

The Modern Slavery Act 2015 (*“the Act”*) came into effect on 29 October 2015 and requires those entities carrying on a business or part of a business in the UK, supplying goods or services, and having an annual turnover of £36 million or more to disclose information regarding the steps they have taken to eradicate slavery and human trafficking from their supply chain as well as within their own organisation during the previous financial year.

Modern Slavery Act Statement

We are committed to good corporate citizenship and the highest ethical standards. To fulfil these commitments, we establish and maintain systems and controls to ensure that slavery and related human trafficking do not form part of the supply chain.

BUSINESS AND ORGANISATION

Barclay Pharmaceuticals is a short line wholesaler operating in the prescription pharmaceutical and pharmacy OTC markets. The company trades under the names Trident Pharmaceuticals and Enterprise. Short line pharmaceutical wholesale is primarily in respect of generic and parallel trade prescription drugs.

VALUES AND TRAININGS

We are committed to sourcing quality products from, and building relationships with, suppliers who share our values and ethical standards.

Our [Code of Conduct](#) provides important guidelines for interactions with customers, suppliers and other business partners. At the core of the Code of Conduct and our activities are our [ICARE principles](#), which are; Integrity, Customer-first, Accountability, Respect and Excellence.

All colleagues are encouraged to raise concerns; this includes potential violations of the Code of Conduct, company policies, and the laws of the countries in which we operate.

We have reporting mechanisms in place to collect and relay information regarding potential violations to appropriate company resources for review and follow up action.

We conduct web-based and/or face to face training for employees to emphasise the importance of acting with integrity and in line with our ICARE principles and Code of Conduct.

SUPPLY CHAIN AND DUE DILIGENCE

Some of our suppliers are located in countries that may be more vulnerable to human rights abuses than others. That is why we have several methods to manage our zero-tolerance policy for such abuses, including the following:

- We clearly communicate our expectations to suppliers to ensure adherence to our values and ethical standards.

- We establish appropriate policies and processes within our businesses to make sure that the products we purchase and sell comply with our ethical standards.
- We utilise both internal and external resources to evaluate the factories of our suppliers based in higher risk countries and audit them against recognised industry standards.
- Our supplier agreements include language that requires our supplier to obey national and regional statutory requirements in the country in which they operate, including where appropriate, any applicable laws regarding human trafficking, forced labour and other forms of modern slavery.

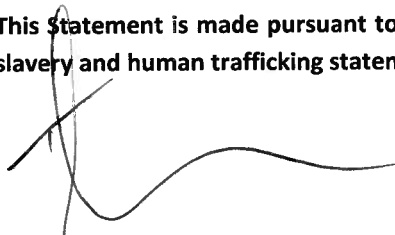
For our responsible sourcing and quality management systems, we have designed and implemented a number of processes to assess suppliers of the products introduced into the supply chain. The focus areas included in the assessment process include, but are not limited to, Commercial, Compliance and Quality Assurance.

Adverse audit findings, non-conformities and other remediation requirements are prioritised based on risk. If remediation is required, we work with our suppliers to improve their standards with corrective action plans and on-going reviews to make sure our standards are maintained. We aim to build relationships with our suppliers to ensure adherence to our values and ethical standards. If a supplier fails to adequately remediate the issue, the relationship would be re-evaluated and if necessary, terminated.

EFFECTIVENESS

We regularly review our monitoring program to ensure our actions are appropriate and we believe our efforts to date have been effective in preventing slavery and human trafficking from being part of our supply chain.

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 31 March 2018.



Toby Anderson
Chief Executive Officer
Celesio UK

Coventry, September 2018