

Statement on the Modern Slavery Act 2015

Our Business

Bestway Panacea Holdings Limited (**BPHL**) is a private limited company headquartered in Manchester, England. It is the holding company of a number of subsidiaries which operate the following businesses across the UK: **Well**, **Well Healthcare Supplies**, **Bestway Medhub** (including **Wardles**), Lexon UK Holdings Limited (and its subsidiaries including Lexon UK Limited, all of which are together defined as **Lexon**) and Asurex Limited. BPHL also owns and operates Lexon Pharmaceuticals (Ireland) Limited (**Lexon Ireland**). In this statement, BPHL and its subsidiaries are called the **Group**.

Well is a leading community pharmacy and healthcare provider with around 740 pharmacies across the UK, mainly in community and health centre locations. Well also operates a digital pharmacy business, serving patients and customers across the UK.

Well provides high quality healthcare products and services aimed at improving community health. Well also works closely with the NHS and local healthcare providers to develop and deliver commissioned services to address specific health needs within communities.

Well Healthcare Supplies, a dedicated online healthcare appliance prescription service.

Bestway Medhub is a wholesale business supplying a range of pharmacy dispensing products and services to the independent pharmacy sector in the UK, including **Wardles**, a specialist dispensing appliance contractor (DAC) supplying everything from bandages to dressings with over 50 years' experience.

Lexon UK Ltd is a pharmaceutical company that focuses on the wholesale and distribution of licensed pharmaceutical medicines within the UK to retail pharmacies. Alongside buying direct, 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.

Asurex (trading as Knights Fragrances) is a specialist wholesaler of fragrances to pharmacies, department stores and health & beauty retailers.

BPHL acquired Lexon, Asurex Limited and Lexon Ireland during the financial year ending 30th June 2023.

The Board of Directors of BPHL have delegated authority for the running of Well, Well Healthcare Supplies, Bestway Medhub, Wardles, Lexon UK Holdings Limited, Asurex Limited and Lexon Pharmaceuticals (Ireland) Limited to an Executive Committee.

This statement on the Modern Slavery Act 2015 (the **Act**) is made in respect of the financial year ended 30th June 2023.

Our Commitment and Policies

The Group is committed to opposing slavery and human trafficking in its direct operations and in the indirect operations of its supply chain. The Group will not knowingly support or do business with any organisation involved in slavery or human trafficking. The detail around how we do this is set out in our Anti-Slavery and Human Trafficking policy which is supported by the framework and policies we have in place for all colleagues, including among others those relating to whistleblowing and the procurement of goods and services (both for resale and not for resale). Those colleagues who need to understand our commitment to the fight against modern slavery and human trafficking as part of their roles, in particular those working in our People team, engagement with agency and locum workers and in the procurement of goods and services, are provided with training on our standards and processes and on how to spot and react to modern slavery issues.

We frequently review and update our policies.

Our Workforce

We consider our workforce of c7,000 colleagues to be valued members and stakeholders of our business and treat them with care and respect. We operate an employee helpline where staff can access appropriate advice and support for their safety and wellbeing. We also operate a whistleblowing and 'freedom to speak up' framework to ensure that colleagues, contractors, consultants and any third parties can safely raise concerns directly to senior management without fear of retribution, victimisation or detriment.

The Group is committed to being an equal opportunity employer and to ensuring that all employees, job applicants, customers/clients and other people with whom it deals are treated fairly and are not subjected to unfair or unlawful discrimination.

Our Supply Chain

Our framework and policies for the procurement of goods and services for the business and for resale requires an assessment of all new suppliers based on a number of risk factors including the nature of services, spend, country of origin and standard operating procedures. Any areas of concern are investigated fully and we will not trade with any business if issues come to light as a result of the risk assessment which cannot be resolved by a supplier.

A key part of our engagement with existing and prospective suppliers is to seek clarity in relation to their operations and their supply chains.

Within the Group, our colleagues are empowered to ask third parties for additional information about their supply chain and business practices, and if they have concerns they know to report them using appropriate channels. We encourage openness and support anyone who raises concerns.

Our approach

We have a zero tolerance to slavery and human trafficking and consider the following steps to be essential steps in fulfilling our responsibilities in this area:

- Including specific questions on Modern Slavery Act compliance in our due diligence process for suppliers;
- Reviewing and conducting checks on our existing suppliers on a risk assessed basis for Modern Slavery Act compliance;
- Obtaining a contractual right to request information and audit suppliers at our discretion with regards to Modern Slavery; and
- Including Modern Slavery Act compliance in our supplier audits.

Responsibility for this Statement

The Executive Committee has overall responsibility for ensuring compliance with this statement and our related policies. Management at all levels are responsible for ensuring those reporting to them understand this statement and comply with our Anti-Slavery and Human Trafficking policy, which is available to all colleagues.

Our Legal Department has primary and day-to-day responsibility for dealing with this statement and any queries about it. Internal control systems and procedures are also audited to ensure that they are effective in countering modern slavery.

This statement is made pursuant to Section 54(1) of the Modern Slavery Act 2015 and has been approved by the Executive Committee and will be reviewed and updated annually.



Seb Hobbs

06/09/2023