



Modern Slavery Statement

Introduction from the Chief Executive

According to the United Nations, around 30 million people are currently in the slave trade. These are people from around the world, with India, China and Pakistan currently housing the highest numbers of people in slave labour.

Modern slavery

However, the idea of modern slavery covers several areas – not simply those born into discrimination and a class-based slavery system. In fact, modern slavery also covers other areas, such as bonded labour, forced migrant labour, child labour and more. The slave trade even takes place in more developed, wealthy countries, such as right here at home, in the United Kingdom and in Europe.

At one end of the chain, modern slavery looks like a migrant worker being forced into labour for fear of losing their passport, or a child being tasked to work in a dangerous factory. However, the links that tie our global economy together mean that modern slavery has an altogether different image, too.

A global concern

Without a doubt, modern slavery is a global concern – one that is not confined to a specific geographical space or a certain social class, but one that is pervasive. That is why governments rightly have worked to introduce new legislation that extends their power to combat traffickers, seize offenders' assets and control their movements. Here in the United Kingdom, the Modern Slavery Act 2015 was introduced.

Smartway Pharmaceuticals Limited is a global organisation and that being the case, we can do our bit to protect those most vulnerable and at risk of slavery and human trafficking. We have an uncompromising, zero tolerance approach to slavery or human trafficking. Where we identify it, we will take robust and decisive action to put it right. Beyond that, where somebody in our supply chain causes a risk that we consider to be unacceptable, we will expect it to be put right.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement.



Our business

Smartway is a global distributor of pharmaceutical goods, products and services and have been in business for over 20 years. We have over 120 employees. We have a global annual turnover of in excess of £200m. We trade in countries on a worldwide basis, including within Europe, Asia and the Americas. We continue to develop our expertise in pharmaceuticals and accept our role as an extremely important part of the global supply chain, doing our bit to ensure patients are able to access medicines.

We are subject to a strict regulatory regime, meaning that we are inspected on a frequent basis for compliance with The Human Medicines Regulations 2012 and EU Good Distribution Practices. We are also subject to an ongoing internal audit/self-inspection programme, which includes the use of external specialists to review compliance and identify areas for improvement

Smartway is regulated and authorised and registered with various authorities, including by the Medicines and Healthcare products Regulatory Agency, the Home Office and the General Pharmaceutical Council.

Our supply chain

Our supply chains generally means we procure from within the United Kingdom and European Economic Area. We may occasionally procure from outside of these areas. We supply throughout the world, far more than we procure from. However, our supply chain is dynamic because of the nature of our business.

Our policies on slavery and human trafficking

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Anti-slavery Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

Due diligence processes for slavery and human

We have a dedicated regulatory team in place to meet our regulatory obligations across the globe. The regulatory team are responsible for administering and giving effect to our Quality Management System. This team is appropriately resourced, meets regularly and has direct access to our Chief Executive.

As part of our strategy to identify and mitigate risk we have established into our Quality Management System various procedures. These procedures help us:

- Carry out risk based due diligence on our customers and suppliers before we decide to start a relationship with them.
- Identify and assess potential risk areas in our supply chains including those posed directly by our customers and suppliers.
- Mitigate the risk of slavery and human trafficking occurring in our supply chains through ensuring we only deal with appropriately qualified and approved customers and suppliers.
- Monitor potential risk areas in our supply chains.
- Promote and protect whistle blowers.

Supplier adherence to our ethics

To ensure all those in our supply chain comply with our ethics, we ensure that our suppliers are aware of our expectations. We achieve this through actively communicating with our suppliers, setting the right tone and culture within our organisation and ensuring that we have a robust Quality Management System in place that is inclusive of the requirement to carry out appropriate risk based due diligence on our suppliers.

We have a zero tolerance to slavery and human trafficking within our business. Where we identify that a supplier, customer or another party within our supply chain has not met the high standards we set, we will cease our dealings with them.

Training Whistleblowers

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide training to our staff at the point of induction and ensure that they know where to find our modern slavery statement.

We also ensure our staff know who to speak to if they have a concern. We also enable staff to report their concerns confidentially.

We will protect whistleblowers from wherever they are. We encourage confidential whistleblowing to assist us protect the supply chain from slavery and human trafficking.



Taking robust action

Where we identify a need to act, we will do so decisively.

Our effectiveness in combating slavery and human trafficking

We use the following key performance indicators to measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains:

- Carry out four audits per year on our business across our identified risks;
- Co-operate with all lawful requests for assistance by authorities around the globe within 48 hours;
- Carry out a review of our supply chain at twice a year with a specific emphasis on modern slavery and human trafficking; and
- Ensure that this policy statement is reviewed annually by our senior management team.

Any questions, comments and requests regarding this policy are welcome. If you wish to contact us, please use:

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Approval and review

This policy was approved by the board of directors on 16th December 2019. It will next be reviewed on 26th April 2026.

The logo for Smartway features the word "Smartway" in a bold, black, sans-serif font. A small green circle is positioned to the left of the letter 'S'. To the right of the word, there is a white circle with a dark blue center. The background is a solid blue color with several overlapping circles of varying shades of blue and white, creating a dynamic, abstract pattern.

Smartway

**Transforming lives by empowering
access to medicines globally**

smartwaypharma.co.uk