

ANTI-SLAVERY AND HUMAN TRAFFICKING POLICY

1. Policy Statement

Pharmazon is committed to the highest standards of ethical conduct, human rights, and labour practices. We operate a **zero-tolerance** approach to all forms of modern slavery, human trafficking, forced labour, servitude, and child labour in our operations and supply chains, including those supporting our pharmacy and homecare services.

This Policy applies to **all** persons working for or on behalf of Pharmazon in any capacity, including employees, directors, officers, consultants, agency workers, secondees, volunteers, contractors, suppliers, and business partners. We expect our suppliers to apply these same standards throughout their own supply chains.

Modern slavery is a severe abuse of human rights and a criminal offence. Pharmazon is committed to preventing, detecting, and eliminating modern slavery risks through robust controls, transparency, due diligence, and continuous improvement.

2. Scope and Definitions

For the purpose of this Policy:

- **Modern slavery** includes slavery, servitude, forced or compulsory labour, debt bondage, child labour, and human trafficking.
- **Human trafficking** involves arranging or facilitating the travel or movement of individuals for the purpose of exploitation.
- **Supply chain** includes all third-party organisations providing goods, services, labour, or related elements to Pharmazon.

3. Governance and Accountability

Pharmazon's management team oversees the implementation, monitoring, and enforcement of this Policy. Specific responsibilities include:

- **General Manager** – ultimate accountability for compliance and reporting.
- **Procurement & Supply Chain** – due diligence, supplier onboarding, contract controls, and ongoing monitoring.

- **People / HR** – employment standards, worker protections, training, and internal reporting channels.
- **All workers** – mandatory responsibility to uphold and report concerns relating to modern slavery.

Failure to comply with this Policy may result in disciplinary action, contract termination, and/or notification to relevant authorities.

4. Our Commitments

Pharmazon commits to:

1. Operating a **zero-tolerance** approach to modern slavery and human trafficking.
2. Implementing **effective due diligence** processes for our workforce and supply chains.
3. Applying a **risk-based approach** to procurement and supplier engagement.
4. Ensuring all workers have access to **fair employment practices** and are free from coercion.
5. Reporting transparently in line with the **UK Modern Slavery Act 2015**.
6. Providing **awareness and training** to relevant staff.
7. Engaging stakeholders to continuously improve standards.

5. Due Diligence and Risk-Based Controls

Pharmazon will apply proportionate due diligence measures, which may include:

- Supplier pre-qualification and compliance questionnaires
- Risk screening for goods, services, sector, and geography
- Verification of identity, right to work, and employment conditions
- Evaluation of labour provider practices and agency labour chains
- Supplier performance review and audits where justified by risk



As part of our supply chain controls, we may require suppliers to:

- Confirm compliance with Pharmazon's **Supplier Code of Conduct**
- Demonstrate compliance with the **Modern Slavery Act 2015**
- Provide transparency over labour sourcing arrangements
- Cascade equivalent standards to their own supply chains

Recruitment agencies and labour providers may be required to demonstrate that they:

- Do not charge recruitment fees to workers
- Ensure workers retain control of travel documents
- Meet legal and ethical employment standards

6. Contractual and Commercial Controls

Where appropriate, Pharmazon will include contractual provisions requiring:

- Prohibition of modern slavery and human trafficking
- Compliance with applicable human rights and labour laws
- Reporting of suspected incidents without delay
- Audit rights and access to relevant records
- Corrective action requirements

Commercial relationships may be **suspended or terminated** for material breaches of this Policy.

7. Training and Awareness

Relevant staff, particularly those in procurement, HR, and supply chain roles, will receive training to:

- Understand modern slavery risk indicators
- Identify red flags in supply chains and labour arrangements
- Respond effectively to concerns or disclosures

Awareness materials will be made available to all workers.

8. Reporting, Whistleblowing and Protection

Pharmazon encourages openness and supports individuals to report concerns in good faith, including suspicions or evidence of modern slavery. Reports can be made confidentially through internal whistleblowing channels.

No individual will suffer retaliation, disadvantage, or dismissal for making a genuine report.

9. Remediation

Where modern slavery risks or incidents are identified, Pharmazon will seek outcomes that prioritise the **safety, protection, and wellbeing of affected individuals**. Remediation measures may include:

- Collaborating with suppliers, authorities, or NGOs
- Rectifying labour practices
- Removing unlawful recruitment fees
- Suspending or ending business relationships where necessary

10. Monitoring, Review and Continuous Improvement

Pharmazon will monitor the effectiveness of this Policy through:

- Supplier performance monitoring
- Internal audits and due diligence reviews
- Incident tracking and remediation outcomes
- Annual policy review and updates

Key performance indicators (**KPIs**) may include:

- Number/percentage of suppliers completing due diligence
- Number of workers trained on modern slavery awareness
- Number of audits conducted and issues identified
- Remediation actions taken

11. Legal and Regulatory Compliance

This Policy and supporting activities are designed to comply with:

- **UK Modern Slavery Act 2015**
- **Cabinet Office PPN 02/23**
- Applicable employment, immigration and human rights laws

This statement constitutes Pharmazon's **Anti-Slavery and Human Trafficking Policy and Modern Slavery Statement** for the **financial year 2025–2026**, pursuant to Section 54 of the Modern Slavery Act 2015.

12. Approval

This Policy has been reviewed and approved by Pharmazon management and will be reviewed annually.

Approved by:

Ambi Singh

General Manager, Pharmazon

Financial Year: **2025–2026**

