

# Slavery and Human Trafficking Statement for Financial Year ending 31 March 2022

## Introduction

This statement is made by Sciensus Pharma Services Limited, and Halcyon Topco Limited, part of the Sciensus group of companies (the “Sciensus Group”) pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 31 March 2022.

We acknowledge that modern slavery and human trafficking are crimes and a violation of human rights taking on various forms, including slavery, servitude, compulsory labour, and human trafficking for exploitation, and can have a significant adverse impact on individuals, families, and communities across the world. We have a zero-tolerance approach to modern slavery and human trafficking in our organisation and supply chain.

## Organisation structure

With over 30 years of experience, the Sciensus Group provides a range of pharmaceutical services focused on complex and usually high value medicines across chronic, rare disease and cancer patient cohorts. Leveraging its digital capabilities, extensive infrastructure and clinical expertise, the Sciensus Group manages the medication needs of over 230,000 patients in the UK and Europe. Servicing a range of public and private sector payors, the Sciensus Group aims to ensure that patients achieve the best possible experience and health outcomes from their medicines.

The Sciensus Group’s unique portfolio of services include patient compliance, patient insight and analytics, pharmacy services, market access and reimbursement, clinical logistics, inventory management, business process outsourcing services, nurse supported medication, and aseptic compounding.

The Sciensus Group partners with pharmaceutical companies, the NHS and health insurers, to manage and optimise the medicine outcomes for patients.

The Sciensus Group employs over 1,700 people with a team of specialists that is dedicated to helping each and every patient make the most of their medicine. The services the Sciensus Group provides are enabled by its end-to-end digital infrastructure connecting patients, physicians, pharmaceutical companies, health funders and health care providers.

We maintain a governance and risk management framework with ongoing review of risk throughout the year. This process covers all our business areas and is reportable at Board level.

## Our supply chains and how we are managing risk

The Sciensus Group operates in a highly regulated industry and given the nature of our business, we believe there is a low risk of slavery, human trafficking or child labour having a connection with our commercial activities. In addition, many of our key suppliers are members of the Pharmaceutical Supply Chain Initiative (PSCI) and this body has established a set of principles to support suppliers in establishing sustainable, ethical, and responsible labour practices. Further details relating to the PSCI are available at <https://pscinitiative.org/home>.



However, we recognise that there may be areas of our business where the risk of slavery is greater for instance business operations which are outsourced, namely security and cleaning.

Although we consider the Sciensus Group has a low direct risk of involvement with modern slavery and human trafficking we apply a risk and assurance based approach to mitigate risks.

All new suppliers are required to provide assurance around their ethical business practices, including confirmation of anti-bribery policies, anti-fraud and corruption policies, and their modern slavery statement for internal review before entering into contracts. Non-compliance is escalated.

For existing direct suppliers of medicines our procurement team undertake licence checks to ensure relevant licences continue to be held before submitting orders. The [Medicines & Healthcare Products Regulatory Agency](#) has stringent guidelines to be followed by suppliers of medicines and medical devices. If a supplier's licence is revoked the issue is escalated to our Superintendent Pharmacist for further advice.

Our commercial team manage the contracts and relationships with our key pharmaceutical company supply chain partners. Our new contracts include ethical supplier conduct principles which we are committed to supporting. We continue to develop our standard terms of business to include these principles and are continuing to review our older contractual arrangements to update with relevant provisions.

We have established safe recruitment practices in respect of our employees and require contracts where we use agency staff or consultants to confirm their recruitment arrangements including checking the right to work in the UK. All non-compliance is escalated.

#### Compliance, awareness and training

The Board and the Executive Leadership Team have overall responsibility to ensure that the Group maintain and are compliant with our legal and ethical obligations.

As part of our efforts to eliminate the risk of modern slavery within our business and supply chains all staff are required to complete annual modern slavery awareness training, together with other relevant training regarding our code of conduct and social responsibility including Safeguarding, Anti Bribery and Whistleblowing. Completion of training and the post training assessment is actively monitored. Any delay in undertaking e-learning or non-compliance is referred to relevant line managers. The training material is reviewed on an annual basis to take account of any legislative or regulatory changes.

Our staff are also required to familiarise themselves annually with relevant policies which are available via Document Management System. Policies are reviewed and updated biannually, or as required.

Modern Slavery related policies:
Whistleblowing Policy
Grievance Policy
Disciplinary Policy
Managing Violence and Aggressive Behaviour Policy
Recruitment and Selection Policy
Equality and Diversity Policy
Procurement Policy – new supplier form

Safeguarding Adults Policy
Safeguarding Children and Young People Policy
Code of Conduct
Employment Checks Policy
Fit and Proper Persons Policy
Community Social Responsibility Policy

At an operational level, line managers are responsible for engaging with their teams to implement and maintain the processes in place, ensuring all colleagues have received the appropriate training in accordance with the policy and procedures

The Sciensus Group operates an open culture and colleagues can report concerns to their line manager and/or other relevant personnel and are encouraged to use the independent whistleblowing help line. We had no concerns in respect of safeguarding or whistleblowing raised during the period

#### Next steps

The Sciensus Group will continue to provide adequate resources, awareness training and investment to support its zero tolerance approach to modern slavery and ensure our approach is proportionate to any identified risk.

We will continue to work to review our existing contractual relationships and to develop opportunities for monitoring and review.

#### Conclusion

As an organisation we continue to work to tackle the risk of modern slavery. Our engagement with our suppliers, both new and existing, includes robust processes to improve our efforts against the risk of modern slavery and human trafficking.

We will continue to seek ways in which to reduce this risk, taking effective action where non-compliance is identified.

This Statement has been approved by the Boards of Sciensus Pharma Services Limited and Halcyon Topco Limited.



Darryn Gibson  
Chief Executive Officer



John Bradshaw  
Group Company Secretary

Dated: 28<sup>th</sup> September 2022