



Glenmark Pharmaceuticals Europe Limited

Modern Day Slavery Statement

Background

Under section 54 of the UK Modern Slavery Act 2015, all incorporated businesses with over £36m in annual turnover and conducting business in the UK are required to publish a slavery and human trafficking statement. In providing this statement, we wish to clearly set out the Glenmark commitment to upholding and implementing high standards of governance and ethical behaviour across its businesses.

We recognise that slavery, forced or compulsory labour and the trafficking of persons for any purpose ("**Modern Slavery**") is a global issue and we are taking steps to ensure that this is eliminated from our supply chains. Details of the steps already taken, and those to be taken are set out below in this statement.

Risk Profile

Glenmark as an entire corporation operates in over 80 countries and employs over 14,000 people. We are aware that a number of countries in which we operate have a higher Modern Slavery risk than others (for example, Cambodia and India)^[1]. However, as the pharmaceutical industry is a highly regulated sector, Modern Day Slavery may be more prevalent in other sectors, for example in construction, FMCG or Manufacturing sectors.

We have taken a number of steps to address our safeguarding responsibilities and create a clear framework across the business to address Modern Slavery.

¹ *The Global Slavery Index 2018: Walk Free Foundation*

Our Supply Chain

We work with a large number of suppliers of goods and services, business partners and operational support partners across the globe. We recognise that each of these business "partners" will themselves have their own partners, affiliates, associated entities, subcontracting and other operating relationships.

We also work with sub-contractors and businesses of varying sizes, with our engagements covering variable amounts of time and expenditure in each case. By working in this way, we believe we are able to create long term relationships in the best interests of our customers, the health services we provide for, and our patients.

Given our global presence and diverse supply chain, we are aware of the importance of taking both meaningful and lasting action to combat this risk.

Our Framework

Compliance Programme

Glenmark has a Compliance Programme in place and that is being continuously developed over time. This consists of a framework of Head Office based staff, as well as dedicated compliance officers in the regions who oversee compliance matters at a more local level. We have recently hired a dedicated Regional Compliance Officer for Europe.

Code of Conduct

We have a global Code of Conduct which includes a section dedicated to Human Rights. This Code acts as an umbrella to other key policies central to the Group's values and operations, namely: whistleblowing, bribery and corruption, conflicts of interest, anti-competitive behaviour, bullying and harassment in the workplace, discrimination, health and safety, data protection and how we interact with the Healthcare Community. Training on the Code and other Group policies we have implemented has helped to ensure that our employees understand our obligations when it comes to operating in a fair and ethical way.

Whistleblowing

There are arrangements in place for concerns to be raised, anonymously if needed, via our whistleblowing process and systems. In particular the Group operates a 24-hour multi-lingual and multi-platform reporting line. This is advertised internally and externally so that our supply chain, as well as our employees can access the reporting mechanism as necessary.

Dow Jones Sustainability Index

We take part in the Dow Jones Sustainability Index survey, where we have been ranked for the last four years. We also operate a comprehensive Corporate Social Responsibility program, aimed at children and health in emerging markets.

The next steps

Anti-Slavery and Human Trafficking Policy

Although we state our position on human rights in our Code of Conduct, we will develop a specific Anti-Slavery and Human Trafficking Policy to demonstrate our global commitment to address Modern Slavery in our business. The policy will give workers, contractors and other business partners guidance on Modern Slavery and clearly states the measures in place to tackle Modern Slavery in its business and supply chains

Equally, we will review and investigate any reports made under our whistleblowing reporting processes.

Risk Assessment

We will refresh our risk assessment processes to ensure we are aware of whether our risk profile has changed. This will be based upon the findings of the Global Slavery Index report and in reference to the following criteria:

- the Group's geographical footprint;
- geographical footprint by offices from which we operate; and
- where we manufacture our products



Oliver Bourne

Company Director

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