

Statement on the Modern Slavery Act 2015

Introduction

This statement on the Modern Slavery Act 2015 is made in respect of the financial year ended 30th June 2024.

Bestway Healthcare Holdings Limited (**BHHL**) is committed to ensuring that modern slavery and human trafficking do not take place in any part of our business or supply chains. This statement sets out the steps BHHL has taken during the financial year ending 30th June 2024 to prevent modern slavery in our operations and supply chains, in accordance with Section 54 of the UK Modern Slavery Act 2015.

Our Business

BHHL is a private limited company headquartered in Manchester, England. It is the holding company of a number of subsidiaries which operate businesses across the UK and Republic of Ireland.

The BHHL businesses are described below, and are operated by a series of trading entities, including (among others) Bestway National Chemists Limited, Bestway Pharmacy NDC Limited, Donald Wardle & Son Limited Lexon (UK) Limited, Asurex Limited, Key Pharmaceuticals Limited, Pharmdata Limited, John Bell & Croyden Limited, and an Irish registered subsidiary company Lexon Pharmaceuticals (Ireland) Limited. While not all these entities would require a modern slavery statement in their own right, this modern slavery statement is relevant and appropriate for all of them. In this statement, BHHL and its subsidiaries are called **Bestway Healthcare**.

- **Well** is a leading community pharmacy and healthcare provider with around 700 pharmacies across the UK, mainly in community and health centre locations. Well also operates the **well.co.uk** digital pharmacy business, serving patients and customers across the UK. Bestway Healthcare also operates the **chemist.net** and **vetpharmacy.co.uk** online consumer-facing businesses.
- **John Bell & Croyden**, founded in 1798, is a standalone pharmacy located in central London and served as the pharmacy to HM Queen Elizabeth II.
- **Lexon** and **Bestway Medhub** are shortline wholesale pharmacy businesses supplying a range of pharmacy dispensing products and services to the independent pharmacy sector in the UK. This includes including **Wardles**, a specialist dispensing appliance contractor (DAC) supplying everything from bandages to dressings with over 50 years' experience. Lexon has a division for parallel importing of medications and is a manufacturer of pharmaceutical specials.
- **Key Pharmaceuticals** is a specialist manufacturer of generic medicines, holding several marketing authorisations in the UK. Lexon and Key Pharmaceuticals also operate in the Republic of Ireland.
- **Knights Fragrances** is a specialist wholesaler of fragrances to pharmacies, department stores and health & beauty retailers.
- **Pharmdata** is a specialist pharmacy data analysis business, majority owned by Bestway Healthcare.

Governance and Our Commitment and Policies

The Board of Directors of BHHL have delegated authority for the running of the Bestway Healthcare companies and their businesses to its Chief Executive Officer and the Bestway Healthcare Operating Board.

Bestway Healthcare is committed to opposing slavery and human trafficking in its direct operations and in the indirect operations of its supply chain. Bestway Healthcare will not knowingly support or do business with any organisation involved in slavery or human trafficking. The detail around how we do this is set out in our Anti-Slavery and Human Trafficking policy which is supported by the framework and policies we have in place for all colleagues, including among others those relating to whistleblowing and the procurement of goods and services (both for resale and not for resale). Those colleagues who need to understand our commitment to the fight against modern slavery and human trafficking as part of their roles, in particular those working in our People team, engagement with agency and locum workers and in the procurement of goods and services, are provided with training on our standards and processes and on how to spot and react to modern slavery issues.

Our Workforce

We consider our workforce of c7,000 colleagues to be valued members and stakeholders of our business and treat them with care and respect. We operate a colleague helpline where staff can access appropriate advice and support for their safety and wellbeing. We also operate a whistleblowing and 'freedom to speak up' framework to ensure that colleagues, contractors, consultants and any third parties can safely raise concerns directly to senior management without fear of retribution, victimisation or detriment.

Bestway Healthcare is committed to being an equal opportunity employer and to ensuring that all colleagues, job applicants, customers/clients and other people with whom it deals are treated fairly and are not subjected to unfair or unlawful discrimination.

Our Supply Chain

Our framework and policies for the procurement of goods and services for the business and for resale requires an assessment of all new suppliers based on a number of risk factors. Any areas of concern are liable to investigation, and we will not trade with any business if issues come to light as a result of a risk assessment which cannot be resolved by a supplier.

Within Bestway Healthcare, our colleagues are empowered to ask third parties for additional information about their supply chain and business practices, and, if they have concerns, they know to report them using appropriate channels. We encourage openness and support anyone who raises concerns.

Our approach

We have a zero tolerance to slavery and human trafficking and consider the following steps to be essential steps in fulfilling responsibilities in this area:

- Including specific questions on Modern Slavery Act compliance in our due diligence process for suppliers
- Reviewing and conducting checks on our existing suppliers on a risk assessed basis for Modern Slavery Act compliance
- Obtaining a contractual right to request information and audit suppliers at our discretion with regards to Modern Slavery
- Including Modern Slavery Act compliance in supplier audits

Responsibility for this Statement

The Bestway Healthcare Operating Board has overall responsibility for ensuring compliance with this statement and our related policies. Management at all levels are responsible for ensuring those reporting to them understand this statement and comply with our Anti-Slavery and Human Trafficking policy, which is available to all colleagues.

Our Legal Department has primary and day-to-day responsibility for dealing with this statement and any queries about it.

We are committed to continuously improving our practices to combat modern slavery. As part of this commitment, we will regularly review our policies and practices to ensure that they are effective and aligned with current best practices.

This statement is made pursuant to Section 54(1) of the Modern Slavery Act 2015 and has been approved by the Executive Committee and will be reviewed and updated annually.

Signed by:

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Greg Pateras

Chief Executive Officer, Bestway Healthcare

Date: 14 November 2024 | 05:11 PST