



**This statement is made pursuant to section 54 of the Act and constitutes the Modern Slavery and Human Trafficking Statement for the Financial year ended 31<sup>st</sup> December 2021 for Napp Pharmaceuticals Limited.**

**Overview**

Napp Pharmaceuticals Limited (including the wholly owned subsidiary, Qdem Pharmaceuticals Ltd) is a privately-owned, UK pharmaceutical company, based in the heart of the Cambridge science community. Napp has grown up with the NHS, providing innovative medicines to patients in the UK since the 1920s. We know how to navigate its complexities and we've shaped our structure to its unique needs, so as the NHS changes, we can too. We foster a flexible culture at Napp where our people thrive on the ability to be agile and autonomous in response to the needs of our partners. From launching the UK's first monoclonal antibody biosimilar to introducing cutting-edge primary care medicines in respiratory and diabetes, we are always striving to move medicine forward for doctors and patients in the UK.

Our business is committed to operating in an ethical and transparent manner. In line with this commitment, we have incorporated the requirements of the Modern Slavery Act 2015 (subsequently amended by the Modern Slavery (Amendment) Bill 2021) (the "Act") into our Code of Business Ethics and our compliance framework.

We take the upholding of these high standards seriously and do not tolerate slavery, human trafficking or child exploitation within our organisation or from those from whom we buy products or services.

We analysed the risks within our own business and our supply network following the introduction of the Act and we do not believe our risk in our supply chains has changed since our previous Statement in 2020. Due to the nature of our business, we currently consider ourselves to be at low risk of exposure to slavery, human trafficking or child exploitation. We are not aware of any areas in our operations likely to lead to a breach of human rights and modern slavery laws. However, we remain committed to never knowingly dealing with any organisation connected to slavery, human trafficking or child exploitation.

**Training, Communication and Raising Concern**

Napp Pharmaceuticals Limited has a robust training program which includes annual HR related and Code of Conduct training. Moving forward, we aim to equip those employees involved in procurement activities, with both the knowledge and understanding of the importance of the Act and the roles that employees play in helping to eradicate modern slavery and trafficking. Human rights concerns (and in particular any form of forced labour, child labour, slavery, or human trafficking) are specifically mentioned in our Third-Party Code of Conduct as practices that we require our suppliers to prohibit.

Napp Pharmaceuticals Limited has an environment which encourages open and frank two-way communication, and its employees are encouraged and expected to raise any concerns of known or suspected violations of its Code of Business Ethics or of illegal or unethical business conduct. Any such concern can be raised in confidence without fear of retaliation, by approaching Management, HR, Legal or Compliance. Alternatively, individuals may report their concern, and if desired remain anonymous, through our independent Integrity Line at



[integrityline.mundipharma.com](https://integrityline.mundipharma.com). which is available 24 hours a day. Any concern raised will be fully investigated and acted upon as appropriate.

## Employment Practices

Our employment practices are compliant with applicable employment and health and safety legislation, and as a result, we are confident that there is no slavery, human trafficking or child exploitation taking place within our organisation. Furthermore, we shall ensure that the employment agencies that we deal with are also fully compliant with the applicable legislation.

## Due Diligence

It is our aim to not work with any supplier that we suspect is connected in any way with slavery, human trafficking or child exploitation. As part of our compliance programme, we take steps to assure ourselves that we only partner with third parties who act ethically, compliantly and within the laws of the jurisdiction in which they operate. We operate a risk-based due diligence procedure covering third party intermediaries. The due diligence process involves assessing the third party, where appropriate, through completion of a questionnaire, business justification review and background checks on third party organisations.

## Enforcement

Any suspected breach of our compliance programme or of our Third-Party Code of Conduct, including the Act, will be investigated and such investigations could lead to the termination of supplier contracts and other actions as appropriate.

## Conclusion

Napp Pharmaceuticals Limited is not aware of any slavery, human trafficking or child exploitation taking place in its business.

Due diligence activities during the financial year ending 31<sup>st</sup> December 2021 did not identify any instances of slavery, human trafficking or child exploitation within the businesses of its suppliers, customers or service providers.

Napp Pharmaceuticals Limited will continue to raise awareness, apply and monitor appropriate risk-based due diligence processes to supplier relationships as part of its ongoing compliance programme in order to mitigate the risk of modern slavery.

This Statement was approved by the Board of Napp Pharmaceuticals Limited on 21 September 2022.

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Bryan Lea  
Director

21 September 2022

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Name and Title of Signatory

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Date