

UDG Healthcare Anti Modern Slavery Policy

October 2016

Modern slavery is a crime and a violation of fundamental human rights. It can take many forms such as forced and compulsory labour, servitude, slavery and trafficking. UDG Healthcare plc is committed to acting ethically and with integrity in all our business dealings and in all our relationships and to this end are committing to this Anti Modern Slavery Policy.

We acknowledge that every supplier and worker deserves the right to live and work with dignity and respect, in decent and safe conditions and earn fair rates of pay. We have a responsibility to ensure good social and ethical practices within our own operations and within our supply chain.

This policy sets out UDG Healthcare plc's actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in our business and in our supply chains. UDG Healthcare maintains relationships with many different organisations; suppliers, contractors, as well as directly employing large numbers of people. In the light of the general law on employment and human rights and more specifically, the Modern Slavery Act 2015, we are absolutely committed to preventing slavery and human trafficking in its corporate activities and to ensuring that its supply chain is free from slavery and human trafficking.

Organisational Structure and Supply Chains

This policy covers all the divisions and activities of UDG Healthcare. It governs all our business dealings and the conduct of all persons or organisations with whom we contract directly or who we appoint to act on our behalf.

We expect all who have, or seek to have, a business relationship with UDG Healthcare and/or any division within UDG Healthcare, to familiarise themselves with our anti-slavery policy and to act at all times in a way which is consistent with our anti-slavery policy.

UDG Healthcare plc. is organised into three operating divisions – Ashfield Commercial and Medical Services, Aquilant Healthcare Services & Sharp Packaging Services. There is a Head of Procurement in each division all of whom have a reporting line to the Head of Procurement at UDG Healthcare plc.

Each division has both unique and common categories of expenditure from and with the other divisions, and source both direct goods and indirect services.

All procurement teams in UDG Healthcare plc. follow a standardised sourcing process for the identification, selection and management of suppliers to the company. As part of this process, and to ensure our obligations are met in relation to

Modern Slavery, candidate suppliers must meet pre-qualification criteria, in order to be considered for a commercial relationship. One of these criteria is the capability to evidence both the existence of and implementation of a Modern Slavery policy and to be prepared to have the implementation of this policy audited by us. This is a dynamic process, by which our procurement leadership team monitor specific categories of expenditure and associated suppliers to ensure ongoing compliance.

UDG Healthcare has operations in Ireland, United Kingdom, USA, Canada, Belgium, Holland, Sweden, Denmark, Finland, Germany Austria, Portugal, Spain, Turkey, Japan.

Responsibility

The Quality and Compliance department are responsible to ensure that the Anti Slavery policy is dispersed throughout our employee network and that all appropriate individuals have read and understood the policy.

UDG Healthcare plc and its divisional procurement teams are responsible for ensuring that all dealings with suppliers, whether contractual or not, comply with this policy.

UDG Healthcare plc mandates all divisions and head office functions to adhere to recruitment practices that ensure that all terms of employment are voluntary.

We endeavour to carry out our own recruitment activities and/or to only use reputable employment agencies to source labour and we carry out appropriate background checks. Where necessary and if required, we may request demonstration of compliance with this policy.

Where UDG Healthcare plc. sources labour (via agencies or directly) there is a detailed process to follow to ensure every worker is being treated appropriately from a legal and welfare perspective.

UDG Healthcare plc operates the following policies and practices that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations.

The Group's Confidential Reporting encourages all our employees to report any concerns related to the direct activities of the organisation or its supply chain. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The Company's confidential reporting procedure is designed to make it easy for employees to make disclosures, without fear of retaliation. Employees who have concerns can refer to the Group's confidential reporting link 'See Something, Speak Out' that is available in The ComplianceCentre and on request from any of the Quality and Compliance team.

Due Diligence

On an annual basis the Quality and Compliance department will review, on The ComplianceCentre, the progress of all required training on this Policy. In addition we will raise awareness of modern slavery issues by it being made available on our website. We expect employees to refer to this policy and understand what is required of them in relation to modern slavery.

