

Modern slavery statement for financial year ended 31 December 2017

This statement is made by Concordia International Rx (UK) Limited on behalf of itself and all companies in the Concordia International Corp. group (collectively referred to as “Concordia”).

Concordia is committed to maintaining the highest ethical standards in its dealings with all parties involved in the company’s business activities, including employees, vendors, contractors and third parties. As an example of this commitment, Concordia was the first pharmaceutical company worldwide to be certified by the British Standards Institution for its anti-bribery management system (BS 10500).

This statement sets out the steps that Concordia has taken, and is continuing to take, to ensure that modern slavery, human trafficking or any form of indentured servitude are not taking place in any of its supply chains or in any part of Concordia’s own business.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. 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 ensure that all our business operations are conducted in accordance with applicable laws, regulations, industry codes and norms.

Our business

We operate an international specialty pharmaceutical business, comprising a broad portfolio of medicines that are sold to wholesalers, hospitals and pharmacies in over 90 countries. Concordia specializes in the acquisition, licensing and development of off-patent prescription medicines, which may be niche, hard-to-make products. Concordia’s medicines are manufactured by a network of third party manufacturers and sold through a combination of direct sales and third party distribution channels. Concordia’s diversified product portfolio consists of more than 200 products, representing a variety of dosage strengths, formulations and geographic markets and covering a range of therapeutic categories, including endocrinology, neurology, ophthalmology and urology.

Our policies

We operate a number of policies to ensure that we conduct our business in compliance with all applicable laws and regulations and in an ethical and transparent manner. These include:

1. A Code of Conduct, applicable to all parts of the Concordia International Corp. group.
2. An Anti-Bribery and Corruption Policy, together with supporting Standard Operating Procedures as described below.
3. Recruitment policies – our policies set clear standards and processes regarding the selection and appointment of all staff, including conducting eligibility as well as background checks checks to safeguard against human trafficking and against individuals being forced to work against their will.
4. A Whistleblowing policy. Openness is one of our core values. All employees know that they can raise concerns about how colleagues are being treated, or about practices within our business or supply chain, without fear of reprisals.

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In addition, integrity is one of our core values and forms a part of every employee's performance management process.

Appointment and Management of Business Partners

Our Anti-Bribery and Corruption Standard Operating Procedures ("SOP") apply to all legal and natural persons working for us including, but not limited to, commission-based sales agents, distributors and resellers ("Partners"). The SOP sets out procedures which must be followed to ensure the orderly appointment and management of all Partners and to enable risk-based and informed decisions to be made on the appointment and management of Partners.

We regularly conduct training for our employees on the principles of the Modern Slavery Act. This training is included in employees' induction training and in annual refresher training.

Our performance indicators

We take a range of measures to monitor the effectiveness of the steps that we are taking to ensure that slavery and/or human trafficking is not taking place within our business or Partners, including:

- regular dialogue with our business partners;
- ongoing performance management processes with our employees; and
- regular review of the effectiveness of our policies and process.

Looking ahead

Concordia is committed to continuously improving the way it manages its business operations. As part of this commitment we will continue to review and improve our policies, processes and controls to ensure that modern slavery and human trafficking do not take place in any of our supply chains or our own business.

Approval for this statement

This Statement has been approved by the Board of Directors of Concordia International Rx (UK) Limited on behalf of that company and its UK affiliates which carry on business in the UK.

A handwritten signature in blue ink, appearing to read "Adeel Ahmad", is written over a dotted line.

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Adeel Ahmad
Director

Date: 25.06.2018
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