

AMERISOURCEBERGEN'S UK MODERN SLAVERY ACT DISCLOSURE STATEMENT

AmerisourceBergen, on behalf of its subsidiaries World Courier Group, Inc. and MWI Veterinary Supply Co. (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.

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 associates 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.

AmerisourceBergen expects all of its third-party suppliers, vendors and other business partners to comply with similar fundamental principles. 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 Code of Ethics and Business 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. AmerisourceBergen's Code of Ethics and Business Conduct includes specific references to the prohibitions against modern slavery and human trafficking.

Ethics and Compliance Training

AmerisourceBergen employees 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 an anonymous basis. All reports are investigated in a timely manner.

AmerisourceBergen is assessing whether its compliance training materials should be updated to reflect its commitment to combating modern slavery and human trafficking.

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 site visits and background checks by AmerisourceBergen's Corporate Security and Regulatory Affairs Department. As noted above, we also require many of our suppliers to confirm in writing their commitment to abiding by applicable laws and our Code of Ethics.

We are in the process of evaluating 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 that present an unacceptable level of risk.

This disclosure statement is issued pursuant to section 54(1) of the Modern Slavery Act 2015 for the financial year ended 30 September 2018.

This disclosure statement is issued on behalf of the following subsidiaries of World Courier Group, Inc. and MWI Veterinary Supply Co.: World Courier Ground (Europe) Ltd., World Courier Logistics (UK) Ltd., World Courier Management Ltd., World Courier (U.K.) Ltd., Vetswest Ltd., Planet Software Ltd., Centaur Services Ltd., Vetspace Ltd., Labpack Ltd., St. Francis Ltd., and Animal Prescriptions Ltd.

On behalf of MWI Veterinary Supply Co.:

Signed: 

Title: Director

Date: May 21, 2019