

UDG Healthcare plc Anti Modern Slavery Policy

November 2018

Introduction

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 deserve 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. We are committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. As part of this commitment, we have implemented effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

We expect the same high standards from all of our contractors, suppliers and other business partners, and as part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.

Organisational Structure and Supply Chains

We operate through two Divisions: Ashfield and Sharp. This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.

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 of our procurement teams follow a standardised sourcing process for the identification, selection and management of suppliers. As part of this process, and to ensure our obligations are met in relation to Modern Slavery, all potential suppliers must meet pre-qualification criteria. One of these criteria is the capability to evidence both the existence of and implementation of a Modern Slavery Act compliant policy and to be prepared to have the implementation of and adherence to 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.

Due Diligence

On an annual basis the Quality and Compliance department will review the progress of all required training on this Policy. In addition, the policy is available on our website, www.udghealthcare.com to raise awareness of modern slavery and human trafficking. We expect employees to refer to this policy and understand what is required of them in relation to modern slavery

Responsibility for the Policy

The Quality and Compliance department has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

Our procurement teams are responsible for ensuring that all dealings with suppliers comply with this policy.

We mandate that throughout our business we adhere to recruitment practices that ensure that all terms of employment are voluntary.

We endeavour to carry out our own recruitment activities and/or 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 we source labour (via agencies or directly) we follow a detailed process to ensure every worker is treated appropriately from a legal and welfare perspective.

Compliance with the Policy

We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern.

Our confidential reporting procedure is designed to make it easy for employees to raise concerns. Employees who have concerns can refer to the Group's confidential reporting link 'See Something, Speak Out' that is available in our ComplianceCentre and on request from any of the Quality and Compliance team.

