

**This Statement is made pursuant to section 54 of the Act and constitutes the Modern Slavery and Human Trafficking Statement for the Financial Year ended 31st December 2023 for Mundipharma International Ltd.**

## **Overview**

Mundipharma International Limited is part of the Mundipharma network of independent associated companies (Mundipharma) and provides business services to related party clients within the pharmaceutical sector.

We analyse the risks within our own business and our supply network annually following the introduction of the Modern Slavery Act 2015 (the “**Act**”) and having analysed the risks within our own business and our supply network, we do not believe our risk in our supply chains has changed since our previous Statement in 2023 for the financial year ended 31 December 2022. We are not aware of any areas in our operations likely to lead to a breach of human rights and modern slavery laws. However, we remain committed to never knowingly dealing with any organisation connected to slavery, human trafficking or child exploitation.

Our business is committed to operating in an ethical and transparent manner. In line with this commitment, Mundipharma International Limited is cognisant to incorporate and follow, and have incorporated the requirements of the Act into our Code of Business Ethics and our Compliance Framework. We take the upholding of these high standards seriously and do not tolerate slavery or human trafficking within our organisation or by those from whom we buy products or services.

## **Policies, contract clauses, training, communication and the raising of concerns**

Mundipharma International Limited recognizes that a key component of managing and mitigating modern slavery risks in our operations and supply chain is the ongoing raising of awareness of modern slavery and the ensuring of ethical and fair practices in our business operations. The Mundipharma Global Code of Conduct and Global Anti-Bribery and Anti-Corruption Policy provide a foundation for acting with integrity for all employees. We have a Whistleblower Protection Policy and a culture of encouraging reporting of misconduct including the reporting of ethical concerns through our on-line reporting hotline [integrityline.mundipharma.com](https://integrityline.mundipharma.com). We aim on an ongoing basis to continue to equip those employees involved in procurement activities, with both the knowledge and an understanding of the importance of the Act and the roles that employees play in helping to eradicate modern slavery and trafficking. Human rights concerns (and any form of forced labour, child labour, slavery or human trafficking) are specifically mentioned in our Third-Party Code of Conduct as practices that we require our suppliers to prohibit.

Mundipharma International Limited has an environment which encourages open and frank two-way communication, and its employees are encouraged and expected to raise any concerns about known or suspected violations of its Code of Business Ethics or of illegal or unethical business conduct. Any such concern can be raised in confidence without fear of retaliation, by approaching Management, HR, Legal or Compliance. Alternatively, individuals may report their concern, and if desired remain anonymous, through our independent Integrity Line, which is available 24 hours a day and can be accessed through [integrityline.mundipharma.com](https://integrityline.mundipharma.com). Any concern raised will be fully investigated and acted upon as appropriate to determine what action is required. We do not tolerate any form of bullying, discrimination or harassment as outlined in our Anti-Bullying Policy and our Equal

Employment Opportunity, Anti-Discrimination and Harassment Policy. We have also implemented a Code of Conduct for Third Parties that sets out our expectations of our third-party partners across multiple areas including health and safety, human rights (modern slavery, human trafficking and child labour) and sustainability.

We have begun to incorporate modern slavery clauses and our Code of Conduct for Third Parties into procurement agreements.

### **Employment Practices**

Our employment practices are compliant with applicable employment and health and safety legislation, and as a result, we are confident that there is no slavery or human trafficking taking place within our organization. Furthermore, we shall ensure that the employment agencies that we deal with have enshrined within their policies and processes, mechanisms for identifying the risks associated with such practices that have led to the introduction of various laws in the employment field; in short, these agencies too must also be fully compliant with the applicable legislation.

### **Due Diligence**

We aim not to work with any supplier that we suspect is connected in any way with slavery or human trafficking. As part of our Compliance Programme, we take steps to assure ourselves that we only partner with third parties that are fit and proper. We operate a risk-based due diligence procedure covering third party relationships or partners. The due diligence process involves assessing the third party, where appropriate, through completion of a questionnaire, business justification review and background checks (including screening against watchlists and adverse media) on third party organisations. From a direct procurement perspective regular contact is maintained and meetings held with all key suppliers on a regular basis, which may include site visits of the key suppliers' facilities (as deemed appropriate).

### **Monitoring and Enforcement**

We will continue to raise awareness and to monitor third-party supplier and partner relationships and continue to mitigate the risk of modern slavery. We acknowledge that there is more to be done in relation to preventing modern slavery and are committed to continually enhancing the Modern Slavery framework in future years. Any suspected breach of our Compliance Programme or of our Third-Party Code of Conduct, including the Act, will be investigated and such investigations could lead to the termination of supplier contracts.

### **Conclusion**

Mundipharma International Limited is not aware of any slavery or human trafficking taking place in its business or within the businesses of its suppliers. Mundipharma International Limited will continue to apply appropriate risk-based due diligence processes and approach as it continually enhances the

Modern Slavery framework into our Compliance Framework and will continue to raise awareness and



to monitor supplier relationships to mitigate the risk of modern slavery.

This Statement was approved by the Board of Mundipharma International Limited on 27 June 2024.

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*Bryan Lea*  
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Bryan Lea  
Director

28 June 2024