



Modern Slavery Act 2015 and Transparency in Supply Chains Act 2010

STATEMENT

OVERVIEW

This statement, made pursuant to section 54(1) of the Modern Slavery Act 2015, sets out the approach taken by Qualasept Pharmaxo Holdings Limited (QPHL) and its subsidiaries, Qualasept Limited (trading as Bath ASU), Pharmaxo Pharmacy Services Limited, Microgenetics Limited, and Corsham Science Limited (together the QPHL Group) to ensure that slavery, servitude, forced labour and/or human trafficking (together Modern Slavery) does not exist in our supply chains.

OUR BUSINESS AND VALUES

The companies making up the QPHL Group are all registered at 1 and 3 Corsham Science Park, Corsham, Wiltshire, SN13 9FU.

The core business activities of the QPHL Group are:

- **Bath ASU and Pharmaxo Pharmacy Services Limited** - 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.
- **Microgenetics Limited** – the capture and management of microbiological environmental monitoring data; and testing for presence and levels of microbial contamination in a range a sample types, such as sterility testing in the pharmaceutical sector hybrid diagnostic qPCR testing.
- **Corsham Science Limited** – 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.

The QPHL Group has four Values, which we embody through all we do:

1. Where patients come first:

Our patients are fighting cancer, living with long-term disease or in need of pain relief. They are dependent on healthcare professionals, including us, to manage proven but complex clinical pathways to get better. In all things, but particularly when things go wrong, we must act as though the patient is one of us. One day it might be.

2. Can it be better?

Great innovations, well-executed anywhere in our processes, can create value through higher quality products and services, lower costs and increased capacity, both for us and the partners we work with. Raising healthcare productivity like this will increase the capacity

of healthcare systems, treat more patients, and improve our business.

3. Is there more to learn?

Almost always yes. To realise our vision, we must all become experts in our domain. What we do should be built on an expanding scientific, technical, process and clinical knowledge base while we develop an ever-deeper understanding of our partners' needs. Learning more about our domain every day develops expertise.

4. Our commitment to you:

Our community - We should care about each other as much as we care about what we do. Collective experiences both in and out of work and respect for each other will drive a sense of connection and belonging.

Your career - A job that enables you to use your strengths, develop autonomy and take responsibility is at the heart of motivation. Promoting your learning and development is important to you and us in your job now and for future roles.

The QPHL Group has over 380 employees and operates only out of the United Kingdom, which is deemed a low risk country by the global slavery index.

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 and human trafficking from touching our business and supply chains. We expect the same standards from all our contractors, suppliers, and other business partners.

OUR SUPPLY CHAINS

We buy a wide range of goods and services, from raw medicinal products, medicines, and consumables, through to corporate clothing, and waste disposal. Some of these products and services are used in the provision of healthcare to patients.

Hundreds of suppliers engage with us, who in turn have their own supply chains, making our end-to-end supply chains complex.

MODERN SLAVERY OVERSIGHT WITHIN THE SUPPLY CHAIN

In order to ensure that other organisations comply with our own 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 meet our standards on modern slavery.

The QPHL 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. In addition, we operate a Company bonus scheme.

TRAINING AND POLICIES

We have implemented a training package on modern slavery and anti-trafficking. 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 those who raise concerns. 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. We have a Whistleblowing Policy, that is promoted on our intranet on the front page.

OUR EFFECTIVENESS IN COMBATING SLAVERY AND HUMAN TRAFFICKING

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

- Any modern slavery concerns raised through our Whistleblowing (or other) 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 the QPHL Group.

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

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Ian Muir

June 2022