

## B&S Group Modern Slavery and Human Trafficking Policy

Effective date: 12 August 2021

Review date: 11 August 2023

<b>Policy name</b>	<b>Modern slavery and human trafficking</b>
<b>Policy statement</b>	<p>This statement sets out B&amp;S Group's actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains. This statement relates to actions and activities between 1 July 2020 to 31 July 2021.</p> <p>As part of the manufacture and supply of pharmaceutical products, B&amp;S recognises that it has a responsibility to take a robust approach to slavery and human trafficking.</p> <p>B&amp;S Group are absolutely committed to preventing slavery and human trafficking in its activities, and to ensuring that its supply chains are free from slavery and human trafficking.</p>

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<b>Organisational structure and supply chain</b>	<p>This statement covers the activities of all legal entities within the B&amp;S Group (the "Group").</p> <p>B&amp;S Group is a diverse, integrated specialty pharmaceutical company focused on developing and supplying pharmaceutical and consumer health products that provide benefits to Patients, Prescribers and the NHS nationally.</p> <p>B&amp;S Group is the trading name of Gowrie Holdings Limited and subsidiary companies. The principal trading subsidiaries are:</p> <ul style="list-style-type: none"><li>• Gowrie Laxmico Limited (trading as B&amp;S Distribution)</li><li>• Laxmico Ltd (trading as B&amp;S Healthcare)</li><li>• Syri Limited (trading as SyriMed and Thame Labs)</li><li>• Laxmi BNS Holdings Limited</li></ul> <p><b>Countries of operation and supply</b></p> <p>The group currently operates in the following countries which have been categorised into high, medium, low risk to slavery and human trafficking (<i>source: global slavery index rating</i>)</p>						
	<table><tr><th>Low risk</th><th>Medium risk</th><th>High risk</th></tr><tr><td>UK Australia Austria Belgium Bulgaria Canada Czech Republic Estonia Finland France Germany Ireland Italy Latvia Lithuania Netherlands Norway Poland Portugal Romania Slovakia Slovenia Spain USA</td><td>Bangladesh China Greece India</td><td>None</td></tr></table>	Low risk	Medium risk	High risk	UK Australia Austria Belgium Bulgaria Canada Czech Republic Estonia Finland France Germany Ireland Italy Latvia Lithuania Netherlands Norway Poland Portugal Romania Slovakia Slovenia Spain USA	Bangladesh China Greece India	None
	Low risk	Medium risk	High risk				
	UK Australia Austria Belgium Bulgaria Canada Czech Republic Estonia Finland France Germany Ireland Italy Latvia Lithuania Netherlands Norway Poland Portugal Romania Slovakia Slovenia Spain USA	Bangladesh China Greece India	None				

Each country is assessed for whether or not they are high risk to slavery or human trafficking using the government ratings given to each country on the Global Slavery Index.

The following is the process by which the Group manages suppliers from countries of High, Medium and Low risk of slavery and human trafficking:

- **Low risk** – No further checks are done
- **Medium risk** – No further checks are done
- **High risk** – Written confirmations of compliance to Modern Slavery & Human Trafficking policy from our supply chain is obtained. Our supplier account opening process includes this as a verification process before any accounts are setup

### ***Responsibility***

Responsibility for the Group's anti-slavery initiatives is as follows:

- **Policies/risk assessments:** The Quality Assurance Department are responsible for ensuring that present policy is in compliance with rules governing good documentation practices and valid for every class of document and dealing with:
  - revisions history
  - revision number tracking
  - review dates
- **Supply chain:** Purchasing and Finance departments will be responsible for ensuring new and existing suppliers meet the Group's requirements
- **Investigations/due diligence:**
  - Human Resources
  - Purchasing
  - Finance
  - Quality Assurance
- **Training:** The training modality in place to better understand and respond to the identified slavery and human trafficking risks is as follows:
  - Staff communications issued outlining our policy and its implications.
  - Operational leaders have been briefed and have acknowledged compliance to the Modern Slavery Act at the Business Leader/Manager forums.
  - Our Modern Slavery Policy is included in our induction process for all new starters.

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<b>Relevant policies</b>	<p>The Group operates the following policies that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations.</p> <ul style="list-style-type: none"><li>• <b>Whistleblowing policy:</b> The Group encourages all its workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, the Group. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The Group's Whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation. Employees should report any findings to the HR department. It is set out in full in the Staff Handbook which is issued to all employees on joining the business and was issued to all current employees in 2020.</li><li>• <b>Anti-corruption and bribery Policy:</b> The policy sets out the Company's commitment to carrying out all of its business in an honest and ethical manner. It has a zero-tolerance approach to bribery and corruption and is committed to acting fairly, professionally and with integrity in all of its business dealings and relationships. This Policy is set out in full in the Staff Handbook. (See above.)</li><li>• <b>Recruitment/agency workers policy:</b> The Group uses only specified, reputable employment agencies to source labour and always verifies the practices of any new agency it is using before accepting workers from that agency.</li></ul>
<b>Due diligence &amp; sanctions</b>	<p>The Group undertakes due diligence when considering taking on new vendors and/or service providers and regularly reviews the already qualified vendors/service providers as part of its qualification programs.</p> <p>The above processes include:</p> <ul style="list-style-type: none"><li>• Annual review of the Modern Slavery Act statement.</li><li>• Periodic review of the risk categorization of countries we trade with using the Global Slavery Index.</li><li>• Annual feed-back of compliance requested from vendors/service providers from medium risk rated Countries by a written confirmation form duly signed</li><li>• Conducting specific assessment (or considering those assessment during periodic audit) through company auditors or certified/qualified third-party companies, having also specific focus on slavery and human trafficking where high risks are identified.</li></ul> <p><b>Actions in case of non-compliance on slavery and human trafficking</b></p> <p>Vendors/service providers found to be non-compliant; or failed to provide written confirmation of compliance, or found to have</p>

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	<p>support slavery or human trafficking of any sort will result in escalation to senior management.</p> <p>Where cases of non-compliance are identified, action plans to ensure issues are rectified will be requested first.</p> <p>In cases where vendors/service providers are not willing to achieve compliance, the Group will reserve the right to end the business relationship.</p>
<b>Performance indicators</b>	<p>The Group has reviewed its Key Performance Indicators (KPIs) and as a result is reporting the following KPIs:</p> <ul style="list-style-type: none"><li>• Reviewing existing supply chains, whereby the Organizations located in countries regarded as "High" risk will be requested preliminarily with written confirmation and then with audit assessment to ensure their compliance to the legislation.</li><li>• Requiring all employees/employees working in the UK and India to have been informed about the Modern Slavery Policy during their employment.</li></ul>
<b>Training, awareness and warning process</b>	<p>The Group requires all employees at all levels within the Group to have an understanding of this policy on modern slavery and human trafficking.</p> <p>The Group's modern slavery awareness training forms part of the Employees induction program and covers:</p> <ul style="list-style-type: none"><li>• Guidance on the Group's stance on slavery and human trafficking</li><li>• How to escalate potential slavery or human trafficking issues to the relevant parties within the Group;</li><li>• Details of the countries the Groups supply chain covers</li><li>• Categorisation of countries into high, medium and low risk of slavery and human trafficking</li><li>• How to manage customers / suppliers from countries of high, medium or low risk of slavery and human trafficking</li><li>• How to assess the risk of slavery and human trafficking in relation to various aspects of the business, including resources and support available;</li><li>• What steps the Group should take if suppliers or contractors do not implement anti-slavery policies in high-risk scenarios, including their removal from the Group's supply chains.</li></ul>
<b>Board approval and Board of directors</b>	<p>This statement was approved by the B&amp;S Group's board of directors, who review and update it annually.</p> <p>Mr G Hathi - <i>Chairman</i></p> <p>Mr S Hathi - <i>Managing Director</i></p> <p>Ms A Hathi - <i>Leadership &amp; Development Director</i></p>
<b>Policy issue date</b>	<p>27 July 2021</p>