

Modern Slavery and Human Trafficking Statement

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 (“the Act”) and sets out the steps that One Stop Pharmacy Ltd (“OSP” or “the Company”) has taken, and continues to take, during the relevant financial year to prevent modern slavery and human trafficking in its business and supply chains.

This statement has been prepared with reference to the Home Office’s updated Transparency in Supply Chains (TISC) statutory guidance (March 2025), and reflects the additional expectations placed on organisations supplying goods and services to the NHS, including those introduced under the Health and Care Act 2022 and associated NHS procurement regulations and contractual requirements. As a specialist provider of clinical homecare pharmacy services to NHS acute and mental health trusts, OSP recognises the particular importance of transparency and rigour in this area.

1. Organisation, Business and Supply Chains

Our organisation

One Stop Pharmacy Ltd is a UK based specialist clinical homecare pharmacy, founded in 2013, providing pharmacy services and the supply of healthcare related goods to NHS acute and mental health trusts across the UK. Our core services include clozapine management, long acting injectable (LAI) antipsychotic administration, and oral antipsychotic homecare services. OSP is regulated by the General Pharmaceutical Council (GPhC), the Medicines and Healthcare products Regulatory Agency (MHRA), and NHS England, and positions itself as the UK’s largest mental health clinical homecare provider.

Our supply chains

Our supply chains include, but are not limited to:

- Pharmaceutical wholesalers and manufacturers
- Medical device and equipment suppliers
- Logistics, delivery and distribution partners
- Professional service providers and contractors, including agency and temporary staffing providers

The majority of our suppliers operate within the UK and are subject to UK employment law, NHS contractual requirements and regulatory oversight. Where suppliers or subcontractors operate outside the UK, we take a risk based approach to understanding the jurisdictions, sourcing routes and labour practices involved, consistent with the broader definition of “supply chain” set out in the Home Office’s March 2025 guidance, which extends to primary value chain, secondary value chain (e.g. facilities, cleaning, catering) and labour supply chain activities (e.g. recruitment agencies and temporary labour providers).

2. Organisational Policies

OSP has a zero tolerance approach to modern slavery and human trafficking.

Our Modern Slavery statement reflects our commitment to acting ethically and with integrity in all business relationships and to implementing effective systems and controls to ensure modern slavery is not taking place within our business or supply chains.

The statement applies to:

- All employees, directors, agency staff, temporary workers, volunteers and apprentices; and
- All suppliers, contractors, agents and business partners.

The statement sits alongside, and is supported by, our recruitment and right to work procedures, whistleblowing (Freedom to Speak Up) arrangements, safeguarding policies and supplier onboarding and contracting standards.

Legal and regulatory framework

We adhere to, and have regard to, the following legislation, statutory guidance and NHS specific requirements in developing and maintaining this statement and our underlying policy:

- **Modern Slavery Act 2015**, in particular Section 54 (Transparency in Supply Chains)
- **Home Office Transparency in Supply Chains (TISC): Statutory Guidance** (updated March 2025), which sets out Level 1 (good practice) and Level 2 (best practice) disclosure expectations across the six statutory reporting areas
- **Procurement Act 2023** (in force from 24 February 2025) and its mandatory and discretionary exclusion grounds relating to modern slavery and labour market misconduct
- **Procurement Policy Note (PPN) 009 – Tackling Modern Slavery in Government Supply Chains** (updated February 2025), which applies to central government, NHS bodies and other in scope public sector organisations we contract with
- **Health and Care Act 2022, section 81**, and the **National Health Service (Procurement, Slavery and Human Trafficking) Regulations 2025** (in force from 17 May 2026), which introduce a statutory duty on NHS bodies procuring goods and services to assess and mitigate modern slavery risk throughout the commercial lifecycle
- **NHS Standard Contract** (Section 19: Safeguarding and Wider Social Duties), including the amendments adopted for 2025/26, and the **NHS Terms and Conditions for the Procurement of Goods and Non Clinical Services**, which align with the Cabinet Office Standard Contract
- **GPhC standards and MHRA regulatory requirements** applicable to registered pharmacies and homecare medicines providers

3. Risk Assessment and Management

OSP recognises that risks of modern slavery can vary by sector and supply chain activity, and that the health and social care sector has been specifically identified by NHS England and DHSC as an area requiring focused attention – including a 2023 NHS review which found a material proportion of medical consumables spend to be with suppliers assessed as medium or high modern slavery risk.

We proactively identify and monitor areas that may be more susceptible to modern slavery and human trafficking, including:

- Labour intensive activities within our own operations and those of our suppliers
- Third party supply chains, including pharmaceutical wholesalers, distribution and logistics partners
- Use of agency, temporary or overseas recruited labour, including sponsor licensed roles

Where risks are identified, we take appropriate steps to manage and mitigate those risks through engagement, monitoring and enforcement of our policies and contractual standards. Where an NHS commissioner or trust identifies a contract with OSP as medium or high risk, we will engage

constructively with relevant risk management tools, including the NHS Modern Slavery Assessment Tool (MSAT) and, the NHS Evergreen Sustainable Supplier Assessment operated via the Atamis ecommerce platform, as required.

4. Due Diligence Processes

As part of our approach to mitigating the risk of modern slavery, we operate due diligence processes proportionate to the size and nature of our business, including:

- Supplier onboarding checks and contractual requirements, including modern slavery clauses aligned to NHS Standard Contract and NHS Terms and Conditions requirements
- Expectations that suppliers comply with all applicable labour and employment laws, and, where relevant, flow down equivalent obligations to their own subcontractors
- The right to review, audit or terminate relationships where breaches of ethical or legal standards are identified
- Robust recruitment procedures, including right to work checks, identity verification and appropriate pre-employment screening
- Readiness to complete supplier due diligence requests from NHS customers, including the Modern Slavery Assessment Tool (MSAT), as part of contract award and ongoing contract management if required.

These processes are designed to reduce the risk of exploitation within our operations and supply chains, and to support the risk based, lifecycle approach to modern slavery expected under the Procurement Act 2023, PPN 009 and the National Health Service (Procurement, Slavery and Human Trafficking) Regulations 2025.

5. Training and Awareness

OSP ensures that relevant staff receive appropriate training and guidance to:

- Understand the requirements of the Modern Slavery Act 2015 and related NHS procurement obligations
- Recognise indicators of modern slavery and human trafficking, including in recruitment and supply chain contexts
- Know how to raise concerns safely and appropriately, including via our Freedom to Speak Up and whistleblowing arrangements

Training is proportionate to role and responsibility and supports a culture of awareness and accountability across the organisation.

6. Monitoring Effectiveness

The effectiveness of our approach is monitored through:

- Ongoing management oversight of recruitment and supplier relationships
- Review of reported concerns, complaints or breaches
- Disciplinary action where internal breaches occur
- Review and potential termination of supplier relationships where noncompliance is identified

- Tracking progress year on year against the Level 1 and Level 2 disclosure expectations set out in the Home Office's TISC statutory guidance

We are committed to continuous improvement and will enhance our controls and processes as our business, supply chains and the legislative and NHS regulatory landscape evolve. Consistent with the updated Home Office guidance, an absence of identified incidents is treated as a prompt to strengthen due diligence rather than evidence that no risk exists.

7. NHS Procurement and Commissioning Requirements

As a supplier of clinical homecare services to NHS trusts, OSP recognises and supports the NHS's wider programme of work to embed modern slavery risk management throughout the commercial lifecycle. In particular, we note and align our practices to:

- The NHS Standard Contract (Section 19) and the NHS Terms and Conditions for the Procurement of Goods and Non Clinical Services, both of which include modern slavery requirements consistent with the Cabinet Office Standard Contract
- The National Health Service (Procurement, Slavery and Human Trafficking) Regulations 2025, made under section 12ZC of the NHS Act 2006 following section 81 of the Health and Care Act 2022, which require NHS bodies to assess and respond to modern slavery risk at every stage of procurement from 17 May 2026
- The NHS Modern Slavery Assessment Tool (MSAT) and, where used by our commissioning trusts, the NHS Evergreen Sustainable Supplier Assessment via the Atamis platform
- The NHS Strategic Framework for NHS Commercial (2023) and Procurement Policy Note (PPN) 009, which set out cross government expectations for identifying and managing modern slavery risk in public sector supply chains

We will respond promptly and openly to reasonable requests from NHS commissioners for information or assurance regarding our modern slavery risk management and will complete supplier assessment tools where required as part of contract award or ongoing contract management.

8. Publication

In line with the Home Office's statutory guidance, this statement is published on OSP's website with a prominent link from the homepage, as soon as reasonably practicable after the end of the relevant financial year and, in any event, within six months of that year end. Where applicable, this statement will also be submitted to the UK Government's Modern Slavery Statement Registry.

9. Responsibility and Governance

The Directors of One Stop Pharmacy Ltd have overall responsibility for ensuring compliance with this statement and the Company's legal and ethical obligations.

Senior management and the HR function are responsible for implementing relevant procedures, particularly in relation to recruitment, supplier management and compliance monitoring.

This statement will be reviewed at least annually, and updated as necessary to reflect best practice, legislative and regulatory developments, and evolving NHS requirements.

Approval



This statement has been approved by the Board of Directors of One Stop Pharmacy Ltd and is signed on their behalf.

Name: Ian Morgan

Position: Managing Director

Date: 08/09/2026