

## THE MODERN SLAVERY ACT 2015

### SLAVERY AND HUMAN TRAFFICKING STATEMENT FOR THE PERIOD 1 MAY 2018 TO 30 APRIL 2019

#### INTRODUCTION FROM THE CHIEF EXECUTIVE OFFICER

Consort Medical plc and its subsidiaries (the “Group”) are 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 Consort Medical’s slavery and human trafficking statement for the financial year to 30 April 2019. This statement covers Consort Medical plc and its subsidiary undertakings.

#### ORGANISATION’S STRUCTURE AND BUSINESS

Consort Medical is a leading global Contract Development and Manufacturing Organisation (CDMO), providing advanced delivery technologies, formulation and manufacturing solutions for drugs. Our customers include some of the world’s largest pharmaceutical companies. The Group has its head office in the UK and trading companies across Europe. The annual turnover of the Group was £305.1m for the period 1 May 2018 to 30 April 2019 (and therefore in excess of the Act’s threshold of £36m).

We offer customers a single source for drug and device development, formulation, manufacturing and fill/finish from our two integrated operating divisions:

***Bespak (Devices)*** – a global market leader in the development and manufacture of premium drug delivery devices, serving pharmaceutical companies with inhaler, auto-injector, nasal and ocular technologies and development and manufacturing services.

***Aesica (Drugs)*** – a leading pharmaceutical CDMO serving pharmaceutical companies with active pharmaceutical ingredient (API) and finished dose formulation development and manufacturing services.

#### OUR SUPPLY CHAINS

Our supply chains include the sourcing of raw materials, polymers, packaging and semi-finished goods for manufacture of drug delivery devices, components and 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.

#### 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 which is published on our website and requires suppliers to ensure that there is no modern slavery or human trafficking in their business.

We also operate an independent 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. 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 30 April 2019 no calls received through the independent whistleblowing service related to modern slavery.

## **OUR POLICIES ON ANTI-SLAVERY AND HUMAN TRAFFICKING**

Our Group policies reflect our commitment to act ethically and with integrity in all our business relationships, including our Code of Business Ethics which is published on our website and has been communicated to all of our employees. In the wake of the Act we adopted in 2016 an Anti-Slavery & Human Trafficking Policy to draw our employees' attention to the Act, what it means in practice for our employees, and informs them 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.

This year the Heads of Procurement of Bepak and Aesica, and the Group General Counsel of Consort, have formed a steering committee to make further progress in securing supplier adherence to our anti-slavery approach. This committee will oversee the creation of a supplier-focused, specific anti-slavery policy (which builds on the content in the Group's Supplier Code of Conduct) which will be sent to all current and future suppliers requesting confirmation of their adherence to its terms. We are also including an express anti-slavery clause in all our template supplier contracts going forwards, or will otherwise seek to negotiate such a clause into our supplier's contracts if one is missing. In due course the committee intends to complete a targeted risk assessment of the Group's supply chain, utilising tools made available from organisations such as Stronger Together, to determine which suppliers may have a higher risk of exposure to modern slavery and decide what, if any, action needs to be taken.

## **TRAINING**

People are the Group's 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. Employees receive periodic training covering our Values and our Code of Business Ethics, and this calendar year we have introduced additional 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 risks. Finally, all of our

Procurement team members undertake the Ethical Procurement and Supply e-learning (which includes preventing human rights abuses) as part of their on going CIPS (Chartered Institute of Procurement and Supply) certificate.

#### **OUR EFFECTIVENESS IN COMBATING SLAVERY AND HUMAN TRAFFICKING**

In addition to the steps 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;
- in support of the Group's employees' rights, Aesica recognises Trade Unions in each of its operating countries (being the UK, Germany and Italy) and works pro-actively to foster and maintain a collaborative relationship with the Workers' Council in Germany. Bepak works closely with its Employee Council, which represents employees across the business and encourages 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.

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

Approved by the Board of Directors on 11 September 2019

Signed:



Jonathan Glenn  
CEO  
Consort Medical plc

11 September 2019

This statement covers Consort Medical plc, Bepak Europe Limited and Aesica Queenborough Limited.

