

East Midlands Pharma Slavery & Human Trafficking Statement

Purpose

The purpose of the East Midlands Pharma (EM Pharma) Policy on Human Trafficking and Slavery is to ensure that:

- EM Pharma employees are able to identify signs and behaviours associated with modern slavery in order to identify potential victims of this practice; and
- EM Pharma employees know how to raise concerns about the welfare of a colleague, agency worker, or supplier who they suspect is a victim of modern slavery.

Scope

Our policy applies to all employees working at the EM Pharma sites and those who are field based and it should be used to help identify and safeguard colleagues or any other individuals who may have been subject to modern slavery practice.

The policy should be used in line with relevant HR policies, IT policies and purchasing policies to ensure compliance with the Modern Slavery Act 2015 and high standards of recruitment as well as all business activities.

Policy Statement

EM Pharma is committed to conducting its business in compliance with the law and the ETI base code for ethical standards and ensuring that there is no modern slavery in any part of our business or supply chain.

The company is committed to increasing awareness of the practice of modern slavery and ensuring that all employees can appropriately identify and safeguard people vulnerable to exploitation.

Our senior management team are committed to an open and transparent culture that provides colleagues with the support and tools they need to safeguard and protect our employees, agency workers and contractors.

A copy of the policy is available upon request.

Due Diligence in the Supply Chain

Our policies for the procurement of goods and services for our business requires an assessment of suppliers based on a number of risk factors.

Any doubts that arise from that assessment, particularly concerning failures of human rights will be thoroughly investigated.

The failure of any supplier to satisfactorily resolve those doubts will result in the refusal to enter into a business relationship of any kind.

Areas of Potential Risk

EM Pharma supply a number of retail customers and businesses in the United Kingdom as well as other geographical locations through Europe.

Given that many of these retail customers and business are large (Tesco, Boots, Sainsbury's) they will have their own Human Trafficking and Slavery statements if required as per the Human Slavery Act 2015.

Given that these business are within the European Union, the risk of human rights violations within their business is extremely low.

Our own business is independently inspected on a regular basis in conformance with SMETA (Sedex Members Ethical Trade Audit) and also regularly inspected and audited by the majority of customers to whom we supply.

As a result, the risk of slavery in our business is negligible and the risk of human rights violations within our business is extremely low.

Any trade with countries outside of the European Union is assessed on a case-by-case basis under the due diligence policy set out above.

We will continue to strengthen our due diligence process for all our supply chain contributors.

Measurement of Effectiveness

Modern slavery is a secretive and clandestine activity and EM Pharma operate in a low-risk environment due to healthcare supply being a strictly regulated business with multiple independent inspection regimes.

It is therefore difficult to formally evaluate the effectiveness of the systems that EM Pharma has put in place to combat the problem.

However, the diversity of the workforce and the open culture of the organisation supports an environment of reporting and whistleblowing, which when added to the measures taken to evaluate suppliers, creates a firewall against trafficking and slavery.

We are working towards improving our operations with specific performance indicators of effectiveness against slavery and human trafficking.

Training and Awareness

Human Trafficking and Slavery Awareness training has been developed and will be trained to every employee working for EM Pharma with annual refreshers.

Every employee will be expected to participate in the training and complete the knowledge checking test at the completion of the course.

The results will be certificated and registered against each employees' training record.

This training will complement that already in place concerning safeguarding, bullying and the Modern Slavery Policy.