



Modern Slavery and Human Trafficking Statement for the financial year ended 31 December 2018

The UK Modern Slavery Act 2015 requires commercial organisations carrying on business in the UK with an annual turnover of £36 million or more to publish a slavery and human trafficking statement setting out the steps they have taken to ensure that there is no slavery or human trafficking in the business or supply chains.

Our business

Circassia is a specialty pharmaceutical company focused on respiratory disease. Our growing commercial organization promotes our innovative asthma management products directly to specialist physicians in a number of key markets, and we market the chronic obstructive pulmonary disease (COPD) product Tudorza® in the United States. Recently, we significantly expanded our commercial platform in China, launching our own direct sales team, and in March 2019 we received US approval for our COPD combination treatment Duaklir®. We are working to expand our portfolio further through in-licensing, partnering or acquisition, and recently we acquired the commercial rights to a ventilator-compatible nitric oxide product in the US and China.

Circassia has its head office in Oxford, United Kingdom. We have approximately 400 employees, and our employees are located in a number of countries including the United Kingdom, the United States, Germany, China and Sweden.

Our products are manufactured for us by a small number of specialist third-party manufacturers based in Europe and Japan.

We have a direct presence in certain key markets including the United Kingdom, United States, Germany and China. Through our network of third-party distributors, our products are sold in over thirty-five additional markets.

We operate our business in accordance with our values, under the banner of “PRIDE”:

- **P**assion – our passion for delivering products to improve patients’ lives energises us to attain our goals
- **R**ecognition – we recognise and acknowledge the contribution of teams and individuals in achieving our goals
- **I**ntegrity – we act with honesty, integrity and fairness at all times and always strive to do the right thing
- **D**rive – we set ambitious goals and go for them, believing this drives extraordinary behaviour
- **E**ffectiveness – we understand key business drivers and manage our resources effectively

Our policies

As part of Circassia’s commitment to our corporate responsibilities, we include our passion for human rights, safety and health, environmental protection and business ethics as a focus in our PRIDE values.

We recognize that the physical world in which we live and our role in the global community as a business, an employer and a world citizen urges us to embed a culture of compliance, ethics and integrity throughout our internal organization and to monitor and demand the same high standards of our external partners and suppliers worldwide, which we do through our Code of Conduct, our policies, including our partner code of conduct, procedures and our actions.

In our Code of Conduct, we affirm our adherence to non-harassment and diversity, to the principles set out in the UN Guiding Principles of Human Rights, the International Labour Organization’s standards regarding child labour and minimum age and the UK Modern Slavery Act.

Any member of staff who becomes aware of any action by an employee or by any member of our external partners that violates our policies or restricts our ability to perform our required duties in this area is required to report the concern to the Compliance Department or the Human Resources Department. External suppliers are required to report any concerns that they might have to the department responsible for Supply Chain management.

Circassia Pharmaceuticals plc

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Registered office: The Magdalen Centre, Robert Robinson Avenue, Oxford Science Park, Oxford, Oxfordshire, OX4 4GA, England.
Registered in England under company number 05822706. VAT number: GB 884 2574 88.

Training

All staff are trained on our Code of Conduct when they join the organisation and also at intervals subsequently.

Steps we are taking to manage the risks of slavery and human trafficking

Through the contracts that we have with our business partners, we set out the ethical standards that we require all of our business partners to operate to. We also require our external suppliers to address and report to us any issues relating to slavery and human trafficking.

Looking ahead

We are committed to continuously improving the way we run our business operations. We will continue to review our policies, processes and controls to ensure that modern slavery and human trafficking do not take place in our supply chains or in our own business.

Approval of this statement

This statement has been approved by the Board of Directors of Circassia Pharmaceuticals PLC on behalf of the company and on behalf of its affiliates which carry on business in the UK.



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Steven Harris
Chief Executive Officer

Date: 29th May 2019

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