

MODERN SLAVERY POLICY

PURPOSE

Uniphar Group is committed to taking necessary steps to ensure that modern slavery or human trafficking does not take place within our business or supply chain. This Policy is implemented pursuant to the UK Modern Slavery Act 2015 and sets out the approach that Uniphar Group has in place to prevent the occurrence of modern slavery and human trafficking in any of our businesses. The Act requires transparency as to how the Group mitigates modern slavery risk and aims to protect workers from exploitation.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. Uniphar Group has a zero-tolerance policy to any form of human slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within our business or supply chain.

SCOPE

This policy is applicable to all employees (temporary and permanent) irrespective of length of service and includes clients and service personnel both inside and outside the work environment. This policy also extends to any business partner within our supply chain.

RESPONSIBILITY FOR COMPLIANCE

The overall responsibility for compliance with this policy lies with the Board of Uniphar plc (“the Board”). The Board has delegated the implementation and effective operation of controls to ensure compliance with the Policy to the management of the individual business units. This policy shall be reviewed, updated where necessary, and approved by the Board on at least an annual basis, or more frequently, as required by any significant change to the Group, its business activities or to the external environment.

DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING

As part of our commitment to identify and eradicate slavery and human trafficking from within our business and from those businesses with which we interact, we

- seek to build long standing relationships with suppliers and to make clear our expectations of ethical business behaviour from them;
- have in place a Whistle Blower Policy to encourage the reporting of concerns within our business; and
- monitor potential risk areas in our supply chain.

TRAINING & DEVELOPMENT

At Uniphar Group, we have a responsibility to ensure our directors and employees understand these issues and understand how to report any suspicions they may have related to modern slavery and human trafficking. The HR department has the responsibility for ensuring that all employees are aware of the Company’s Modern Slavery Policy and its on-going commitments.

The topic of modern slavery is flagged in the induction training undertaken by new staff members starting with Uniphar Group.

COMPLIANCE WITH THE POLICY

The prevention, detection and reporting of modern slavery in any part of our business or supply chain is the responsibility of all those working for us or under our control.

We have a number of policies to ensure that we are conducting our business with integrity and transparency including our Whistle Blower Policy. We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our business or in any of our supply chains.

OUR POLICIES

Uniphar Group operate a number of policies which reflect our objective to act ethically and in line with our legal and regulatory obligations to include but not limited to our employees and our customers.

- Recruitment Policy – outlines our approach to hiring employees across our business. Equality underpins our recruitment activity always ensuring that recruitment and selection processes promote fairness.
- Equality Policy – outlines our approach and reaffirms our commitment to equality for all employees and potential employees.
- Dignity at Work Policy – recognises the right for all employees to be treated with dignity and respect and is committed to providing all employees with a safe working environment which is free from bullying, harassment and sexual harassment.
- Anti-Bribery and Corruption Policy – applies to all employees, directors and contractors work activities and sets our rules with regard to bribery and corruption.
- Anti-Money Laundering Policy – applies to all employees and sets our policies and procedures to prevent crime and the movement of money which has been derived from crime.
- Whistle Blower Policy – applies to all employees and non-employees. Uniphar Group is committed to creating and maintaining a culture of openness within our organisation so that individuals feel encouraged and confident to raise any concerns relating to suspected misconduct at an early stage.

COMMUNICATION AND AWARENESS OF THIS POLICY

Uniphar Group will ensure that this policy is communicated to all current and prospective employees, and all those who partner with Uniphar from a business perspective if deemed appropriate.

BREACHES OF THE POLICY

Any employee found in breach of this policy will face disciplinary action, up to and including dismissal. We may terminate our relationship with other individuals and organisations working with Uniphar Group if, following a thorough investigation, it is found that a breach has occurred with this policy.

LOOKING FORWARD

Uniphar Group will continue to develop and implement the measures mentioned above in respect of our business.

Our approach to modern slavery and human trafficking risk will continue to evolve and we will continue to mitigate these risks through the provisions mentioned above during 2021 and beyond.