



UK MODERN SLAVERY ACT STATEMENT 2024

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**”).

This is ClarusONE’s sixth statement and in respect of the financial year ending 31 March 2024. As required by the Act, it sets out the steps ClarusONE has taken to address modern slavery risks in our business and applicable 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,
- developing risk mitigation strategies and evolving upstream partnerships; 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 the pharmaceutical products.

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 engaged by ClarusONE. 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.

ClarusONE Sourcing Services, LLP

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

Registered number: OC411839

Registered business address: c/o T MF Group, 13th Floor, One Angel Court, London, EC2R 7HJ, UK

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



MITIGATING MODERN SLAVERY RISKS IN OUR BUSINESS

ClarusONE takes its social responsibility seriously and does not tolerate any form of modern slavery or human trafficking in any part of our business. We are committed to respecting applicable international human rights and fair labour practices and explicitly condemn all forms of slavery and human trafficking.

We expect any current or future suppliers of ClarusONE to operate in an ethical and legally compliant manner.

Based on ClarusONE's business model and the way it operates, ClarusONE has assessed the risk that it faces in terms of modern slavery as low overall. We have set out the steps below that have been taken to manage modern slavery risks in the last twelve months.

POLICIES

ClarusONE is managed through systems and policies that are designed to ensure the well-being of individuals within our business and supply chain, as well as compliance with applicable law. ClarusONE formally implemented a "Modern Slavery Prevention Policy" in September 2021 which outlines ClarusONE's commitment to preventing modern slavery.

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**"). Each Code of Conduct sets out **McKesson Group's** and **Walmart Group's** position on modern slavery. 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 Codes of Conduct apply to all ClarusONE associates respectively.

In addition, since 2022 ClarusONE has implemented a supplier facing modern slavery policy that applies to all vendors responsible for supplying goods or services directly to ClarusONE. Compliance with the policy is a condition of partnering with ClarusONE and sets out our expectations in relation to the prevention of modern slavery and human trafficking.

RISK AND GOVERNANCE COMMITTEE

The formation of a risk and governance committee was approved by the ClarusONE Board in 2023. The committee meets regularly to review, evaluate and discuss risks applicable to ClarusONE's business, including modern slavery. The risk and governance committee also ensures all risks and associated actions to manage and mitigate such risks are reported to the ClarusONE Board of Directors.

TRAINING AND AWARENESS

All ClarusONE associates undertake annual compliance training that addresses modern slavery and the offences in the Act. The training presents an opportunity to build awareness and ensure that associates are well equipped on how to react should they experience any issues in relation to modern slavery.

ClarusONE associates are required to undertake regular Code of Conduct compliance training which also addresses modern slavery.

SPEAK UP AND INVESTIGATIONS

ClarusONE seeks to maintain an open and supportive environment where associates are confident in raising concerns. 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 and situations where the rights of an individual may have been compromised. The service is available twenty-four hours a day, seven days a week, with support available in multiple languages.

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ClarusONE operates an effective investigation framework to provide efficient and appropriate remedial actions if a concern is reported, as set out in our Whistleblowing Policy. The policy is intended to create a transparent process and encourages associates to raise issues without fear of retaliation. Operating an open and supportive environment promotes ethical behaviour and a culture of integrity within ClarusONE.

In the financial year ending 31 March 2024 there were no reports suggesting there were any occurrences of modern slavery in the ClarusONE business or supply chains.

GOING FORWARD

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

- continuing to regularly train ClarusONE associates to ensure a high level of understanding of the risks of modern slavery and human trafficking;
- Implementing a formal policy review cycle to ensure all policies are updated and reflect current regulation and best practice;
- continuing to work alongside our Members to evolve our compliance due diligence processes; 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: _____

DocuSigned by:

Francois Bodereau

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Name: Francois Bodereau

Date: August 14, 2024

For and on behalf of

WMGS Europe Limited

Signature: _____

DocuSigned by:

Helen Howard-Spink

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Name: Helen Howard-Spink

Date: August 14, 2024

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