



HUMAN RIGHTS POLICY

Clinigen Group plc
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RIGHT MEDICINE RIGHT PATIENT RIGHT TIME



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Overview

We believe governments are responsible for defining and enforcing a legal human rights framework that accords with international laws and agreements, such as the Universal Declaration of Human Rights. As a global business, we recognise that we have a role to play in upholding human rights and in addressing adverse human rights impacts where we are in a position to influence.

Our commitment

We support the UN Guiding Principles on Business and Human Rights. We are committed to upholding and respecting human rights both within our business and in that of our third parties. In line with the UN Guiding Principles on Business and Human Rights (Guiding Principles), we base our human rights policy commitment on the International Bill of Human Rights and the principles concerning fundamental rights set out in the International Labour Organization's Declaration on Fundamental Principles and Rights at Work. We are committed to respecting internationally recognised human rights relevant to our operations.

As an employer we are:

- committed to providing a fair salary and good conditions of employment.
- committed to providing a healthy, safe, and secure workplace for all employees and contractors.
- opposed to discrimination at work and committed to promoting inclusion and diversity.
- committed to promoting the personal development and dignity of every individual employee;
- respectful of the right of employees to join an independent trade union, the right to collectively bargain, and of freedom of association.
- opposed to all forms of slavery and exploitative child labour and will work with appropriate partners to address this problem responsibly wherever we encounter it.

Our policies and practices in more detail

No use of child labour

There shall be no recruitment of child labour by Clinigen and/or its business partners / suppliers / customers. This includes:

- No employment of workers who are younger than the country's legal minimum age for employment or the age established for completing compulsory education. Children under the age of 15 must not be employed in any circumstances. Robust age verification checks are in place to ensure this expectation is met.
- Young workers (those under 18 years of age but above the legal working age) are still growing and developing. They are less experienced and more vulnerable than adult workers to being exploited, injured or made ill from their job. For this reason, young workers are afforded extra protection and must not be employed in hazardous work – that which could jeopardise their physical, mental or moral well-being. This includes (but is not limited

to) working at night, working overtime, being exposed to chemicals, pesticides, machines or tools, dust or excessive cold, heat or noise.

- Workers under the age of 18 are subject to an appropriate risk assessment and regular monitoring of their health and working conditions.

No use of forced labour

All work must be conducted on a voluntary basis, not under threat of any kind. Prison, indentured, bonded or otherwise involuntary labour is prohibited. Workers must not be required to lodge original identification papers or monetary deposits on starting work. Workers are able to leave the company after reasonable notice, the period of which should be agreed upon engagement, and receive all owed salary.

A safe and healthy workplace is provided

All workers are provided with clean and safe conditions in all work and break facilities. Workers have access to clean toilet facilities, potable water, and if applicable, hygienic food storage. Adequate steps to prevent accidents and injury arising out of, associated with, or occurring during work, are taken by minimising the causes of occupational hazards. In the event of an occupational accident or incident, emergency healthcare is provided to workers.

Health and safety information and training is provided to workers so they are able to understand the hazards, risks and control measures associated with their job.

A member of our Executive Management Team has been assigned responsibility for health and safety. Health and safety management systems have been implemented with clearly defined accountabilities for maintaining them.

No discrimination

There is no discrimination in hiring, compensation, access to training, promotion, termination or retirement based on race, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation.

All of our workers are treated with respect and dignity. The employment relationship is based on the principle of equal opportunity and fair treatment. This means that workers are not discriminated against based on race, colour, religion, ethnicity, disability, gender, sexual orientation or gender identity, political affiliation, union membership or marital and/or pregnancy status in any hiring or employment practices.

No cruel or abusive treatment

Clinigen provides a workplace free of harsh and inhumane treatment, including any corporal punishment, mental, physical, sexual or verbal abuse and no threat of any such treatment or other forms of intimidation.

Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation is prohibited. Conduct of this nature will be dealt in compliance with Clinigen's Grievance and Disciplinary Policy and in line with local legislation.

Every employee is treated with respect and dignity.

Clinigen operates a clear Freedom to Speak Up policy [available from this page](#). The policy is made available to all workers so that they can report a breach of policy or other unlawful conduct.

Fair wages and benefits

Wages and benefits paid for a standard working week meet, at a minimum, national legal standards or industry benchmark standards, whichever is higher. Wages should always be enough to meet basic needs and to provide some discretionary income.

All workers are provided with written and understandable information about their employment conditions in respect to salaries / wages before they enter employment and about the particulars of their salaries / wages for the pay period concerned each time that they are paid.

Deductions from wages as a disciplinary measure shall not be permitted nor shall any deductions from wages not provided for by local law be permitted without the expressed permission of the worker concerned. All disciplinary measures are recorded.

All third parties must pay at least the statutory minimum wage, or a fair representation of the prevailing industry wage, and provide all legally mandated benefits and paid leave. Wages should always be enough to meet basic needs and to provide some discretionary income.

A transparent process must be established to ensure that workers are compensated in a timely manner and fully understand the wages that they receive.

Working hours must not be excessive

Clinigen understands the importance of ensuring all employees maintain a healthy work-life balance but at the same time there may be occasions in all business areas where extra hours are required and ask workers to be flexible in this regard. Clinigen follows all applicable laws regarding working hours, break times, days off, holidays, healthy working environments, and overtime in each region we operate in.

Freedom of Association

All workers, without distinction have the right to establish and join groups for the promotion and defence of their interests. Workers' representatives must be free to carry out their representative functions in the workplace.

Clinigen adopts an open attitude towards the activities of trade unions and their organisational activities.

Workers representatives are not discriminated against and have access to carry out their representative functions in the workplace.

Where the right to freedom of association and collective bargaining is restricted under law, the employer facilitates, and does not hinder, the development of parallel means for independent and free association and bargaining.

Disciplinary and grievance procedures

Written disciplinary procedures have been established and explained to workers in terms that are clear and understandable to them. Disciplinary and/or performance management actions are recorded and explained to workers. Workers have the right to trade union or other appropriate representation as part of this process.

A grievance mechanism for workers to raise occupational concerns has been established and outlined in Clinigen's Employee Handbook. This mechanism is accessible, understandable, and transparent to workers. Issues raised will be dealt with promptly by an appropriate level of management and feedback should be provided to those concerned, without any reprisal.