

McKesson Corporation (“**McKesson**”) publishes this Modern Slavery and Human Trafficking Statement (this “**Statement**”), pursuant to section 54 of the Modern Slavery Act 2015, on its corporate website on behalf of McKesson Strategic Services Limited (“**MSSL**”) for the fiscal year ended 31 March 2021 (“**FY21**”).

MSSL is committed to good corporate citizenship and the highest ethical standards. To facilitate the fulfilment of these commitments, MSSL has established and maintains appropriate measures to safeguard against the occurrence of human rights abuses, modern slavery and related human trafficking within its supply chain, as further detailed in this Statement

BUSINESS AND ORGANISATION

MSSL is a private limited company incorporated in England and Wales. MSSL is a member of the McKesson group and is one of two shareholders in ClarusONE Sourcing Services LLP (“**ClarusONE**”).

McKesson is a global leader in healthcare supply chain management solutions, retail pharmacy, community oncology and specialty care, and healthcare information technology.

ClarusONE, a London-based limited liability partnership organized under the laws of England and Wales, is jointly owned by MSSL and WMGS Europe Limited. ClarusONE provides strategic pharmaceutical sourcing services for its members, namely MSSL and WMGS Europe Limited and their affiliates, to ensure that they have access to generic pharmaceutical products to meet customer demand at a competitive market cost.

MSSL itself does not have any operational business, but only holds participations in ClarusONE. While MSSL has a number of employees, those employees provide services to ClarusONE and are integrated in the ClarusONE organisation.

VALUES AND TRAINING

MSSL, as part of McKesson, takes social responsibility seriously and is strongly committed to respecting applicable international human rights and fair labour practices and explicitly condemns all kinds of modern slavery or human trafficking.

McKesson has implemented a [Code of Conduct](#) which provides the guidelines for MSSL’s interactions with its employees and contractors, as well as with affiliates, and other business partners. The ethical principles that form the basis of the Code of Conduct are at the heart of all decisions made by MSSL.

MSSL’s employees are encouraged to raise concerns including potential violations of McKesson’s Code of Conduct, company policies and applicable laws. McKesson and ClarusONE provide separate mechanisms by which concerns can be raised. This includes an independent third party to which concerns can be raised anonymously. Both McKesson and ClarusONE do not tolerate any form of retaliation for raising concerns in good faith, asking questions or participating in an investigation.

MSSL employees receive periodic web-based and/or face-to-face training to emphasize the importance of acting with integrity and in line with the Code of Conduct and relevant applicable laws and internal policies. MSSL employees providing services to ClarusONE have also received awareness training on the UK Modern Slavery Act and its implications to ensure a high level of understanding of the risks of modern slavery and human trafficking.

ClarusONE is preparing a new ‘Modern Slavery Prevention Policy’ which shall be formally implemented during ClarusONE’s fiscal year ending 31 March 2022, and which will apply to MSSL employees providing services to ClarusONE.

SUPPLY CHAIN AND DUE DILIGENCE

MSSL itself does not have any operational business and, therefore, no direct supply chain. For further information on the ClarusONE supply chain and related due diligence measures, please refer to the [ClarusONE Modern Slavery Act statement](#) for the fiscal year ended 31 March 2021.

COVID-19 PANDEMIC

MSSL recognises the unprecedented challenges that were brought about by the Covid-19 pandemic in FY21 and that have persisted into the current fiscal year as they continue to lead to an increased chance of modern slavery in industry supply chains as businesses continue to adapt to the situation. MSSL has continued to take steps to manage these risks as they have emerged in order to guard against the occurrence of modern slavery within its organisation.

To help prevent the spread of the virus, MSSL has continued to monitor the public health emergency and review its own existing measures in accordance with UK Government guidance. Pursuant to such guidance, MSSL has continued to facilitate homeworking for its personnel during the fiscal year and all non-essential travel and face to face meetings were suspended. To the extent personnel voluntarily attended the office, personnel were required to follow office safety guidelines which complied with current UK Government guidance.

Employees have received regular communications throughout the period to keep them informed about the impact of the Covid situation on MSSL and which measures have been taken to protect the health and safety of the employees. All usual recruitment checks have been carried out virtually and all employees have had continued t access to their usual support or grievance procedures as they remained available online and escalation routes remained fully available.

MSSL's Board of Directors has been kept up to date throughout the pandemic of risk posed by the virus and has been actively involved in determining any necessary adjustments to existing measures to help protect MSSL employees.

EFFECTIVENESS

MSSL believes its efforts to date as outlined in this Statement have been appropriate in helping prevent modern slavery and human trafficking in its organization.

GOING FORWARD

In the upcoming financial years, MSSL intends to take the following further steps to combat the occurrence of modern slavery and human trafficking:

- Continue to monitor the legal landscape within the UK and implement any additional measures, as appropriate.
- Continue to monitor the risk landscape within the context of MSSL operations and adapt measures, as appropriate.
- Maintain workplace safety measures as required to help keep its personnel safe in response to the evolving Covid-19 pandemic.

For additional steps that relate to ClarusONE, please refer to the ClarusONE Modern Slavery Act statement for the fiscal year ended 31 March 2021.

This Statement has been approved by the Board of Directors of MSSL, and the Board has authorized G.B. Thomas, Director, to sign the Statement on behalf of MSSL.

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Signed: 
Name: Bryn Thomas
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Position: Director

Date: 9/22/2021