

Menwell Ltd – Modern Slavery Statement for Financial Year 2024

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 and outlines the steps Menwell Ltd has taken during the financial year ending 31 December 2024 to ensure that modern slavery and human trafficking are not taking place within our business or supply chains.

1. Introduction

Menwell Ltd is committed to acting ethically and with integrity in all our business dealings and relationships. We recognize the importance of tackling modern slavery and human trafficking and are committed to preventing any occurrence of such practices within our operations and supply chain.

Modern slavery encompasses slavery, servitude, human trafficking, and forced labour. We acknowledge our responsibility to respect human rights and ensure transparency across our business practices, actively promoting ethical conduct.

2. Our Business and Supply Chains

Menwell Ltd operates in the online pharmacy industry and provides its services and products in the UK and Brazil. Our supply chains include the sourcing of medicinal products, relationships with suppliers, contractors, and service providers.

We have evaluated the inherent national risks within our national operations using the <u>Walk Free Global Slavery Index</u>.

3. Our Policies

Menwell Ltd has implemented a range of policies to combat modern slavery. These include our:

- Anti-Modern Slavery Policy: Clearly outlining our zero-tolerance stance toward modern slavery and human trafficking.
- Speaking Up (Whistleblowing) Policy: Encouraging employees to report concerns about unethical behaviour, including any suspicion of modern slavery, without fear of retaliation.
- Anti-Bribery & Anti-Corruption Policy: Setting out the measures we have put in place to prevent improper conduct and the abuse of position of responsibility.

4. Due Diligence and Risk Assessment

We recognise that within highly regulated pharmaceutical supply chains the inherent risk of the occurrence of modern slavery is not as high as in less-regulated industries. Nevertheless, we ensure that our product and service suppliers on a case by case basis for modern slavery risk. Only suppliers that pass our third party onboarding process checks will be accepted as supply partners.

5. Training and Awareness

We recognize the importance of training in combating modern slavery. Starting in 2025 we will:

- Provide modern slavery awareness training to staff, particularly those involved in procurement and supply chain management.
- Offer guidance, on an as needed basis, to our suppliers on identifying and addressing modern slavery risks.

6. Measuring Effectiveness

Menwell Ltd monitors the effectiveness of our actions through:

- Regular reviews of our policies and practices to ensure they remain effective and aligned with best practices.
- Supplier feedback.

• Reporting mechanisms for employees and suppliers to raise concerns related to modern slavery.

7. Future Steps

Menwell Ltd is committed to continuously improving our efforts to combat modern slavery. Over the next year, we plan to:

- Enhance supplier engagement, focusing on high-risk areas.
- Increase the frequency and scope of supplier risk assessments.
- Strengthen training programs to include scenario-based learning for better identification and response to modern slavery risks.

8. Approval

This statement has been approved by myself as CEO of Menwell Ltd and will be reviewed and updated annually to reflect our ongoing commitment to eradicating modern slavery in all forms.

Signed,

George Pallis 2025-06-25

George Pallis CEO & Founder | Menwell Ltd