

## **Modern slavery statement for the financial year 2019**

### **Introduction**

This statement is made pursuant to s.54 of the Modern Slavery Act 2015 and sets out the steps that M3 (EU) has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

Modern slavery encompasses slavery, servitude, human trafficking and forced labor and M3(EU) has a zero-tolerance approach to any of these practices. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within our business or supply chain and which allow us to deliver financial success whilst conducting our business strategy and operations in a responsible manner.

### **Our business**

Making use of the Internet to increase, as much as possible, the number of people who can live longer and healthier lives, and to reduce, as much as possible, the amount of unnecessary medical costs” - this is both the desire and goal of M3(EU)

We hope to change the direction of medicine to an even better path, by making use of the medium of the Internet, and deliver quality medical information directly to the clinical and research arenas as fast as possible.

We aim to continue to provide services that constantly surprise, impress, and please our clients and customers.

To the shareholders who invest in our business, we hope to answer to their expectations by maximizing the value of our business, as well as, continue to communicate the meaning of our work for society.

M3(EU) directly employs over 200 staff in the UK servicing all areas of the business and subsidiary companies and is led by Senior Management Teams and the Board.

### **Our policies**

We have adopted a Code of Conduct which sets out a number of principles with which we comply and with which we expect our suppliers to comply. These include statements that all employees shall be free to choose their employment and shall not be forced to work against their will, strict provisions for any child under 16 years of age engaged in the workplace and a commitment to a safe working environment, terms and conditions no less than required by law, a work culture which promotes equality and respect and which allows for whistleblowing and freedom of association.

For our employees, failure to comply with the provisions of the Code may result in disciplinary action which could, in some instances, result in their immediate suspension or the termination of their employment.

In relation to our suppliers and sub- contractors, we believe that transparency is vital to a successful business relationship. M3 (EU) is committed to building long-term relationships with suppliers and promotes open and honest communication. In the event of non-compliance with our Code of Conduct we expect our suppliers to agree and commit to timely corrective action. M3 (EU) reserves the right to terminate any agreements in line with any contractual obligations should a supplier be unable, for whatever reason, to comply with the Code or where a supplier shows repeated disregard for the its provisions.

### **Our supply chain**

Our supply chain includes an array of suppliers covering everyday items such as office stationery and services and IT equipment through to a wide range of other professional services including recruitment and translation.

Our suppliers vary enormously in terms of their size, structure and mode of operation and many of those will themselves be reliant on their own supply chain, potentially across many countries, in order to be able to supply relevant goods or services to us.

### **Our current and proposed due diligence**

We have started work on establishing a range of due diligence processes to enable us to identify and assess potential risk areas in our business and our supply chain.

Our Code of Conduct will form part of our contract with all new suppliers and they are required to confirm that no part of their business operations contradicts this policy through signing a Supplier Confirmation Form. We intend to communicate our Code and expectations in relation to it to all of our suppliers prioritizing key suppliers and those whose contracts are due for renewal. We anticipate that all suppliers will have been communicated to by the end of Q1 2020.

Within our offices we have optimum control of the work environment, including shift scheduling and pay rates, thus reducing the risks within our own business. Nevertheless, training will be developed and delivered to appropriate individuals across the business where required to ensure that they are aware of the issues and able to assess the risks in their area of responsibility.

### **Monitoring our performance and effectiveness**

We intend to regularly review our practices, processes and procedures both in relation to our own business operations and the way in which we engage with suppliers to ensure we mitigate any risk of non- compliance with the Modern Slavery Act.

In the event of any report received from an employee, member of the public or authoritative body pertaining to a suspected breach of the Code by M3 (EU) or one of its suppliers, the matter will be communicated to the appropriate Senior Management Team, a full investigation launched, and any necessary remedial action taken without undue delay.

This statement was approved by the Board of M3 (EU) Ltd

A handwritten signature in black ink, appearing to read 'Aki Tomaru', with a stylized flourish at the end.

Aki Tomaru  
CEO M3 (EU) Ltd

Date 1<sup>st</sup> December 2019