

## Modern Slavery Act 2015 and Transparency in Supply Chains Act 2010

### OVERVIEW

This statement, made pursuant to section 54(1) of the Modern Slavery Act 2015, sets out the approach taken by Qualasept Pharmaxo Holdings Limited (QPHL) and its subsidiaries, Qualasept Limited (trading as Bath ASU), Pharmaxo Pharmacy Services Limited, Microgenetics Limited, and Corsham Science Limited, together with its holding company, Qualasept Holdings Limited (QHL) (together the QPHL Group) to ensure that slavery, servitude, forced labour and/or human trafficking (together Modern Slavery) does not exist in our supply chains. This statement covers the period the financial year ending 30 April 2019.

### OUR BUSINESS AND VALUES

All the companies making up the QPHL Group are all registered at 3 Corsham Science Park, Corsham, Wiltshire, SN13 9FU.

The core business activities of the QPHL Group are the supply of pharmaceutical products and services, patient homecare services, and sterility testing methods.

We have an overarching principle of putting patients first.

The QPHL Group has over 260 employees and operates only out of the United Kingdom, which is deemed a low risk country by the global slavery index.

We have a zero-tolerance approach to modern slavery. Our Executive team operates to develop and oversee a series of measures, our Modern Slavery Oversight Measures (described below), to prevent modern slavery and human trafficking from touching our business and supply chains. As a result, we expect the same standards from all our contractors, suppliers and other business partners.

### OUR SUPPLY CHAINS

We buy a wide range of goods and services, from raw medicinal products, medicines, and consumables, through to corporate clothing and waste disposal. Some of these products and services are used in the provision of healthcare to patients.

Hundreds of suppliers engage with us, who in turn have their own supply chains, making our end-to-end supply chains complex.

### MODERN SLAVERY OVERSIGHT MEASURES

In order to ensure other organisations comply with our own standards and values, we are developing Modern Slavery Oversight Measures to assess and manage supply chain risk.

This shall include undertaking due diligence on our key suppliers by periodically auditing their modern slavery statements and placing mandatory compliance terms in all new supply contracts. We will focus our supplier due diligence by identifying higher risk suppliers by category of product and/or the geography of their operations, with reference to the global slavery index.

Where a key supplier does not satisfy us of their position on modern slavery, we will work with them to raise standards in this area. If there is a lack of engagement or sufficient assurances, we will review the continued use of that supplier with a view to changing to a supplier which is able to meet our standards on modern slavery.

## TRAINING AND POLICIES

We are developing a training package on modern slavery obligations and the Modern Slavery Act. This will be made available to all staff but will be a mandatory requirement for our recruitment and procurement teams, as well as other staff in key roles across our business. In 2019/20, we will continue to develop our training programme to inform and raise awareness on modern slavery across the QPHL Group and look to assess engagement and understanding through future staff surveys.

We have a clear Anti-Modern Slavery and Human Trafficking Policy and are also reviewing and updating all relevant policies that touch on the issues arising under the Modern Slavery Act.

## RAISING CONCERNS

We are committed to dealing with any concerns raised in an open and honest manner, empowering and protecting those who raise concerns. Our staff can report concerns through a variety of channels including our Freedom to Speak up Guardians.

## OUR EFFECTIVENESS IN COMBATING SLAVERY AND HUMAN TRAFFICKING

As part of our Modern Slavery Oversight Measures, our Executive Committee will monitor the following key indicators:

- Any modern slavery concerns raised through the Freedom to Speak up (or other) routes.
- The results from the audit of our suppliers' modern slavery statements.
- The position with respect to suppliers of the QPHL group being signed-up to clear modern slavery terms via our contractual arrangements.
- The position with regards to our staff completing modern slavery training.
- The position with regards to internal audit on the payments made to our staff, and their respective rights to work in the UK.

Our Executive team will periodically (and no less than annually) reflect upon the above, and use that intelligence to inform the development of the strategy and policy for combating modern slavery within the QPHL Group. These developments will then be put to our Board for endorsement.

This statement is approved by the Board and signed on its behalf by Chris Fountain, CFO, QPHL



**Chris Fountain**

May 2019