

# **Modern Slavery Act Statement**

## **Introduction**

This statement is made by Pharmadent Holdings Limited. The holding company is both registered and represented in the United Kingdom.

This statement sets out the steps taken by the company to understand and address any risk of slavery and human trafficking related to its business. The information included in the statement refers to the financial year 2023.

## **Our Structure**

The labour supplied to the Group, of around 50 staff, in pursuance of its operation is carried out at our facility in Edenbridge, Kent. The company recruits predominantly from within the industry and benefits from high staff retention. It is perceived that existing staff do not fall into a category identified as being vulnerable to modern slavery in this Country, therefore the Companies emphasis is placed upon policies and procedures in place for our contractors and suppliers.

## **Definitions**

The Group considers that modern slavery encompasses:

- Human trafficking;
- Forced work, through mental or physical threat;
- Being owned or controlled by an employer through mental or physical abuse or the threat of abuse;
- Being dehumanised, treated as a commodity or being bought or sold as property;
- Being physically constrained or to have restriction placed on freedom of movement.

## **Commitment**

The Group acknowledges its responsibilities in relation to tackling modern slavery and commits to complying with the provisions in the Modern Slavery Act 2015. The Group understands that this requires an ongoing review of both its internal practices in relation to its labour force and, additionally, its supply chains.

The Group does not enter into business with any other organisation, in the United Kingdom or abroad, which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labour.

No labour provided to the Group in the pursuance of the provision of its own services is obtained by means of slavery or human trafficking. The Group strictly adheres to the minimum standards required in relation to its responsibilities under relevant employment legislation in the UK.

## **Our Supply Chains**

Our supply chain involves the wholesale of medicinal and non-medicinal healthcare products, with supply and procurement within the UK, EEA Countries and Rest of the World Countries.

Our Supply Chain exists of:

- (i) suppliers of direct materials (medicinal and non-medicinal products, suppliers of services relating to Good Distribution Practice activities including but not limited to security arrangements, pest control and outsourced transportation), and;
- (ii) suppliers of indirect services (facilities and professional services).

With the majority of the Companies supplier base within the UK, the risk of vulnerability to human rights abuses is currently considered to be at a low level.

In general, the Group considers its exposure to slavery/human trafficking to be relatively limited. Nonetheless, it has taken steps to ensure that such practices do not take place in its business nor the business of any organisation that supplies goods and/or services to it.

## Steps

The Group carries out due diligence processes in relation to ensuring slavery and/or human trafficking does not take place in its organisation or supply chains, including conducting a review of the controls of its suppliers.

The Group has not, to its knowledge, conducted any business with another organisation which has been found to have involved itself with modern slavery.

In accordance with section 54(4) of the Modern Slavery Act 2015, the Group has taken the following steps to ensure that modern slavery is not taking place:

- We mainly source pharmaceutical products from UK and EEA suppliers all of which are subject to validation as outlined in the companies Standard Operating Procedures and in line with Good Distribution Practice.
- Non-pharmaceutical products are sourced from the UK, EEA and Third Countries and are also subject to validation.
- All suppliers are expected to have suitable anti-slavery and human trafficking policies and processes.
- The group does not source from those countries considered to be high risk as identified by the Global Slavery Index.
- Introducing a zero tolerance policy towards modern slavery;
- Reviewing our supplier contracts to include termination powers in the event that the supplier is, or is suspected, to be involved in modern slavery;
- Putting measures in place to identify and assess the potential risks in our supply chains;

## Our Policies

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, including when managing its supply chain.

We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:

**Recruitment policy:** we operate a robust recruitment policy, including conducting eligibility to work in the UK checks for all employees to safeguard against human trafficking or individuals being forced to work against their will.

**Whistleblowing policy:** The Company is committed to the highest standards of openness, integrity and accountability. The aim of the policy is to ensure that employees are confident that they can raise matters that concern them in the knowledge that their matter will be taken seriously, treated in confidence and, providing they are acting in good faith, will not result in them being placed at any disadvantage.

**Anti-bribery and corruption policy:** this code explains the way we behave as an organisation and how we expect our employees and suppliers to act.

## Code of Business Conduct

The organisation's code makes clear to relevant 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.

The Group is committed to continuously improving its approach to ethical practice and integrity in all business relationships. To ensure we continue to source products from a responsible supplier base, we assess both commercial and regulatory compliance aspects of suppliers.

We have established supplier qualification procedures within our businesses to make sure that the products we purchase and sell comply with both regulatory and ethical standards.

### **Awareness-raising programme**

The organisation raises awareness of modern slavery issues via accessible training for all personnel on Modern Slavery in the Supply Chain, delivered by our HR consultancy. Internal awareness forms part of induction and refresher training.

The awareness campaign explains to staff:

- The basic principles of the Modern Slavery Act 2015;
- What employees can do to flag up potential slavery or human trafficking issues to the relevant parties within the organisation; and
- What external help is available, for example through the Modern Slavery Helpline.

### **Further steps**

All existing policies and procedures will be periodically reviewed and updated as required to ensure that we maintain appropriate safeguards against the risks of Modern Slavery with an ongoing focus on supplier qualification should the business model change.

### **Managing Director Approval**

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and will be reviewed for each financial year.

**Date of approval:** 17<sup>th</sup> October 2024

**Name:** Bimal Patel

**Title:** Group Director