

MODERN DAY SLAVERY ACT STATEMENT

The Modern Slavery Act 2015 (“the Act”) came into effect on 29 October 2015 and requires those entities carrying on a business or part of a business in the UK, supplying goods or services, and having an annual turnover of £36 million or more to disclose information regarding the steps they have taken to eradicate slavery and human trafficking from their supply chain as well as within their own organisation during the previous financial year.

Forum Health Products Ltd are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. We are committed to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective system and controls to ensure slavery and human trafficking does not take place in our supply chains. FHPL has a zero tolerance to slavery and human trafficking.

This Statement is made pursuant to Section 54 of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 31 March 2021.

OUR SUPPLY CHAINS

Our supply chains include:

- Marketing Authorisation Holders
- Warehousing and storage sites

BUSINESS STRUCTURE AND ORGANISATION

Forum Health Products Ltd (FHPL) is part of the Barentz Group, which has its headquarters in the Netherlands, the Group is active in 60+ countries and employees more than 1,100 staff. FHPL operates only in the United Kingdom. Due to the differences in the nature of trade between FHPL and the Barentz Group, FHPL have their own Modern Day Slavery Act Statement. FHPL is a distributor of finished medicinal products.

FHPL is a pharmaceutical distributor of medicinal products on behalf of a small number of Marketing Authorisation Holders. All distribution is within the United Kingdom. FHPL offices are based in Redhill, in Surrey. Products are warehoused and distributed from third party contract warehouses. There are a handful of employees who work for Forum Health Products Ltd, with most of the Redhill employees working on the Barentz UK business.

OUR POLICIES, TRAINING AND VALUES

FHPL only procure medicinal products from companies that hold a Marketing authorisation issued by the UK regulatory agency, the Medicines and Healthcare products Regulatory Agency (MHRA). All the Marketing Authorisation Holders of these products have a statement regarding Modern Day Slavery. FHPL does not enter into business with any organisation, in the United Kingdom or abroad, which knowingly supports or is found to be involved in slavery, servitude and forced or compulsory labour.

FHPL are an equal-opportunities employer committed to creating and ensuring a non-discriminatory and respectful working environment for our colleagues. Our recruitment and people management processes are designed to ensure that all prospective colleagues are legally entitled to work in the UK and to safeguard colleagues from any abuse or coercion once in our employment.

SUPPLY CHAIN AND DUE DILIGENCE

Our principal suppliers are regulated by the MHRA (Marketing Authorisation Holders and Warehouses).

These suppliers are located within the United Kingdom. However, some of their suppliers (e.g. ingredient suppliers, finished products manufacturers, testing laboratories) are located elsewhere. It is a requirement that all medicinal products sold within the United Kingdom are manufactured according to Good Manufacturing Practice (GMP) and distributed according to Good Distribution Practice (GDP). GMP and GDP dictate a robust Quality Management System (QMS) is in place. The Marketing Authorisation Holders/Warehouses must operate a QMS and part of this involves the need to understand suppliers and perform due diligence on these suppliers. All elements of the supply chain are mapped so it is clear where ingredients

are made, where products are manufactured/tested, where packaging is sourced from etc.

In addition, it is a requirement under GMP and GDP that agreements are in place where any aspect of manufacture or distribution that is outsourced to another company, is documented and agreed.

FHPL have agreements in place with suppliers setting out their respective responsibilities from a GDP point of view. The Marketing Authorisation Holders have agreements in place with their suppliers setting out responsibilities in relation to GMP.

As well as covering the responsibilities relating to the manufacture and testing of the medicinal products and/or distribution, these agreements also set out the requirements relating to personnel and the training required.

Suppliers are audited against their QMS and the relevant agreement on a routine basis. Adverse audit findings, non-conformities and other remediation requirements are graded based on risk (critical, major or other). If remediation is required, FHPL work with our suppliers to improve their standards with corrective action plans and reviews to make sure standards are of an acceptable level. The same process is followed by the Marketing Authorisation Holders. If a supplier fails to adequately remediate issues, the relationship would be re-evaluated and if necessary, terminated.

EFFECTIVENESS

FHPL regularly review our QMS to ensure our actions are appropriate. Through these reviews and that of the Marketing Authorisation Holders, whose medicinal products we distribute, we believe these systems are effective in preventing slavery and human trafficking from being part of our supply chain.

We continue to assess our QMS through regular self-inspections/internal audits to ensure we are making improvements where improvements can be made.

STATEMENT OF APPROVAL

This Statement has been approved by the board of directors of Forum Health Products Limited, and the board has authorised Neill Copp, Managing Director, FHPL, to sign the Statement on behalf of Forum Health Products Limited.

Neill Copp
Managing Director
Forum Health Products Limited