

## **Modern Slavery Statement 2019**

### **Accord Healthcare Ltd, Accord-UK Ltd and any subsidiaries (“the Company”) Prohibition Against Human Trafficking and Modern Slavery - Modern Slavery Act 2015**

Pursuant to applicable regulations, including Section 54 of the UK Modern Slavery Act of 2015, the Company provides the following statement:

This statement sets out actions taken by the Company to understand and mitigate potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business or its supply chain.

The Company’s understanding of slavery and human trafficking is based on the definitions set out in 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.

As part of the pharmaceutical industry, the Company recognises that it has a responsibility to take a robust approach to slavery and human trafficking and is absolutely committed to preventing slavery and human trafficking in its business activities and ensuring to the best of its ability that its supply chain is free from such activities.

#### **Our Business**

The Company’s business is the development, manufacture and sale of pharmaceutical products to hospitals, community pharmacies, clinical groups, dispensing doctors and wholesalers across Europe, Middle East and North Africa.

The company believes in the protection of human rights globally both in the workplace at our own facilities and within our supply chain. We forbid slavery or human trafficking of any kind and are committed to promoting responsible business practices with our suppliers. We have several corporate policies, including our Code of Conduct, our Respect at Work Policy, and our Know Your Business Partner checks, which address our position on these issues. Code of Conduct The Company’s Code of Conduct sets forth our code of ethics and expectations regarding responsible business conduct. It provides information about the standards of integrity that The Company requires all employees to follow, including standards relating to fair treatment and diversity, anti-harassment and bullying, human trafficking and slavery.

#### **Our Supply Chain**

Our company purchases medicines, pharmaceutical ingredients and componentry from third party suppliers.

Whilst the company neither requires annual certifications nor conducts formal on-site audits of all its’ supplier relationships, the company:

- a) conducts new supplier due diligence via a Know Your Business Partner process which includes a review of publicly available news related to legal and ethical practices/ violations, a search of UK and US sanctions lists and a questionnaire requesting more detailed information about the suppliers’ operations and key employees
- b) provides training support for partners without established compliance frameworks in place
- c) ensures its’ supply contracts contain provisions by which suppliers agree to comply with all laws related to their performance under those agreements

- d) conducts on-site visits of its' primary suppliers from time to time to review and discuss contract and quality performance
- e) *requires suppliers to provide as a minimum to all their employees working regularly on Accord Premises, a living wage \* or equivalent country standard.*

*(\*As defined by the Living Wage Foundation)*

The company's aspiration is to select and work with suppliers who embrace and comply with the principles of our code and conduct within their business and that of their suppliers. Any exceptions to the above diligence are risk assessed and reviewed by the Compliance Manager before proceeding with the business relationship.

### **Accountability Standards**

The Company has a Code of Conduct in place that governs the actions of our company and employees and holds them to the highest level of ethical and social responsibilities. The Company's goal is to work with suppliers who embrace and comply with our principles, and, in turn, to have these suppliers encourage compliance from any suppliers with whom they work in delivery of goods or services for The Company.

Employees who do not comply with the provisions of the Code of Conduct may be disciplined, which may include dismissal. To the extent permitted by law and contractual provisions governing termination rights, we reserve the right to terminate relationships with third parties, including suppliers, who conduct business in a manner that conflicts with the companies Code of Conduct.

### **Relevant Policies**

In keeping with the Company's commitment to act with integrity in all its business dealings, many of our existing policies are relevant to ensure that there is no slavery or trafficking in any part of the business. All relevant staff are trained in these policies as part of the company's ongoing training program.

Our relevant policies include:

- **Public Interest Disclosure ("Whistle-blowing") Policy:** The Company encourages all its workers to report any concerns related to the direct activities, or the supply chains of, The Company. The Company'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:** The Company uses only specified, reputable employment agencies to source labour and always verifies the practices of any new agency it is using before accepting workers from that agency.
- **Anti-Harassment & Bullying:** 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- 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 takes its social responsibilities very seriously, supporting a wide range of good causes and initiatives around the world. Our strategy is to support programs and projects that offer shared value for both parties. These initiatives also need to be consistent with our business, improving health and the quality of life, contributing to a qualified and productive workforce and enriching life. To help make a difference in the community, we work with chosen community partners through a company matching donations program. We encourage employees to get actively involved with our community partners through either volunteering or raising sponsorship.
- **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.

## Resources

Supply chains into our organisation are managed by the Demand teams

- **Training:** Both the Direct and Indirect Demand teams undertake regular Human Trafficking and Modern Slavery awareness training.
- **Recruitment:** As our business has grown, we have seen a rise in the number of our Third Party supplier relationships. As a result the headcount within the Demand teams has been increased and is located to best meet the requirements of the business.
- **Subject Matter Experts:** Our Demand teams work closely with the Compliance and EHS functions to ensure that our suppliers & business partners not only have a clear expectations of what is required, but also why it is required. Together they ensure that processes being followed by the Demand teams and both rigorous and robust and in line with acknowledged best practices.

## Regular Reviews

As a business we regularly review the limitations and requirements of the due diligence processes in operation. All suppliers and business partners are reviewed in line with a documented programme based on a pre-defined risk profile. Any suppliers or business partners who no longer meet our high expectations, or for whom negative behaviours have been displayed, may as a consequence, be discontinued from use or risk-assessed for continued use if deemed essential. A further supplier audit may also be conducted.

Date of Statement      July 2020

Period Covered        April 2019 – March 2020

Approved by            Dr James Burt, Executive Vice President