

SMARTWAY PHARMACEUTICALS LIMITED

Modern Slavery and Human Trafficking Statement

Financial year ended 31 March 2026

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Our position in one line

We have no tolerance for slavery or human trafficking in any part of our business or our supply chains. Where we find it, we will act decisively.

Modern slavery is not a historical problem, and it is not somebody else's problem.

It is happening now, it is growing, and it happens in wealthy countries as readily as in poor ones. It covers far more than the word suggests: bonded and forced labour, forced migrant labour, child labour, domestic servitude and human trafficking.

Smartway moves medicines around the world. That gives us a supply chain reaching well beyond the United Kingdom, and with it a responsibility to know who is in it. We have no tolerance for slavery or human trafficking in any part of our business or our supply chains. Where we find it, we will act decisively, and where somebody in our supply chain creates a risk we consider unacceptable, we will expect it to be put right.

This statement sets out the controls we have in place today, the risks we have identified across our operations and supply chains, and the commitments we will deliver over the coming year. We will report against each of them in next year's statement so that our progress can be measured.



Before setting out what we do, it is worth understanding the scale of what we are dealing with.

The most recent global estimates were published in 2022 by the International Labour Organization, Walk Free and the International Organization for Migration, and describe the position in 2021. They are worth a minute of anyone's time.

THE NUMBERS

49.6 million

people are in modern slavery

That is about one in every 150 people alive.

27.6m

in forced labour

They cannot refuse the work or walk away. The other 22 million are in forced marriage.

86%

is done by businesses, not governments

Most of it happens in services, factories, building sites, farms and people's homes.

Over half

happens in rich countries

Including here in the UK. This is not only a problem somewhere else.

Who it happens to, and what keeps them there

3×

Migrant workers are more likely to be trapped

Being far from home, and far from help, is what makes people easy to exploit.

36%

are held there by unpaid wages

Another one in five are kept by the threat of being sacked. Debt and fear do the work that locks and chains used to.

3.3m

are children

About one in eight of everyone in forced labour.

11.8m

are women and girls

Nearly four in five people forced into sexual exploitation are female.

+2.7m

more than in 2016

The problem is getting bigger, not smaller.

2030

is the deadline to end it

The world has promised to stop modern slavery by then.

Source: ILO, Walk Free and IOM, *Global Estimates of Modern Slavery: Forced Labour and Forced Marriage* (September 2022), reference year 2021.

Why this matters to a medicines wholesaler in London

Two of the five highest-risk sectors, manufacturing and services, sit in our supply chain: the factories where medicines and packaging are made, and the cleaning, security and transport services we buy. Temporary and agency labour, migrant workers and jobs where wages can be delayed or docked are exactly where the estimates say exploitation concentrates, and all three are features of warehouse work in a large city. That is why the actions in this statement start with labour agencies, our site contractors and the suppliers whose products are made outside the UK and EEA.

What it can look like close to home

Modern slavery in the UK rarely looks like the word suggests. These are the signs our people are asked to watch for.

A worker who never speaks for themselves

A colleague answers every question on their behalf.

A passport held by someone else

Held by an employer, or by a "friend".

Wages paid into another person's account

The worker does not control their own pay.

Several people from one overcrowded address

Arriving for work together in the same vehicle.

Someone frightened, withdrawn or reluctant to accept help

Behaviour that does not fit the situation.

A worker who says they owe money

Owed to the person who found them the job.

If you notice something like this

Tell your manager or use our Whistleblowing Policy. **Nobody will be criticised for raising a concern in good faith that turns out to be nothing.**



Our business, structure and supply chains

We are a licensed wholesaler of medicines to the healthcare sector, trading for over 20 years.

We are licensed by the Medicines and Healthcare products Regulatory Agency (wholesale dealer's licences WDA(H) and WDA(V) and a manufacturer's specials licence) and by the Home Office for controlled drugs.

We supply pharmacies, GP surgeries, hospitals, clinics, overseas hospitals and health authorities, ministries of health and non-governmental organisations around the world.

We buy mostly from within the United Kingdom and the European Economic Area, and we supply to far more

countries than we buy from. Because we source against what our customers need, and because the medicines we handle are often specialist or hard to find, our supply chain moves.

A supplier used for one urgent order may not be used again for a year. That makes a static, once-a-year view of our supply chain unhelpful, and it is why our checks happen at the point a supplier is approved rather than only at an annual review.

Our supply chain has six main parts

Medicines and medical products

Bought from manufacturers and licensed wholesalers, mostly in the UK and EEA, with some products sourced from other regions where a customer requires them.

Packaging and consumables

The materials used to store, protect and ship what we supply.

Agency and temporary labour

Which we do not use at present but may engage for warehouse cover.

Transport and freight

Including temperature-controlled and international shipping, mainly through freight forwarders and couriers.

Facilities services at our site

Including cleaning, security, waste and maintenance.

IT, professional and other business services

The suppliers that support the running of the business.

Our policies

The strongest protection against exploitation inside a business of our size is not a document: it is a workforce that knows what to look for and is confident that raising a concern will be taken seriously rather than held against them.

Our policies are written to support that. They are set out in our Employee Handbook, which every employee receives and which is covered at induction, and the most relevant are these:

Whistleblowing Policy

A confidential route for anyone working for or with us, including contractors and agency workers, to raise concerns about wrongdoing, with protection from detriment. Concerns can also be raised with the independent charity Protect.

Anti-corruption and Bribery Policy

Applies to everyone who works for us or on our behalf, including agents, contractors and business partners.

Equal Opportunities, and Anti-harassment and Bullying Policies

Fair recruitment, dignity at work and protection from victimisation.

Recruitment and pay

We employ our people directly, carry out right to work checks on everyone we employ, do not charge workers any fee for recruitment, and never retain anyone's identity documents.

Our commitment is contained in this statement, which is approved by the Board, and in the policies above.



Where the risks are

A meaningful risk assessment distinguishes between the parts of a business we control directly and the parts we do not. We have assessed our business and supply chains against the sector, the countries we buy from and the type of labour involved, using the global estimates above as our starting point.

Our own operations are low risk: a single UK site, a directly employed and mostly skilled workforce, and a licensed, regulated activity that is inspected by multiple regulators across the UK, as well as third parties to assess their own compliance; all on an ongoing basis. Every one of our employees is on our payroll and has had a right to work check.

The higher risk sits in the parts of the supply chain we do not control directly, and in our judgement it concentrates in three places:

01

Agency and temporary warehouse labour

Low-paid, temporary work is a recognised concentration of risk in the UK. We do not use agency labour at present; if we do, it will be engaged only on the terms set out in this statement.

02

Products sourced outside the UK and EEA

Where we source medicines from manufacturers in other regions, the manufacturing and raw material stages of those supply chains can involve higher-risk countries. However, procurement from outside the UK and EEA is still typically from well regarded jurisdictions.

03

Contracted services at our site and in transport

Cleaning, waste, security and freight are sectors where subcontracted, low-paid labour is common.

Our regulated status is a real advantage here: every medicines supplier must hold a licence from its regulator and pass our Good Distribution Practice qualification before we trade with them, which gives us a verified legal identity and a documented relationship for every supplier of product. We are building on that foundation by extending our attention to labour conditions further up the chain, which is where the actions below are directed.

Due diligence: what we do now

As a licensed wholesaler we operate a Quality Management System and we refuse to trade with anyone we cannot verify.

That gives us a strong foundation: we know who our suppliers are, we hold documented relationships with them, and we have an established route through which our people can raise concerns. The controls we rely on today are these:

- **Supplier qualification.** Every supplier of medicines and medical products is qualified under our Quality Management System before we trade: we verify their licence with the regulator, confirm their bona fides and, where required, put a written quality agreement in place. Suppliers are re-evaluated at set intervals.
- **Customer verification.** Every customer is checked for a valid licence or registration before we supply, because the same regulations require it.
- **Employment checks.** Everyone we employ is subject to a right to work check, is paid through payroll and receives our handbook, including the whistleblowing route.
- **Agency terms.** Any agency workers will be engaged only through agencies with which we have written terms.
- **Routes to raise a concern.** Concerns can be raised through the Whistleblowing Policy, through Protect, or through the Modern Slavery and Exploitation Helpline.

The next section sets out how we will extend these controls beyond our immediate suppliers over the coming year, and the written standard we will ask our suppliers to meet.

What we will do in the next 12 months

Each of the following actions is owned by the Special Projects Manager, who reports progress to the Board, and will be delivered within the year. Together they extend our existing controls into the areas where we have identified the greatest risk: any labour agencies we engage, our site contractors and the suppliers whose products are manufactured outside the UK and EEA. **We will report against every one of them in next year's statement.**

01 Supplier Code of Conduct

Adopt a code covering forced and child labour, recruitment fees, identity documents, wages and hours, freedom of association, health and safety and our right to ask questions and, where necessary, to end the relationship. Send it to every active supplier and ask them to acknowledge it.

02 Contract wording

Add a modern slavery clause to our standard purchase terms and to quality agreements as they are renewed.

03 Higher-risk supplier questionnaire

Send a questionnaire to any labour agencies we engage, our cleaning, waste and security contractors, freight forwarders and any supplier of product manufactured outside the UK and EEA, asking about their own policies, recruitment practices and how their workers can raise concerns. Record the answers and follow up any gaps.

04 Labour agency checks

Before engaging any agency, confirm with it in writing that no worker is charged a fee, that all workers are paid at least the National Minimum Wage directly into their own bank account, and that identity documents are returned to workers.

05 Supplier risk register

Maintain a register of suppliers with their category, country and risk rating, reviewed once a year.

06 Training

Add a modern slavery awareness module to induction for all employees, with a fuller session for warehouse managers, quality and regulatory staff, HR and anyone who buys on our behalf, covering the signs of exploitation and what to do. Completion is recorded in our training system.

Taking robust action

If we identify that a supplier, customer or anyone else in our supply chain has fallen short of the standards we set, we will act.

What that action looks like depends on what we find. Where a supplier is willing to put a problem right, our first instinct is to work with them to fix it, because walking away from a supplier can leave the affected workers worse off than before, with the exploitation simply moving out of sight.

Where a supplier will not engage, or where the abuse is serious or deliberate, we will end the relationship. Where we suspect that a criminal offence has been committed, or that someone is at risk of harm, we will report it to the police or the Fair Work Agency, and we will co-operate with the competent authorities.

Protecting the person at risk comes before protecting the commercial relationship or our own reputation.



Our effectiveness in combating slavery and human trafficking

The absence of a reported case is not on its own evidence that nothing is happening, so we measure our effectiveness by what we do rather than by what is reported to us. No concern relating to modern slavery was raised through any channel during the year, and none was identified.

Our indicators this year cover delivery of the commitments set out above and whether our people and our suppliers know how to raise a concern. As the programme develops, these measures will shift towards what our suppliers are doing in their own operations. The indicators we will use are:

Measure	Target for the coming year
Supplier Code of Conduct issued to active suppliers	Issued to all active suppliers within the year
Higher-risk suppliers returning the modern slavery questionnaire	100% of site contractors and any labour agencies engaged; 80% of others
New suppliers screened before onboarding	100%
Employees completing modern slavery awareness training	100% of new starters at induction; all existing employees within the year
Modern slavery concerns raised through any channel, and their outcome	All reported to the Board, including where the number is zero
Statement published within six months of the financial year end and submitted to the government registry	Yes

We will report progress against these measures in next year's statement.

Contact us

Any questions, comments and requests regarding this statement are welcome. If you wish to contact us, please use:

Smartway Pharmaceuticals Limited

10 Lyon Road, London, SW19 2RL

Tel: +44 20 8545 7711

Email: info@smartwaypharma.co.uk

Anyone who suspects modern slavery in connection with our business can contact us in confidence, or the **Modern Slavery and Exploitation Helpline** on **08000 121 700**.

Raise a concern internally

Speak to your manager, or use the route set out in our Whistleblowing Policy in the Employee Handbook.

Raise a concern independently

Contact the independent whistleblowing charity Protect, or the Modern Slavery and Exploitation Helpline.



Responsibility and approval

This statement is made under section 54 of the Modern Slavery Act 2015 and is our slavery and human trafficking statement for the financial year ended 31 March 2026. It covers **Smartway Pharmaceuticals Limited, company number 08481191**. It supersedes our previous statement, under which no commitments were outstanding at the year end. It is published on our website with a link from the homepage and submitted to the government's modern slavery statement registry.

Day-to-day responsibility for this statement and the actions in it rests with the Special Projects Manager working with the Responsible Person and the Operations Manager. The Board has overall responsibility and reviews the statement annually.

This statement was approved by the Board of Directors of Smartway Pharmaceuticals Limited on **15 September 2026** and is signed on its behalf by:

Josh Cocklin

Josh Cocklin

Chief Executive and Director, Smartway Pharmaceuticals Limited

15 September 2026





**Transforming lives by empowering
access to medicines globally**