

October 2024

Modern Slavery Statement - UK

Ferring Pharmaceuticals Ltd

Section 54: Transparency in Supply Chains, Modern Slavery Act 2015

1. Introduction / Background

As required by section 54: Transparency in Supply Chains of the Modern Slavery Act 2015, this Modern Slavery Statement is on behalf of Ferring Pharmaceuticals Ltd (“Ferring Pharmaceuticals”) for the period ending December 2023.

At Ferring, we believe in the values of respect and dignity and human rights are of the utmost important to us.

2. Organisation Structure and Supply Chain

Ferring is part of the Ferring Group which is a biopharmaceutical company dedicated to the development of innovative treatments that make a real difference in people’s lives all over the world. The Group’s research and development programmes involve the internal development of first in-class therapeutic peptides and proteins, whilst collaborating with external partners. This provides the basis for introducing new products and drug delivery systems.

In the UK, the company focuses on sales & marketing activities with products in the gastroenterology, urology, reproductive health, men’s health and endocrinology therapy areas. The success of both current and planned products within these therapy areas lies at the core of the company’s strategic direction, within a within a framework of values called the Ferring Philosophy which places people at the heart of what we do.

Ferring’s supply chain is comprised of: (i) suppliers of direct materials (manufactured and packaged active pharmaceutical ingredients, drug products and related materials), (ii) suppliers of indirect goods and services (information technology, professional services, sales and marketing agencies and facilities), and (iii) suppliers of research and clinical goods and services (pre-clinical and / or clinical research organisations and laboratories).

You can read more about Ferring on our global website at [Home - Ferring Global](#).

3. Policies in relation to slavery and human trafficking

As a Ferring Group company, we have various policies and processes in place which together constitute an evolving due diligence process, the purpose of which is to identify potential or actual risks at Ferring, across our operations or with our business partners or suppliers. Risks include child labour, modern slavery, human trafficking, human rights breaches, ethical issues, bribery or corruption, although this list is not exhaustive. Risks may also include behaviour that does not adhere to Ferring's values. We are assessing needs and vendor capabilities on an ongoing basis to identify and implement improvements to our processes.

- [The Ferring Philosophy](#) sets the expectation and the tone of principled behaviour and that “People come first at Ferring”;
- [The Code of Conduct](#) sets the expectation of compliant and ethical behaviour and provides instruction to employees and other third parties acting on Ferring's behalf;
- [The Human Rights Commitment](#) describes Ferring's commitment to uphold internationally recognised principles throughout our value chain;
- [The Sustainability Statement](#) captures our sustainability vision and that people are at the heart of our business; and
- [The Supplier Conduct Principles](#) detail those fundamental principles that we expect our suppliers to adhere to, including no forced or child labour and to be opposed to all forms of exploitation of workers and children. We require that our suppliers expect the same of their own suppliers. This is part of our supplier contracting process and attached to purchase orders.
- [Ferring's speak up culture](#) demonstrates the importance we attach to fostering an open culture where employees feel comfortable and safe to speak up and discuss any concerns they might have.

Ferring is also a committed participant of the UN Global Compact and you can read our Communication in Progress for the period 1 January to 31 December 2023 [here](#).

4. Due Diligence Processes, Risk Assessment and Management

	Name	Objective	Scope	Frequency of application	Risk Management Process
1.	SAP GTS Screening	SAP GTS is designed to help organizations comply with	Applied to Ferring's partners such as customers,	In either real time, or daily or weekly	The system generates alerts or takes action to block or warn

	Name	Objective	Scope	Frequency of application	Risk Management Process
		international trade regulations by screening business partners against sanctioned party lists. Complies with international sanctions, embargoes, and dual use regulations.	suppliers, and banks. <i>In future, bank transfers will also be included.</i>	depending on site ¹ .	against transactions involving sanctioned parties. It maintains an audit trail of all screening activities, including the results and actions taken. Sanctioned party lists are regularly updated, and regulations monitored for updates to ensure that the screening process remains up-to-date and effective.
2.	Supplier Selection Matrix (SSM)	The SSM is a Procurement tool designed to support vendor selection during a Request for Proposal (RFP) exercise. It enables the vendor selection team to assess the vendor responses based on pre-defined criteria, including corporate social responsibility criteria.	Applied for RFP over €1m (<i>excludes contract renewal or price renegotiations</i>).	Each time the scope is applicable.	The SSM is designed to enable informed decision making when selecting suppliers and to reduce risks.
3.	Self-Assessment questionnaire (SAQ)	The SAQ is used to collect information from selected vendors on the following topics: 1. Adherence to global standards; 2. Existence of current legal issues;	Applied to facility management and catering companies in India and Argentina.	Once a year	The process depends on the risk, if any, identified, and may be escalated to any of the following departments: Ethics, Legal or Compliance.

¹ Phased approach to real time roll-out: (1) current real-time application: Ferring Controlled Therapeutics Ltd & Ferring Pharmaceuticals Ltd (UK), Ferring SAU (Spain), Ferring Portuguesa Produtos Farmacêuticos Sociedade & Ferring Service Center LDA (Portugal) and Ferring (Ireland) Ltd (Ireland); (2) real time application from mid-June 2024: Ferring International Center SA (Switzerland) and Ferring Pharmaceuticals BV (Netherlands); and (3) real-time application in alignment with SAP go live for all other sites (roll-out until 2027).

	Name	Objective	Scope	Frequency of application	Risk Management Process
		<p>3. Existence of Ethics and anti-corruption internal policies and processes;</p> <p>4. Existence of Human Rights and Labour Rights policies and processes;</p> <p>5. Environment measures in place including existence of policies and processes; and</p> <p>6. Integration of Health & Safety standards into internal policies.</p>			This process will be replaced by the Supplier Management Platform once implemented (see below).
4.	Coupa Risk Assess Module Due Diligence Process	The Coupa Risk Assess Module's objective is to support Ferring with ensuring that our 3rd Party Business Partners are selected and assessed with sufficient diligence to avoid potential misconduct that would have adverse legal, reputational and/or financial effects for Ferring	Applied to all new 3 rd Parties that act on behalf of Ferring and that are being set up in Coupa for payment. <i>This process will be implemented in all markets that use Coupa to process payments to 3rd Parties.</i>	The Module is always "on" and is initiated whenever a new 3 rd Party is added to Coupa	The case follows an escalation process that includes deeper analysis of the 3 rd party leveraging public and non-public data bases (e.g., Dun & Bradstreet), discussion with senior leaders within Legal, Tech Ops and Compliance, obtaining advice from outside counsel (if required) and a discussion with the business assess how to mitigate or eliminate the risk (e.g., terminate engagement with 3 rd Party).

	Name	Objective	Scope	Frequency of application	Risk Management Process
5.	Supplier Management Platform	To collect Environmental, Social and Governance information from selected vendors so that we have visibility over the selected suppliers, enabling us to identify risks and prioritise follow-up actions to remedy such risks <i>Note: purchased at the end of 2023, and implementation to commence in 2024.</i>	<i>Phase 1: to be applied to top 28 key and high-spend suppliers in 2024. Next phases for expansion to be defined.</i>	<i>Supplier information to be updated annually.</i>	<i>The process is being finalised, however, depending on the risk identified, it may be escalated to any of the following departments: Ethics, Legal or Compliance, to investigate and/or address any risks, as appropriate.</i>
6.	Ferring AlertLine (available on our global website)	To enable Ferring employees and third parties to raise concerns, including concerns relating to human rights or child labour, in our operations and value chain. Such concerns can be raised confidentially and Ferring has a strict non-retaliation policy for all potential violations reported in good faith.	Open to Ferring employees and third parties to raise concerns of potential violations in Ferring's operations or in our value chain.	The AlertLine is always open.	All concerns raised are allocated to the relevant department for investigation (Ethics, Legal, Compliance, Human Resources) and resolution.
7.	Minerals & Metals sourced in conflict affected and high-risk areas	In accordance with Article 964j of the Swiss Code of Obligations, to conduct a search for minerals and metals sourced in conflict affected and high-risk areas (CAHRAS ²) meeting certain thresholds. The purpose is to identify child labour in high-risk industries and	Minerals and metals sourced in CAHRAS and meeting the thresholds detailed in the Swiss Code of Obligations.	Once a year	In this first year of reporting (2023) we do not meet the thresholds of the reporting requirements as we source negligible quantities of minerals and metals and are therefore exempt from the Swiss reporting

² We referred to [CAHRAs \(cahraslist.net\)](https://cahraslist.net) and applied the following list: Afghanistan, Burkina Faso, Burundi, Cameroon, Central African Republic, Chad, Colombia, Democratic Republic of the Congo, Egypt, Eritrea, Ethiopia, India, Libya, Mali, Mozambique, Myanmar, Niger, Nigeria, Pakistan, Philippines, Somalia, South Sudan, Sudan, Turkey, Ukraine, Venezuela, Yemen and Zimbabwe

	Name	Objective	Scope	Frequency of application	Risk Management Process
		geographies and to mitigate and report accordingly.			requirements. Should this change, any concerns would be raised to the relevant department (Ethics, Legal, Compliance) and we would comply with the reporting requirements.

5. Key Performance Indicators to measure effectiveness of steps being taken

To monitor the effectiveness of the due diligence processes, we continually review the information we receive, and should a risk be identified, we follow the risk management process detailed at section 4 above.

Our current due diligence process is not designed to specifically address modern slavery, human trafficking and child labour, although it is sufficiently robust to identify modern slavery, human trafficking and child labour should it exist. For example, we would be notified of any negative press about any direct supplier flagging forced or child labour, or other risks. We are likewise aware of our suppliers' level of commitment to protecting human rights in India and Argentina, both of which are in scope of our SAQ due diligence process (see no. 3 in the above table). Based on our review of vendor capabilities, considered together with the challenges of detecting and combatting forced and child labour, we have not yet identified an available tool with robust capabilities in this area.

We continually monitor for new and enhanced due diligence processes and systems, specifically those that offer modern slavery, human trafficking and child labour due diligence, to identify potential enhancements to our current due diligence process.

At the time of reporting and following our due diligence process we have no reasonable grounds to suspect modern slavery, human trafficking or child labour at Ferring, across our operations, or by our business partners or suppliers.

6. Training on modern slavery and trafficking

Ferring employees receive training on the following company policies and commitments to ensure that they understand the spirit of Ferring's values and our commitment to respecting human rights in accordance with internationally recognised principles throughout our value chain:

- The Ferring Philosophy;
- The Code of Conduct;
- The Human Rights Commitment; and
- Ferring's speak up culture

The Supplier Conduct Principles are part of Ferring's contracting process and attached to purchase orders.

This statement is approved by the board of directors of Ferring Pharmaceuticals Ltd on 17 October 2024



Mel Foster-Hawes

General Manager – UK & Ireland

Ferring Pharmaceuticals Ltd

17 October 2024