The Modern Slavery Act 2015 (“the Act”) 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.

Modern Slavery Act Statement

Each of AAH Pharmaceuticals Limited (AAH) and its subsidiaries remain committed to ensuring that it trades ethically, sources responsibly and works to prevent modern slavery and human trafficking throughout the organisation and in its supply chain. This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 on behalf of all companies and business units within the AAH group.

The AAH group companies that meet the disclosure requirement under the Act are listed below.

- AAH Pharmaceuticals Limited
- Sangers (Northern Ireland) Limited (Sangers)
- Barclay Pharmaceuticals Limited (BPL)

This statement highlights the key activities that we have undertaken during the financial year ending 31 March 2026 (the Reporting Period) to combat modern slavery in our organisation and supply chain.

Business Structure and Organisation

AAH is one of the largest pharmaceutical wholesalers in the UK, with just over 2,400 colleagues and 12 locations across the UK. We are a part of the Hallo Healthcare Group and have our head office in the UK.

AAH is one of the UK's leading distributors of pharmaceutical and healthcare products and services to all healthcare institutions, including pharmacies, hospitals and doctors, delivering over 10 million items per week to more than14,000 pharmacies and other organisations. Through our group of companies, we offer an extensive and competitively priced range of Prescription-only, Pharmacy, General Sale Lists and OTC medicines.

BPL is a short line wholesaler operating in the Prescription-only, Pharmacy and OTC medicines markets. Short-line pharmaceutical wholesale primarily sources and supplies generic and parallel trade prescription medicines. A small number of BPL’s suppliers are based outside of the UK.

In Northern Ireland, Sangers has been supplying pharmaceutical and healthcare products to community pharmacy, hospital pharmacy and dispensing doctors for almost 160 years. Sangers provides a top-quality omnichannel customer focussed service to community pharmacy, hospital pharmacy and dispensing doctors. We also provide out-sourced contract logistics, administration and speciality sales and logistics related services primarily to pharmaceutical, surgical and bio-tech manufacturers.

Our Policies, Values and Training

We have appropriate policies in place that underpin our commitment to combat modern slavery and human trafficking in our supply chains and in any part of our business. Our policies are reviewed and updated at least annually, or more frequently if required in response to a legislative or organisational change.

Our Modern Slavery Policy reflects our commitment to acting ethically, and with integrity in all of our business relationships. We are committed to implementing and enforcing effective systems and controls to guard against slavery and human trafficking in our supply chains. The Modern Slavery Policy is available to all colleagues on our intranet and supported by communications to colleagues to reinforce the key messages within the policy. During the Reporting Period as part of our compliance program communications plan, we issued a focussed communication to all colleagues on the topic of Modern

Slavery to help them better understand, identify, and report any modern slavery risks within the workplace. This was supported by an invitation to complete an eLearn module via our learning platform.

We also have compliance and HR policies in place relevant to modern slavery and business relationships, which are reviewed and updated at least annually or sooner if required. These are listed below:

- Code of Conduct
- Recruitment Policy
- Procurement Policies
- Whistleblowing Policy and Procedures
- Anti-Bribery and Corruption Policy
- Grievance Policy
- Bullying, Harassment & Sexual Harassment Policy
- Equal Opportunities & Diversity Policy
- Executive Leadership Team Escalation Policy and Process

Our Code of Conduct provides important guidelines for interactions with customers, suppliers and other business partners. At the core of the Code of Conduct and our activities are our iCARE principles which are; Integrity, Customer-first, Accountability, Respect and Excellence. During the Reporting Period we enhanced the Modern Slavery Act content in both the Code of Conduct and Code of Conduct mandatory eLearn module to further reinforce colleague understanding of modern slavery risk.

We 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. Where a specific job role requires it, we also undertake Disclosure and Barring Service (DBS) checks as part of our ongoing screening processes.

We want all of our colleagues to feel confident that they can expose wrongdoing without fear of retaliation.

Our Whistleblowing Policy encourages all colleagues to raise any concerns with us including potential violations of the Code of Conduct, company policies, and the laws of the countries in which we operate. We have reporting mechanisms in place to collect and relay information regarding potential violations to appropriate company resources for review and follow up action.

These reporting mechanisms include a UK-based confidential helpline which is available 24 hours a day, 7 days a week, and an Executive Leadership Team Escalation Process which ensures that colleagues are aware of those matters requiring immediate escalation to the Executive Leadership Team (which includes the Statutory Directors) of AAH. Data on whistleblowing cases is shared with our AAH Statutory Board of Directors each month.

We provide online and face to face training for colleagues to emphasise the importance of acting with integrity and in line with our iCARE principles and Code of Conduct.

Supply Chain and Due Diligence

We are committed to sourcing quality products from, and building relationships with, suppliers who share our values and ethical standards. The due diligence processes we have in place, help to ensure that we do not enter into business with any organisation, in the UK or abroad, which knowingly supports or is found to be involved in slavery, servitude and forced or compulsory labour.

Our principal suppliers are regulated manufacturers and distributors of medical-surgical products, medical devices and pharmaceutical products.

Some of our suppliers are located in countries that may be more vulnerable to human rights abuses than others. That is why we have implemented several methods to manage our zero-tolerance policy for such abuses, including the following:

- We communicate our expectations clearly to suppliers to ensure adherence to our values and ethical standards.
- We establish appropriate policies and processes within our business to make sure that the products we purchase and sell comply with our ethical standards.
- We take a risk based approach to ensuring we proactively engage with our existing suppliers; this engagement includes regular account management meetings, site visits, audits, and top to top meetings
- Our supplier agreements include provisions that require our suppliers to obey national and regional statutory requirements in the country in which they operate, including where appropriate, any applicable laws regarding human trafficking, forced labour and other forms of modern slavery.
- We have a robust supplier due diligence and onboarding process that collects data from any prospective new supplier and is assessed by key stakeholders across the business to make sure that the supplier meets our values and standards, and where necessary we can identify, understand and mitigate any potential risk
- Where a new supplier is based in a higher risk country (according to our Countries of Concern framework), we complete enhanced compliance, and diligence checks to identify any targeted risks that may need to be considered prior to proceeding with any engagement.

For our responsible sourcing and quality management systems, we have designed and implemented a number of processes to assess suppliers of the products introduced into the supply chain. The focus areas in the assessment process include, but are not limited to, Commercial, Compliance and Quality Assurance.

For GNFR we continue to seek partnerships with suppliers that demonstrate strong performance in all aspects of Environmental, Social and Governance topics, with robust supplier management and due diligence processes to enhance the AAH supply chain.

Adverse audit findings, non-conformities and other remediation requirements are prioritised based on risk. If remediation is required, we work with our suppliers to improve their standards with corrective action plans and on-going reviews to make sure our standards are maintained. We aim to build relationships with our suppliers to ensure adherence to our values and ethical standards. If a supplier fails to adequately remediate the issue, the relationship would be re-evaluated and if necessary, terminated.

During the reporting period AAH has continued to develop its approach to and the reporting framework around our corporate Sustainability Strategy which enhances and demonstrates our commitment to formalising and documenting agreed targets in relation to Environmental, Social and Governance topics.

One such target which was delivered during the Reporting Period was the introduction of a Supplier Statement of Compliance, to be completed by all new suppliers during the due diligence and onboarding process. This sets out the expectations and requirements of suppliers, business partners and stakeholders with whom we do business in relation to compliance with all relevant legislative and regulatory obligations. It is designed to demonstrate our commitment to promote honest and ethical conduct and to encourage trust, fair dealing and integrity in all interactions with suppliers.

Looking ahead to FY27, and as part of our ongoing improvements, we will look to extend the completion of the Supplier Statement of Compliance to our existing supplier base. We will also look to develop a modern slavery risk assessment which can be used to assess our highest risk suppliers and identify any further areas for improvement or risk mitigation within our supply chain.

Effectiveness

We regularly review our governance frameworks to ensure our actions are appropriate and we believe our efforts to date have been effective in preventing slavery and human trafficking from being part of our supply chain.

Training sessions for existing colleagues on the key compliance risks affecting our business and inductions for new starters include the topics of supplier due diligence and modern slavery as appropriate.

Modern slavery risks are captured in our Corporate Risk Register.

Statement of Approval

This Statement has been approved by the Board of Directors of AAH Pharmaceuticals Limited on behalf of the AAH group. The Board has authorised John Clark, Managing Director, to sign the Statement on behalf of AAH Pharmaceuticals Limited.

John Clark
Managing Director

26 August 2026