



Slavery and Human Trafficking Statement

for Financial Year ending 31 March 2024

Introduction

This statement is made by Halcyon Topco Limited and Sciensus Pharma Services Limited which are 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 2024

Our position:

We acknowledge that modern slavery and human trafficking are crimes and a violation of human rights. We also acknowledge that Modern Slavery may take on various forms, including slavery, servitude, compulsory labour, and human trafficking for exploitation, and that any aspect can have a significant adverse impact on individuals, families, and communities across the world.

As a business we have a zero-tolerance approach to modern slavery and human trafficking in our organisation and supply chain. We address this by ensuring that our staff are appropriately trained to identify issues and raise any concerns; that we have policies and procedures in place for dealing with any issues arising; and that our procurement processes identify potential risks in our supply network.

Our Background:

The Sciensus Group is a global life science business established in 1992. We provide a range of pharmaceutical services focused on complex and usually high value medicines across chronic, rare disease and cancer patient cohorts.

We partner with healthcare providers (including the NHS), health insurers, life science companies and physicians to optimise the medicine and healthcare outcomes and experience for over 230,000 patients across the UK and Europe.

We employ over 1,600 people including our specialist teams and support staff.

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

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>.

We, however, 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 or where parts of our supply chain may involve countries which have a low record of human rights or low paid staff. As part of our interaction with Walk Free ("an international human rights group focussed on the eradication of modern slavery, in all its forms, in our lifetime") to our knowledge our supply chain does not include countries classified as medium or high risk. The list of countries of concern is reviewed in respect of each tender process we undertake.

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

We recognise there could be a risk of slavery or child labour being part of our wider supply chain. 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 confirmation that they have published their modern slavery statement, where relevant. All new Suppliers must complete our supplier questionnaire form, and we have a process for internal review of responses and checking information by our trained team before entering into contracts. Non-compliance is escalated and we may either require further assurances or refuse to contract with a supplier.

For existing direct suppliers of medicines we undertake monthly 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 Director of Pharmaceutical Governance and Compliance for further advice.

Our commercial team manage the contracts and relationships with our key pharmaceutical company supply chain partners. All new contracts include provisions which require adherence to ethical conduct principles which we are committed to supporting. We have developed standard terms of business to include these principles and are continuing to review our older contractual arrangements to update with relevant provisions when these are extended or updated.

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

Compliance, awareness and training

The Boards of the Sciensus Group companies and the Executive Leadership Team have overall responsibility to ensure that the Group maintains and is compliant with our legal and ethical obligations. We have appointed an Executive Board Director as lead for Environmental Social and Governance matters within Sciensus and these matters are regularly reported at Board level.

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. The training includes guidance on what factors may raise concerns that a person is subject to a form of Modern Slavery and how to report issues. All training is by e-learning and this is reviewed on an annual basis to take account of any legislative or regulatory changes and is updated as necessary

Completion of training and the required post training assessment is actively monitored. Any delay in undertaking training or non-compliance by an employee is referred to the relevant line managers for further action.

Our staff are also required to familiarise themselves annually with relevant policies which are available via the Document Management System. Policies are reviewed and updated biannually, or as required. Our current Policies and procedures include the following list:

Modern Slavery related policies and SOP:
Human Rights Policy (includes reference to Modern Slavery)
Whistleblowing Policy
Grievance Policy
Disciplinary Policy
Managing Violence and Aggressive Behaviour Policy
Recruitment and Selection Policy
Equality and Diversity Policy
Safeguarding Adults Policy
Safeguarding Children and Young People Policy
Code of Conduct for employees
Employment Checks Policy
Fit and Proper Persons Policy
Corporate Social Responsibility Policy
Supplier Code of Conduct
Supplier Questionnaire Form (for completion by all new suppliers)
SOP for the Approval of Suppliers (for use by Procurement staff)

At an operational level, line managers are responsible for engaging with their teams to implement and maintain the processes that are in place, ensuring all colleagues have received the appropriate training in accordance with the relevant 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. In the event that a whistleblowing concern is raised our process includes escalation to nominated senior managers for investigation and where appropriate reporting of concerns to the relevant Boards of the Sciensus Group companies. We have had

no concerns relating to modern slavery in respect of safeguarding or whistleblowing raised during the current period.

2024-2025 and next steps

The Sciensus Group will continue to invest in its processes, procedures and awareness training for relevant staff to support its zero-tolerance approach to modern slavery, and ensure our approach remains proportionate to any identified risk.

We have been working to gain a better understanding of our suppliers and their supply chain and to use this information to classify all suppliers as either low, medium or high risk to support a targeted approach to reviewing our suppliers regarding their continued compliance.

Our procurement team has an ongoing objective to conduct Environmental Social and Governance Audits across our Direct Supply base to support the sustainability goals of Sciensus by improving the environmental, social and economic impact of procurement activity across third party expenditure. Part of this work includes validating our assumption that our direct suppliers and indirect suppliers are low risk as that they have mature ESG Policies in place covering the end to end supply chain incorporation in respect of Human Trafficking prevention and Modern Slavery compliance.

Although we have not as yet identified any of our suppliers as high risk, should this occur, we will expedite our audit process to review their compliance, identify any concerns and walk them through our Supplier Code of Conduct. We continue to review our new existing contractual relationships and develop opportunities for ongoing monitoring and review.

Over the next year we are planning to introduce questionnaires for audit purposes for completion by our suppliers to confirm their compliance with modern slavery and human trafficking legislation and to require copy statements and policies to be provided for our review to verify the response to the questionnaires.

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 identify potential risks of modern slavery and human trafficking being present which we keep under review.

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

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



Darryn Gibson
Chief Executive Officer



John Bradshaw
Group Company Secretary

Dated: 26th September 2024

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