

**STARK INTERNATIONAL LUX SARL (SIL)
Parent Company (100%) of SERB SAS (France)
SERB SA (Belgium) & SERB Ltd. (UK)
Modern Slavery and Human Trafficking Statement**

Introduction

This Modern Slavery and Human Trafficking Statement relates to actions and activities during the financial year 1 January 2019 to 31 December 2019.

The statement sets down SIL's commitment to preventing slavery and human trafficking in our business activities and the steps that we have put in place with the aim of ensuring that there is no slavery or human trafficking in our own business and supply chains. We all have a duty to be alert to risks, however small. Staff are expected to report their concerns and management to act upon them.

This statement is issued by SIL on its own behalf and on behalf of its 100% subsidiaries SERB SAS (France), SERB SA (Belgium) and SERB Ltd. (UK).

Organisational structure and supply chains

This statement covers the business activities of SIL and its subsidiaries- SERB SAS, SERB SA & SERB Ltd. which are as follows:

SIL is the holding company of the SERB Group, is a group of European pharmaceutical companies, focused on niche specialty pharmaceuticals for human use and specialized in the critical and emergency care, neurology, diagnostic agents and endocrinology.

Its essential activities consist in the acquisition, sale, promotion, distribution, licensing, manufacture sub-contracting, storage and related activities of pharmaceutical products. Product supply is sourced from CMOs established essentially in France, UK, Germany, Sweden and USA.

The Company currently operates directly in Belgium, France, UK, Luxembourg, Germany and Poland and through a network of distributors in around 60 countries over the world. Its activities consist essentially in the distribution of its line of products.

SIL and the SERB Group generally operate, directly and indirectly, in countries where there is limited risk of modern slavery or human trafficking. It has also implemented a set of policies aimed towards engaging in business in an ethical manner and ensuring to the extent reasonably possible that its suppliers, licensees, sub-contractors, advisors and consultants, commit to doing business in a manner compliant with SERB's policies. After initial assessment of the activities of its partners, SERB ensures that all agreements it enters into with such partners, incorporate ethics provisions in general and

modern slavery or human trafficking in particular.

High Risk Activities

There are no activities in which SIL is directly or indirectly related that may reasonably be considered at high risk of modern slavery or human trafficking.

Responsibility for the Company's anti-slavery initiatives is as follows:

- 1.1 Policies: Wahib Geagea, General Counsel and Chief Compliance Officer for SIL and the SERB Group, is responsible for creating and reviewing the Company's Code of Conduct and related policies. The process by which policies are developed is by setting out and regularly updating SERB's Code of Conduct, which is formally notified to each member of the Company, and by organizing training sessions to employees and managers.
- 1.2 Risk assessments: The General Counsel and Chief Compliance Officer for SIL and the SERB Group, is responsible for risk assessments in respect of human rights and modern slavery, by a process of written rules and regulations formally notified to each member of the Company.
- 1.3 The General Counsel and Chief Compliance Officer for SIL and the SERB Group, is responsible for due diligence in relation to known or suspected instances of modern slavery and human trafficking. Each member of the Company is invited to immediately report to the Chief Compliance Officer, any activity or behaviour that raises suspicion, whether within SIL and the SERB Group, or in relation to a particular licensee, sub-contractor, advisor or consultant.

Training

To ensure a good understanding of the risks of modern slavery and human trafficking in our business and supply chains, the Company requires all staff to attend regular training sessions related to ethics.

Policies

The Company is committed to ensuring that there is no modern slavery or human trafficking in our business or our supply chains. This Statement affirms its intention to act ethically in our business relationships.

The following policies set down our approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in our operations:

- 2.1 **Whistleblowing hotline:** The Company encourages all its workers, customers and other business partners to report any concerns related to its direct activities or its supply chains.
- 2.2 **Company Code of Conduct:** The Code of Conduct sets down the actions and behaviour expected of employees when representing the

Company and sets out guidelines encouraging the contribution to sustainable economic and social development.

Due Diligence Processes for Slavery and Human Trafficking

The Company undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. The Company's due diligence process includes building long-standing relationships with suppliers and making clear our expectations of business partners and evaluating the modern slavery and human trafficking risks of each new supplier and invoking sanctions against suppliers in the event of non-compliance with SERB's policies, including the termination of the business relationship.

Performance indicators

Given that there are no activities in which SERB is directly or indirectly related that may reasonably be considered at high risk of modern slavery or human trafficking, the Company does not use formal key performance indicators (KPIs) to measure how effective we are in ensuring slavery and human trafficking is not taking place in any part of our business or supply chains. Our inside out knowledge of our partners enables us to ensure that we are operating in an environment free from modern slavery and human trafficking risks.

This Modern Slavery and Human Trafficking Statement will be regularly reviewed and updated as necessary. The Management Team endorses this policy statement and is fully committed to its implementation.

This Modern Slavery and Human Trafficking Statement has been approved and authorised by:

Name: Jeremie Urbain
Position: Managing Director

Signature: 