



## Modern Slavery Act 2015 and transparency in Supply Chain Act 2010 Statement

### OVERVIEW

We have a zero-tolerance approach to Modern Slavery. Members of our HR, Procurement, and Executive teams oversee a series of measures to prevent Modern Slavery from touching our business and supply chains. We expect the same standards from all our contractors, suppliers, and other business partners.

### OUR BUSINESS AND VALUES

The companies making up Pharmaxo are registered at Corsham Science Park, Corsham, Wiltshire, SN13 9FU. The core business activities of the QPHL Group are:

- **Bath ASU and Pharmaxo Healthcare** – aseptic compounding and the provision of specific unlicensed medicines referred to as 'specials', and the provision of clinical homecare services and clinical services out of hospital and closer to home.
- **Pharmaxo Scientific** – scientific analysis of biological and other medicinal products to determine their stability; applied research and development of clinical and non-clinical presence/ absence testing services and products; research and development of a software system for the reporting of non-clinical microbiological results, designed to improve the efficiency of data integrity in laboratories; and research and development of software systems to control and optimise the efficiency of aseptic manufacturing processes.

Pharmaxo operates only out of the United Kingdom, which is deemed a low risk country by the [global slavery index](#).

### OUR SUPPLY CHAINS

Pharmaxo purchases a wide range of goods and services, from raw medicinal products, medicines, and consumables and waste disposal. Some of these products and services are used in the provision of healthcare to patients.

Pharmaxo only operates in a regulated pharmaceutical supply environment and as such is required to source materials and components from similarly regulated and approved suppliers.

### MODERN SLAVERY OVERSIGHT WITHIN SUPPLY CHAINS

In order to ensure that our suppliers comply with our standards and values, we apply Modern Slavery oversight measures to assess and manage supply chain risk. This includes undertaking due diligence on our new suppliers and placing mandatory compliance terms in all new supply contracts. We also carry out regular assessments of key suppliers. Where a supplier does not satisfy us of their position on Modern Slavery, we will clarify our expectations in this area. Ultimately, if there is a lack of engagement or we receive insufficient assurances, we will review the continued use of that supplier with a view to changing to a supplier that is able to better meet our standards on Modern Slavery.



# Pharmaxo

The Pharmaxo HR team carries out due diligence on payments made to our team members (including consideration of whether personal bank accounts are situated within the UK, whether bank details provided are in the given individual's name, and we check for duplicate account details across our team members). We also carry out checks to confirm that individuals have the right to work in the UK.

We pay in excess of the national minimum wage and maintain a health differential against that figure to support a sustainable and affordable lifestyle by our team members.

## **TRAINING AND POLICIES**

We have implemented a training package on Modern Slavery. This is available to all staff but is a mandatory requirement for our recruitment and procurement teams, as well as other staff in key roles across our business. We also have a Modern Slavery and Human Trafficking Policy.

## **RAISING CONCERNS**

We are committed to dealing with any concerns raised in an open and honest manner - empowering and protecting our workforce to speak up when something isn't right. Our team members can report concerns through a variety of channels, including directly to our Head of HR or a member of our Executive team.

## **MONITORING KEY PERFORMANCE INDICATORS**

As part of our Modern Slavery oversight measures, members of our Executive team monitor the following key performance indicators:

- Any Modern Slavery concerns raised through our Whistleblowing Policy, or other applicable routes.
- The outcomes with respect to due diligence carried out on our suppliers.
- The outcomes with regards to our staff completing Modern Slavery training and understanding how to raise concerns about Modern Slavery.
- The outcomes regarding checks made in relation to staff member bank accounts, and staff member rights to work in the UK.

Members of our Executive team will periodically (and no less than annually) reflect upon the above and use that intelligence to inform our approach to combating Modern Slavery within Pharmaxo.

This statement is approved by the Board and signed on its behalf by Ian Muir, Chief Executive Officer.

  
Ian Muir  
Date 7<sup>th</sup> May 2024