



## Lexon (UK) Ltd's Modern Slavery Act Compliance Statement

### Introduction

This statement sets out Lexon (UK) Ltd's actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains. This statement relates to actions and activities during the financial year [1 April 2019 to 31 March 2020].

As part of the pharmaceutical wholesale, manufacturing, and distribution industry, the organisation recognises that it has a responsibility to take a robust approach to slavery and human trafficking.

The organisation is absolutely committed to preventing slavery and human trafficking in its activities, and to ensuring that its supply chains are free from slavery and human trafficking.

### Organisational structure and supply chains

Lexon UK Ltd is a pharmaceutical company owned privately by the Sodha family and Mr Sonpal. Their core business is in wholesale and distribution of licensed pharmaceutical medicines within the UK to retail pharmacies.

Lexon falls under the category of a SME (small and medium sized enterprise) in the UK. It supports a high level of decentralised organisational structure, where top managers including directors are easily available for conversation to the entire level of employees.

Alongside direct buying, Lexon has a special division for parallel importing, manufacturing medical products at competitive rates known as 'specials' which supply bespoke medicine for individual patients as well as supporting and managing their growing customer base.

### Relevant policies

The organisation operates the following policies that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations :

- **Whistleblowing policy** The organisation encourages all of its workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of the organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The organisation's whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation. Employees, customers or others who have concerns can [use our confidential helpline/complete our confidential disclosure form].
- **Employee code of conduct** The organisation's code makes clear to employees the actions and behaviour expected of them when representing the organisation. The organisation strives to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing its supply chain.
- **Supplier code of conduct** The organisation is committed to ensuring that its suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour. The organisation works with suppliers to ensure that they meet the standards of the code and improve their worker's working

conditions. However, serious violations of the organisation's supplier code of conduct will lead to the termination of the business relationship.

- **Recruitment/Agency workers** The organisation uses only specified, reputable employment agencies to source labour and always verifies the practices of any new agency it is using before accepting workers from that agency.
- **Equality & Diversity** The company is committed to being an equal opportunity employer and to ensuring that all employees, job applicants, customer/clients and other people with whom we deal with, are treated fairly and are not subjected to unfair or unlawful discrimination.

### Supplier Audits

Lexon (UK) Ltd does not yet audit its suppliers to evaluate their compliance with company standards prohibiting slavery and human trafficking. However, we are reviewing available options to independently assess supplier compliance and the effectiveness of the steps Lexon (UK)Ltd has taken in this area.

### Training

The organisation requires all relevant staff within the organisation to complete training on modern slavery.

The organisation's modern slavery training has started, continues to be in progress and will cover:

- our business's purchasing practices, which influence supply chain conditions and which should therefore be designed to prevent purchases at unrealistically low prices, the use of labour engaged on unrealistically low wages or wages below a country's national minimum wage, or the provision of products by an unrealistic deadline;
- how to assess the risk of slavery and human trafficking in relation to various aspects of the business, including resources and support available;
- how to identify the signs of slavery and human trafficking;
- what initial steps should be taken if slavery or human trafficking is suspected;
- how to escalate potential slavery or human trafficking issues to the relevant parties within the organisation;
- what external help is available, for example through the Modern Slavery Helpline, Gangmasters and Labour Abuse Authority and "Stronger together" initiative;
- what messages, business incentives or guidance can be given to suppliers and other business partners and contractors to implement anti-slavery policies; and
- what steps the organisation should take if suppliers or contractors do not implement anti-slavery policies in high-risk scenarios, including their removal from the organisation's supply chains.

This statement has been approved by the organisation's board of directors, who will review and update it annually.

**Anup Sodha**

Signature:



Date:15/09/2019