

Modern Slavery Policy

Statement purpose and scope

Sterling is a manufacturer of Pharmaceuticals supplied worldwide and is proud of its history of corporate responsibility. We value our integrity as a core and defining characteristic of how we operate. We are therefore committed to acting ethically and with transparency in all business dealings including complying with the requirements of the UK Modern Slavery Act 2015. We recognise that slavery and human trafficking can occur in many forms. We have taken, and will continue to take, steps to ensure that slavery and human trafficking are not taking place in any part of our business including our supply chains. As an equal-opportunities employer, Sterling is committed to creating and ensuring a non-discriminatory and respectful working environment for its staff.

Sterling recruitment and people management processes are designed to ensure that all prospective employees are legally entitled to work in the UK and to safeguard employees from any abuse or coercion once in our employment.

Sterling maintains the following policies which are accessible to all staff:

- Code of Conduct
- Whistleblowing Policy
- Bribery, Gifts and Corporate Hospitality
- Corporate Social Responsibility
- Equality.

Sterling recognises that our suppliers have a critical role to play in achieving this successfully. We therefore expect them to maintain the same commitment to ethical and sustainable business practices as Sterling does.

Through our supply chain we procure goods and services from UK and overseas suppliers. We audit our suppliers based on risk and request that they sign up to our Modern Slavery Statement.

We agree not to:

- Use or facilitate any type of involuntary labour, including forced, compulsory, indentured, bonded, slave or human trafficked labour.
- Traffic individuals or groups for the purpose of labour exploitation. All employees must be voluntary and should be free to leave upon reasonable notice.
- Accept any child labour or any practice that inhibits the free development of children. The term "child" refers to any person under the age of 16 (or according to the applicable local laws) or under the minimum age of employment in any particular country. Employees under the age of 18 should not perform hazardous work and such individuals must provide documented informed consent.

- Prevent fair remuneration, reasonable working hours, leave periods and public holidays in compliance with all applicable local wages, hour laws and regulations. Any maximum working hours should not be exceeded. Overtime should be consented, and workers must receive adequate compensation for any overtime worked.
- If any of our staff suspect good practices are not being followed they should report it to the HR Director.

Over the past 12 months, Sterling has undertaken the following activities:

- Made staff aware of the Modern Slavery Act 2015 and informed them of the appropriate action to take if they suspect a case of slavery or human trafficking.
- Ensured that consideration of the modern slavery risks and prevention are added to the supply chain department policy review process as an employer and procurer of goods and service.
- Ensured procurement strategies and new contract terms and conditions included references to modern slavery and human trafficking.
- Delivered training sessions to staff procuring goods and services.
- Ensured ongoing engagement and communication between the procurement team and the wider organisation.

During 2021–2022 we will undertake the following activities:

- Continue to develop staff awareness.
- Ensure procurement strategies and contract terms and conditions include references to modern slavery and human trafficking.
- Embed the Modern Slavery Act 2015 into our Whistleblowing Policy.

Modern Slavery Statement:

Signed: 

Position: CEO

Date: 31 March 2021