

B&S Group
Modern Slavery and Human Trafficking Policy

SOP/GEN/0054/v2

Effective Date: 23Apr2019

Review Date: 21Apr2021

Author _____ Date _____
Dip Khakhria
Head of Sales

Reviewer/ Approver _____ Date _____
Kamlesh Patel
Director of Pharmaceutical Development

QA Administrator _____ Date _____
Angela Selladurai
QA Administrator

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1.0 Overview

<p>Policy Name</p>	<p>Modern slavery and human trafficking</p>
<p>Policy Statement</p>	<p>This statement sets out B&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 August 2018 to 31 March 2019.</p> <p>As part of the manufacture and supply of Pharmaceutical products, B&S recognises that it has a responsibility to take a robust approach to slavery and human trafficking.</p> <p>B&S 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>
<p>Organisational structure and supply chain</p>	<p>This statement covers the activities of all legal entities within the B&S Group:</p> <ul style="list-style-type: none"> • B&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>B&S Group is the trading name of Gowrie Holdings Limited and subsidiary companies. The principle trading subsidiaries are: -</p> <ul style="list-style-type: none"> • Gowrie Laxmico Limited (Trading as 'B&S Colorama') • Syri Limited (Trading as 'Thame Laboratories') <p><i>Countries of operation and supply</i></p> <p>The organisation 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>

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Low Risk	Medium Risk	High Risk
UK	India	
Spain	China	
Portugal	Ireland	
Norway	Greece	
France	Bulgaria	
Netherlands	Slovakia	
Austria	Poland	
Belgium	Romania	
Italy	Germany	
Latvia	Estonia	
	Lithuania	
	Czechoslovakia	

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. See Appendix 1 for the rating descriptions.

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	<p>The following is the process by which the organisation manages suppliers from countries of High, Medium and Low risk of slavery and human trafficking;</p> <ul style="list-style-type: none"> • 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 from our supply chain. Our supplier account opening process includes this as a verification process before any accounts are setup. <p><i>Responsibility</i></p> <p>Responsibility for the organisation's anti-slavery initiatives is as follows:</p> <ul style="list-style-type: none"> • Policies / Risk Assessments: Our Quality Assurance department will be responsible for putting in place and reviewing policies and the process by which they were developed. • Supply Chain: Purchasing and Finance departments will be responsible for ensuring new and existing suppliers meet the organisations requirements • Investigations/ due diligence: <ul style="list-style-type: none"> • Human Resources • Purchasing • Finance • Quality Assurance • Training: The training that has taken place to better understand and respond to the identified slavery and human trafficking risks is as follows; <ul style="list-style-type: none"> • All 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 unit head forums.
<p>Relevant policies</p>	<p>The organisation 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>

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	<ul style="list-style-type: none"> • Whistleblowing policy: The organisation encourages all its workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, the organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The organisation'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. • Employee code of conduct: The organisation's code makes clear to employees the actions and behaviour expected of them when representing the organisation. The organisation strives to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing its supply chain. • Recruitment/Agency workers policy: The organisation 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.
<p>Due Diligence & Sanctions</p>	<p>The organisation undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. The organisation's due diligence and reviews include;</p> <ul style="list-style-type: none"> • Annual review of the Modern Slavery Act statement. • Review of the risk categorisation of countries we trade with using the Global Slavery Index. • Annual review of compliance from suppliers from medium risk countries by the form of written confirmation • Conducting supplier audits or assessments through the organisation's own employees/third party auditor, which have a greater degree of focus on slavery and human trafficking where high risks are identified. <p>Actions of Non-Compliance</p> <ul style="list-style-type: none"> • Suppliers found to be non-complaint, failed to provide written confirmation of compliance or found

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	<p>to have support slavery or human trafficking of any sort will result in escalation to our quality team and senior management. Where non-compliance is identified, we will work with them on action plans to ensure issues are rectified. In cases where suppliers are not willing to work with us to achieve compliance, we reserve the right to end the business relationship.</p>
<p>Performance indicators</p>	<p>The organisation has reviewed its key performance indicators (KPIs). As a result, the organisation is reporting these KPIs;</p> <ul style="list-style-type: none"> • Requiring all employees/employees working in UK & India to have completed training on modern slavery. • Reviewing its existing supply chains, whereby the organisations located in countries regarded as “High” risk is requested for written confirmation of compliance to the act.
<p>Training Awareness warning process</p>	<p>The organisation requires all employees at all levels within the organisation to have a complete understanding of this policy on modern slavery and human trafficking.</p> <p>The organisation's modern slavery training covers;</p> <ul style="list-style-type: none"> • Guidance on the organisations stance on slavery and human trafficking • How to escalate potential slavery or human trafficking issues to the relevant parties within the organisation; • Details of the countries the organisations supply chain covers • Categorisation of countries into high, medium and low risk of slavery and human trafficking • How to manage customers / suppliers from countries of high, medium or low risk of slavery and human trafficking • How to assess the risk of slavery and human trafficking in relation to various aspects of the business, including resources and support available; • What steps the organisation should take if suppliers or contractors do not implement anti-slavery policies in high-risk scenarios, including their removal from

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	the organisation's supply chains.
Board Approval	<p>This statement was approved by the B&S Group's board of directors, who review and update it annually.</p> <p>Kamlesh Patel</p> <p>Pharmaceutical Development Director</p> <p>Sign:  Date: 15APR2019</p>
Board of Directors	<p>Mr G Hathi, <i>Chairman</i>;</p> <p>Mr S Hathi, <i>Managing Director</i>,</p> <p>Ms A Hathi, <i>Learning & Development Director</i>;</p> <p>Mr K Patel, <i>Pharmaceutical Development Director</i>;</p>
Policy Issue Date	August 2018

2.0 Revision History

Version	Previous version	Reason for revision	Issued
1	Not Applicable	Refer to CC18-0562	Oct2018
2	1	Clarity on Organisational structure provided.	April 2019

3.0 Appendices

Not Applicable