

Modern Slavery policy

Policy statement

Durbin PLC recognises that slavery and human trafficking can occur in many forms including child labour, compulsory labour, freedom of association, discrimination, disciplinary practices, working hours and remuneration. We have taken, and will continue to take, a number of steps to endeavour to ensure that modern slavery is not taking place anywhere in our own business or in any of our supply chains. We are committed to acting ethically, with integrity and transparency in all business dealings. Durbin PLC knows that all businesses have an obligation to prevent slavery and human trafficking. Every company must do its share to eradicate this modern day scourge.

Our Business

Durbin PLC works closely with international wholesalers/importers to source and supply quality-assured pharmaceuticals, consumables and medical equipment to over 180 countries worldwide, including the developing world. Our head office is in London.

In the UK, the Company is legally compliant with all relevant employment legislation. Durbin PLC is committed to maintaining and improving systems and our processes to avoid complicity in human rights violations related to our own operations and supply chain.

Where a country is deemed high risk the Company will seek assurances from its suppliers in that country that all workers have appropriate employment contracts, are of legal working age, and are paid a wage commensurate with the work that they do and the relevant practices in the country where that work is carried out.

Our Supply Chain

Our supply chains are mostly concentrated on pharmaceuticals and medical consumable products, which are predominately supplied via large wholesale and manufacturing organisations. Our responsible person & sales manager's have direct responsibility for supply chain management and acceptance of our supplier's credentials to be included in the Approved Suppliers List.

Effective 1st January 2018, our Supplier Approval Questionnaire has included a requirement for suppliers to acknowledge full compliance with the requirements of the Modern Slavery Act 2015. Suppliers are required to supply us with a copy of their own statement signed by an authorised signatory (or refer us to where this is on their website) or, where this is not available, to sign a statement supplied by Durbin to indicate that their supply chain is compliant with the main provisions of the Modern Slavery Act 2015. Copies of these statements are then added to the Supplier Bona Fides folders that we keep on all suppliers and which also include their licences to trade in pharmaceutical products. Commercial supply contacts with Durbin also now, where relevant, include appropriate clauses and undertakings regarding supplier compliance with the Modern Slavery Act 2015.

No supplier contracts will be awarded to any supplier that is not able to comply with the undertakings detailed in the Modern Slavery Act 2015. Any breach of the Act by a supplier will result in dialogue with that supplier and potentially the termination of that supply contract.

Responsibility

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

- **Policies:** The Board of Directors are responsible for ensuring all Company policies are fully compliant with UK employment legislation and that all policies are reviewed at least every two years. All policies are available to the Company's employees via the Company Intranet, Employee Handbook and in hard copy.
- **Risk assessments:** These will be conducted by the Chief Operating Officer with support as required from Human Resources and Quality departments.
- **Investigations:** It will be the responsibility of the Chief Operating Officer to investigate any concerns raised, whether these concerns are communicated directly to the role holder or via the Anonymous Suggestions System which the Company operates with support as required, by the Human Resources & Quality departments.

Relevant Policies

In keeping with the Company's commitment to act with integrity in all its business dealings, many of our existing policies are relevant to ensure that there is no modern slavery or trafficking in any part of the business.

Our relevant policies include:

- **Anonymous Suggestions System:** The Company encourages all its workers to report any concerns related to the direct activities, or the supply chains of, the Company. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The Company's Anonymous Suggestions System is designed to make it easy for workers to make disclosures, without fear of retaliation.
- **Company Handbook:** The Company Handbook makes clear to employees the actions and behaviour expected of them when representing the Company. Durbin PLC strives to maintain the highest standards of employee conduct and ethical behaviour throughout its business and in managing its supply chain. The guidelines detailed in the code of conduct apply to all Company personnel, whether permanent or on fixed term contracts and including agency staff, contractors and workers employed via distributors to deliver services to the Company.
- **Recruitment of workers policy:** The Company 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.

- **Dignity at Work:** The Company encourages and maintains a professional and friendly working environment where everyone is free to work without harassment, victimisation or bullying for any reason and where everyone in the workplace is treated with dignity and respect. The policy, which is laid out in our Company Employee Handbook, applies to all workers, job applicants, agency employees, contractors, consultants, suppliers and customers.
- **Anti-Bribery and Corruption:** Durbin PLC is committed to the highest standards of ethical conduct and integrity in its business activities in the UK and overseas. This policy, also laid out in our Company Handbook, outlines the Company's position on preventing and prohibiting bribery in accordance with the UK Bribery Act 2010 and the US Foreign Corrupt Practices Act 1977 (FCPA). Durbin PLC will not tolerate any form of bribery or corruption by, or of, its employees, agents or consultants or any person or body acting on its behalf.
- **Equality and Diversity:** Durbin PLC is committed to being an equal opportunity employer and to ensuring that all employees, job applicants, customers/clients and other people with whom we deal are treated fairly and are not subjected to unfair or unlawful discrimination. This policy is again laid out in our Company Employee Handbook.

Due Diligence Processes for Slavery and Human Trafficking

As part of our commitment to identify and eradicate slavery and human trafficking from within our business and from those businesses with which we interact, we -

- Work closely with our supply chains to ensure compliance with legislative obligations and we require these organisations to have suitable anti-slavery and human trafficking policies and processes.
- Seek to build long standing relationships with suppliers and to make clear our expectations of ethical business behaviour from them.
- Have in place systems to encourage the reporting of concerns on the Company Intranet under our Anonymous Suggestions System.
- Monitor potential risk areas in our supply chain.

Education and Training

To ensure appropriate levels of risk awareness in respect of modern slavery and human trafficking, we provide annual training to relevant employees and management in all departments.

The Human Resources department has the responsibility for ensuring that all employees are aware of the Company's statement of compliance with the Modern Slavery Act 2015 and its

on-going commitments. This statement is displayed on the Company Intranet and included in the Employee Handbook.

Our Effectiveness in Combating Slavery and Human Trafficking

We believe that because of our position within the healthcare industry and our direct one to one recruitment processes, with subsequent monitoring of performance and the attainment of regulatory standards, our exposure within our human resources to human trafficking and slavery is low. The Company does however now review its existing supply chain on an ongoing basis to ensure that all suppliers are evaluated for compliance with the Modern Slavery Act 2015. Any non-compliance will result in removal from the Approved Suppliers List.

Board Approval

This statement is made pursuant to Section 54(1) of the Modern Slavery Act 2015 and constitutes Durbin PLC slavery and human trafficking statement for the financial year ending 31st December 2020.

This statement has been approved by the Company's board of directors and signed by the Managing Director, who will ensure it is reviewed annually and published.

Dan Piggott
Managing Director, Product Access Division – Uniphar

Date: 1st January 2020