

Slavery and Human Trafficking Policy Statement

INTRODUCTION FROM CLARITY PHARMA AND CLARITY GLOBAL GROUP LTD BOARD OF DIRECTORS

Slavery and human trafficking remains a hidden blight on our global society. We all have a responsibility to be alert to the risks, however small, in our business and in the wider supply chain. Staff are expected to report concerns and management are expected to act upon them.

ORGANISATION'S STRUCTURE

Clarity Pharma and Clarity Global Group Ltd is a leading pharmaceutical and health distribution services provider. We specialise in market intelligence, commercial solutions and supply chain issues. In addition, we work with pharmaceutical manufacturers to distribute products to wholesalers, hospitals and doctors.

OUR SUPPLY CHAINS

We are committed to sourcing quality products from and building relationships with suppliers who share our values and ethical standards.

OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING

We are committed to ensuring that there is no slavery or human trafficking in our supply chains or in any part of our business, in accordance with the Modern Slavery Act 2015. This Anti-Slavery and Human Trafficking Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING

As part of our initiative to identify and mitigate risk - Where possible, we build long standing relationships with local suppliers and make clear our expectations of business behaviour;

With regards to national or international supply chains, our point of contact is with a UK company or branch and we expect these entities to have suitable anti-slavery and human trafficking policies and processes. We expect each entity in the supply chain to, at least, adopt 'one-up' due diligence on the next link in the chain. It is not practical for us (and every other participant in the chain) to have a direct relationship with all links in the supply chain.

We have in place systems to encourage the reporting of concerns and the protection of whistle blowers.

SUPPLIER ADHERENCE TO OUR VALUES

We have zero tolerance to slavery and human trafficking. We expect all those in our supply chain and contractors to comply with our values.

The Company Directors are responsible for compliance in their respective departments and for their supplier relationships.

TRAINING

Our Code of Conduct provides important guidelines for interactions with customers, suppliers and other business partners.

All colleagues are encouraged to raise concerns, this includes potential violation to the Code of Conduct, company policies and the laws of the countries in which we operate.

We have an SOP in place to cover Slavery and Human Trafficking and all staff are trained in this policy.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our group's slavery and human trafficking statement for the current financial year.

Signed:



Position: Group Managing Director

For: Clarity Pharma and Clarity Global Group Limited

Date: 17th November 2020

Review Date: 16th November 2021