

# AMERISOURCEBERGEN'S UK MODERN SLAVERY ACT DISCLOSURE STATEMENT

AmerisourceBergen, on behalf of its subsidiaries in the Alliance Healthcare business, World Courier Group, Inc. and MWI Veterinary Supply Co. and their respective subsidiaries listed below (collectively, "AmerisourceBergen"), which supply goods and services in the UK, is committed to prohibiting modern slavery and human trafficking in its business and supply chain. This disclosure statement under Section 54 of the UK Modern Slavery Act 2015 (the "Act") describes the steps that AmerisourceBergen is taking in support of that commitment.

## **Our People and Our Code of Ethics and Business Conduct**

AmerisourceBergen's Code of Ethics and Business Conduct provides the foundation for our business culture and underscores our commitment to conducting our business with integrity, accountability and respect for applicable laws. Our Code provides guidance for our employees, suppliers and other business partners on the ethical principles that apply to all of our business activities and relationships. The Code reflects our zero-tolerance policy on ethical violations, and compliance with the Code and all applicable laws and regulations is a condition of employment at AmerisourceBergen.

Our Code reflects AmerisourceBergen's strong commitment to providing an equal opportunity work environment where team members are treated with fairness, dignity and respect. Our managers are expected to create a work environment free from harassment and intimidation and where integrity and ethical business conduct are recognized and valued. The foundation of our Code is the obligation to comply with all applicable legal requirements, including those relating to workplace safety and human rights.

Our Code also includes specific references to the prohibitions against modern slavery and human trafficking.

## **Ethics and Compliance Training and Reporting Mechanisms**

AmerisourceBergen team members receive training on the Code of Ethics and related ethics and compliance policies, including our policies relating to a respectful and safe work environment. In addition to the resources available to employees through the Code and its underlying compliance policies, AmerisourceBergen has established various mechanisms through which

employees and business partners can report concerns about compliance issues to the company without fear of retribution.

One such mechanism is an ethics reporting hotline managed by an outside vendor which enables employees and third parties to report concerns about compliance issues relating to AmerisourceBergen's activities on a confidential basis, and reporters can remain anonymous if they wish. All reports are investigated in a timely manner.

AmerisourceBergen regularly assesses whether its training materials should be updated to reflect its commitment to combating modern slavery and human trafficking.

### **Our Supply Chain and Our Supplier Code of Conduct**

As an industry leader with over 44,000 team members, we touch nearly every aspect of the pharmaceutical supply chain and recognize that our responsibility includes conducting our business ethically and with uncompromising integrity. We work hard every day to ensure that all applicable laws, regulations and applicable industry standards are followed, and we expect the same from others in our supply chain.

The AmerisourceBergen Supplier Code of Conduct sets forth the basic expectations with respect to various ethics and compliance matters that we have established for our suppliers, agents, vendors, subcontractors and other business partners that provide goods or services to, or on behalf of, AmerisourceBergen.

Many of our suppliers are required by contract to comply with applicable laws and provide us with written certifications that reflect their commitment to abide by the ethical principles set forth in our Supplier Code of Conduct. AmerisourceBergen is engaged in various initiatives to expand the number of third party suppliers that are required to provide such contract commitments and certifications.

### **Due Diligence and Audits**

AmerisourceBergen has devoted substantial resources to conducting due diligence and compliance audits of its key business partners, including certain third-party suppliers and other vendors. In certain circumstances, these procedures include physical site visits and background checks.

We have a corporate sanction screening program that screens all vendors and suppliers for government sanctions, regulatory and anti bribery and corruption violations.

In addition, we have a targeted due diligence program for third parties that provide goods or services on behalf of AmerisourceBergen. This program includes comprehensive due diligence covering a large number of information sources, including negative media.

We continue to evaluate the extent of any exposure we may have to modern slavery or human trafficking risk in our supply chain. Based on the results of that risk assessment, we will establish appropriate due diligence and auditing procedures with third-party suppliers.

This disclosure statement is issued pursuant to section 54(1) of the Modern Slavery Act 2015 for the financial year ended 30 September 2022.

This disclosure statement is issued on behalf of the following subsidiaries in the Alliance Healthcare business, World Courier Group, Inc. and MWI Veterinary Supply Co.: AH UK Holdco 1 Limited (formerly known as WBA UK Holdco 1 Limited), Alcura UK Limited, Beachcourse Limited, Alliance Healthcare (Distribution) Limited, Alliance Healthcare Management Services Limited, Alliance UniChem IP Limited, Alloga UK Limited, Almus Pharmaceuticals Limited, AmerisourceBergen UK Holdings Ltd., OTC Direct Limited, W.C. International Limited, World Courier Ground (Europe) Limited, World Courier Logistics (UK) Limited, World Courier Management Ltd., World Courier (U.K.) Ltd., AmerisourceBergen International Technology Limited, Centaur Services Ltd., MWI Buying Group Ltd. (formerly known as St. Francis Limited), Vetspace Ltd., MWI Supply (UK Acquisition) Limited, MWI Supply (UK Holdings) Limited, MWI Supply (UK) Limited.