

## **Modern slavery statement for financial year ended 31 December 2018**

This statement is made by Advanz Pharma Services (UK) Limited on behalf of itself and all companies in the ADVANZ PHARMA group (collectively referred to as "ADVANZ PHARMA").

ADVANZ PHARMA is committed to maintaining the highest ethical standards in its dealings with all parties involved in the company's business activities, including employees, vendors, contractors and third parties. As an example of this commitment, ADVANZ PHARMA was the first pharmaceutical company worldwide to be certified by the British Standards Institution for its anti-bribery management system (BS 10500) and we have maintained this commitment to excellence by obtaining certification for our anti-bribery management system under ISO 37001 at the end of 2018.

This statement sets out the steps that ADVANZ PHARMA has taken, and is continuing to take, to ensure that modern slavery, human trafficking or any form of indentured servitude are not taking place in any of its supply chains or in any part of ADVANZ PHARMA's own business.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to ensure that all our business operations are conducted in accordance with applicable laws, regulations, industry codes and norms.

### Our business

We operate an international specialty pharmaceutical business, comprising a broad portfolio of medicines that are sold to wholesalers, hospitals and pharmacies in over 90 countries. ADVANZ PHARMA specializes in the acquisition, licensing and development of off-patent prescription medicines, which may be niche, hard-to-make products. ADVANZ PHARMA's medicines are manufactured by a network of third-party manufacturers and sold through a combination of direct sales and third-party distribution channels. ADVANZ PHARMA's diversified product portfolio consists of more than 200 products, representing a variety of dosage strengths, formulations and geographic markets and covering a range of therapeutic categories, including endocrinology, neurology, ophthalmology and urology.

### Our policies

We operate a number of policies to ensure that we conduct our business in compliance with all applicable laws and regulations and in an ethical and transparent manner. These include:

1. A Code of Conduct, applicable to all parts of the ADVANZ PHARMA group.
2. An Ethics and Compliance Charter that establishes governance procedures.
3. An Anti-Bribery and Corruption Policy, together with supporting Standard Operating Procedures as described below.
4. A Standards for Product Manufacturers and Suppliers Global Policy that includes a policy that manufacturers and suppliers shall be committed to upholding the human rights of workers and to treating them with dignity and respect.
5. Recruitment policies – our policies set clear standards and processes regarding the selection and appointment of all staff, including conducting eligibility as well as background checks to safeguard against human trafficking and against individuals being forced to work against their will.

6. A Whistleblowing policy. Openness is one of our core values. All employees know that they can raise concerns about how colleagues are being treated, or about practices within our business or supply chain, without fear of reprisals.

In addition, integrity is one of our core values and forms a part of every employee's performance management process.

#### Appointment and Management of Business Partners

We aim to ensure that our Anti-Bribery and Corruption Standard Operating Procedure ("SOP") applies to all our commercial partners (including commission-based sales agents, distributors and resellers) as well as manufacturers and suppliers. The SOP sets out procedures which must be followed to ensure the orderly appointment and management of all partners and to enable risk-based and informed decisions to be made on the appointment and management of partners, including assessment of the partner's commitment to ensure that modern slavery is not taking place in any part of their business. In addition, contractual undertakings that include reference to the avoidance of modern slavery are required before partners are engaged.

We regularly conduct training for our employees on the principles of the Modern Slavery Act. This training is included in employees' induction training and in annual refresher training.

#### Our performance indicators

We take a range of measures to monitor the effectiveness of the steps that we are taking to ensure that slavery and/or human trafficking is not taking place within our business or Partners, including:

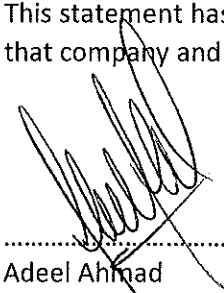
- regular dialogue with our business partners;
- ongoing performance management processes with our employees; and
- regular review of the effectiveness of our policies and processes.

#### Looking ahead

ADVANZ PHARMA is committed to continuously improving the way it manages its business operations. As part of this commitment we will continue to review and improve our policies, processes and controls to ensure that modern slavery and human trafficking do not take place in any of our supply chains or our own business.

#### Approval for this statement

This statement has been approved by the Board of Directors of Advanz Pharma Services (UK) Limited on behalf of that company and its UK affiliates which carry on business in the UK, the names of which are listed in Annex 1.



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Adeel Ahmad  
Director

Date: 10-04-2019.....

Annex 1

Company	Registration No.
Advanz Pharma Services (UK) Limited	4678629
Mercury Pharma Group Limited	2330913
Advanz Pharma Generics (UK) Limited	2760679
Mercury Pharmaceuticals Limited	2619880
Midas Bidco Limited	6883921
Amdipharm Mercury Midco Limited	8177295
Amdipharm Mercury Holdco UK Limited	8189816
Amdipharm Mercury UK Limited	8169596
Amdipharm Marketing Limited	6062056
Amdipharm UK Limited	4606340
Focus Pharma holdings Limited	6317129
Focus Pharmaceuticals Limited	4522142
Primegen Limited	9129663
Concordia Investment Holdings (UK) Limited	9821116

