

The Modern Slavery Act 2015 (the “Act”) came into effect on 29 October 2015 and requires those entities carrying on a business or part of a business in the United Kingdom, supplying goods or services, and having annual turnover of £36 million or more, to disclose information regarding the steps they have taken to eradicate slavery and human trafficking from their supply chain as well as within their own organization during the previous financial year.

McKesson Corporation (“McKesson”) publishes this UK Modern Slavery Act Statement (this “Statement”) on its corporate website and on MSSL Sourcing Services LLP website on behalf of McKesson Strategic Services Limited (“MSSL”) for the fiscal year ended 31 March 2019. **UK Modern Slavery Act Statement**

MSSL is committed to good corporate citizenship and the highest ethical standards. To fulfil these requirements, MSSL has established and maintains systems and controls to ensure that slavery and related human trafficking do not form part of its supply chain.

BUSINESS AND ORGANIZATION

MSSL was incorporated in 2016 as a limited company organised under the laws of England and Wales. MSSL is a member of the McKesson Corp. group of companies and is a partner in Clarus Sourcing Services LLP.

McKesson is a global leader in healthcare supply chain management solutions, retail pharmacy, community oncology and specialty care, and healthcare information technology.

WMGS Europe Limited, the other member of Clarus Sourcing Services LLP is a member of the Walmart Group which is engaged in retail and wholesale operations in various formats around the world, and many of its operations include pharmacies.

VALUES AND TRAINING

Clarus Sourcing Services LLP, which incorporates MSSL, is committed to sourcing quality generic pharmaceutical products, on behalf of its members, from suppliers who share Clarus Sourcing Services LLP’s ethical values.

Both of Clarus Sourcing Services LLP’s members have implemented codes of conduct (each, a “Code of Conduct” and collectively, the “Codes of Conduct”) within their respective organisations, which provide the guidelines for MSSL’s interactions among its employees and contractors as well with affiliates, customers, suppliers and other business partners.

McKesson’s Code of Conduct can be viewed at the following link:

<http://www.mckesson.com/uploadedFiles/McKessoncom/Content/ Documents/Investors/Code%20of%20Conduct.pdf>

Walmart’s Code of Conduct can be viewed at the following link:

<https://www.walmartethics.com/uploadedFiles/Content/U.S.%20-%20English.pdf>

The ethical principles that are the basis of the Codes of Conduct are at the heart of every decision MSSL makes. MSSL’s employees are encouraged to raise concerns, including potential violations of: (i) the Codes of Conduct; (ii) MSSL policies; and (iii) the laws of the countries in which MSSL operates. There are sophisticated reporting

mechanisms in place to collect and relay information regarding potential violations to appropriate resources within MSSL and within its Members for review and follow-up.

MSSL conducts web-based and/or in person trainings for employees to emphasize the importance of acting with integrity and consistently with the Codes of Conduct.

SUPPLY CHAIN AND DUE DILIGENCE

As a provider of strategic sourcing services in the pharmaceutical market, MSSL takes its social responsibility seriously and is strongly committed to respecting international human rights and fair labour practices and explicitly condemns all kinds of slavery or human trafficking.

MSSL's principal supplier agreements include language that requires MSSL's suppliers to comply with all laws that relate to their interactions with MSSL, including any applicable national laws regarding human trafficking, forced labour and other forms of modern slavery.

In addition to its own efforts, MSSL can, whenever required, upon request, rely on the strong support of its Members, who have designed and implemented processes to: (i) assess suppliers of services and products introduced into the supply chain; and (ii) confirm that the policies and procedures of such suppliers are compliant with the Codes of Conduct.

EFFECTIVENESS

MSSL continuously evaluates its monitoring program to ensure its actions are consistent with industry norms and coordinates with the policies and procedures of its Members to leverage their experience and knowledge.

MSSL believes its efforts to date have been effective in preventing slavery and human trafficking from entering the supply chain.

This Statement is made pursuant to Section 54 of the Modern Slavery Act 2015 and constitutes MSSL's slavery and human trafficking statement for its financial year ended March 31, 2019.

London, United Kingdom.



Gareth Thomas
Director
McKesson Strategic Services Limited
March 31, 2019