

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.

Our Structure, Business & Supply Chains

Ethypharm UK is part of a global pharmaceutical business. Our mission is to improve patients lives by providing essential drugs focusing on hospital care, central nervous system (severe pain, addiction) and internal medicine and make a positive impact to society and the environment.

In the UK our business is focused on four areas; Manufacturing, Direct Sales in the UK, International Distribution & Contract Development and Manufacturing.

Internationally, we work with distributors globally, and we operate directly in the following countries:

United Arab Emirates (sales)

Saudia Arabia (sales)

Singapore (sales)

Ethypharm UK is integrated into a global supply chain involved in the manufacturing, packaging and distribution of finished goods through a global network of manufacturing sites and distribution centres (both owned by Ethypharm and third parties). This network includes the procurement of goods and services from a large number of external suppliers.

Our Policies

Ethypharm UK understands the global challenges related to slavery and human trafficking and works to ensure that this is not present in any part of our business, including all suppliers and the supply chain.

We ensure a robust training process with clear 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.

- **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 all workers 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 where required for the role. 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.

Ethypharm ensures that its employees are paid at minimum in accordance with the National Minimum Wage requirements

- **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. 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 finished medical products as well as pharmaceutical ingredients and componentry from third party suppliers.

This year the Ethypharm Group has been assessed by EcoVadis, one of the leading global platforms for evaluating Corporate Social Responsibility (CSR). The assessment covers four key areas: Environment, Social & Human Rights, Ethics, and Responsible Purchasing.

This year's results reflect measurable progress across all four pillars, confirming our commitment to continuous improvement in CSR. Ethypharm has been awarded the Committed Company badge, which is now visible on the EcoVadis platform.

The Company is working towards all commercial contracts, where relevant including appropriate clauses and undertakings regarding supplier compliance with Modern Slavery

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.