

# Modern Slavery and Human Trafficking Statement

## Year Ending 31 December 2021

### Overview

Mundipharma IT Services Ltd is an IT company that is underpinned by an entrepreneurial spirit coupled with a desire and passion for recognising and acting upon opportunities to deliver technological solutions to its customers that improve patients' lives.

Our business is run upon the principal foundation: to operate in an ethical and transparent manner; always doing what is right for our employees and stakeholders. This has led Mundipharma IT Services Ltd to incorporate the requirements of the Modern Day Slavery Act 2015 (subsequently amended by the Modern Slavery (Amendment) Bill 2021) (the "Act") into its Company Handbook and encompassing those requirements into our compliance framework.

The requirements of our Compliance programme are an integral part of our business DNA and it is this framework that enables and ensures that we protect all that we care about; our business, our people, our stakeholders and our customers. We take these responsibilities seriously and in upholding these high standards, we do not tolerate slavery or human trafficking within our organisation or our supply chain.

We recognise that our supply chain can be complicated due to the nature of our products and the sector in which we operate, however we currently consider ourselves to be low risk of exposure to slavery and human trafficking and we shall never knowingly deal with any organisation connected to slavery or human trafficking.

We are not aware of any areas in our operations and supply chain likely to lead to a breach of human rights and modern slavery laws that the reporting requirements of the Modern Slavery Act 2015 Act seek to capture.

### Training, Communication and Raising Concern

Equipping those employees and senior members of the business involved in the supply chain and procuring functions, 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 will help maintain and nurture a commercial environment that is fit for purpose for today's global pressures. Awareness of our policy is included as part of our induction process for new employees, and awareness training was rolled out to all current employees during 2019, and refresher training delivered again during 2020.

Mundipharma IT Services Ltd has an environment which encourages open and frank two-way communication, and its employees are encouraged and expected to raise concern of any known or suspected violation of its Code of Business Ethics or other 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 third-party Integrity Line, which is available 24 hours a day at [integrityline.mundipharma.com](https://integrityline.mundipharma.com).

Any concern raised will be fully investigated to determine what action is required.

### 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 organisation. 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 has led to the introduction of various laws in the employment field; in short, these agencies too must be fully compliant with applicable legislation.

### **Due Diligence**

It is our aim to not work with any supplier that we suspect is connected in any way with slavery or human trafficking. As part of our Compliance programme, taking steps to assure ourselves that we only partner with third parties that are fit and proper has been part of our on-boarding process for many years.

### **Enforcement**

Any suspected breach of our Compliance programme, including the Act will result in appropriate steps being taken to investigate the potential wrongdoing. Such investigations could lead to the termination of supplier contracts.

### **Our 2021 objectives**

We commit to continuation of our quarterly committee meetings where we will check progress of our objectives as below, and discuss potential new risks:

- We will establish where central guidance in Mundipharma on modern slavery requirements is to be taken from following the globalisation of the structure, and ensure guidance given is followed. As a result of discussions we have now disbanded the Mundipharma IT Services Ltd committee and are following central Mundipharma guidance.
- Spot checks of vendor due diligence for a sample of our top 50 vendors were conducted with no issues found.


We committed to ensuring that Mundipharma IT Services is compliant with the new Government Modern Slavery Register requirements for 2021. Requirements were reviewed and we continue to ensure our Modern Slavery Statement is available on request.

### **Conclusion**

Mundipharma IT Services Ltd is not aware of any slavery or human trafficking taking place in our business or supply chain. Mundipharma IT Services Ltd will continue to apply appropriate risk-based due diligence processes as it further embeds the Act into its compliance programme.

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 2021, covering the period 1 January to 31 December 2021, for Mundipharma IT Services Ltd.

This statement was approved by the Board of Mundipharma IT Services Ltd on 21 September 2022.

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Bryan Lea  
Director

21 September 2022

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Name and Title of Signatory

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Date