

Modern Slavery Policy

1. Policy Statement

Torbay Pharmaceuticals is committed to preventing modern slavery and human trafficking in all areas of our business and supply chains. We have a zero-tolerance approach to slavery and human trafficking and are committed to acting ethically and with integrity in all our business dealings and relationships.

2. Purpose

This policy outlines our commitment to ensuring that modern slavery is not taking place within our organisation or supply chains and sets out the steps we take to identify and mitigate such risks.

3. Scope

This policy applies to all employees, contractors, suppliers, and other business partners of Torbay Pharmaceuticals.

4. Definitions

- **Modern Slavery:** Includes slavery, servitude, forced or compulsory labour, and human trafficking.
- **Human Trafficking:** The recruitment, transportation, transfer, harbouring or receipt of persons by improper means for an improper purpose including forced labour or sexual exploitation.

5. Responsibilities

- **Management** is responsible for ensuring this policy is implemented and reviewed annually.
- **Employees** must report any concerns related to modern slavery in any parts of our business or supply chains.

6. Due Diligence

We undertake due diligence when considering new suppliers and regularly review our existing suppliers. Our due diligence includes:

- Evaluating the modern slavery and human trafficking risks of each new supplier.
- Conducting supplier audits or assessments.
- Requiring improvements from suppliers that fail to meet our standards.

7. Training and Awareness

We provide training to ensure that our staff understand the risks of modern slavery and human trafficking in our business and supply chains.

8. Reporting Concerns

Employees are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains. Reports can be made confidentially through our whistleblowing procedure.

9. Breaches of This Policy

Any employee who breaches this policy will face disciplinary action, which could result in dismissal. We may terminate our relationship with individuals and organisations working on our behalf if they breach this policy.

10. Review

This policy will be reviewed annually and updated as necessary to reflect changes in legislation or our business operations.

Approved and signed by:

Signature: *Dawn Sowerby*
Dawn Sowerby (Sep 4, 2025 12:08:24 GMT+1)

Dawn Sowerby
Chief People Officer
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