
Modern Slavery Policy

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1. Introduction

This policy ("Policy") specifies the approach of Medicines Discovery Catapult ("MDC") and its subsidiaries to fulfilling its commitment to support the elimination of modern slavery and to fully meet its obligations under the Modern Slavery Act 2015 (as amended).

This Policy applies to all persons working for MDC or acting on its behalf in any capacity, including board members, employees, agency workers, seconded workers, volunteers, interns, agents, contractors, suppliers, consultants, third-party representatives and other business partners.

2. Policy Statement

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another to exploit them for personal or commercial gain.

MDC has a zero-tolerance towards modern slavery and is committed to acting ethically and with integrity in all its business dealings and relationships. MDC will implement procedures to reduce the risk of modern slavery occurring anywhere in its business or supply chain.

MDC will ensure there is transparency in the business and in its approach to tackling modern slavery.

MDC expects the same high standards from all its agents, contractors, suppliers, consultants, third-party representatives and other business partners.

3. Responsibilities

The Board of Directors has overall responsibility for ensuring this Policy complies with the legal and ethical obligations, and that all those under their control are compliant.

The Procurement Manager has primary and day-to-day responsibility for ensuring this Policy is effective in countering modern slavery including:

implementing this Policy;

monitoring its use and effectiveness;

dealing with any queries; and

reviewing internal procedures.

All levels of management are responsible for ensuring those reporting to them understand and comply with this Policy, and that they are given adequate time to attend appropriate training.

You are invited to comment on this policy and suggest ways in which it might be improved.

Comments, suggestions and queries are encouraged and should be addressed to the Procurement Manager.

4. Managing risk

To assess and minimise the risk of modern slavery in MDC's business and supply chains, MDC implements the following measures:

1. MDC's supplier selection and on-boarding procedure includes due diligence of all potential suppliers, including checks on the supplier's compliance with the Act.
2. MDC includes specific provisions in its standard documents which require those third parties, and any other entities in their supply chains, to comply with all applicable anti-slavery and human trafficking laws, regulations and codes, and to not engage in any activity, practice or conduct which would constitute an offence under sections 1, 2 or 4, of the Modern Slavery Act 2015 if such activity, practice or conduct were carried out in the UK.
3. MDC protects whistle-blower's in accordance with the with the MDC whistle blowing procedure which can be found in the Employee Handbook (0001-HRS-POL).

5. Compliance

You must ensure that you read, understand, and comply with this policy. The prevention, detection, and reporting of modern slavery in any part of MDC business or supply chain is the responsibility of everyone working for, or under the control of MDC. If modern slavery is suspected either within the business, or as part of the supply chain, the following actions must be taken:

- avoid any activity that might lead to, or suggest, a breach of this Policy;
- raise the concern with your line manager at the earliest opportunity;
- notify the Procurement Manager as soon as possible if you believe or suspect that a conflict with this Policy has occurred, or may occur in the future;
- report it in accordance with the MDC whistle blowing procedure which can be found in the MDC Employee Handbook as soon as possible.

If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, raise it with your line manager.

We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the compliance manager immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Procedure, which can be found in the Employee Handbook on the Hub.

6. Communication and Awareness

Communication of this Policy will form part of the new starter induction programme and training will be provided as required.

MDC's zero tolerance approach to modern slavery will be communicated to all agents, contractors, suppliers, consultants, third-party representatives and other business partners, at the outset of our business relationship with them and reinforced as appropriate thereafter.

7. Breaches

Any employee found to be in breach of this Policy may face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

MDC may terminate its relationship with other individuals, suppliers and organisations working with MDC if they are deemed to have breached this Policy.

8. Document Control

This document will be reviewed every two years or when required through operational necessity.