




Name of Policy	Anti-Slavery and Human Trafficking Policy
Version	1.0
Date of issue	17 th May 2021
Date of implementation	19 th May 2021
Date of last review	N/A
Date of next review	17 th May 2022
Developed by	Gavin Cheema <i>Head of Clinical Services and Service Development</i>  May 17, 2021
Reviewed by	Rammah Shah <i>Clinical Director</i>  May 18, 2021
Approved by	Parmod Sharma <i>Managing Director</i>  17 May 2021

1. THE PURPOSE OF THIS POLICY

The purpose of this policy is to present the values and principles upheld by One Stop Pharmacy in accordance with its legal responsibilities as set out in the Modern Slavery Act 2015, which focuses on increasing transparency in supply chains.

This policy applies to all persons:

- i. working for One Stop Pharmacy, or on our behalf, in any capacity, including employees at all levels, directors, agency or temporary workers, volunteers and apprentices (“Group Staff”); and
- ii. our contractors, agencies, third-party representatives, and business partners (“Suppliers”).

Modern slavery and human trafficking statement:

Modern slavery is the exploitation of other people for personal or financial gain. Modern slavery takes many different forms, including, but not limited to, forced labour, sexual exploitation, domestic servitude and debt bondage. Human trafficking is the recruitment, movement, harbouring and receiving of people through the use of deception, force, coercion, or other means for the purpose of exploitation.

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One Stop Pharmacy (the “company”) has a zero-tolerance approach to modern slavery within its business, supply chains and partners.

We expect the same high standards from all our suppliers.

2. PRINCIPLES

One Stop Pharmacy is committed to creating and maintaining an organisation that:

- i. acts ethically in all business-related transactions and relationships
- ii. acts with integrity in all our business-related transactions and relationships
- iii. meets all legal and regulatory requirements, including our disclosure obligations, under the Modern Slavery Act 2015
- iv. adheres to the NHS Terms and Conditions for Goods and Services, which requires compliance with all relevant legislation and guidance, including modern slavery conditions
- v. implements and enforces effective systems within the company to ensure modern slavery is not taking place anywhere in the company or our suppliers
- vi. implements and enforces effective training within the company to ensure the group staff have a strong awareness of legislative requirements in relation to slavery and human trafficking
- vii. implements and enforces effective training within the company to ensure the group staff are able to identify those who are victims of modern slavery and human trafficking
- viii. proactively identifies, assesses and monitors key areas in the business of the company which may be more prone to modern slavery and human trafficking
- ix. has an open and transparent working relationship with NHS CCGs, Purchasing Authorities, Pharmaceutical Companies, NHS-funded groups or other partner organisations to promote a zero-tolerance approach to modern slavery and human trafficking

3. RESPONSIBILITY AND COMPLIANCE

The directors have overall responsibility for ensuring this policy adheres with the companies legal and ethical obligations.

The HR Department has responsibility for ensuring the recruitment procedures are robust and effective. This includes (but is not limited to) strict requirements for identity checks, work permits, and criminal record checks.

Senior management has responsibility for ensuring this policy is managed and implemented appropriately.

All group staff and suppliers must comply with this policy.

4. MONITORING

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This policy will be reviewed by the Head of Clinical Services and Service Development at least every 24 months, or as necessary to ensure that it meets legal and ethical requirements and reflects best practice.

5. COMPLAINTS

Any employee of One Stop Pharmacy who wishes to make a complaint about this policy or adherence/non-adherence to its contents should do so in accordance with the One Stop Pharmacy Grievance Procedure. Any potential employee or those not directly employed by One Stop Pharmacy should make their complaint in accordance with the One Stop Pharmacy Complaints Procedure.

6. BREACHES OF THIS POLICY

Any group staff member who breaches this policy may face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

Any suppliers found to be in breach of this policy may be subject to review and/or termination of its relationship and/or Service Level Agreement with the company.