

BioScript Solutions Ltd. Canadian Modern Slavery Act Report 2023

Introduction

This report has been published pursuant to subparagraph 11(4)(b)(ii) of the Canadian Fighting Against Forced Labour and Child Labour in Supply Chains Act (the “Act”). Each of the following reporting entities named below (together, the “Reporting Entities”) are required to submit a report under the Act:

- Andrew and David Wholesale Ltd. (“A&D Wholesale”)
- BioScript Pharmacy Ltd. (“BioScript Pharmacy”)

This joint report sets out the steps that the Reporting Entities have taken to prevent forced labor and child labor (each as defined in the Act and together referred to herein as “modern slavery”) in their operations and supply chains during the fiscal year ended October 31, 2023. Each of the Reporting Entities is a company owned by BioScript Solutions Ltd. (“BioScript Solutions”) and falls within BioScript Solutions’ compliance program, which is discussed throughout this statement. As such, the policies and procedures of BioScript Solutions to assess, manage, and mitigate risks of modern slavery in our operations and supply chain described below apply to the Reporting Entities.

Our Business and Supply Chains

BioScript Solutions is a Canadian pharmacy company that provides care to patients with chronic illnesses and rare diseases by offering access to complex drug therapies and delivering full-service specialty care solutions at every stage of their treatment journey. Headquartered in Moncton, New Brunswick, BioScript Solutions supports patients by working with manufacturers, physicians, and health care practitioners as well as insurance providers.

BioScript Solutions employs a diverse team of over 1000 employees and operates over 100 Coverdale Clinics and 13 BioScript Pharmacies nationwide. Through our network of clinics, pharmacies, and patient support programs, we serve thousands of Canadians every year.

BioScript’s culture is rooted in the fundamental value of doing what’s right for the patient that the co-founders established. The co-founders are still very involved in the organization and still share the same values with team members today. BioScript is focused on ensuring engagement at all levels of the organization with a firm belief that a highly engaged team will deliver the most positive experience for BioScript patients. With a focus on engagement, regular surveys are sent to all team members to measure overall engagement, including the opportunity for team members to raise concerns confidentially. Results are available to all leaders to review allowing them to efficiently address any areas of concern and plan initiatives that will have a positive impact.

With more than a decade of experience working solely with specialty medications, our BioScript Pharmacies have in-depth knowledge about all aspects of specialty and biologic drugs: how they work, how to handle and store them, and the best ways to support patients to whom they are prescribed. Our

13 pharmacies are located throughout the country and offer timely, secure, and free-of-charge delivery to a patient's home, physician's office, a Coverdale Clinic or any other location within Canada.

In 2012, we opened A&D Wholesale, our own wholesale distribution center, to distribute product to all our pharmacies. Our A&D Wholesale operation is experienced in distributing cold chain and temperature-sensitive specialty and biologic pharmaceuticals. We ensure hospitals, health care providers, and pharmacies across Canada receive the medications their patients depend on quickly and reliably.

Our network of Coverdale Clinics provides patients with a safe, comfortable environment to receive specialty medications by infusion or injection. We take a personalized approach to patient care that includes education and counselling to better support medication adherence and help achieve the best outcomes possible. Our nurse-led clinics are staffed by a team of registered nurses with extensive experience in administering specialty and biologic drugs intravenously, subcutaneously and intramuscularly.

Finally, our NavieGo patient support programs help patients navigate their treatment process. We work closely with the Canadian offices of pharmaceutical manufacturers to support their therapies and create an optimal experience for patients who've been prescribed specialty drugs. By simplifying the process, providing expert guidance, and tailoring our touchpoints to the needs of the person and the profile of the medication, we keep the patient at the center of the treatment journey every step of the way.

Our product supply chains are predominantly domestic, with all direct suppliers for our Reporting Entities located in Canada.

About BioScript Pharmacy

In 2009, the first BioScript Pharmacy opened as a direct result of reimbursement, cold-chain management, and clinical challenges experienced by patients and prescribers accessing specialty therapy through retail and community pharmacies. Today, BioScript Pharmacy has at least one location in each Canadian province dedicated to managing the clinical and dispensing needs of patients prescribed specialty medications. This national network of pharmacies allows for convenient dispensing to any patient anywhere in Canada and can accommodate appointments in a clinic, hospital or doctor's office. BioScript Pharmacy receives substantially all its specialty medications from A&D Wholesale. BioScript Pharmacy has approximately 465 employees, the majority of which are either licensed pharmacists, pharmacy technicians or pharmacy staff.

About A&D Wholesale

A&D Wholesale focuses on the warehousing and distribution of temperature-sensitive, specialty and biologic drugs to BioScript Pharmacies and hundreds of other pharmacy and hospital accounts. Distributing both refrigerated (2-8°C) and controlled ambient temperature products (15-25°C), we have a robust and closely monitored quality control system with 24/7 temperature monitoring. Governing SOPs combining cGMP and GDP requirements as well as industry best practices ensure drug integrity from warehouse to pharmacy, and also serve to limit the risk of modern slavery. A&D only purchases drugs from Canadian license holders or the Canadian office of manufacturers and wholesalers and does not

import drugs directly from international sources. A&D Wholesale has approximately 30 employees, predominantly working in our warehouse and corporate office in Ontario.

Risks of Modern Slavery in Operations and Supply Chain

We consider the Reporting Entities' risk of modern slavery in their operations to be low due to our domestic direct supply chain, the highly regulated nature of the Canadian pharmacy industry, and the strength of our internal employment policies and procedures. We believe the risk of modern slavery occurring at BioScript Solution's suppliers, including the Reporting Entities' suppliers, in connection with those suppliers' providing goods and services to be relatively low due to the policies and procedures we have in place to mitigate those risks, as described in this report, as well as the Canadian regulatory landscape for healthcare companies and drug manufacturers. We also strive to have long-term, collaborative relationships with our most significant suppliers, which we believe further mitigates modern slavery risks. We actively participate in comprehensive supply chain audits in our industry to assess the risk of modern slavery and continue to develop ambitious ESG targets. We believe that the highest risk area, as it is for most other companies in our industry, is that modern slavery could occur without our knowledge in violation of our policies in upper tiers of the supply chain from which we may be several levels removed. The actions described below outline our efforts to assess and manage these risks and where appropriate engage suppliers in remediation and continuous improvement.

Policies and Contractual Controls

At BioScript Solutions, we are steadfast in our commitment to fostering an ethical, humane, and responsible workplace environment, as well as the fair and equitable treatment of all peoples, particularly those involved in our supply chains. Our Reporting Entities comply with all applicable employment laws in the Canadian provinces where we have operations, including age of work and minimum wage requirements.

Forced Labour and Child Labour Policy

Our Forced Labour and Child Labour Policy serves as a testament to our dedication to upholding the highest standards of integrity, respect for human rights, and social responsibility. This policy establishes requirements for conduct related to human rights and labor standards, including those relating to modern slavery. This policy is informed by internationally recognized instruments setting forth human rights and labor standards. In developing this policy, we have considered, among other things, the International Bill of Human Rights, the United Nations Guiding Principles on Business and Human Rights, the Ten Principles of the United Nations Global Compact, and the International Labour Organization Declaration on Fundamental Principles and Rights at Work. The policy complements our Employee Code of Conduct, other BioScript Solutions policies, and the contractual controls discussed below, which contain additional requirements addressing modern slavery.

Our Forced Labour and Child Labour Policy states that BioScript Solutions, including its subsidiaries and affiliates, is committed to maintaining a workplace that is free from forced labour and child labour and will comply with all applicable federal and provincial laws and regulations. Among other things, the policy indicates the following expectations for BioScript Solutions personnel:

- no coerced, bonded, indentured, or prison labor; all work is to be voluntary without fear of abuse and employees are not to be required to lodge deposits of their identity papers;
- no child labor;
- compliance with local and national minimum wage, overtime, and benefits laws and regulations;
- working hours consistent with local and national laws and regulations and not otherwise excessive;
- a healthy, clean, and safe work environment;
- compliance with applicable immigration laws and regulations;
- freedom of association; and
- compliance with applicable laws and regulations, including those related to employee records and employee privacy.

Further, this Forced Labour and Child Labour Policy specifies that BioScript Solutions complies with all provincial and federal labour standards legislation and regulations, including those related to age of work, and that BioScript Solutions will regularly assess and monitor its supply chain and business operations to identify and address any risks of modern slavery.

Contractual Controls

We include provisions in our standard supplier contracts that require compliance with modern slavery prohibitions and other applicable legislative requirements. Further, our standard supplier and partner contracts include compliance clauses that capture modern slavery and require our business partners to comply with all applicable Canadian and provincial laws and regulations.

ESG Committee

BioScript Solutions has a committee lead by senior leadership to help assess and address environmental, social, and governance (“ESG”) risks, including risks relating to modern slavery. The committee’s ongoing process is designed to assess ESG risks, engage suppliers and stakeholders in remediation and continuous improvement, and exit engagements where necessary. Our approach to managing the risk of modern slavery forms part of our broader efforts to respect human rights.

In support of our ESG initiatives, we have established a Diversity, Inclusion, Belonging, and Equity committee who meet monthly with a mission to promote diversity and foster a culture of respect and belonging through dialogue, education, and community engagement.

As described above, rather than immediately terminating suppliers that do not meet all our supplier expectations, we generally will seek to help our suppliers remedy identified issues and continuously improve. We hope that by doing this, we prevent additional harm to the employees of such suppliers and the loss of income to the most vulnerable families.

Employee Training

All BioScript Solutions team members receive training yearly on our Forced Labour and Child Labour policy and are provided with appropriate confidential reporting mechanisms to report any concerns or violations related to modern slavery either with a supplier or within a Reporting Entity.

Raising Concerns

BioScript Solutions prioritizes confidentiality and urges team members, suppliers, and other stakeholders to confidentially report any concerns or violations related to forced labour or child labour, as well as any other business practice or compliance concerns. Employees, suppliers (and their employees), and other third parties can report any concerns or issues, including claims of forced or child labor, to BioScript Solutions confidentially. A confidential email is included in BioScript Solutions' policies and is communicated to team members and third parties to confidentially and, if desired, anonymously, raise issues about the business conduct of BioScript Solutions and any issues regarding its supply chain.

In addition to the confidential reporting methods above, BioScript Solutions holds monthly company-wide meetings to engage with team members nationally. Team members receive updates on business and have the opportunity to ask questions and raise concerns in an open forum.

BioScript Solutions does not tolerate any retribution or retaliation taken against any individual who has, in good faith, sought out advice or has reported questionable behavior or a possible violation of any policy, applicable law or regulation.

Assessment of Effectiveness

BioScript Solutions reviews the effectiveness of our modern slavery risk management program by assessing suppliers' ability to detect and mitigate modern slavery risk, and through the investigation of any reports of modern slavery. BioScript Solutions will evaluate remediation actions taken in response to any such reports and engage with stakeholders to assess their effectiveness. We recognize that as a complex and hidden issue, modern slavery requires more effort to uncover, particularly in higher tiers of our supply chain. As we continue our due diligence activities we will consider additional ways to assess the effectiveness of our actions. BioScript Solutions is committed to continuous improvement and to fostering compliance with our suppliers and stakeholders.

Attestation

In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in the report for the Reporting Entities subject to the Act. 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 Act for the reporting year listed above.



Lisa Matar
Chief Executive Officer
BioScript Solutions Ltd.

May 24, 2024