



UK Modern Slavery Policy

Statement purpose and scope

Sterling develops and manufactures active pharmaceutical ingredients for a global customer base and is proud of its history of corporate responsibility. We value our integrity as a core and defining characteristic of how we operate. In line with our strong values of being caring and transparent, we are committed to acting ethically and with transparency in all business dealings, including complying with the requirements of the UK Modern Slavery Act 2015. This policy refers to the fiscal year (April 2023 to March 2024) for its sites operating and conducting business in the UK and is reviewed annually.

Policy

Our employees

We recognise that slavery and human trafficking can occur in many forms. We have taken and will continue to take steps to ensure that slavery and human trafficking are not taking place in any part of our business.

As an equal-opportunities employer, Sterling is committed to creating and ensuring a non-discriminatory and respectful working environment for its staff and ensure we do not influence their freedom of movement, mobility rights, or their right to travel from place to place within the territory of a country, and to leave the country and return to it.

Sterling recruitment and people management processes are designed to ensure that all prospective employees are legally entitled to work in the UK, in line with the requirements of the UK Visas and Immigration (UKVI), and to safeguard employees from any abuse or coercion once in our employment. Monitoring of employees who have only temporary rights to remain are conducted.

Sterling maintains the following policies which are accessible to all staff:

- Code of Conduct
- Whistleblowing Policy
- Bribery, Gifts and Corporate Hospitality
- Corporate Social Responsibility
- Equality

If any of our employees suspect good practices are not being followed, they should report it to the UK HR Director or alternatively should they not feel comfortable in reporting and issue in person should report it through our internal ethics reporting portal, EthicsPoint.

Sterling suppliers

Sterling recognises that our suppliers play a critical role in achieving this successfully. We therefore expect them to maintain the same commitment to ethical and sustainable business practices as Sterling does.



Through our supply chain, we procure goods and services from UK and overseas suppliers. We audit our new suppliers based on risk and request that they sign up to our Modern Slavery Statement (see Appendix 1) and conduct reassessment of existing suppliers.

Sterling ensures that it does not:

- Use or facilitate any type of involuntary labour, including forced, compulsory, indentured, bonded, slave or human trafficked labour.
- Traffic individuals or groups for the purpose of labour exploitation. All employees must be voluntary and should be free to leave upon reasonable notice.
- Accept any child labour or any practice that inhibits the free development of children. The term "child" refers to any person under the age of 16 (or according to the applicable local laws) or under the minimum age of employment in any particular country. Employees under the age of 18 should not perform hazardous work and such individuals must provide documented informed consent.
- Prevent fair remuneration, reasonable working hours, leave periods and public holidays in compliance with all applicable local wages, hour laws and regulations. Any maximum working hours should not be exceeded. Overtime should be consented and workers must receive adequate compensation for any overtime worked.

If any of our suppliers or customers feel that Sterling is unknowingly not meeting these standards, they should report it to Sterling's General Counsel, located at the Dudley, Cramlington, UK site.

Sterling has undertaken the following activities:

- Made staff aware of the Modern Slavery Act 2015 and informed them of the appropriate action to take if they suspect a case of slavery or human trafficking.
- Ensured that consideration of the modern slavery risks and prevention are added to the supply chain department policy review process as an employer and procurer of goods and service.
- Ensured procurement strategies and new contract terms and conditions included references to modern slavery and human trafficking.
- Continued reinforcement of procedures to staff procuring goods and services.
- Ensure procurement strategies and contract terms and conditions include references to modern slavery and human trafficking.

Going forward, we will undertake the following activities:

- Continue to develop staff awareness.
- Continue to embed the Modern Slavery Act 2015 into our environment, social and governance (ESG) activities.

Modern Slavery Statement:

Signed: 

Position: CEO Date: 19th April 2024



Appendix 1 - Modern Slavery Statement

Statement purpose and scope

Sterling is proud of its history of corporate responsibility, and we value our integrity as a core and defining characteristic of how we operate. We are therefore committed to acting ethically and with transparency in all business dealings including complying with the requirements of the UK Modern Slavery Act 2015. We recognise that slavery and human trafficking can occur in many forms. We have taken and will continue to take steps to ensure that slavery and human trafficking are not taking place in any part of our business including our supply chains.

Sterling recognises that you, as one of our suppliers, play a critical role in achieving this successfully. We therefore expect you to maintain the same commitment to ethical and sustainable business practices as Sterling does.

Our suppliers **MUST NOT**:

- Use or facilitate any type of involuntary labour, including forced, compulsory, indentured, bonded, slave or human trafficked labour.
- Traffic individuals or groups for the purpose of labour exploitation. All employees must be voluntary and should be free to leave upon reasonable notice.
- Accept any child labour or any practice that inhibits the free development of children. The term "child" refers to any person under the age of 16 (or according to the applicable local laws) or under the minimum age of employment in any particular country. Employees under the age of 18 should not perform hazardous work and such individuals must provide documented informed consent.
- Prevent fair remuneration, reasonable working hours, leave periods and public holidays in compliance with all applicable local wages, hour laws and regulations. Any maximum working hours should not be exceeded. Overtime should be voluntary and workers must receive adequate compensation for any overtime worked.

Please confirm your agreement and compliance with the above statement and return to Sterling within 30 days. Please note, in accordance with our Supplier Code of Conduct, we must take a zero-tolerance approach to our suppliers who do not comply or who do not co-operate with these principles and reserve the right to terminate agreements due to any non-compliance.

We (insert company name) agree and comply with the terms of Sterling Pharma Solutions Limited.

Modern Slavery Statement:

***Signed:**

Position:

Date:

***NB:** Signatory must have authority to bind your company to the information provided.