Modern Slavery and Human Trafficking Statement

Introduction

This statement sets out Kent-Athlone Pharma Group's (hereinafter referred to as the "Company" or "We") actions to understand all potential modern slavery risks related to its business, and to put in place controls and procedures which are aimed at ensuring that there is no slavery or human trafficking in its own business and within its wider supply chain. This statement relates to actions and activities during the financial year 6 April 2026 to 5 April 2027.

As part of the pharmaceutical sector, we recognise that we have a responsibility to take a robust approach to slavery and human trafficking.

The Company is committed to preventing slavery and human trafficking in all its forms, throughout the business and in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

We have a dedicated compliance team, which consists of representatives and involvement from the following departments:

- Legal.
- Audit and Compliance.
- Human Resources.
- Operations, including Supply Chain and Procurement.
- Commercial Sales teams.

Our Company structure and supply chains

This statement covers the activities of the Company.

The Company is committed to ensuring that it maintains the highest ethical and moral standards throughout its business, and through all relationships with third parties within its supply chain. This is demonstrable through our commitment to the principles of the UN Global Compact, alignment with the UNDP Sustainable Development Goals, and our commitment to achieving Eco Vadis accreditation in 2023. We uphold the highest levels of compliance through our business activities, ensuring integrity, transparency, and equality always. Kent Pharma is committed to acting in the best interests of the global community in which it operates, ensuring that all applicable legislation, regulations, Codes of Conduct, and industry best practice are adhered to.

About The Company

The Company is a specialty, European pharmaceutical company with sites in both the UK and Ireland. We have a significant history of supporting and collaborating with customers in the UK, Ireland, and internationally, through a network of partners and suppliers around the globe. The Company has a broad portfolio of value-added products, delivered through in-house product development capabilities and specific focus on in-licencing and distribution agreements fulfilled through a network of global partnerships. Our portfolio consists of over 200 products, with a core focus on Anti-Infectives, Pain, Ophthalmology, Oncology, and Hospital Injectables. A large proportion of the medicines we distribute are manufactured by third party manufacturers and sold through direct sales and third-party distribution.

Our supply chain primarily consists of authorised pharmaceutical manufacturers and distributors. The majority of these are located in countries where the risk of modern slavery and human trafficking is low. Where we deal with suppliers in countries with higher risk, we have put more robust controls and due diligence in place to combat modern slavery and human trafficking in all its forms.

To reduce labour and human rights risks, particularly regarding fair and safe employment practices and modern slavery and human trafficking, the Company is committed to:

- Providing on an annual basis awareness training on the topic of Supply Chain Labour and Human Rights to 100% of the workforce.
- Reporting 0 cases of Modern Slavery and Human Rights abuses in our supply chain.
- Engaging in communication campaigns with supply chain stakeholders regarding risks and best practices on Labour & Human Rights practices.
- Conducting Supplier Risk Assessments procedure for suppliers on an annual basis.
- Distributing our newly implemented Supplier CSR Questionnaire to all suppliers by 2030.

The following are the measures and actions we take to align with our beliefs and achieve the objectives listed above:

- Mitigate the risk of slavery and human trafficking occurring in our supply chains, including reviewing, where necessary, the controls that our suppliers have in place and carrying out other suitable checks, including audits.
- Provide training on Labour and Human Rights applied to our Supply Chain to directors and relevant employees, and additional training to those working with high-risk countries.
- Only engage with suppliers that are able to demonstrate due regard to health and safety matters as well as modern slavery and human rights.
- Continuously review and implement continuous improvement on our Supplier CSR Questionnaire.
- Review on an annual basis our Supplier Risk Assessment procedure and keep preference for those suppliers that pose less risk to the company's supply chain.
- Conduct audits of suppliers and provide corrective actions.

Countries of operation and supply

We currently operate directly in the UK and Ireland with partner/supply networks as detailed above.

The following is the process by which the Company assesses whether or not particular activities or countries are high risk in relation to slavery or human trafficking:

- Use of our Supply Chain CSR Risk Assessment. This risk assessment tool is used to evaluate and monitor sustainability risks associated with working with third parties.
- Through this assessment we identify whether our suppliers' activities ae associated with sustainability risks and we act upon them where necessary.
- The risks we evaluate fall into three pillars, environmental, social, and ethical. Additionally, we assess based on industry, geographical location, and individual engagement.

- We use SASB to define both sector and industry[1], as well as to indicate purchasing category.
- We use a combination of the Environmental Performance Index[i], the Labour Rights Index[2], the Global Rights Index[3], and the Corruption Perception Index[4] to assess and mitigate against risk.
- We refer to internal policies (detailed below), rigorous due diligence and investigations in addition to conducting risk assessments in line with the above.

Relevant policies

We operate the following policies that describe our approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in our operations:

- **Whistleblowing policy** We encourage all of our employees (including agency workers, consultants and temporary), customers, and other business partners to report any concerns related to the direct activities, or the supply chains of, our Company. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. Our whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation. Employees, customers, or others who have concerns can use our confidential anonymous reporting tool 'WHISPER'.

- **Employee Code of Conduct** Our code makes clear to employees the actions and behaviour expected of them when representing our organisation. We strive to maintain the highest standards of employee conduct and ethical behaviour when operating and managing our supply chain.

- **Supplier/Procurement policy and Code of Conduct** We are committed to ensuring that its suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour. We work with suppliers to ensure that they meet the standards of the code and improve their worker's working conditions. However, serious violations of our supplier code of conduct will lead to the termination of the business relationship.

- **Recruitment policy** We use only specified, reputable employment agencies to source labour and always verify the practices of any new agency before accepting workers from that agency. We ensure that we undertake referencing of all employees during the onboarding process through a specialised third-party platform to mitigate risk through screening.

- **CSR policy** Our CSR policy details our commitment to incorporating social responsibility in everything we do. Our commitment to bettering the lives of our community is embedded within our ethos and we strive not only to set a standard in excellence within our sector, but more extensively through our dedication to positively impacting social change. Our policy is based on five guiding principles:

- To integrate CSR considerations into our business decisions.
- To minimise the impact our work may have on the **environment** and those around us, whilst maximising the benefits our work brings.
- To strive for **continuous improvement** in our CSR/ESG performance.
- To be a catalyst for change through encouraging **diversity** and through the utilisation of our team's skills, voices, and perspectives.
- To endeavour to always do the right thing, to boost **community engagement**, to bring about impactful and positive change, to ensure change is beneficial to the wider community and to leave a **sustainable legacy** through our work.

- **Anti-bribery and corruption policy** Our policy reiterates the Company's stance on prohibiting facilitation payments and kickbacks; setting out the expected standards of behaviour in respect of corporate hospitality, gifts and donations, and contractually obliging compliance with the policy and the reporting of suspicious activity in line with current legislation.

- **Company Values** our Company values are embedded into our daily activities through our performance management and appraisal cycle, with accompanying standards and competencies which we expect our team to uphold. Integrity and accountability are both core values for the Company .

Due diligence

We undertake due diligence when considering taking on new suppliers, and regularly review our existing suppliers though ongoing due diligence and auditing. Our due diligence and reviews include:

- mapping the supply chain broadly to assess particular product or geographical risks of modern slavery and human trafficking.
- evaluating the modern slavery and human trafficking risks of each new supplier as part of a more general human rights or labour rights assessment.
- reviewing on a regular basis all aspects of the supply chain based on the supply chain mapping.
- conducting supplier audits or assessments which have a greater degree of focus on slavery and human trafficking where general risks are identified.
- participating in collaborative initiatives focused on human rights in general, and slavery and human trafficking.

Performance indicators

We have reviewed our key performance indicators (KPIs). As a result, we:

- mandate all staff completed training on business ethics (including modern slavery) by 31 December annually.
- developed a system for supply chain, whereby we evaluate potential suppliers before they enter the supply chain.
- reviewed existing supply chains.

- Conduct continual performance management and appraisal processes within our team.
- Carry out reviews of our Company policies and procedures in line with current legislation, regulation, guidance, and best practice.

Training

We require all staff within the Company to complete training on modern slavery as a module within our wider business ethics training programme.

Our modern slavery training covers:

- our business's purchasing practices, which influence supply chain conditions.
- how to assess the risk of slavery and human trafficking in relation to various aspects of the business, including resources and support available.
- how to identify the signs of slavery and human trafficking.
- what initial steps should be taken if slavery or human trafficking is suspected.
- how to escalate potential slavery or human trafficking issues to the relevant parties within the Company.
- what external help is available.
- what messages, business incentives or guidance can be given to suppliers and other business partners and contractors to implement anti-slavery policies.
- what steps the Company should take if suppliers or contractors do not implement anti-slavery policies in high-risk scenarios, including their removal from our supply chains.

The Company operates a policy of continuous improvement, spanning our internal processes and business practices and our engagement with our supply chain. We will continue to prioritise and commit to ensuring that modern slavery and human trafficking in all its forms does not take place within the Company directly, or within our supply chain.

Board approval

This statement was approved on 03.06.26 by our Senior Leadership Team and Board of Directors, who will review and update it annually.

Director's signature: TERRY petersen

Director's name: Terry Petersen, CEO

Date: 03.06.26