies to all workers, job applicants, agency employees, contractors, consultants, suppliers and customers.
- **Anti-Bribery and Corruption:** The Company is committed to the highest standards of ethical conduct and integrity in its business activities in the UK and overseas. This policy outlines the Company's position on preventing and prohibiting bribery, in accordance with the Bribery Act 2010. The Company will not tolerate any form of bribery by, or of, its employees, agents or consultants or any person or body acting on its behalf.
- **Corporate Social Responsibility:** The Company manages its Corporate Social Responsibility programme based on four key areas: Our Community, Our Environment, Our Marketplace and Our People. Within each of these areas, the Company has identified key priorities that reflect our values and support our objectives of building a sustainable Company and maintaining our high ethical standards.
- **Equality and Diversity:** The Company is committed to being an equal opportunity employer and to ensuring that all employees, job applicants, customers/clients, and other people with whom we deal are treated fairly and are not subjected to unfair or unlawful discrimination.
- **Employee Assistance Programme:** Our EAP operates through a third-party provider which allow employees and their families access to confidential advice on a range of topics.

**Our Supply Chain** - The Company purchases medical products as well as pharmaceutical ingredients and componentry from third party suppliers.

Currently, suppliers must complete a questionnaire prior to the Company doing business with them (and where relevant entering into a formal supply contract). The supplier is required to provide information with regard to its policies on human rights and workplace conditions to ensure these are consistent with the requirements of the Universal Declaration of Human Rights and the International Labour Conventions.

Effective 1 July 2016, this supplier questionnaire will also require the supplier to provide information and evidence to demonstrate that it is also fully compliant with the requirements of the Modern Slavery Act 2015. All future commercial contracts will, where relevant, also include appropriate clauses and undertakings regarding supplier compliance with the Modern Slavery Act.

The Company operates a zero-tolerance policy to slavery and human trafficking. No supplier contracts will be awarded to any supplier not able to comply with the undertakings detailed in the Modern Slavery Act 2015 and any breach of the Act by a supplier will result in dialogue with that supplier and potentially the termination of that supply contract.

\*among which Macarthy's Laboratories trading as Martindale and Ethypharm UK Ltd in the UK