The MediCare Pharmacy Group Anti-Slavery & Human Trafficking Statement 2023

1. Introduction

MediCare Pharmacy Group recognises its responsibility to address and mitigate the risk of modern slavery and human trafficking in its operations. This statement sets out our commitment to eradicating these practices and describes the actions we have taken through to the end of our financial year, August 31, 2022. We are proud of the steps we have taken to combat slavery and human trafficking. This statement meets the requirements of the Trafficking and Exploitation (Criminal Justice and Support for Victims) Act (Northern Ireland) 2015.

2. The MediCare Pharmacy Group

The MediCare Pharmacy Group with 54 branches, employing over 700 staff, including 100 pharmacists, dispensing 4.9 million prescriptions per year, is the largest indigenous pharmacy group in Northern Ireland. Our pharmacies are community based and located in some of the most socially deprived areas of Northern Ireland.

The MediCare Pharmacy Group consists of the following trading Companies:

- Magir Ltd
- A&FA Dundee Ltd
- Campbells Dispensary Ltd
- Cloverdale Merchants Ltd

The head office is located at 44 Montgomery Road Belfast and includes over 60,000 sq ft of warehousing.

The Group trades under the MediCare Pharmacy name and our motto ***"Caring for your Health"*** expresses very well what MediCare is about. Our strategy has always been to deliver to patients and customers the services and medicines they require in the most efficient and effective manner possible.

At MediCare we pride ourselves on the level of service we deliver and continue to deliver in the healthcare arena. The core competencies of efficient dispensing within a safe and regulated environment are always a priority and we have managed to develop these services by listening to what our patients' current needs are, whilst monitoring developments at Department of Health level to plan, prepare and adapt if necessary for future requirements and services.

In recent years we have been involved in initiatives including the Pharmacist Independent Prescribing provision. Consultation services such as Pharmacy First services as well as new commissioned services to deliver both COVID and Flu vaccine services. Public health campaigns to include smoking cessation and living well campaigns have also been a success within health promotion. In 2022 we participated

in the Department of Health COVID19 and Seasonal Flu vaccination drive operating vaccination clinics at a number of our pharmacies.

3. The MediCare Pharmacy Group Anti-Slavery & Human Trafficking Statement 2023.

MediCare Pharmacy Group adheres to the principles of the United Nations' Universal Declaration on Human Rights as part of its corporate activities. MediCare Pharmacy Group is committed to ensuring that human trafficking and slavery do not exist in any area of the organisation, nor within any company which forms part of our supply chains including service companies. As part of our commitment MediCare Pharmacy Group has drawn up its own Supplier Code of Conduct, based on internationally recognised social, ethical and environmental criteria for the procurement of indirect and trading goods.

We continue to ensure that safe working practices are adhered to at all our sites. We also support public interest disclosure, freedom of association, equal opportunities as well as promoting social and ethical codes of conduct from both employees and suppliers alike.

Ultimately, as a responsible company, we believe that long-term sustainability and success of our employees is inextricably linked with social responsibility, economic growth and environmental accountability.

By continuing to work with our employees, partners and suppliers, we hope to further develop strategies and improve working practices (particularly within supply chains) across the MediCare Pharmacy Group.

Our Commitments

- To ensure that human rights are promoted and championed within our business, with our suppliers and across our supply chain.
- To ensure that our suppliers hold a similar ethos and practical commitment to human rights and anti-slavery.
- To ensure that no human trafficking or slavery exists within any part of our business or that of our supply chain.
- To ensure a sustainable business that is both commercially successful yet socially and environmentally responsible.

As a responsible company, we seek to carry out all reasonable and practicable steps to ensure that the necessary standards are being adhered to, not only throughout our company, but in particular the businesses of our suppliers. As a pharmaceutical wholesaler and retailer, our industry is heavily regulated and consequently we are obliged to meet exacting standards as part of both government legislation (such as MHRA and Home Office) as well as industry regulation. As a company, we are also subject to both frequent internal and external operational and financial audits. Therefore, a clear and adequate framework, promotion of good governance practice and compliance across the company are all key factors in helping us to manage our business, suppliers and supply chain.

4. Supply Chain and Risk Assessment

Due to the nature of our business all of our suppliers are based in the United Kingdom and Ireland, although we do use a UK supplier of plastic bags which are manufactured and supplied from outside of the UK.

Identifying Supply Chain

MediCare Pharmacy Group turnover:

NHS Medicines Dispensing – 70%

OTC Medicines and Health & Beauty Retailing – 30%

Dispensed Medicines Procurement

In assessment of our suppliers and our supply chain standardised processes are performed on all new suppliers. This process includes requesting Wholesaler Dealer Licences (WDL) details, checking for appropriate insurance cover, checking the MHRA web site on a weekly basis to ensure suppliers have not had their WDL temporarily or permanently revoked.

New Suppliers are also obliged to complete a 'New Supplier' form which includes a regulatory checklist relating to MHRA Wholesale Dealer's Licence and Home Office Controlled Drugs licences. All new medicine supplier accounts must be approved by the Managing Director.

Over 80% of our prescription medicine's purchases are from the three main Northern Ireland based Pharmaceutical Wholesalers; with the remaining 20% being purchased from smaller UK based Pharmaceutical Wholesalers. The supply of medicines is a highly regulated market.

Over The Counter (OTC) Medicines and Health & Beauty

All OTC Medicines are sourced from suppliers based in the UK and Republic of Ireland. We do not source or sell own label products. However, we do acknowledge some of our suppliers, particularly beauty products may be manufactured outside of the EU, and we do not currently have any process in place to ensure that the labour used in the manufacture of these products is compliant with the UK Modern Slavery Act 2015. We will ensure that we comply with our own legal obligations in relation to this supply chain and encourage our suppliers to monitor their own supply chains including manufacturers.

5. Service Providers

The Company uses a rage of service providers for maintenance, waste disposal and cleaning.

6. Our Policies & Procedures

Our Policy & Procedures as detailed in our Company Handbook and Standard Operating Procedures provide the foundational standards for all aspects of our business and are applicable to all of our employees.

Primary among the provisions included therein is our opposition to the exploitation of workers through any form of forced or bonded labour, slavery, human trafficking or other labour practices that involve harsh or inhumane treatment. Robust recruitment policies are in place to ensure all current and prospective employees are treated fairly and consistently in regard to recruitment and selection of candidates. These include Access NI and the applicable Right to Work checks. Contracts and agreed rates of pay for temporary staff are in place with preferred agencies.

The following are just a sample of our group company policies covering employees and the workplace.

Policies & Procedures	**Reasoning/Objectives**
Recruitment & Selection Policy	As an employer, the company has legal responsibilities under the Immigration, Asylum and Nationality Act 2006 to prevent illegal working The Company will carry out various document checks before employing a person.
Equal Opportunities Statement	We are committed to providing equality of opportunity in employment to all persons and are committed to the principle of equality regardless of race, colour, nationality, ethnic or national origin, religious belief, political opinion or affiliation, gender reassignment, Irish Traveller or disability. We will apply employment policies that are fair, equitable and consistent with the skills and abilities of our employees and the needs of the business
Raising a Concern	The aim of our Raising Concerns policy is: • To help those wanting to raise concerns regarding malpractice within this organisation in the correct way by providing a procedure for doing so. • To ensure we are committed in providing an open culture for employees to raise concerns with confidence, in order to maintain patient care and public safety. • Not discriminate or victimise anyone raising concerns, nor tolerate any bullying or harassment due to whistleblowing. • Improve our services by communicating learnings from concerns raised and ensuring necessary changes are made.
Grievance Policy	The purpose of this grievance procedure is to enable employees who have a concern, problem or complaint about their work, working environment, to have that concern, problem or complaint considered by the Company in a short a time as possible.
Harassment and Bullying in the Workplace Policy	The aim of this policy is to try to ensure Bullying and Harassment does not occur and if it does occur, to ensure procedures are available to resolve the problem and prevent reoccurrence.
Family Friendly Policies – • Maternity • Paternity • Shared Parental Leave and pay • Adoption Policy • Parental Leave Policy • Flexible working Policy	The objectives of these policies is to help to promote the well-being of all employees via the development of family friendly policies.

Health and Safety Policy	The aim of this policy is to ensure that we are legally compliant and up-to-date with all safety, environmental and fire safety legislation. This includes audits, training, and creating best practices. In particular our policy includes assessing the risks to young persons under 18 years old. The objective is to ensure the well-being of our young workers (between the ages of 16 and 18 years old) while in our employment or during a period of work experience.

7. Training and Compliance

All employees sign to confirm that they have read and understood all sections of the Employee Handbook as per their contract sign off.

Pharmacy staff also sign all relevant Standard Operating Procedures (SOP's) to confirm their understanding and adherence to the method of operating in the Pharmacy. In addition, staff are obliged to register on the web based Numark training and recording system.

8. Actions - Looking ahead

During the current financial year, it is our intention to ensure any outstanding suppliers of goods and services who were sent our Supplier Code of Conduct (based on internationally recognised social, ethical and environmental measures) for the procurement all goods and services have returned a signed copy of our code of conduct. Compliance with such guidelines is an important decision-making factor when adding companies onto our approved supplier list going forward. The MediCare Pharmacy Group also retains the right to verify that suppliers are complying with our Code of Conduct.

Within our Supplier Code of Conduct, we will continue to support the recognition of the United Nations' Universal Declaration of Human Rights, banning child and forced labour, all forms of discrimination as well as the right to observe regulated working hours and right to freedom of association. We also ask that our business partners to commit to meeting occupational health and safety for their own employees, combat corruption, make continuous improvements to environmental protection and observe the best practice relating to social, ethical and environmental standards. Hopefully this will help us to continue to develop and strengthen our existing partnerships whilst ensuring greater compliance and sustainability within our supply chains.

MediCare Pharmacy Group places a great deal of importance on training and development within the business and to this end all branch staff are registered on the Numark online training programme which provides training modules on all aspects of the business. As yet, Numark have not added a module on the Modern Slavery Act 2015 to improve awareness and to advise on reporting of concerns. However, we will continue to communicate with our staff at all levels to ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, among our key staff, particularly those who are most likely to be involved in the recruitment decision-making process relevant to such risk.

It is also our intention to ensure posters are in place and up to date on all staff notice boards highlighting our commitment to ensuring compliance with the principles of the act and providing contact details for HR for confidential reporting of concerns. We will also provide links on our internal communications to improve awareness at branch level.

MediCare Pharmacy Group is a holder of Sponsorship licence for migrant workers.

Responsibility and Review

MediCare Pharmacy Group recognise that the risks from modern slavery change, and as such our approach to preventing modern slavery is expected to be reviewed annually. Each review shall look at:

- Effectiveness of risk assessment processes
- Staff training programs
- Assessment programs (where applicable); and
- Reporting and escalation processes.

The Medicare Pharmacy Group Directors will have responsibility for such reviews and for the day-to-day implementation of this statement.

Michael Guerin (Managing Director) Dated: 24th March 2023

On behalf of the Board of Directors

MediCare Pharmacy Group