

Smartway



Environmental, Social & Corporate Responsibility

We recognise the privileged role that we have in the global distribution of pharmaceutical and medicines supply.

At Smartway, we appreciate that we are privileged to be able to transform the lives of patients across the globe by empowering access to medicine and pharmaceuticals. More than just recognising our role, we understand that we are a vital part of the medicines supply chain and have been for decades. This means that the patient always comes first.



Ethics

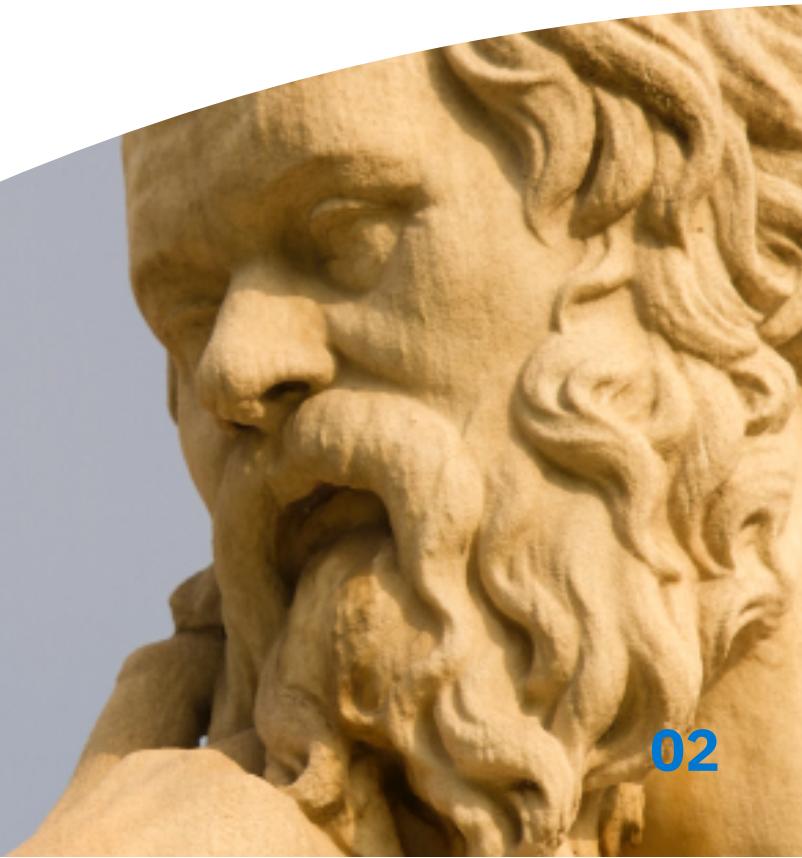
We are committed to conducting our business in an ethical manner. For us, ethics is the consistent application of clear ethical values set by Smartway that influence the behaviour of the company as a whole and the individuals within it. For Smartway, ethics mean more than just meeting the minimum expectations but instead, having clear practical ways of making decisions that align with our ethical values.

To achieve this, we have set rigorous standards of ethics, conduct and behaviour throughout our operations, regardless of which country they take place in. These apply to all of the decisions and actions that we take. In putting the patient first, we are not afraid to make decisions even if they appear contrary to our own commercial interests.

We have rigorous recruitment criteria, meaning that we only employ those who share our values and the commitment to patients throughout the globe. We also apply these criteria to the stakeholders that we work with, such as our suppliers, our customers and our logistics partners, for example. We monitor these behaviours through audits, compliance reviews, employee feedback and whistleblowing reports. Where those values are not applied or met, we will take action to put it right.

We have a dedicated regulatory, quality and compliance team with all of the resources they need to ensure that we meet the high standards. The team is led by a senior manager, who is able to make decisions about resourcing, innovation and targets/KPIs. The effectiveness of the team is measured and reviewed to ensure that objectives are being met.

We regularly cooperate on a voluntary basis with regulators across the globe to support investigations intended to disrupt the introduction of falsified, sub-standard or poor quality medicines. We also take part in regular industry events to share our knowledge, to help others do the same and learn from the experience of our industry colleagues.



Equality, Diversity & Inclusion

We are committed to having a workforce that is diverse and having a culture of genuine inclusion, which champions equality. For us, equality, diversity and inclusion are about having a workforce that reflects the global communities that we ultimately serve. We are committed to breaking down barriers and seeing the value in the equality of employees across countries and cultures, of all levels and backgrounds.

To achieve this, we ensure that when we recruit, we do so solely on the basis of merit, and to the exclusion of discriminatory or unfair characteristics. These decisions are made having regard for our own ethical values.

We have clear procedures in the form of employee handbooks, employment policies and recruitment and monitoring procedures, which are consistently applied in a non-discriminatory way. We will ensure fair and equal pay, irrespective of the characteristics of our employees. We expect all of our employees to treat each other with respect and dignity.

We proactively monitor our recruitment practices and our workforce statistics to ensure we reflect the communities that we serve and to ensure that there are no unintended practices that are unfair. We will adopt fair processes to investigate discriminatory conduct. Where we identify poor conduct or culture, or discrimination in whatever form, we will take corrective action in accordance with the law to achieve that.

We are proud to say that not only are we owned by ethnic minority women, but data suggests that our existing global operation represents true diversity and inclusion in respect of gender, age and ethnicity. To meet our own commitment to inclusion, we are already a registered 'Disability Confident' (UK government scheme) employer. So far, we have employees from over 20 countries across the world. We have also pledged our support for the UN LGBTI global business standards and have implemented these policies into our recruitment, retention and reward policies and practices.



Governance

We are committed to upholding the principles of effective corporate governance. For us, governance is about setting the right culture for all of those who work for or with Smartway to promote the long term success of the company in accordance with our own values and standards. Culture starts at the top. This means ensuring that we are well led, we are compliant with all of the regulatory, ethical and legal obligations, that our service is effective and that patients' needs are met.

To deliver this, we have a clearly defined mission statement: transforming lives by empowering access to medicines globally. This mission statement is our DNA. We ensure that not only is it visible on our website, our marketing literature, our public announcements and our recruitment adverts, but it is also the guiding force by which decisions are made at all levels of our business.

At a basic level, our senior management team set clear values which promote good, ethical and patient-centred behaviours. This provides a foundation for effective decision making throughout all of our global operations. We have formalised this in our policies, procedures and employee handbook, covering the expectations we have of all of our staff. This also includes procedures on managing conflicts of interest, whistleblowing, anti-bribery and corruption and modern slavery.

The majority of our business operations are managed by our quality system. We have developed this system with these ethical values in mind, to ensure that the right decisions are made within a defined framework. We have a quality manual, which sets out the expectations and principles that apply. Our quality documents are drafted to comply with domestic legislation and best practice, taking account of our own risk appetite. It also affords appropriate discretion to competent professionals, so that they can make pragmatic decisions enabling medicines to reach patients.

Our senior managers take part in regular meetings to ensure effective oversight of our business. These meetings include stakeholders from across the business, including our regulatory colleagues, to ensure that the senior management team are aware of trends and issues, as well as strategic opportunities. Our senior managers have access to a wide range of data to support their decision-making processes.





Sustainability

We are committed to operating our business in a sustainable manner across our entire operations. We recognise that, as we have a complex global supply chain, there are things that we can do to help end unfair and unlawful practices, promote equality and the environment, as well as address social justice and humanitarian issues.

To meaningfully contribute to the global sustainability agenda, we have adopted the relevant UN Sustainable Development Goals, which set out a pathway to ending poverty, hunger, inequality, and for providing protection for the environment and natural resources across the globe. It is hoped that this will be achieved by 2030. To meet this target, action by governments, commercial and NGO, and individuals will be required. Smartway will do its bit to help deliver this vision.

Our initial focus in transforming lives by empowering access to medicines globally feeds directly into Goal 3 – Good Health and Wellbeing. We will use our knowledge, expertise and infrastructure to provide that access to patients across the globe. However, we can meet the other goals. With operations across the world that help us distribute pharmaceuticals to patients, Smartway can make an impact on many of the other sustainable development goals.

As a global distributor of medicines and pharmaceuticals, we focus on the reduction of carbon in our operations. We work in partnership with our clients to develop carbon neutral programs including working in partnership with a charitable project to trees for carbon capture.

As part of our ethical values, we will continue to support charitable causes through donations, fundraising and raising awareness on important and relevant issues. We will continue to provide our expertise to help influence domestic and foreign policy.



Anti-corruption & Slavery

We are committed to eliminating and preventing all forms of corruption, abuse and slavery from our global supply chain. We recognise that, because our supply chain spans jurisdictions with different views on acceptable business practices, we must do our bit to prevent these practices.

To do this, we have policies in place to manage the risks of these practices. This defines that we adopt a zero-tolerance approach to any form of corruption or abuse in our operations. We expressly prohibit all forms of bribes or analogous inducements, whether that be paying for them or receiving them. We take the same approach to forced labour, modern slavery or human rights abuses. This is regardless of whether it is considered acceptable in the relevant jurisdiction or not.

To prevent working with such organisations, we employ onboarding processes for suppliers, customers and other supply chain partners, which assess suitability across a range of parameters using a range of information sources. This assessment period is ongoing throughout the life of our relationship. We will not work with anybody that does not meet our rigorous standards.

To ensure that such behaviours are eliminated, we have a whistleblowing procedure that enables the reporting of information to designated members of our senior management team, who are empowered to make immediate decisions to arrest any risk of working with anybody that would be in contravention of our ethical values. These reports can be made anonymously or openly.

As a policy decision, we will cooperate with regulators and take legal action of our own. We have legal protection in place which allows us to take robust action against those who engage in such conduct within the supply chain.





**Transforming lives by empowering
access to medicines globally**