

# Orifarm Group A/S UK Modern Slavery Act Statement

In accordance with section 54 of the UK Modern Slavery Act 2015, Orifarm Group publishes its Modern Slavery Act statement, which covers the financial year 1 January 2022 – 31 December 2022. The statement sets out the steps taken by Orifarm Group that falls within the scope of preventing modern slavery and human trafficking from occurring in Orifarm Group operations and in the supply chain.

#### Our business:

We are an organization with a global footprint forever united in one, simple purpose: For as many as possible, as healthy a day as possible. By challenging market conventions, we work to make healthcare a better deal for customers, partners, communities, payers, and society at large as we create access to high-quality healthcare products. Put simply, our business model is to challenge the price of traditional supply, allowing us to create more value for the patients treated and for society.

Orifarm's business model helps the market find the balance in supply and demand by providing affordable medicines and healthcare products where needed. We do this through our seven strategic business areas. Our two major business areas are:

## Parallel Import (PI)

Based on the free movement of goods and services within the E.U., traditional parallel import is the process of importing original pharmaceuticals marketed in the E.U. countries, repacking/relabeling, and reselling the products on different markets at more affordable prices for the end users and societies.

#### Generics (GE)

When a patent for an original pharmaceutical expires, generic manufactures have the opportunity of marketing a similar pharmaceutical containing the same Active Pharmaceutical Ingredient (API) and is subject to that same strict quality and safety requirements as the original. Simply put, we help patients and societies get a better deal.

Our five additional strategic business areas are:

# Unlicensed Medicines

The need for treatment is not always linked to pharmaceuticals already available with a traditional marketing authorization in the given market. To support patients in need, we use our strong and long experience of trading medicines to deliver pharmaceuticals through special authorization from local authorities. This is known as Unlicensed Medicines. As the largest parallel import player in the EU, we have unparalleled access to suppliers and markets, allowing us to source the needed treatments when they are needed the most; fast, safely, and reliably. In 2022, we supplied more than 500 different pharmaceuticals to patients in need.

#### Clinical Trial Supplies

Clinical trials are essential for developing healthcare treatments. We contribute to the development by sourcing pharmaceuticals used as comparators and co-medications in clinical trials. Using our position as one of Europe's largest traders in pharmaceutical products, we are able to shift the procurement dynamics from the standard transactional approach to a data- and market-intelligence-driven supply chain, making sourcing more reliable for the companies performing



clinical trials as part of developing new treatments.

#### Promotional Rx

By promoting prescription medicines, we aim to enlighten patients, prescribers, and pharmacies that treatment is achievable. Doing so is essential for obtaining our overall business purpose of creating healthy days for as many as possible. We have 175 SKUs on the market in this business area.

## Over-the-counter (OTC)

With our Over-the-Counter (OTC) portfolio, we deliver pain and fever relief, nasal congestions relief, products for bone health, and multipurpose herbal tonics directly to end users without prescription. Brands in this category are Pamol®, Pamol® flash, Ibumetin ®, and Zymelin ®.

## Consumer healthcare

To enable our customers to take care of their wellbeing, we supply a variety of food supplementary products such as vitamins and minerals. This category of products is regulated outside the pharma regulation.

Orifarm operates in 13 sales markets across Europe and in the US.

We operate 6 main production and/or storage facilities in Denmark (Hobro, Skælskør, and Odense), Poland (Łyszkowice), the Czech Republic (Hostivice), and Germany (Leverkusen).

All products from Orifarm are manufactured in compliance with the quality and safety regulations governed by the health authorities.

Orifarm's products within generics, OTC, consumer healthcare, and promotional Rx are manufactured at our own production facilities as well as by trusted Contract Manufacturing Organizations (CMOs) around the world.

For repacked and/or relabeled products, we transport the imported pharmaceutical products to our repacking facilities in the Czech Republic, Germany or Denmark. After repacking the products, they are distributed to customers in our markets. For these products Orifarm's own operations include the production of boxes, printing labels and leaflets, and repacking the pharmaceuticals.

For inbound and outbound logistics, we rely on external partners.

# In our own operations - the Corporate Social Responsibility (CSR) policy and supporting policies

Our CSR policy summarizes our views, standards, fundamental attitude, and contribution to social responsibility and sustainability. It is rooted in our four core values: ambitions, flexibility, responsibility, and customer centricity. The values are the cornerstones in our company guiding us in our decisions and in our daily behavior. Together, the CSR Policy and the values form our ethical compass.

Our CSR Policy is aligned with the UN Guiding Principles for Business and Human Rights, the UN Children's Rights and Business Principles, ILO Conventions, the UN Framework Convention on Climate Change, and the UN Convention against Corruption. It also links to the UN Global Compact and its ten principles on human rights, labor rights, climate and environment, and



anti-corruption.

Since 2018, Orifarm has been a signatory to United Nations Global Compact and its ten principles, and through our CSR policy and our Supplier Code of Conduct, we aim for implementing the principles within our business and supply chains.

The CSR policy is mandatory for all Orifarm Group staff. In addition, we ask all staff to comply with applicable laws, regulations and industry codes, international requirements and all our supporting guidelines. The Orifarm Group CSR policy is approved by the Orifarm Board of Directors.

Through our commitment to respect and support internationally recognized human rights, Orifarm Group is committed to ensure patient safety, safeguard rights to privacy, strengthen labor rights across our operations through fair and safe working conditions.

In 2021, we conducted an internal CSR audit incl. modern slavery at our production site in Skælskør, Denmark. We did not identify any significant risks for or breaches to human rights or labour rights.

# In our Supply Chain - the Orifarm Supplier Code of Conduct

For the companies we engage e.g., Contract Manufacturing Organizations (CMOs) the Orifarm Supplier Code of Conduct forms the basis for our dialogue on human rights, labor rights, environment and anti-corruption. In the Supplier Code of Conduct we communicate our expectations to our suppliers on responsible business conduct. The Supplier Code of Conduct states that all suppliers must ensure that no forced, boned or involuntary labor is employed and ensure freely chosen employment and freedom of association.

Suppliers shall ensure compliance with the Orifarm Group Code of Conduct at all times and must be open for dialogue and collaboration with Orifarm to ensure continuous improvement in relation to the principles stated in this Code of Conduct.

To ensure compliance we expect suppliers to monitor the negative impact of their operations on human rights and labor rights and to establish preventive measures in order to reduce any negative impact identified during their monitoring.

Upon request from Orifarm, suppliers shall document compliance with all obligations set out in the Code of Conduct. Moreover, suppliers shall undertake all reasonable efforts to ensure that agents and sub-contractors comply with the requirements of the Code of Conduct.

# Assessing and addressing risk of risks of modern slavery in our operations and in our supply chain

Our procedures are based on the UN Guiding Principles on Business and Human Rights. To minimize our adverse impacts within our business we work to:

- 1. Identify where in our operations and value chain we may be at risk to cause or contribute to Human rights breaches
- 2. Prevent any breaches we may cause or contribute to in our operations or throughout our supply chain



3. Mitigate the impact that we may have caused or contributed to. Our biggest exposure to Modern Slavery is in our global supply chain. We conduct assessments of the country of origin and our value chain activities, in the markets we operate, to identify risk for infringing on Human Rights and Labor Rights.

New suppliers are assessed for risk of violations to human rights, labor rights, environmental matters or business ethics, including risk of modern slavery, as a part of our procurement procedures and due diligence evaluation.

An updated supply chain risk assessment methodology has be developed during 2022 as part of improving our supplier management setup. The new methodology assesses both product and supply chain, and addresses ESG risks such as human rights, labor rights as well as physical climate risks.

21 detailed and supplier specific hotspot assessments were conducted during 2022 and the work continues in the coming years.

In 2022, we furthermore sat Future-Fit targets including targets for procurement and linked to improving our due diligence processes.

## **Training**

Our employees can find information about Orifarm's approach to human rights in our CSR policy available at our intranet. Moreover, employees on our main sites receive a personnel handbook with guidelines for non-discrimination and ethical behavior.

It is mandatory for all Orifarm employees to comply with the Orifarm CSR policy.

New employees are presented for our CSR policy and supplier code of conduct as a part of their onboarding program and we train our procurement specialists in our supplier code of conduct and sustainability due diligence processes.

#### Grievance mechanisms

Orifarm provides external stakeholders with the option of reporting illegal or unethical behaviour, including behaviour and practices that do not comply with the social responsibility of Orifarm to respect human rights and labour rights. External stakeholder can contact their Orifarm representative or reach out via <a href="mailto:csr@orifarm.com">csr@orifarm.com</a>.

In our own operations, Orifarm employees can raise concerns via their manager, the sustainability representative or the Legal Department. Alternatively employees can report anonymously via the Orifarm Whistleblower Scheme available on our intranet.

The Executive Management Group (EMG) oversees our commitment to respect human and labor rights.

Erik Sandberg

CEO, Orifarm Group A/S