

The Modern Slavery Act 2015 (*“the Act”*) 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**

LPHCS Limited (LPHCS) is committed to ensuring that we trade ethically, source responsibly and work to prevent modern slavery and human trafficking throughout our organisation and in our supply chain. This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 and highlights the key activities we have undertaken during the financial year ending 31 March 2024 to combat modern slavery in our organisation and supply chain.

### **Business Structure and Organisation**

We are a part of the Hallo Healthcare Group and have our head office in the UK. LPHCS is a business that provides outsourced Pharmacy Services to the NHS, it operates in over 34 NHS trusts with over 60 sites across the UK.

### **Our Policies, Values and Training**

We have appropriate policies in place that underpin our commitment to combat modern slavery and human trafficking in our supply chains or in any part of our business. Our policies are reviewed and updated regularly.

Our Modern Slavery Policy reflects our commitment to acting ethically, and with integrity in all our business relationships. We are committed to implementing and enforcing effective systems and controls to guard against slavery and human trafficking in our supply chains. The Policy is available to all colleagues on our intranet and supported by regular communications to colleagues to reinforce the key messages within the policy.

We also have the following policies in place relevant to modern slavery and business relationships, which are reviewed and updated regularly:

- Code of Conduct
- Recruitment Policy
- Procurement Policies
- Whistleblowing Policy and Procedures
- Anti-Bribery and Corruption Policy
- Grievance Policy
- Statutory Board Escalation Policy and Process

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.

We are an equal-opportunities employer committed to creating and ensuring a non-discriminatory and respectful working environment for our colleagues. Our recruitment and

people management processes are designed to ensure that all prospective colleagues are legally entitled to work in the UK and to safeguard colleagues from any abuse or coercion once in our employment.

We want all our colleagues to feel confident that they can expose wrongdoing without fear of retaliation.

Our Whistleblowing Policy encourages all colleagues to raise concerns including 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. Data on whistleblowing cases is shared with our Board of Directors each month.

These reporting mechanisms include a UK-based confidential helpline which is available 24 hours a day, 7 days a week, and a Statutory Board Escalation Process which ensures that colleagues are aware of those matters requiring immediate escalation to the Statutory Directors of LPHCS.

We provide online and face to face training for colleagues to emphasise the importance of acting with integrity and in line with our ICARE principles and Code of Conduct.

### **Supply Chain and Due Diligence**

We are committed to sourcing quality products from, and building relationships with, suppliers who share our values and ethical standards. The due diligence processes we have in place, help to ensure that we do not enter into business with any organisation, in the UK or abroad, which knowingly supports or is found to be involved in slavery, servitude and forced or compulsory labour

Our principal suppliers are regulated manufacturers and distributors of medical-surgical products, medical devices and pharmaceutical products. All of our suppliers are based in the UK.

We have implemented several methods to manage our suppliers and ensure our zero-tolerance policy for any human rights abuses is adhered to by those suppliers, including the following:

- We communicate our expectations clearly 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 take a risk based approach to ensuring we proactively engage with our existing suppliers; this engagement may include regular account management meetings, site visits, and top to top meetings
- Our supplier agreements include provisions that require our suppliers to obey national and regional statutory requirements, including any applicable laws regarding human trafficking, forced labour and other forms of modern slavery.
- We have strengthened our supplier due diligence and onboarding processes with the introduction of an online platform to collect data about our new suppliers and improve our understanding and management of risk around our supplier base. This onboarding process includes cross the functional review of the new supplier by assessment by Commercial, Finance, Compliance, and Professional Standards and Quality & Regulatory.

- Should a prospective, new supplier be based in a higher risk country (according to our Countries of Concern framework), we would complete enhanced compliance and diligence checks to identify any targeted risks that may need to be considered prior to proceeding with any engagement

Should there be any 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 governance frameworks 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.

Training sessions for existing colleagues on the key compliance risks affecting our business and inductions for new starters include the topics of supplier due diligence and modern slavery as appropriate.

Modern slavery risks are captured in our Corporate Risk Register.

### Statement of Approval

This Statement has been approved by the Board of Directors of LP HCS Limited, and the Board has authorised Kieran Doona, Chief Executive Officer, to sign the Statement on behalf of LP HCS Limited.

**Kieran Doona**  
**Chief Executive Officer**

23 September 2024