

**ASPEN PHARMACARE HOLDINGS LIMITED
AND IT'S SUBSIDIARIES
("Aspen" OR "Aspen Group")**

ASPEN GROUP STATEMENT ON MODERN SLAVERY

1. Preamble

- 1.1. Increasingly international legislation and protocol require companies to act in respect of modern slavery. Specifically, the UK Modern Slavery Act and the Australian Modern Slavery Act require companies to disclose their efforts to address the risk of modern slavery in their businesses and we are seeing the same legislative trend emerging across Europe and other parts of the world.
- 1.2. This statement provides insight into Aspen's governance approach, risk assessment and mitigation strategy in relation to modern slavery.
- 1.3. Aspen Group companies rely upon this statement, where necessary, for satisfying the disclosure requirements of the abovementioned laws, and any equivalent laws in the jurisdictions in which Aspen operates.

2. The Aspen Group Policies & Governance Approach

- 2.1. Aspen is a global supplier of specialty and branded pharmaceuticals with an extensive range of products that provide treatment for a broad spectrum of acute and chronic conditions experienced through all stages of life.
- 2.2. **Values** - we are driven by our commitment to our core values of Integrity, Innovation, Excellence, Commitment and Teamwork.
- 2.3. **Supply Chain** – To ensure that parties within our supply chain share our ethical, social and environmental standards, they are required to adhere to the Aspen Code of Conduct for Suppliers and Service Providers. In agreeing to the provisions, these parties warrant that:
 - 2.3.1. They do not use or engage in child labour or indentured labour;
 - 2.3.2. A safe and healthy workplace is provided for employees;
 - 2.3.3. Employees are not unfairly discriminated against;
 - 2.3.4. No corporal punishment and no form of abuse or cruelty is applied or supported;
 - 2.3.5. Each employee is paid at least a minimum wage or a fair representation of the prevailing industry wage;

- 2.3.6. All laws on working hours and employment rights relevant to the business are complied with; and
- 2.3.7. Employees are free to join and form independent trade unions and have the freedom of association.
- 2.4. **Assurance** – aligned to Aspen’s ethics and compliance management programme, employees are required to certify, on an annual basis, that they have read, understood and agree to abide by the Aspen Code of Conduct. Aspen also subscribes to a Tip-Off Hotline in multiple jurisdictions, which allows Aspen stakeholders to anonymously report suspected unethical behaviour by any person who is employed by or has a business relationship with Aspen, including, but not limited to, suspected breaches of the Aspen Supplier Code of Conduct.
- 2.5. **Training** – mandatory ethics training is conducted with all employees on an annual basis to ensure that the principles of ethical business conduct are understood and implemented.
- 2.6. As a signatory to the United Nations Global Compact, Aspen has committed to support the ten principles on human rights, labour, environment, and anti-corruption, including principles 4 and 5, which call for the elimination of all forms of forced and compulsory labour and the effective abolition of child labour.
- 2.7. Part of the above commitment entails compliance with applicable laws, and we are therefore committed to complying with laws aimed at identifying, preventing, managing, remedying, and reporting on forced labour and other human rights risks in our supply chains.
- 2.8. We acknowledge our obligations pursuant to the applicable laws and endeavour to create a culture of transparency and compliance within our business and our supply chains.

3. Risk Assessment

- 3.1. Having regard to the nature of the pharmaceutical industry which is highly regulated, human rights risks within Aspen’s employed workforce are assessed to be low. This is mainly due to our workforce largely being made up of skilled individuals who undertake work in controlled and regulated environments that operate under established policies and procedures.
- 3.2. Our possible modern slavery exposure, if any, could exist in the engagement of suppliers and service providers in higher risk sectors such as cleaning, transportation, warehousing, construction and manufacturing, and in countries that do not adequately protect human rights. Notwithstanding these potential risks, no incidents of forced labour have been reported in the past year.

4. Continuing Efforts

- 4.1. Aspen recognises that tackling modern slavery requires a continuing year-on-year commitment and awareness to continue to undertake appropriate initiatives to remain sensitive to the global risks surrounding modern slavery. Aspen strives to routinely review, with an aim to improve procedures to support the identification and prevent of the risks of modern slavery across our business.
- 4.2. Aligned to the above, we have started taking steps to further enhance responsible supply chain management across the Group by developing a Group-wide supplier sustainability risk assessment and due diligence programme. This programme is planned for implementation in 2022. The programme will allow us to monitor sustainability performance on a routine basis through reliable sustainability assessments and engage with suppliers to achieve continual improvement and advancement of supplier performance on relevant sustainability aspects.

5. Board Approval

This statement is approved by the Board of Aspen Pharmacare Holdings Limited and is published for the prior financial year ending 30 June 2021.

S.B Saad

GROUP CHIEF EXECUTIVE

22 November 2021