

HAC PHARMA'S UK Modern Slavery Act Disclosure Statement – 2026

Introduction

H.A.C. PHARMA is an independent French pharmaceutical SME, employing fewer than 49 people, with activities coordinated from its headquarters in Caen. The company operates in the pharmaceutical sector and is committed to maintaining the availability of essential and speciality medicines, ensuring product quality, supporting the proper use of medicines, and acting as a trusted partner in healthcare.

This statement has been prepared in response to UK healthcare procurement expectations and with reference to the principles of section 54 of the UK Modern Slavery Act 2015. Where H.A.C. PHARMA is requested to provide a Modern Slavery Statement setting out the steps taken to identify, prevent and manage modern slavery and human trafficking risks in its own activities and supply chain.

H.A.C. PHARMA relies on a selected network of qualified European partners and its supply chain is managed in a regulated environment, where supplier qualification, quality oversight, documentation, traceability, and contractual responsibilities are essential to the way the company operates.

H.A.C. PHARMA considers the prevention of modern slavery and human trafficking as part of its wider responsibility to conduct business ethically and to work with partners who respect human dignity, labour standards and applicable laws. This commitment applies to our own activities and to the relationships we maintain with suppliers, subcontractors, logistics providers, distributors, and other business partners involved in the pharmaceutical value chain.

Modern slavery, forced labour, child labour and human trafficking are incompatible with H.A.C. PHARMA's values, its Code of Business Conduct and Ethics, and its expectations towards suppliers and subcontractors.

This Modern Slavery and Human Trafficking Statement describes how H.A.C. PHARMA integrates modern slavery prevention into its supplier standards, partner selection, due diligence, risk-based monitoring, internal awareness and responsible procurement approach.

Our business, activities and European pharmaceutical supply chain

The company operates in the pharmaceutical sector and is committed to maintaining the availability of essential and speciality medicines, ensuring product quality, supporting the proper use of medicines and acting as a trusted partner in healthcare.

H.A.C. PHARMA's activities rely on a structured pharmaceutical value chain coordinated from France. Across its product portfolio, the company works with different categories of qualified European partners, including manufacturers of active pharmaceutical ingredients, suppliers of excipients, manufacturers of semi-finished or finished pharmaceutical products, packaging and technical service providers, quality and regulatory service providers, logistics providers, storage and transport partners, distributors and other subcontractors involved in the supply of medicines.

Because H.A.C. PHARMA operates in a regulated healthcare environment, its partners are selected and monitored according to requirements relating to quality, regulatory compliance, reliability, continuity of supply, traceability and responsible business conduct. These requirements also support the prevention of modern slavery and human trafficking, as they help ensure that H.A.C. PHARMA works with identified, qualified, and accountable partners.

The European location of the company's supply chain partners contributes to a more controlled modern slavery risk profile, supported by applicable legal and regulatory frameworks governing labour rights, employment standards, workplace safety and anti-trafficking obligations. H.A.C. PHARMA maintains appropriate vigilance through supplier qualification, contractual responsibilities, documentation, transparency requirements and escalation mechanisms throughout the business relationship.

Our standards on modern slavery and responsible business conduct

H.A.C. PHARMA uses its Supplier and Subcontractor Code of Conduct to formalise the standards expected from suppliers, subcontractors and business partners providing goods or services to, or acting on behalf of, the company. This Code applies to direct suppliers and subcontractors and requires them to communicate its principles to their own employees, affiliates, contractors, and supply chain partners involved in work connected to H.A.C. PHARMA.

The Supplier and Subcontractor Code of Conduct expressly prohibits forced labour, bonded labour, indentured labour, involuntary prison labour, modern slavery and human trafficking in any form. It also prohibits child labour and requires suppliers and subcontractors to provide workplaces free from harassment, abuse, intimidation, coercion, discrimination and inhumane treatment.

Suppliers and subcontractors are also expected to comply with applicable labour laws relating to wages, benefits, working hours, rest periods and employment conditions, freedom of associations and to respect workers' rights to raise workplace concerns without fear of retaliation.

These requirements ensure that H.A.C. PHARMA's expectations are clearly communicated to the business partners that contribute to its pharmaceutical supply chain, and that compliance with human rights and labour standards forms part of the way the company structures supplier relationships.

H.A.C. Pharma's internal Code of Business Conduct and Ethics also reinforces the importance of responsible business partners and supply chain integrity. H.A.C. PHARMA works with manufacturers, suppliers, logistics providers, distributors, consultants, subcontractors and other business partners across its value chain, and expects them to operate responsibly, ethically and in compliance with applicable laws and professional standards.

Due diligence and supply chain controls

H.A.C. PHARMA's due diligence approach is embedded in the way the company selects, qualifies and monitors its pharmaceutical partners. Before working with a supplier or subcontractor, H.A.C. PHARMA assesses whether the partner is able to perform the entrusted activity under the required conditions.

This review may include the partner's pharmaceutical status, licences, authorisations, certifications, technical capabilities, quality systems, logistics organisation, personnel qualification, inspection history, reputation, operational reliability and ability to meet expected service levels.

This process contributes to modern slavery prevention by supporting visibility over who H.A.C. PHARMA works with, where key activities are performed, how responsibilities are documented, and whether partners have the necessary level of organisation and compliance to operate responsibly.

Supplier relationships are also framed by contractual and quality documentation, such as commercial agreements, quality agreements, technical agreements, specifications, Safety Data Exchange Agreements or equivalent arrangements, depending on the activity concerned. These documents help define roles, responsibilities, communication channels, applicable requirements and conditions under which the activity must be performed.

H.A.C. PHARMA expects partners to cooperate transparently, provide required records, notify significant changes and avoid unauthorised subcontracting where prior information, assessment or approval is required. This is particularly important for modern slavery monitoring because visibility over subcontracting and changes in the supply chain is a key condition for maintaining responsible oversight.

H.A.C. PHARMA may also request supporting documentation, supplier questionnaires, self-assessments or additional information relating to labour standards, responsible business conduct, health and safety, quality, ethics or supply chain transparency.

Modern slavery risk management

H.A.C. PHARMA's modern slavery risk management approach reflects the nature of its business model: a French pharmaceutical SME working with qualified European partners in a regulated sector. The company's principal area of vigilance is the continued oversight of partners involved in pharmaceutical manufacturing, packaging, logistics, storage, transport, distribution and related services.

H.A.C. PHARMA manages this risk through a combination of supplier qualification, contractual responsibilities, quality documentation, supplier conduct requirements, transparency expectations and risk-based monitoring.

As it is stated in the H.A.C. PHARMA's Responsible Procurement Charter, the company's responsible purchasing activity consists of selecting and working with partners able to meet high expectations in terms of quality, compliance, reliability and integrity, while progressively integrating ESG criteria into supplier selection and monitoring.

For modern slavery purposes, this means that H.A.C. PHARMA's vigilance focuses on the integrity of supplier relationships, respect for labour standards, transparency of subcontracting, availability of documentation and the ability to act where a concern is identified.

The company's Supplier and Subcontractor Code of Conduct requires suppliers to keep accurate and transparent records, maintain appropriate management systems, report concerns promptly and cooperate with any reasonable request from H.A.C. PHARMA relating to review, investigation or remediation.

H.A.C. PHARMA regularly conducts or requests audits, assessments, or reviews relating to quality, compliance, health and safety, ethics, or labour standards from its suppliers. Where a supplier or subcontractor does not meet H.A.C. PHARMA's expectations, the company may request clarification, supporting documentation, self-assessments, corrective action plans, or evidence of implementation

Monitoring effectiveness

H.A.C. PHARMA monitors the effectiveness of its approach through the practical controls already used to manage its supplier relationships: supplier qualification, documentation review, contractual and quality oversight, supplier cooperation, review of supporting evidence, escalation of concerns and corrective action follow-up.

Effectiveness is also assessed through the quality of supplier files, the clarity of supplier responsibilities, the completeness of required documentation, the ability to identify the partners involved in the supply chain, the traceability of supplier commitments and the responsiveness of partners when information or corrective action is required.

H.A.C. PHARMA's Responsible Procurement Charter provides that ESG expectations are integrated into supplier monitoring and include ESG questionnaires, additional supporting documents, strengthened dialogue with key suppliers and reinforced requirements relating to ethics, working conditions and responsible business practices.

Where a significant non-compliance or major gap is identified, H.A.C. PHARMA may request clarifications, evidence, corrective action, enhanced monitoring, supplier requalification or, where necessary, suspension or termination of the relationship.

H.A.C. PHARMA intends to monitor the effectiveness of this approach through practical indicators, including the proportion of relevant suppliers covered by supplier conduct expectations, the completion and update of supplier qualification files, the number of ESG or responsible procurement questionnaires issued and reviewed, the follow-up of missing documentation or clarification requests, and the number of concerns or corrective actions raised in relation to labour standards, human rights or supplier conduct.

In this way, the monitoring of modern slavery prevention is connected to the company's broader supplier governance framework. The objective is to ensure that the company works with partners who are aligned with H.A.C. PHARMA's expectations on human rights, labour standards, transparency and responsible conduct.

Training, awareness and reporting

H.A.C. PHARMA promotes a culture in which employees are expected to act responsibly, seek guidance when a situation is sensitive, and raise concerns in good faith where conduct may be unlawful, unethical, unsafe or inconsistent with the company's standards.

This culture of early escalation is tied to modern slavery prevention, as employees involved in supplier relationships must be able to identify and report concerns relating to labour standards, human rights, subcontracting transparency or supplier conduct.

H.A.C. PHARMA's internal guidance reinforces the importance of compliance, traceability, respect, non-discrimination, responsible conduct and early escalation. Employees are encouraged to seek advice before acting when a situation is unusual, unclear or sensitive.

Concerns raised in good faith are handled confidentially, objectively and without retaliation, in accordance with applicable French and European whistleblowing regulations. H.A.C. PHARMA's Code of Business Conduct and Ethics states that employees should raise

concerns in good faith when they become aware of a situation that may be unlawful, unethical, unsafe or non-compliant, and identifies internal contacts such as line managers, the Responsible Pharmacist, Human Resources, Quality Assurance, Pharmacovigilance and Medical Information, Information Systems, the Harassment referent and General Management.

Modern slavery awareness is also embedded in H.A.C. PHARMA's supplier governance approach. Employees involved in supplier selection, quality oversight, logistics, procurement, corporate social responsibility, finance, regulatory affairs, pharmacovigilance, and sales are expected to consider supplier conduct as part of responsible partner management.

This includes checking whether the partner is properly identified, whether responsibilities are documented, whether subcontracting is transparent, whether required records and certifications are available, and whether any concern should trigger clarification, escalation or corrective action.

H.A.C. PHARMA's Supplier and Subcontractor Code of Conduct is a key reference for this awareness. It requires suppliers and subcontractors to prohibit forced labour, bonded labour, indentured labour, involuntary prison labour, modern slavery and human trafficking in any form. It also requires them to prohibit child labour, provide fair working conditions, maintain a workplace free from harassment, abuse and discrimination, and respect workers' rights to raise workplace concerns without fear of retaliation.

The same Code requires suppliers and subcontractors to maintain accurate and transparent records, implement appropriate management systems, train relevant employees, monitor compliance, identify and correct non-compliance, manage social, health, safety and ethical risks, and communicate these principles to their own suppliers and subcontractors.

These expectations help ensure that modern slavery prevention is also communicated within the supplier's own organisation and relevant supply chain.

H.A.C. PHARMA will continue to strengthen employee awareness of modern slavery and human trafficking through its wider compliance, ethics and responsible procurement framework. The objective is to ensure that employees understand the modern slavery provisions, recognise potential warning signs in supplier relationships, know which internal contacts to approach, and understand when to request supporting evidence, corrective action or escalation.

This statement has been approved by H.A.C. Pharma's General Management on August 8th, 2026.

H.A.C. Pharma will review this statement annually and update it where necessary to reflect changes in its activities, supply chain, supplier governance processes, regulatory expectations or healthcare procurement requirements.

Signed by:

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H.A.C. PHARMA