
MGPSL MODERN SLAVERY STATEMENT FY 2023

McKesson Global Procurement & Sourcing Limited (“**MGPSL**”, “**we**” or “**our**”) publishes this Modern Slavery Statement (“this **Statement**”) pursuant to section 54 of the UK Modern Slavery Act 2015 (the “**Act**”), for the financial year ending 31 March 2023 (“**FY23**”).

MGPSL is opposed to all forms of modern slavery and human trafficking. Through our policies and practices in relation to our operations, people, culture and corporate responsibility, MGPSL is committed to taking steps to ensure that modern slavery plays no part in our business or supply chains. This Statement, which is the fifth consecutive modern slavery statement published for MGPSL, outlines the continued steps MGPSL has taken in FY23 to prevent the occurrence of modern slavery occurring anywhere within its business or supply chains.

BUSINESS AND ORGANISATION

McKesson Corporation (“**McKesson**”), together with its international subsidiaries (collectively, the “**McKesson Group**”), is a global leader in healthcare supply chain management solutions, community oncology and specialty care and healthcare information technology. McKesson is incorporated in the State of Delaware, USA, whose shares are traded on the New York Stock Exchange.

MGPSL is a private limited company incorporated in England and Wales and wholly owned by McKesson. MGPSL is the global sourcing and procurement organisation for the McKesson Group, delivering value to its international McKesson Group affiliates by managing strategic partnerships at an enterprise level with pharmaceutical manufacturers and suppliers across multiple countries, focusing on the goal of ensuring the supply of generic pharmaceutical products for the McKesson Group and its customers at competitive pricing. MGPSL does not manufacture any products or purchase pharmaceutical products from suppliers.

MGPSL’S SUPPLY CHAIN

MGPSL’s core operations are the strategic services it provides to its McKesson Group affiliates. MGPSL does not have the authority to make purchasing commitments on behalf of the McKesson Group, purchase products from pharmaceutical product suppliers, onboard suppliers on behalf of the McKesson Group, or take legal title or possession of any pharmaceutical products. Accordingly, the pharmaceutical suppliers that MGPSL interacts with on behalf of the McKesson Group as part of its core operations do not form part of MGPSL’s own supply chain. To support its core operations MGPSL utilises the services of various third-party service providers, including but not limited to IT and software providers, professional services firms, and United Kingdom-based office cleaning and maintenance providers, which together comprise MGPSL’s supply chain.

The majority of MGPSL personnel are employees located in the United Kingdom, and there are a small number of temporary contracted workers typically engaged by MGPSL via third-party agencies. Except for the small number of contracted workers, MGPSL does not currently outsource any of its core operations to unaffiliated third parties.

MITIGATING MODERN SLAVERY RISKS IN MGPSL’S BUSINESS AND SUPPLY CHAINS

As a provider of strategic services in healthcare, MGPSL takes its social responsibility seriously. We are committed to respecting applicable international human rights and fair labour practices, and explicitly condemn all kinds of slavery or human trafficking. Steps taken by MGPSL to continue to address modern slavery risks in FY23 are set out below.

A. CULTURE AND POLICIES

MGPSL has a zero-tolerance approach to modern slavery and all forms of discriminatory or exploitative behaviour and treatment, whether within our own business or that of those who supply us; this stance is demonstrated in our policies and behaviours. Our key policies reflecting our culture and these behaviours are set out below and reviewed on a regular basis.

(i) **McKesson I²CARE Values**. The McKesson Group and its employees are fundamentally guided by McKesson's global I²CARE Values, namely: Integrity, Inclusion, Customer-first, Accountability, Respect and Excellence. The I²CARE Values are foundational to all that we do, and who we are as a company. Consistent with these values, MGPSL is committed to acting ethically and with integrity in all its business relationships, aiming to ensure that modern slavery and human trafficking is not taking place anywhere in its business. <https://www.mckesson.com/About-McKesson/McKesson-Values/>

(ii) **Code of Conduct**. The McKesson Group operates in accordance with McKesson's published Code of Conduct, to which the I²CARE Values are central, that set out the conduct we expect of our partners, employees, contractors and suppliers. The Code of Conduct establishes the highest standards to which MGPSL is required to conduct its business operations, functioning as the foundation of every decision that MGPSL makes. <https://www.mckesson.com/Documents/Investors/Code-of-Conduct-2022/>

(iii) **Modern Slavery Prevention Policy**. At the commencement of FY23 MGPSL formally implemented a 'McKesson Global Procurement & Sourcing Modern Slavery Prevention Policy' (the "**Policy**"), underlining MGPSL's commitment to tackling modern slavery. MGPSL management at all levels is responsible for ensuring those workers reporting to it understand and comply with the Policy, and in the event management is alerted to any indication that a worker or person connected to any third-party business partner of MGPSL is in an exploitative situation or may be a victim of modern slavery, management must escalate the matter. MGPSL would consider any breach of the Policy or the Act severe and may result in MGPSL terminating its relationship with an individual or organisation found in breach.

(iv) **Open Door Policy**. McKesson's Open Door Policy provides the framework for all MGPSL employees to have the opportunity to raise concerns within the organisation safely and without fear of reprisal, encouraging a culture of transparency and open communication.

(v) **Speak Up Policy**. In addition to the Open Door Policy, MGPSL employees are encouraged to raise concerns, including potential violations of McKesson's Code of Conduct, company policies and applicable laws via the McKesson Integrity Line, operated by an independent third party and available either by phone or online to all employees 24 hours a day, 7 days a week, in multiple languages, through which concerns can be raised anonymously.

B. RISK ASSESSMENT

In FY23 MGPSL took initial steps toward completing a modern slavery risk assessment utilising the International Labour Office's Indicators of Forced Labour as a guiding framework. Taking into consideration the organisational structure, operational model, third-party contracting, and employment practices of MGPSL, the risk assessment aims to identify opportunities to enhance efforts to address modern slavery risks within its business and supply chains. The risk assessment remained in progress at the conclusion of FY23.

C. DUE DILIGENCE AND RECRUITMENT

MGPSL's principal agreements include provisions requiring MGPSL's business partners to comply with applicable laws that relate to their interactions with MGPSL, and, where appropriate, additional assurances might be specifically requested from our third-party service contractors against the use of forced labour and other forms of modern slavery. As part of our people and culture policies and procedures, MGPSL only uses reputable recruitment firms and complies with all applicable employment laws and regulations. Relying on the International Labour Office's Indicators of Forced Labour as non-financial key performance indicators, no such indicators were identified by MGPSL's Human Resources Department as occurring within MGPSL operations in FY23. We regularly review our recruitment procedures and providers, as well as our arrangements for employees' and contractors' welfare by championing mental and physical wellbeing. All employees are paid at least the minimum wage in the local jurisdiction, and in London employees and contractors are paid the London Living Wage or above.

GOING FORWARD

Following consideration of the effectiveness of the steps taken in FY23 to help ensure our business and supply chain is free of modern slavery, MGPSL intends to take the following continued steps to combat the risk of modern slavery and human trafficking in future:

- incorporate the topic of modern slavery into MGPSL's regular employee compliance training schedule to help maintain a high level of awareness and understanding amongst workers of the risks of modern slavery and human trafficking;
- finalise a modern slavery risk assessment in order to identify any opportunities for improvement to tackle risks of modern slavery and human trafficking in its business and supply chains;
- include enhanced language in standard form contract templates to help ensure vendors will not engage in any activity, practice, or conduct that could constitute modern slavery; and
- continue to monitor the legal and risk landscape within the context of MGPSL's core operations and adapt mitigation actions accordingly.

This Statement has been approved by the MGPSL board of directors on 28 September 2023, and the board has authorised, Francois Bodereau, Director, to sign the Statement on behalf of MGPSL.

Signed: *Francois Bodereau*

Name: Francois Bodereau

Title: Director

Date: 9/29/2023