

# Modern Slavery Statement



## **Medflow Clinical's Prohibition Against Human Trafficking and Modern Slavery**

**Pursuant to applicable regulations, including the California Transparency in Supply Chain Act of 2010 and Section 54 of the UK Modern Slavery Act 2015, Medflow Clinical provides the following statement:**

MedFlow Clinical Ltd is a medical logistics company dealing primarily with medical consumables. MedFlow Clinical believes in the protection of human rights globally both in the workplace at our own facilities and within our supply chain. MedFlow Clinical forbids slavery or human trafficking of any kind and are committed to promoting responsible business practices with our suppliers. MedFlow Clinical has several corporate policies, including our Standards of Business Conduct, our Global Ethical Business Practices Policy, our Prohibition Against Abuse of Child Labor Policy, our Prohibition Against Human Trafficking Policy and our Supplier Code of Conduct, which address our position on these issues.

MedFlow Clinical has not identified any instances of modern slavery and human trafficking at the company in the last year. As described below, MedFlow Clinical has implemented and continues to develop policies and procedures that reflect our on-going commitment to the protection of human rights.

MedFlow Clinical's Standards of Business Conduct sets forth our code of ethics and expectations regarding responsible business conduct. It provides information about the standards of integrity that MedFlow Clinical and all MedFlow Clinical affiliated entities require from all their employees, directors and officers, including standards relating to fair treatment and diversity, anti-harassment and bullying, child labour and human trafficking. MedFlow Clinical expects that our consultants, agents, representatives, business partners and suppliers will conform to the behaviours set forth in our Standards of Business Conduct, which are also highlighted in our Supplier Code of Conduct.

MedFlow Clinical has a Whistleblower Policy that encourages all employees, customers and suppliers to report any suspicion of slavery or human trafficking without fear of retaliation.

### **Supplier Code of Conduct**

MedFlow Clinical's corporate values and culture statement include an emphasis on respect of others. Consistent with this, MedFlow Clinical has zero tolerance for human trafficking. MedFlow Clinical requests every supplier to acknowledge that they have been provided with a copy of our Supplier Code of Conduct, reviewed it in its entirety, and can commit to comply with its principles. Included in our Supplier Code of Conduct is the requirement that our suppliers behave in a lawful, ethical and socially responsible manner with respect to, among other things, human rights and acceptable working conditions. MedFlow Clinical will not conduct business with suppliers that we conclude or reasonably believe have engaged in child labor violations or activities that promote human trafficking or forced or involuntary labor. While MedFlow Clinical neither requires annual certifications nor conducts formal on-site audits of all its supplier relationships, MedFlow Clinical (a) conducts new vendor due diligence, which includes review of publicly available news related to legal and ethical practices/violations; (b) ensures its supply contracts contain provisions by which suppliers agree to comply with all laws related to their performance under those agreements; and (c) conducts on-site visits of its primary suppliers from time to time to review and discuss contract and quality performance, which may incorporate review of the Supplier Code of Conduct.

### **Training**

As indicated above, MedFlow Clinical maintains worldwide Standards of Business Conduct. In creating those standards, MedFlow Clinical considered many different standards relating to the ethical and humane treatment of people, including the International Labour Organization (ILO) international labor standards and the United Nations Universal Declaration of Human Rights. MedFlow Clinical requires that all its directors, officers and employees comply with the provisions of its Standards of Business Conduct. All MedFlow Clinical employees are trained on the Standards upon hire and are periodically provided refresher training thereafter, which includes training on the UK Modern Slavery Act. MedFlow Clinical is also preparing a standalone training to be launched in August 2021 entitled "Understanding & Awareness of Human Trafficking," which will be assigned and completed biannually by all employees. MedFlow Clinical also provides information and training to its Procurement Team directly involved with the selection of new suppliers and the ongoing management of current suppliers. This training covers the assurance of ethical business practices by our suppliers.

As part of our internal ethics campaign, MedFlow Clinical will in 2021 raise awareness of modern slavery and human trafficking issues by annually distributing to all employee emails and articles that are specifically focused on modern slavery. These materials will include information regarding:

- Our commitment in the fight against modern slavery;
- Red flags for potential cases of slavery or human trafficking; and
- How employees should report suspicions of modern slavery.

## **Accountability Standards**

MedFlow Clinical has Standards of Business Conduct in place that govern the actions of our company and employees and holds them to the highest level of ethical and social responsibilities. MedFlow Clinical's goal is to work with suppliers who embrace and comply with the principles of our Supplier Code of Conduct, and, in turn, to have these suppliers encourage compliance from any suppliers with whom they work in the delivery of goods or services for MedFlow Clinical. MedFlow Clinical employees who do not comply with the provisions of MedFlow Clinical's Standards of Business Conduct may be disciplined. Unless otherwise prohibited by law (U.S. or other), discipline may include dismissal. To the extent permitted by law and contractual provisions governing termination rights, we reserve the right to terminate relationships with third parties, including suppliers, who conduct business in a manner that conflicts with Catalent's Standards of Business Conduct or Supplier Code of Conduct.

## **Monitoring**

MedFlow Clinical monitors human trafficking risks, based upon the industry in which we operate, and the geographic locations in which we conduct business and/or obtain materials necessary to provide products and services to our customers, by reviewing published country risk profiles for corruption and human trafficking risks and sharing these within the workplace. monitors human trafficking risks, based upon the industry in which we operate, and the geographic locations in which we conduct business and/or obtain materials necessary to provide products and services to our customers, by reviewing published country risk profiles for corruption and human trafficking risks and sharing these within the workplace.

MedFlow Clinical's focus regarding this ongoing effort will be on:

- Continuing to develop the maturity of our supplier due diligence program
- Assessing our practices against the requirements of the Modern Slavery Act 2018 (Cth)



Stacey Ibbott - Director

November 10<sup>th</sup> 2020

For and on behalf of MedFlow Clinical Ltd.

This statement was executed and approved after a duly noticed meeting of the board of directors of MedFlow Clinical Ltd, and a link to this statement shall be placed on the homepage of the Medflow Clinical website.