

CENCORA'S UK MODERN SLAVERY ACT DISCLOSURE STATEMENT

Cencora, Inc., on behalf of its UK subsidiaries (collectively, “Cencora”), which supply goods and services in the UK, is committed to prohibiting modern slavery and human trafficking in its business and supply chain. This disclosure statement under Section 54 of the UK Modern Slavery Act 2015 (the “Act”) describes the steps that Cencora is taking in support of that commitment.

Our People and Our Code of Ethics and Business Conduct

Our Code of Ethics and Business Conduct provides the foundation for our business culture and underscores our commitment to conducting our business with integrity, accountability and respect for applicable laws. Our Code provides guidance for our employees, suppliers and other business partners on the ethical principles that apply to all of our business activities and relationships. The Code reflects our zero-tolerance policy on ethical violations, and compliance with the Code and all applicable laws and regulations is a condition of employment at Cencora.

Our Code reflects Cencora’s strong commitment to providing an equal opportunity work environment where team members are treated with fairness, dignity and respect. Our managers are expected to create a work environment free from harassment and intimidation and where integrity and ethical business conduct are recognized and valued. The foundation of our Code is the obligation to comply with all applicable legal requirements, including those relating to workplace safety and human rights.

Our Code also includes specific references to the prohibitions against modern slavery and human trafficking.

Ethics and Compliance Training and Reporting Mechanisms

Cencora team members receive training on the Code of Ethics and related ethics and compliance policies, including our policies relating to a respectful and safe work environment. In addition to the resources available to employees through the Code and its underlying compliance policies, Cencora has established various mechanisms through which employees and business partners can report concerns about compliance issues to the company without fear of retribution.

One such mechanism is an ethics reporting hotline managed by an outside vendor which enables employees and third parties to report concerns about compliance issues relating to Cencora's activities on a confidential basis, and reporters can remain anonymous if they wish. All reports are investigated in a timely manner.

Cencora regularly assesses whether its training materials should be updated to reflect its commitment to combating modern slavery and human trafficking.

Our Supply Chain and Our Supplier Code of Conduct

As an industry leader with over 46,000 team members, we touch nearly every aspect of the pharmaceutical supply chain and recognize that our responsibility includes conducting our business ethically and with uncompromising integrity. We work hard every day to ensure that all applicable laws, regulations and applicable industry standards are followed, and we expect the same from others in our supply chain.

Our Supplier Code of Conduct sets forth the basic expectations with respect to various ethics and compliance matters that we have established for our suppliers, agents, vendors, subcontractors and other business partners that provide goods or services to, or on behalf of Cencora.

Many of our suppliers are required by contract to comply with applicable laws and provide us with written certifications that reflect their commitment to abide by the ethical principles set forth in our Supplier Code of Conduct. Cencora is engaged in various initiatives to expand the number of third-party suppliers that are required to provide such contract commitments and certifications.

Due Diligence and Audits

Cencora has devoted substantial resources to conducting due diligence and compliance audits of its key business partners, including certain third-party suppliers and other vendors. In certain circumstances, these procedures include physical site visits and background checks.

We have a corporate sanction screening program that screens all vendors and suppliers for government sanctions, regulatory and anti-bribery and corruption violations.

In addition, we have a targeted due diligence program for third parties that provide goods or services on behalf of Cencora. This program includes comprehensive due diligence covering a large number of information sources, including negative media.

We continue to evaluate the extent of any exposure we may have to modern slavery or human trafficking risk in our supply chain. Based on the results of that risk assessment, we will establish appropriate due diligence and auditing procedures with third-party suppliers.

This disclosure statement is issued pursuant to section 54(1) of the Modern Slavery Act 2015 for the financial year ended 30 September 2023.

This disclosure statement is issued on behalf of the following UK subsidiaries of Cencora: Alcura UK Limited, Beachcourse Limited, Alliance Healthcare (Distribution) Limited, Alliance Healthcare Management Services Limited, Alliance UniChem IP Limited, Alloga UK Limited, Almus Pharmaceuticals Limited, OTC Direct Limited, World Courier Ground (Europe) Limited, World Courier Logistics (UK) Limited, World Courier Management Limited, World Courier (U.K.) Limited, AmerisourceBergen International Technology Services Limited, Centaur Services Limited, MWI Buying Group Limited (formerly known as St. Francis Limited), Vetspace Limited, MWI Supply (UK Acquisition) Limited, MWI Supply (UK Holdings) Limited, MWI Supply (UK) Limited, Awesome People Company Limited, Blue Reg Pharma Consulting Limited, MorExcellent Limited, NeoHealthHub Limited, NeoNavitas Limited, NeoOptima Limited, NeoSypher Limited, Net Solutions Europe Limited, PharmaLex UK Services Limited, PhlexGlobal Limited, Regulis Consulting Limited, Vintura UK Limited, Xcenda (UK) Limited and AB Finco Limited.

This statement was approved on 15 March 2024 by the board of directors of each of AmerisourceBergen UK Holdings Limited and MWI Veterinary Supply Co. on behalf of the companies named above.

This statement has been signed by Elizabeth Campbell, Executive Vice President and Chief Legal Officer of Cencora, Inc.

Elizabeth S. Campbell
Elizabeth S. Campbell (Mar 19, 2024 11:57 EDT)

Elizabeth Campbell