

# Modern Slavery and Human Trafficking Statement

## Year Ending 31 December 2018

### **Overview**

Bard Pharmaceuticals is a leading contributor to manufacturing output and the UK economy. Based at the Cambridge Science Park, the UK is home to several companies within the Mundipharma network all focusing on the needs of patients.

Bard is committed to operating in an ethical and transparent manner. In line with that commitment we have incorporated the requirements of the Modern Slavery Act 2015 (the "Act") into our Company Handbook and our compliance Framework.

We take the upholding of these high standards seriously and do not tolerate slavery or human trafficking within our organisation or from those whom we buy products or services.

We have analysed the risks within our own business and our supply chain based upon the industry we operate and the geographical locations in which we conduct business. We are not aware of any areas in our operations likely to lead to a breach of human rights and modern slavery laws. However, we remain committed to never knowingly dealing with any organisation connected to slavery or human trafficking.

We are not aware of any areas in our operations and supply chain likely to lead to a breach of human rights and modern slavery laws that the reporting requirements of the Modern Slavery Act 2015 Act seek to capture.

### **Training, Communication and Raising Concern**

Equipping those employees and senior members of the business, who are involved in the supply chain and procuring functions, with both the knowledge and understanding of the importance of the Act and the role it plays in helping to eradicate modern slavery and trafficking will help maintain and nurture a commercial environment that is fit for purpose for today's global pressures. Awareness of our policy is included as part of our induction process for new employees.

Bard pharmaceuticals Ltd has an environment which encourages open and frank two-way communication and its employees are required to raise concern of any known or suspected violation of its Code of Business Ethics or other illegal or unethical business conduct. Any such concern can be raised in confidence without fear of retaliation, by approaching Management, HR, Legal or Compliance. Alternatively, individuals may report their concern, and if desired remain anonymous, through our independent third party Compliance and Ethics Hotline, which is available 24 hours a day.

Any concern raised will be fully investigated to determine what action is required.

## **Employment Practices**

Our employment practices are compliant with applicable employment and health and safety legislation, and as a result, we are confident that there is no slavery or human trafficking taking place within our organisation. Furthermore, we shall ensure that the employment agencies that we deal with, have enshrined within their policies and processes, mechanisms for identifying the risks associated with such practices that has led to the introduction of various laws in the employment field; in short, these agencies too must be fully compliant with applicable legislation.

## **Due Diligence**

It is our aim to not work with any supplier that we suspect is connected in any way with slavery or human trafficking. As part of our Compliance programme, taking steps to assure ourselves that we only partner with third parties that are fit and proper has been part of our on-boarding process for many years.

In addition we require suppliers to ensure all goods and services provided to Bard Pharmaceuticals are undertaken in accordance with all applicable laws. No supplier contracts will be awarded to any supplier not able to comply with the legislation that the Act seeks to address.

## **Enforcement**

Any suspected breach of our Compliance programme, including the Act will result in appropriate steps being taken to investigate the potential wrong doing. Such investigations could lead to the termination of supplier contracts.

## **Conclusion**

Bard Pharmaceuticals is not aware of any slavery or human trafficking taking place in our business or supply chain. Bard Pharmaceuticals will continue to apply appropriate risk-based due diligence processes as it further embeds the Act into its compliance programme.

This statement is made pursuant to section 54 of the Act and constitutes the Modern Slavery and Human Trafficking Statement for the Financial Year ended 31st December 2017 for Bard Pharmaceuticals

This statement was approved by the Leadership Team of Bard Pharmaceuticals Limited