

Fidenza, 13th February 2019

Modern Slavery and Human Trafficking Statement 2019

Modern slavery is a crime and a violation of fundamental human rights.

It takes various forms, such as slavery, servitude, forced and compulsory labor and human trafficking; all of which have in common the deprivation of the of a person's liberty by another in order to exploit them for personal or commercial gain.

This statement is made on behalf of the Board of directors of Bormioli Pharma Spa in accordance with the Modern Slavery Act 2015 and sets out the steps Bormioli Pharma Spa have taken to ensure that our business as well as our supply chains are free from slavery and human trafficking. While this statement is for compliance specifically as required for our 2019 financial year, these principles and policies continue actively.

Our Principles

Bormioli Pharma Spa is committed to preventing slavery and human trafficking occurring in any of its corporate activities, as well as seeking to ensure that its supply chains are also free from such practices. Bormioli Pharma Spa is committed to tackling this crime through effective due diligence, risk assessments, and maintaining the highest ethical standards across our business and operations. These principles are included into the Organizational Model adopted by Bormioli Pharma Spa according to L. Decree 231/01.

Our Organisational Structure and Business

Bormioli Pharma Spa is an Italian company, manufacturer of glass and plastic primary packaging for the pharmaceutical, nutraceutical and cosmetic worldwide markets.

Bormioli Pharma Spa is a Portfolio Company of the PE Triton Fund and the holding company of Bormioli Pharma Group. Its head office is in Milan, Italy and its plants are located in North of Italy and in France.

Bormioli Pharma Group sales are directly present in over 20 countries in Europe and operates in over 65 countries globally, with manufacturing and supply chain operations also present on an international basis.

We have a fully integrated business including Manufacturing, Quality Management, Research & Design, Product Development, Sourcing, Logistics, Manufacturing, Marketing, and Sales.

In the UK Bormioli Pharma Spa operates as a supplier of its products with a relevant turnover.

Supply Chain Policies and Due Diligence relating to Modern Slavery and Human Trafficking

The Company's Suppliers are mostly located in US, EU and Japan.

Bormioli Pharma Spa ensures that its suppliers are aware of our policies and take appropriate measures to ensure that our suppliers adhere to the same high standards. The Company's policies have been developed encompassing the ethical code, which is part of the Organizational Model according to L. Decree 231/01.

In order to monitor and mitigate the risks of slavery and human trafficking occurring within the supply chains, the Company carries on due diligence by applying specific processes in relation to existing and all new suppliers.

Bormioli Pharma Spa's supplier approval processes includes both monitoring and evaluation of the supplier and is integrated into our business processes through the following measures:

- Quality Control Procedure documentation,
- Clauses into Suppliers agreement requiring compliance with anti-slavery measures, and
- a dedicated software to assess the services suppliers.

Bormioli Pharma Spa has a dedicated compliance team, composed by the Compliance Officer and the Chief Privacy Officer. It involves the following departments:

- Legal;
- Internal Audit and
- all the other functions, through the appointment of the relevant Key Officers.

Additionally, Key suppliers will be subject to a further annual risk assessment.

Staff Training

It is a compulsory requirement that all new employee starters complete our ethics modules within three months of joining the business. Staff are able to raise any ethical concerns through internal mechanisms, all the way from their line manager, through to the relevant key officers, the compliance officer, and to the supervisory body.

Further Steps

Following periodical reviews of the effectiveness of the steps we have taken this year to ensure that there is no slavery or human trafficking in our supply chain, we are determined to do all the necessary steps to improve our ethical behavior.

Bormioli Pharma Spa



Andrea Lodetti – CEO