



THE MODERN SLAVERY ACT 2015

SLAVERY AND HUMAN TRAFFICKING STATEMENT FOR THE PERIOD 1st JANUARY 2023 TO 31st DECEMBER 2023

INTRODUCTION FROM THE SITE DIRECTOR

Bespak Holmes Chapel is committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls with a view to ensuring that modern slavery is not taking place in our own business or, to the extent reasonably possible, in any of our supply chains.

This statement is made in accordance with the Modern Slavery Act 2015 (the "Act") and constitutes Bespak Holmes Chapels slavery and human trafficking statement for the financial year to 31st December 2023.

ORGANISATION'S STRUCTURE AND BUSINESS

Bespak Holmes Chapel is a global market leader in the design, development and manufacture of drug delivery devices, providing inhaler and nasal technologies, as well as development and manufacturing services. Our customers include some of the world's largest pharmaceutical companies with whom we work to accelerate their drug route to market.

OUR SUPPLY CHAINS

Our supply chains include the sourcing of raw materials, componentry and packaging for the manufacture of pharmaceutical products, as well as goods and services required to operate our manufacturing sites such as energy, maintenance facilities management, operating supplies, and capital equipment. To reinforce the standards of Bespak's Code of Conduct, Bespak has established a Supplier Code of Conduct. Bespak requires its suppliers to acknowledge and adhere to the principles in the Supplier Code of Conduct.

OUR EMPLOYMENT PRACTICES

Our employment practices are compliant with applicable employment and health and safety legislation and wherever possible we endeavour to exceed our legal obligations. Where we do not engage staff directly and rely on the provision of agency staff, we require our supplier(s) to adhere to our Supplier Code of Conduct and requires suppliers to ensure that there is no modern slavery or human trafficking in their business.

We operate a whistleblowing service that allows any employee or anyone connected with our business to report any suspected incidents including slavery and human trafficking matters. This service is communicated to our employees via our employee handbook. Our culture permits employees and third parties to raise concerns in a constructive manner without fear of recrimination. Any such reports are thoroughly and independently investigated. For the year to 31st December 2023 no calls were received via our whistleblowing process relating to modern slavery.



OUR POLICIES ON ANTI-SLAVERY AND HUMAN TRAFFICKING

Our policies reflect our commitment to act ethically and with integrity in all our business relationships, including our Code of Conduct which is published on our intranet and has been communicated to all of our employees. Our Code of Conduct is our statement of ethical and compliance principles that guide our daily operations. The Code of Conduct establishes that we expect management, employees and agents of our company to act in accordance with law and applicable company policy. In 2024, we have launched an Anti-Slavery & Human Trafficking Policy to draw employees' attention to the Modern Slavery Act 2015, what it means in practice for our employees, and informs how to report any relevant concerns.

SUPPLIER DUE DILIGENCE AND ADHERENCE TO OUR ANTI-SLAVERY APPROACH

As part of our initiative to identify and mitigate risk we have a rigorous supplier selection process which includes supplier questionnaires, and a risk based approach to supplier auditing. Where appropriate, we build long term relationships and take a partnering approach with our suppliers.

We require new suppliers to comply with our Supplier Code of Conduct which requires suppliers to ensure that there is no modern slavery or human trafficking in their business. This Code is published on our website.

TRAINING

People are our most valuable asset and we recognise that appropriate training on modern slavery and human trafficking will increase awareness as well as mitigate risk within our business and our supply chains. All employees receive specific training covering our Values and our Code of Conduct, and in 2024, we will conduct anti-slavery training via an online learning module; this training will be provided to those employees whose roles are more likely to be impacted by / be exposed potentially to, modern slavery and human trafficking. Following completion of this training, each impacted function will review their respective areas to identify and implement any improvements that will help to reduce the risk of modern slavery practices entering our business and /or wider supply chain.

EFFECTIVENESS IN COMBATTING SLAVERY AND HUMAN TRAFFICKING

In addition to the measures outlined above, we take the following steps to prevent slavery and human trafficking taking place in any part of our business or, to the extent reasonably possible, supply chains:

- Use labour monitoring and payroll systems to ensure we pay staff at least in accordance with local legislation and that our staff have the necessary rights to work in the country in which they are employed;
- Work closely with our Employee Focus Team, which represents employees across the business and encourage them to discuss a range of employment matters indiscriminately;
- Conduct audits of certain suppliers which may include investigations regarding their employment practices and transparency of their supply chains; and
- Where appropriate, taking into account the size of our spend, nature of the product and results of supplier audits, there is communication and personal contact with the next link in the supply chain to understand their compliance with our expectations.

Bespak HC Ltd.

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The statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes oursite's slavery and human trafficking statement for the current financial year.

Approved by Site Director of Bepak Holmes Chapel, on June 5th 2024

Signed:

A handwritten signature in blue ink, consisting of a stylized 'J' followed by a long horizontal stroke.

Jeremy Tidmarsh
Site Director
Bepak Holmes Chapel

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