

Modern Slavery Act

Introduction

medac Pharma LLP recognises the importance of the Company's actions to understand all potential modern slavery risks related to our business and plans to put in place steps that are aimed at ensuring there is no slavery or human trafficking in our own business and supply chains. This statement relates to actions and activities during the financial year 2021/2022.

We recognise our responsibility to take a robust approach to slavery and human trafficking and we continue to take our responsibility very seriously during the Coronavirus pandemic.

medac Pharma LLP is absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

Organisational structure and supply chains

This statement covers the activities of medac Pharma LLP

- medac Pharma LLP is a supplier of pharmaceutical medicinal products and medical devices to the NHS and other qualified customers.
- medac Pharma LLP provides technical information and services to support users of supplied medicines and devices.

We currently operate in the following countries:

- medac Pharma LLP currently operates within the United Kingdom.
- medac Pharma LLP is an entity of medac GmbH

The following is the process by which medac Pharma LLP assesses whether or not particular activities or countries are high risk in relation to slavery or human trafficking:

High-risk activities

We believe medac Pharma LLP has no activities that are considered to be at high risk of slavery or human trafficking. We expect the same high standards from all our contractors both in and outside of the UK.

Responsibility

Responsibility for our anti-slavery initiatives is as follows:

- **Policies:** When policies are put in place, whether these are new or revised they are prepared by our outsourced HR Consultant and are reviewed/approved by our Managing Director.
- **Risk assessments:** Risk assessments for all our suppliers, including recruitment agencies both inside and outside of the UK are the responsibility of all those working for us or under our control and will be performed on an ad-hoc basis as and when new suppliers need to be engaged or a service is to be rendered.
- We will seek written reassurance from all recruitment agencies we are working with that they are compliant with the Act and have also set out this requirement in our Heads of Terms. We will continue to do this for any new agencies we use. Documents proving the right to work in the UK documents are

always checked by medac Pharma LLP for all new employees when they commence their employment. Temporary employees from agencies are always thoroughly checked prior to appointment. All employees are given an employment contract and are made aware of all internal policies and procedures as well as their statutory entitlements and other benefits.

- **Investigations/due diligence:** The Managing Director and outsourced HR Consultant are responsible for investigations and due diligence in relation to known or suspected instances of slavery and human trafficking. medac Pharma LLP also undertakes due diligence when considering taking on new clients and suppliers and will regularly review its existing clients and suppliers.

Relevant policies

We operate the following policies that describe our approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:

- **Whistleblowing policy** We encourage all our employees, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, our organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. Our whistleblowing procedure is designed to make it easy for employees to make disclosures, without fear of retaliation. Employees, customers or others who have concerns can contact the Managing Director in confidence.
- **Employee Values** Our values make it clear to our employees the actions and behaviour expected of them when representing medac Pharma LLP. We strive to maintain the highest standards of employee conduct and ethical behaviour.
- **Procurement code of conduct** We are committed to ensuring that our suppliers adhere to the highest standards of ethics. Suppliers/customers will be required to undergo checking before an association with medac Pharma LLP can begin.
- **Recruitment policy** We use only specified, reputable employment agencies to source labour and always verify the practices of any new agency before accepting employees from them.

Due diligence

medac Pharma LLP will be conducting due diligence when considering taking on new suppliers/customers and will hold regular reviews of its existing suppliers/customers. Our due diligence and reviews might include:

- evaluating the modern slavery and human trafficking risks of each new supplier;
- reviewing on a regular basis all aspects of the supply chain based on the supply chain mapping;
- conducting supplier audits or assessments through third party auditor, which have a greater degree of focus on slavery and human trafficking where general risks are identified;
- creating an annual risk profile for each supplier; and
- invoking sanctions against suppliers that fail to improve their performance in line with an action plan or seriously violate our supplier code of conduct, including the termination of the business relationship.

Awareness-raising programme

medac Pharma LLP will continue to raise awareness of modern slavery issues by a series of emails to employees.

The awareness explanation to employees will include:

- the basic principles of the Modern Slavery Act 2015;

- how employees can identify and prevent slavery and human trafficking;
- what employees can do to flag up potential slavery or human trafficking issues to the relevant parties within our organisation; and
- what external help is available, for example through the Modern Slavery Helpline.

Members approval –

This statement was approved on 23/07/2021 by our Management members, who review and update it annually.

Managing Director's signature: *Michael Johnson*

Date: 23/07/2021

Quality Director' Signature: *Wingstone*

Date: 23/07/2021

Finance Director's Signature: *Victoria Maclean*

Date: 23/07/2021

Commercial business manager's Signature: *L Barnham*

Date: 23/07/2021