

Modern Slavery Act Statement 2020

Introduction

Pharmed Group is publishing this statement in accordance with the UK Modern Slavery Act 2015 (the 'Act'). The Act requires businesses to state the actions they have taken during the financial year to ensure that modern slavery is not taking place in their operations and supply chains. Modern slavery encompasses slavery, servitude, forced labour and human trafficking.

This statement covers Pharmed Group and its group companies and refers to the financial year ending 31 December 2020.

Pharmed Group's business and supply chains

The Pharmed Group offers a variety of sales, marketing, distribution and after sales support services to manufacturers of laboratory, medical, pharmaceutical and consumer healthcare products. The Pharmed Group is primarily focused on the Irish and UK market.

Turnover was €43.5 Million in 2019. We have over 190 personnel across our operations based in Ireland and the UK. Further information on our business can be found in the Group's Financial Statements (Pharmed Holdings Limited – registration number 420569) which are filed annually with the Companies Registration Office in the Republic of Ireland. <https://www.cro.ie/en-ie/>

Pharmed Group supply chains are complex and includes more than 200 suppliers that provide us with:

- Goods and services that are imported from manufacturers and other distributors for supply to the UK and Ireland markets.
- We work with third parties on the transportation of our products to our customers.
- Good and services that are required for our service and calibration services;
- Goods and services that are required to run our business, for example IT, marketing, facilities management and engineering services.
- We also partner with some external contract manufacturing organisations that supply finished product for sale, such as food supplements etc.

Policies

Our range of company policies set out how employees should apply our values (professionalism, entrepreneurial spirit, responsibility, dynamism and integrity) and expectations in their daily work and embeds respect for human rights and labour rights across the business:

- Our Corporate Responsibility Policy recognises that responsible, sustainable corporate performance is essential to the long term success of our business and is desirable to all of our stakeholders. We adhere to the principles relating to the environment, integrity and ethics, our people, health and safety, community and performance.
- Our Labour Standards Policy sets out minimum labour standards to guide us in our business operations incorporating:
 - o Ethical responsibilities towards our customers, employees and the communities in which we work and our wish to work and trade in an ethical fashion;

- Threat to security of supply – where the group has identified that labour standards abuses in supply chains that can pose a risk to the security of supply;
 - Adverse publicity and damage to our reputation – adverse publicity from the discovery of labour standards abuses in the Company’s supply chain.
 - Our groups’s commitment to ensure its suppliers reach minimum labour standards at all times in relation to child labour, forced & compulsory labour, health & Safety, freedom of association, discrimination, disciplinary practices, working hours and remuneration.
- Our Ethical Interactions & Anti-Bribery/Anti-Corruption Policy describes what is required to meet Pharmed Group’s commitment to operate ethically in our business and personal interactions with third parties, including:
- Patients – members of the general public who may use Pharmed Group products or services;
 - External stakeholders – Pharmed Group’s key stakeholders. Examples include: healthcare professionals (“HCPs”) (including members of the medical, dental, pharmacy and nursing professions, and relevant administrative staff), healthcare organisations (“HCOs”), payors, scientists, medical societies, patient groups and public officials;
 - Other third parties – third parties (other than external stakeholders). Examples include: the media, vendors, suppliers, distributors, agents and partners.

Assessment of Modern Slavery Risk

As part of our commitment to working in line with UN Guiding Principles on Business and Human Rights, we periodically assess our human rights risks at a corporate level to ensure we focus on where our business has the greatest potential to impact people. For labour rights we consider country of operation, the type of work being carried out and the type of labour being used to determine risk level and we refer to external data sources (antislavery.org; Govt.uk) to help us better understand the contextual factors relevant to modern slavery.

We believe the risk of modern slavery in our directly employed workforce is low. This is due to the historically professional nature of our industry, the regulated nature of aspects of our industry, our employees being largely educated or skilled, or undertaking work in controlled environments where there are established policies and processes.

In 2019 we were subject to external audits in relation to labour standards for contracts within the National Health Service in relation to the category of services/supplies that we were awarded. In 2020, the NHS have moved to a new system and we are working with the Modern Slavery Assessment Tool (MSAT) which is embedded into their Supplier Registration System.

Our exposure to risk of labour exploitation increases when we engage with our suppliers where products are manufactured in countries where human rights are not well protected. We therefore assess our suppliers and those relationships, taking into consideration the country of manufacture and the elements set out in our Labour Standards Policy.

Governance

The Pharmed Group Board of Directors oversee our approach to addressing human rights risks, including modern slavery and this approach includes senior representatives from across the business including from the operational, compliance, finance, legal, quality and human resource disciplines.

The Board provides oversight through our well-established governance and risk management frameworks and has approved this statement.

Embedding Respect for Human rights

Mandatory training on Labour Standards is designed to help our workforce understand ethical issues relating to our supply chain. Our Values and Culture as set out in our Strategic and Operational Plans, Induction Programmes and Policies and helps to create an environment where issues can be raised and rigorous follow up ensures concerns are addressed. Company representatives visit different countries/suppliers while maintaining the business relationship and there have been no signals suggestive of modern slavery.

Overseeing Third Parties

We aim to work with third parties that share our values and work to the ethical and business standards expected by Pharmed Group. Third parties are assessed against the principles set out in our policies and operating procedures enabling us to identify labour rights risks before entering into contracts with them. We evaluate our Suppliers against standards as set out in our Labour Standards Manual and assess risk based on their responses and seek improvement where possible and take corrective action where required.

Reporting and Investigating Concerns

We want to maintain an open environment where people feel confident to raise concerns about possible breaches of our policies or suspected violations of country laws and regulations. Anyone within Pharmed Group can raise issues; the management hierarchy within the organisation are easily contactable and approachable. Pharmed are committed to promptly investigating all reports of alleged unethical, illegal or inappropriate activity. In 2019 there were no reports suggestive of modern slavery. The Pharmed Group publishes an annual Slavery & Human Trafficking Statement setting out the measures that the Group has taken to ensure that slavery or human trafficking is not taking place within its supply chains or within itself.

Collaboration & Training

Pharmed Group endeavors to seek continuous improvement in its approach to identify and addressing modern slavery risks. We monitor a number of organisations such as the Equality and Human Rights Commission, Ethical Trade Initiative, Anti-Slavery Organisation and the International Labour Organisation to ensure our processes and procedures are up to date and reflect the current economic and social status nationally and internationally. Staff training includes awareness of the Human Cost of Healthcare within the NHS.



Dara Murphy
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