

# MiP Pharma Group's statement of Disclosure and Compliance with Section 54 of the Modern Slavery Act (UK)

#### Introduction

Human trafficking and slavery are crimes under UK and International Law. These crimes occur throughout the world and therefore this document defines MiP Pharma group's commitment to ensuring that human trafficking and slavery does not exist within its business.

The companies of the MiP Pharma group are committed to maintaining the highest standards of legal and ethical conduct. MiP Pharma recognises the seriousness and importance of combatting modern slavery and human trafficking and is committed to fully understanding and taking all appropriate action to address any slavery and human trafficking risks in our own business and in our supply chains.

This statement relates to actions and activities during the financial year ending June 2025.

### **Modern Slavery**

Modern Slavery is a term used to encapsulate both offences in the Modern Slavery Act (UK): slavery, servitude and forced or compulsory labor and human trafficking. The ILO (International labor organization) has identified the following indicators that highlight the circumstances where forced labor may be found:

- · Abuse of vulnerability
- Deception
- Restriction of movement
- Isolation
- Physical and sexual violence
- Intimidation and threats
- Retention of identity documents
- Withholding of wages
- Debt bondage
- Abusive working and living conditions
- Excessive overtime



# **Our Business and Commitment**

MiP Pharma Group is an internationally operating group of medium-sized pharmaceutical companies with its headquarters, development and production in Germany and with a corporate history going back more than 65 years. We are a reliable and sustainable pharmaceutical supplier in Germany and Europe.

We have been manufacturing drugs in our modern, GMP-certified production facilities located in the Saarland, both for our own sales and under contract manufacturing (CMO) for other pharmaceutical companies since 1970.

Our sales focus is on the hospital sector and on catering for select medical specialists such as dentists and urologists. Our main markets are in Germany, Poland and other eastern European countries.

## Our Policies in relation to slavery and human trafficking

MiP Pharma is committed to ensuring that there is no modern slavery or human trafficking in its supply chain or in any other parts of its business.

At MIP Pharma, we are committed to acting ethically and with integrity in all our business relationships and to implement and enforce effective systems that will promote ethical and lawful employment practices as well as the obligations outlined under the Modern Slavery Act 2015. These principles are articulated within our Code of Conduct for employees and in our Code of Conduct for suppliers which applies to our contactors throughout the supply chain in all geographies (https://mip-pharma.de/fileadmin/downloads/Code\_of\_Conduct\_for\_Suppliers\_of\_MiP-Pharma-Group.pdf).

MiP Pharma trains all employees on the Code of Conduct for employees. The Code of Conduct for suppliers is published in a prominent place on the homepage and has to be followed by all of MiP Pharma's suppliers, subcontractors and business partners, e.g. a reference to the COC is an integral part of the standard order form at MiP Pharma.

MiP Pharma has established a whistleblowing contact point. Employees and stakeholders can report any suspect breach to it.

Due Diligence Processes in relation to slavery and human trafficking in MiP Pharma's business and supply chains and identified risks and steps it has taken to assess and manage the risk for Slavery and Human Trafficking

MiP Pharma has carried out the following to identify and mitigate risk:

MiP Pharma prefers long-standing relationships with suppliers. The risk for unrecognized and surprising cases of Slavery and Human Trafficking in long-standing relationships is comparatively low.

MIP Pharma's suppliers are following the highly demanding GMP (good manufacturing practice) rules, which are also inspected by MiP Pharma and by the authorities. GMP rules include strict follow-up of QA-supervised procedures and repeating on-site auditing of MiP Pharma's personal, independent third parties, clients and authorities. MiP Pharma's personnel inspecting suppliers would escalate any observations or suspicions even outside



GMPs immediately. The risk for Slavery and Human Trafficking in pharmaceutical business, even in Non-European countries is therefore comparatively low.

MiP Pharma group is a group of medium-sized companies without any monopolistic supplier relationships. Therefore, MiP Pharma exerts no existential pressure or very high pressure on suppliers which could result in modern slavery in the supply chain.

MiP Pharma encourages the reporting of concerns and the protection of whistle blowers.

MiP Pharma has zero tolerance to slavery and human trafficking

All suppliers are obliged to comply with the Code of Conduct for suppliers.

MiP Pharma has a QA-supervised standard operating procedure for suppliers' qualification. This procedure includes a supplier questionnaire including questions on ESG-status of the supplier.

# Effectiveness in ensuring that slavery and human trafficking is not taking place in MiP Pharma's business or supply chains

Any breach of this policy can be reported in multiple ways, e.g. by whistle blowers, by auditors or by clients. Every type of report of suspicion of slavery and human trafficking in trafficking in MiP Pharma's business and supply chains would be taken seriously, and follow-up would start immediately.

Suppliers who would be found to have or be engaging in human trafficking and slavery or who refuse to co-cooperate with any audit to verify compliance with this policy will be requested to remedy these deficiencies immediately since otherwise any supply agreement, arrangement or other contract with MiP Pharma could be terminated immediately.

#### **Training**

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide regular briefings to relevant members of staff on compliance issues.

This policy is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the position of the MiP Pharma group for the current financial year.

Approved by the Board of Directors 11.03.2025) and signed by Dr. Friedrich Sernetz (CEO) and Peter Lenbet (CFO) MiP Holding GmbH 11,03.2025

Or Friedrich Sernetz (CEO)

Peter Lenbet (CFO)