

Modern Slavery Statement

Introduction

This statement is made pursuant to section 54(1) of the UK Modern Slavery Act 2015 and is published on behalf of Biovantic Pharma Limited. This statement refers to the financial year ending 31 December 2024 and progress made during the financial year ending 31 December 2025, and sets out the steps we have taken to address modern slavery risks in our business and supply chains. This is the first Modern Slavery Statement Biovantic Pharma has produced and as such will outline Biovantic Pharma's profile as a company, supply chain risks, as well as mitigating actions undertaken by Biovantic Pharma in the past year. However, many of the actions undertaken by Biovantic Pharma are recently created or in progress.

Biovantic Pharma's structure, business, and supply chains

Biovantic Pharma is a UK-based pharmaceutical company that acts as a marketing authorisation holder and a wholesaler of generic medicines. As a marketing authorisation holder, Biovantic Pharma holds marketing authorisations granted by the MHRA for the generic medicines it places on the UK market and is responsible for the quality, safety and efficacy of those products, including their ongoing pharmacovigilance. We prioritise consistency and robust supply chains to maintain a continuous supply of medicines to the market, ensuring patients always have access to our treatments.

As a licensed wholesaler operating under a Wholesale Dealer's Authorisation (WDA(H)) issued by the MHRA, Biovantic Pharma sources finished generic medicines from licensed manufacturers and suppliers and distributes them to wholesalers, the NHS, and retail pharmacies.

Biovantic Pharma has its own storage facility and uses third party vendors for the transportation of medicines from its suppliers and to its customers based in Great Britain.

Responsibility

Responsibility for anti-slavery and human trafficking policies lies with the following departments within Biovantic Pharma:

HR: The HR team is responsible for keeping all HR policies up to date in line with current government law, which also includes slavery and human trafficking policies.

Purchase: It is the responsibility of the purchase team to ensure that the local laws related to modern slavery and human trafficking are followed in the country from where products are sourced.

Logistics: It is the responsibility of the logistics/operations team to ensure that the contract storage and transport service providers have robust policies to counter modern slavery and human trafficking.

Policies

Biovantic Pharma will be launching a new Modern Slavery policy which reflects our purpose to provide reliable and consistent treatments to patients. Our new Code sets out the commitments we make as a company and to each other.

- Biovantic Pharma's Anti-Slavery and Human Trafficking Policy, outlining the organisation's stance of modern slavery as a crime and a violation of fundamental human rights.
- Supplier Assessment/Management SOP, including an assessment of compliance with Modern Slavery laws, international labour standards and the Ethical Trading Initiative (ETI) Base Code principles.
- Supplier Code of Conduct policy, aligned with International Labour Organisation codes and the Ethical Trade Initiative Base Code.
- Equality Opportunities Policy, a commitment to promote equal opportunities in employment regardless of age, race, colour, nationality, ethnicity or national origin, religion or belief, sex or sexual orientation.
- Whistleblower Policy, a mechanism to support employees in raising concerns to senior management regarding any breach of legal or professional obligations.

Assessment of Modern Slavery Risk

To assess modern slavery risk, we refer to external data sources (e.g. Alliance 8.7 Global Estimates of Modern Slavery and the US State Department's list of goods produced by child and forced labour) and consult with external experts. To identify the business activities with greater exposure to modern slavery risk, we consider the following factors:

- Reliance on a low skilled workforce
- Presence of migrant workers
- Long, complex, or non-transparent supply chains
- Presence of child labour
- Country risks, i.e. poverty, conflict, weak enforcement of international human rights standards

Our staff are largely directly employed and overseen by us, and so are not considered to be in a category which is vulnerable to modern slavery in this country. Our focus was therefore on our supply chain, where we work with 25 plus key suppliers. Our suppliers range from small to very large and are based in Mainland Europe.

Direct Biovantic Pharma Colleagues

Everyone at Biovantic Pharma has been assigned mandatory training that aligns with company values; this is ongoing.

Continual Improvement

Biovantic Pharma has created a system of multiple policies in tandem with a standard operating procedure to attempt to consistently apply the company's values throughout its direct operations and through its third-party operations. Biovantic Pharma will continuously review and improve the Modern Slavery risk mitigation systems by assessing our suppliers' ability to detect and mitigate the risk and by taking a collaborative approach to engaging with stakeholders and implementing corrective actions. Over time Biovantic Pharma will aim to extend its operations beyond Tier 1 suppliers where possible; we recognise that modern slavery can be concealed within more complex supply chains and are committed to uncovering it within our organisation's operations.

The above statement was approved by Biovantic Pharma's director on 10-01-2026.



Anir Vora

Director