



A JONES HEALTHCARE GROUP COMPANY

Medi-Clear

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Statement on Modern Slavery

For Financial Year Ending Dec 31, 2023: This statement is made pursuant to Bill S-211, also known as the Fighting Against Forced Labour and Labour in Supply Chains Act (2023) and the requirements of the Modern Slavery Act (2015), by Jones Healthcare Group Inc. ("Jones"), the parent company of Medi-Clear.

About Us

Jones Healthcare Group Inc. is a world-class provider of advanced packaging and medication dispensing solutions. For over a century, our partnerships, knowledge, and expertise across healthcare sectors have uniquely positioned us to respond to evolving market needs with insights and opportunities for our customers. As a subsidiary of Jones Healthcare Group Inc., Medi-Clear adheres to these high standards and is committed to combating modern slavery and forced labor within our supply chains.

Business Structure

Jones Healthcare Group Inc. (891176471) is headquartered in London, Ontario, Canada, and includes the following legal entities: Jones Healthcare Group - Cartons & Labels Inc. (762683100), Jones Healthcare Group - Pharmacy & Medication Adherence Inc. (762683308), Jones Healthcare Group - Packaging Services Inc. (761881804), Jones Healthcare Group - International (762682102), Medi-Clear Ltd. (6444421), and Bringhigh Ltd. dba Venalink (04034837).

Jones Healthcare Group Inc. is comprised of six distinct business units: Cartons & Labels, Pharmacy & Medication Adherence, Packaging Services, Venalink UK, Venalink Spain, and Medi-Clear Ltd. Each unit operates with a dedicated supply chain structure, designed to address its specific requirements. The structure, activities, and supply chains of each business unit are outlined as follows:

- **Cartons & Labels:** Purchasing of primarily raw material required for the manufacturing process. Major suppliers are large corporations with North American head offices.

- **Pharmacy & Medication Adherence:** Purchases of primarily material from our C&L division or resale material from outside supply base. Most major suppliers are North American based with some off shore purchasing occurring.
- **Packaging Services:** Purchasing of primarily raw material required for the manufacturing process. Major suppliers are large corporations with North American head offices.
- **Venalink UK:** Purchase of goods for resale from Canadian and UK/European suppliers.
- **Venalink Spain:** Purchase of goods for resale from Canadian and UK/European suppliers.
- **Medi-Clear Ltd.:** Purchasing of primarily raw material required for the manufacturing process. Major suppliers are large corporations with European head offices.

Human Rights

Jones Healthcare Group Inc. recognizes and observes the right of every individual to equality of opportunity with respect to employment based on qualifications and is committed to providing a workplace free from harassment and discrimination. Every person has a right to equal treatment with respect to employment without discrimination because of race, ancestry, place of origin, colour, ethnic origin, citizenship, creed, religion, sex (including pregnancy and gender identity), sexual orientation, age, record of offences, family status, disability, or perceived disability. We expect our suppliers to share the same commitment and meet our ethical standards.

Jones Healthcare Group Inc. does not tolerate modern slavery in any form—including forced labour and child labour. We support the elimination of all forms of modern slavery from our supply chain.

Policies

Jones Healthcare Group Inc. currently has policies and due diligence processes in place related to modern slavery, including:

- Embedding responsible business conduct into policies and management systems.
- Identifying and assessing adverse impacts in operations, supply chains and business relationships.
- Ceasing, preventing, or mitigating adverse impacts.
- Tracking implementation and results.

- Communicating how impacts are addressed.
- Providing for or, cooperating in, remediation when appropriate.

All Jones Healthcare Group Inc. entities are subject to Jones Healthcare Group human resources or employee policies that specify strict adherence to relevant laws and regulations, including the Canadian Human Rights Act and The Human Rights Act (UK). These policies outline procedures for risk assessment, reporting/whistleblowing, penalties, and remediation procedures. Human Resources is responsible to ensure that all leaders understand these policies and further, ensure receipt of an Acknowledgement and Statement of Compliance from all colleagues.

All Jones Healthcare Group Inc. supplier interactions are subject to a Sustainable Procurement Policy, which commits to compliance with all relevant laws and regulations—including International Labor Organization (ILO) standards prohibiting slavery, child labour, and forced labor. Through this policy, all Jones Healthcare Group Inc. procurement teams commit to establishing criteria for assessing our suppliers' ethical business practices and the elimination of forced and child labour. Further, by 2025 all strategic suppliers and suppliers establishing and conducting business with Jones Healthcare Group Inc. must endorse and sign a Supplier Code of Conduct, which includes: requirements for suppliers to not use forced or child labor either directly or indirectly; adherence to the minimum employment age limit defined by national law or regulation; compliance to relevant ILO standards; procedures for whistleblowing; and penalties and remediation procedures for non-adherence.

Current Assessment

Jones Healthcare Group Inc. has started the process of identifying risks of modern slavery in our supply chains, but there are still gaps in our assessments. Based on preliminary information gathered, there is low to no risk of forced or child labour. Certain suppliers have received a low-risk rating based on location of their activities, operations, or factories. We are currently working to address gaps in our assessments and mitigate potential risks (see "In Development").

To date, we have not identified any instance of modern slavery in our activities or supply chains. Further, we have not identified any loss of income to vulnerable families resulting from measures taken to eliminate the use of modern slavery in our activities and supply chains.

Training

In April 2024, we set a target to ensure that 100% of colleagues involved in procurement activities at Jones Healthcare Group Inc., will be trained on identification of forced labour, modern slavery, and trafficking by 2025. This training commitment was ratified in our Sustainable Procurement Policy on May 1, 2024. We are proud to announce that within two months, this target has been met. All procurement colleagues, as well as their managing directors, have now completed a third-party training course designed to equip them with the knowledge to recognize and prevent exploitative labour practices. This ensures that our workplace is not just compliant with the law but can also serve as a beacon of ethical employment practices.

The training course completed consists of seven modules, centered around: the definitions of forced and child labour; the importance of labour legislation; the penalties and enforcement mechanisms of legislation; and steps to take for compliance.

In Development

As we move forward, we are dedicated to enhancing our supply chain processes with a particular focus on identifying and mitigating the risks of modern slavery. To achieve this, we will establish:

- **Regular Risk Assessments:** Implement systematic and regular assessments to identify potential risks of modern slavery within our supply chain.
- **Key Performance Indicators (KPIs):** Develop and track specific KPIs that will help us measure our progress in mitigating the risks of modern slavery. These indicators will be critical in ensuring accountability and transparency in our efforts.
- **Supplier Engagement:** Engage with our suppliers to ensure they understand and adhere to our ethical standards.
- **Continuous Improvement:** Commit to continuous improvement by regularly reviewing and updating our policies and practices based on the latest insights and developments in combating modern slavery.

This commitment was ratified in our Sustainable Procurement Policy on May 1, 2024, which commits to compliance with all relevant laws and regulations, including International Labor Organization (ILO) standards prohibiting slavery, child labour, and forced labor. Through this policy, all Jones Healthcare

Group Inc. procurement teams commit to establishing criteria for assessing our suppliers' ethical business practices and the elimination of forced and child labour. Furthermore, by 2025, all strategic suppliers and new suppliers with Jones Healthcare Group Inc. must endorse and sign a Supplier Code of Conduct, which includes: requirements for suppliers to not use forced or child labor, either directly or indirectly; adherence to the minimum employment age limit defined by national law or regulation; compliance with relevant ILO standards; procedures for whistleblowing; and penalties and remediation procedures for non-adherence. In addition, we are currently working with a third-party provider to incorporate technology to more readily diagnose risks based on a number of criteria, including political, climate, and geographic factors.

Related Documents

- [JHG Supplier Code of Conduct](#)
- [JHG Sustainable Procurement Policy](#)

Approval and Attestation

In accordance with the requirements of the Fighting Against Forced Labour and Labour in Supply Chains Act (2023) and the requirements of the Modern Slavery Act (2015) (collectively the "Acts"). I attest that I have reviewed the information contained in the report for the entities listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate and complete in all material respects for the purposes of the Acts, for the reporting year listed above.

Signed



Ron Harris, President & CEO
May 31, 2024

I have the authority to bind Jones Healthcare Group Inc.