

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 2018 for Qdem Pharmaceuticals Limited.

Overview

Qdem Pharmaceuticals Limited is a privately-owned, UK pharmaceutical company, based in the heart of the Cambridge science community. Qdem has grown up with the NHS, providing innovative medicines to patients in the UK since the 1920s. We know how to navigate its complexities and we've shaped our structure to its unique needs, so as the NHS changes, we can too. We foster a flexible culture at Qdem where our people thrive on the ability to be agile and autonomous in response to the needs of our partners. From launching the UK's first monoclonal antibody biosimilar to introducing cutting-edge primary care medicines in respiratory and diabetes, we are always striving to move medicine forward for doctors and patients in the UK.

Our business 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 Code of Business Ethics and our compliance framework.

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

We analyse the risks within our own business and our supply network annually based upon the industry in which we operate and the geographical locations in which we conduct business. Due to the nature of our business, we currently consider ourselves to be at low risk of exposure to slavery, human trafficking or child exploitation. 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, human trafficking or child exploitation.

Training, Communication and Raising Concern

We aim to equip those employees who are involved in procurement activities, with both the knowledge and understanding of the importance of the Act and the role it plays in helping to eradicate modern slavery, trafficking or child exploitation. Information on the Act is also included as part of our induction process for new employees through our Induction Compliance Training and the Code of Business Ethics.

Qdem Pharmaceuticals Limited has an environment which encourages open and frank two-way communication and its employees are required to raise any concerns of known or suspected violations of its Code of Business Ethics or of 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 Compliance and Ethics Hotline, which is available 24 hours a day and can be accessed through iac.ethicspoint.com. Any concern raised will be fully investigated and acted upon as appropriate.

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, human trafficking or child exploitation taking place within our organisation. Furthermore, we shall ensure that the employment agencies that we deal with are also fully compliant with the applicable legislation.

Due Diligence

We aim not to work with any supplier that we suspect is connected in any way with slavery, human trafficking or child exploitation. As part of our compliance programme, we take steps to assure ourselves that we only partner with third parties who act ethically, compliantly and within the laws of the jurisdiction in which they operate. This process has now been broadened to include screening for any potential or confirmed red flags or issues relating to slavery, human trafficking or child exploitation.

In addition to pre-contract due diligence, any new contracts will require suppliers to ensure all goods and services are provided to Qdem Pharmaceuticals Limited in accordance with all applicable laws, including the Act. No contracts will be awarded to any supplier not able to comply fully with the Act.

For existing suppliers, contracts are reviewed and updated, as required, to include relevant clauses relating to slavery, human trafficking or child exploitation.

Enforcement

Any suspected breach of our compliance programme or of our Code of Business Ethics, including the Act, will be investigated and such investigations could lead to the termination of supplier contracts and notification to the relevant authorities.

Conclusion

Qdem Pharmaceuticals Limited is not aware of any slavery, human trafficking or child exploitation taking place in its business.

Due diligence activities during the financial year ending 31st December 2018 did not identify any instances of slavery, human trafficking or child exploitation within the businesses of its suppliers, customers or service providers.

Qdem Pharmaceuticals Limited will continue to raise awareness, apply and monitor appropriate risk-based due diligence processes to supplier relationships as part of its ongoing compliance programme in order to mitigate the risk of modern slavery.

This Statement was approved by the Leadership Team of Qdem Pharmaceuticals Limited on 15th November 2019.

A handwritten signature in black ink, appearing to be the name of the Managing Director, written in a cursive style.

Managing Director