ANTI-SLAVERY AND HUMAN TRAFFICKING STATEMENT
1: OPENING STATEMENT FROM SENIOR MANAGEMENT

ITH Pharma is committed to preventing acts of modern slavery and human trafficking from occurring within its business and supply chain, and imposes the same high standards on its suppliers. At ITH Pharma we are committed to running our operations responsibly, in so doing we are committed to ensuring that slavery and human trafficking, child labour and indeed any abuse of human rights have no place in or around our organisation, and we are pleased to reinforce that commitment through this statement.

2: STRUCTURE OF THE ORGANISATION

ITH Pharma is a UK Limited Company in the pharmaceutical sector. It employs approximately 210 people in the UK and has business operations in the UK.

ITH Pharma has an annual turnover of £50,000,000. To find out more about the nature of our business, please click www.ithpharma.com.

In order to provide aseptic compounding services, we work with a range of suppliers’ medical suppliers and logistics organisations to compound bespoke prescriptions for the NHS and deliver as required.

3: POLICIES

As part of our commitment to combating modern slavery, we have implemented the following policies:

We comply with all applicable employment legislation relating to employee terms and conditions, including pay, and we invest in supporting the health and well-being of our staff. Within the UK nobody who works in our offices - whether directly employed or not - earns less than the minimum wage. We encourage our people to feel empowered to call out any breaches of our policies including any concerns related to modern slavery.

We also make sure our suppliers are aware of our policies, and adhere to the same high standards.

These policies have been developed by reference to the Modern Slavery Act, the United Nations Guiding Principles on Business and Human Rights, supports the principles contained within the International Bill of Human Rights and the International Labour Organization’s Declaration of Fundamental Principles and Rights at Work.

4: DUE DILIGENCE

As part of our efforts to monitor and reduce the risk of slavery and human trafficking occurring within our supply chains, we have adopted due diligence procedures gaining assurances from our supply chains that they are adhering to the UK Modern Slavery Act and statutory guidance.

Our procedures are designed to:

- establish and assess areas of potential risk in our business and supply chains
- monitor potential risk areas in our business and supply chains
- reduce the risk of slavery and human trafficking occurring in our business and supply chains
5: RISK AND COMPLIANCE

ITH Pharma regularly evaluates the nature and extent of its exposure to the risk of modern slavery occurring in its supply chain by an annual review of our policies and procedures, complaints, an audit of pay scales and right to work information held, and reminders to our supply chain regarding adherence to the UK Modern Slavery Act.

We do not consider that we operate in high risk sectors or locations because we are working in a heavily regulated, audit-compliant industry.

Where we have identified a potential risk through due diligence, we look to improve procurement practices and look to industry-led and legal collaboration.

We enforce a strict code of compliance and do not tolerate slavery and human trafficking within our supply chains. For example, if we find proven evidence of a failure to comply with our policies we will immediately seek to terminate our relationship with the relevant supplier.

6: EFFECTIVENESS AND KPI

ITH Pharma uses key performance indicators (KPI) to measure how successful we have been in ensuring that slavery and human trafficking are not taking place in any part of our business or supply chains. These are as follows: minimum wage adherence and a record of complaints raised and dealt with.

7: TRAINING

We invest in educating our staff in our induction program to recognise the risks of modern slavery and human trafficking in our business and supply chains. Through our induction training programme, employees are encouraged to identify and report any potential breaches of the organisation’s anti-slavery and human trafficking policy. Employees are taught the benefits of stringent measures to tackle slavery and human trafficking, as well as the consequences of failing to eradicate slavery and human trafficking from our business and supply chains.

8: FURTHER ACTIONS AND SIGN-OFF

Following our review of our actions this financial year to prevent slavery or human trafficking from occurring in our business or supply chains, we intend to take the following further steps to tackle slavery and human trafficking: continue to monitor trends legislative changes and be proactive to meeting any changes in standards as required.

This statement is made in accordance with section 54(1) of the Modern Slavery Act 2015 and constitutes ITH Pharma’s slavery and human trafficking statement for the financial year commencing 01st April 2019 and ending 31st March 2020.

Signature: [Signature]
Director

ITH PHARMA LIMITED

Date: 01st April 2019