



UK MODERN SLAVERY ACT STATEMENT 2023

This Modern Slavery Statement is published by ClarusONE Sourcing Services LLP (“**ClarusONE**” or “**we**”) in accordance with our obligations under section 54(1) of the Modern Slavery Act 2015 (the “**Act**”).

ClarusONE is opposed to all forms of modern slavery and this serious issue must be tackled head on. This Statement, which is the fifth statement produced and focused in respect of the financial year ending 31 March 2023, sets out the new and ongoing steps ClarusONE is taking to address and prevent modern slavery taking place both within our business and our supply chains.

BUSINESS AND ORGANISATION

ClarusONE is a London-based limited liability partnership established in 2016 and is jointly owned by McKesson Strategic Services Limited and WMGS Europe Limited (each a “**Member**” and together the “**Members**”), which are wholly owned subsidiaries of McKesson Corporation (“**McKesson**”) and Walmart, Inc. (“**Walmart**”), respectively (each a “**Service Recipient**” and together the “**Service Recipients**”).

ClarusONE provides strategic pharmaceutical sourcing services for its Service Recipients to ensure that both Service Recipients and their respective affiliates have access to generic pharmaceutical products to meet customer demand at a competitive market cost.

McKesson (together with its affiliates, the “**McKesson Group**”) is a global leader in healthcare supply chain management solutions, retail pharmacy, community oncology and specialty care and healthcare information technology.

Walmart (together with its affiliates, the “**Walmart Group**”) is engaged in retail and wholesale operations in various formats around the world and a large proportion of its operations include pharmacies.

SUPPLY CHAIN RELATIONSHIPS

ClarusONE’s core operations are the services it provides to its’ Service Recipients and generic pharmaceutical product suppliers, which include:

- soliciting, evaluating and negotiating product offers and contract terms,
- issuing contract awards that establish the terms pursuant to which its Service Recipients may place purchase orders with suppliers, and
- coordinating with the Service Recipients to forecast product demand and ensure customer needs are met.

ClarusONE *does not*:

- have the authority to make purchasing commitments on behalf of its Service Recipients,
- purchase products from pharmaceutical product suppliers on its own account, or
- take legal title or possession of pharmaceutical products.

ClarusONE Sourcing Services, LLP

A limited liability partnership registered under the laws of England and Wales

Registered number: OC411839

Registered business address: C/O TMF Group, 13th Floor, One Angel Court, London, EC2R 7HJ, United Kingdom.

Principal place of business: Russell Square House, Bloomsbury, London WC1B 5EH, UK



Accordingly, the pharmaceutical product suppliers that ClarusONE interacts with on behalf of its Service Recipients as part of its core strategic pharmaceutical sourcing services operations, do not form part of ClarusONE's own supply chain.

The majority of ClarusONE personnel are employees seconded from the McKesson Group or the Walmart Group. There are a small number of temporary contracted workers, each engaged by ClarusONE through a third party. ClarusONE does not have any direct employees of its own.

Except for the small number of contracted workers, ClarusONE does not currently outsource any of its core operations.

MITIGATING MODERN SLAVERY RISKS IN OUR BUSINESS

As a provider of strategic sourcing services in the pharmaceutical market, ClarusONE takes its social responsibility seriously and is strongly committed to respecting applicable international human rights and fair labour practices and explicitly condemns all kinds of slavery or human trafficking.

ClarusONE does not tolerate any form of modern slavery or human trafficking in any part of our business. We expect any current or future suppliers of ClarusONE to operate in an ethical and legally compliant manner. We have set out the steps we have taken to continue to manage modern slavery risks in the last twelve months below.

POLICIES

ClarusONE operates under, a 'Modern Slavery Prevention Policy' formally adopted in September 2021, underlining ClarusONE's commitment to tackling modern slavery. This policy is complemented by a number of other policies which are relevant to Modern Slavery, all of which are updated and made available to all ClarusONE personnel.

Both the McKesson Group and Walmart Group operate in accordance with published codes of conduct (each a "**Code of Conduct**" and together the "**Codes of Conduct**") within their respective organisations. The Codes of Conduct establish the highest standards to which ClarusONE conducts its business operations and are the foundation of every decision that ClarusONE makes.

The McKesson Group's Code of Conduct can be viewed at the following link:
<https://www.mckesson.com/Documents/Investors/Code-of-Conduct-2022/>

The Walmart Group's Code of Conduct can be viewed at the following link:
https://www.walmartethics.com/content/walmartethics/en_us/code-of-conduct.html

In addition, ClarusONE in fiscal year ending 31 March 2022 adopted and published a supplier facing modern slavery policy that applies to all vendors responsible for supplying goods or services directly to ClarusONE. Compliance with the supplier facing modern slavery policy is a condition of working with ClarusONE and sets out our expectations in relation to the prevention of modern slavery and human trafficking.

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RISK ASSESSMENT

In order to assess the risk of modern slavery in its supply chains, ClarusONE utilised internationally recognised standards and guidance to conduct a comprehensive risk assessment to ensure that processes and practices are fit for purpose. The risk assessment was presented to the ClarusONE Board in the financial year ending 31 March 2023 and considered the following:

- the organisational structure of ClarusONE,
- its operating model, and
- recruitment and employment practices.

Based on ClarusONE's business model and the way it operates, the risk that ClarusONE faces in terms of modern slavery was assessed as low overall.

FORMATION OF RISK COMMITTEE

ClarusONE is managed through systems and policies that are designed to ensure compliance with applicable law. This year, the formation of a new Risk and Governance committee of the Board was approved and established. The committee's responsibilities are to assess risks applicable to ClarusONE's business, including modern slavery and ensure the leadership team have the necessary policies, processes and training in place to mitigate risk.

TRAINING AND AWARENESS

All ClarusONE associates undertake annual compliance and Code of Conduct training that cover both modern slavery and the associated offences in the Act. The training presents an opportunity to build awareness and ensure that associates are well equipped should they experience any issues in relation to modern slavery.

Associates also receive informal training through all associate communication meetings where Modern Slavery is presented. In the last year, this coincided with the International Day for the Abolition of Slavery.

SPEAK UP

ClarusONE seeks to maintain an open and supportive culture where associates always feel confident in raising concerns or issues. We provide access to an anonymous and confidential speak up service operated by an independent third party for associates to report concerns, including potential issues of modern slavery. The service is available twenty-four hours a day, seven days a week, with support available in multiple languages.

GOING FORWARD

In the forthcoming financial year, ClarusONE will continue to take steps to combat slavery and human trafficking by:

- work in partnership with our Members to improve our compliance due diligence processes for suppliers to allow us to better assess risk factors relating to modern slavery;

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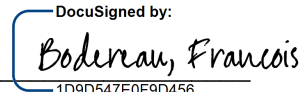


- including language in standard form contract templates to ensure that ClarusONE vendors have not and will not engage in any activity, practice, or conduct that could constitute modern slavery;
- continuing to regularly train and communicate with all ClarusONE personnel to ensure a high level of understanding the risks and identification of modern slavery and human trafficking; and
- monitoring the legal landscape within the UK and implementing any additional measures as appropriate.

STATEMENT OF APPROVAL

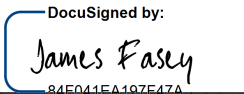
This statement has been approved by the Members of ClarusONE Sourcing Services LLP:

For and on behalf of
McKesson Strategic Services Limited

Signature: 
Name: Bodereau, Francois

Date: August 30, 2023

For and on behalf of
WMGS Europe Limited

Signature: 
Name: James Fasey

Date: August 30, 2023

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