

CLINIGEN

CLINIGEN LIMITED

Modern Slavery Statement

FINANCIAL YEAR ENDING 30 JUNE 2022

Executive summary

Introduction

This statement is made in accordance with section 54(1) of the Modern Slavery Act 2015 and constitutes Clinigen Limited's ("Clinigen") modern slavery and human trafficking statement for the financial year from 1st July 2021 to 30th June 2022.

It has been approved by Clinigen's Board and Executive Management Team.

Commitment

Clinigen and its subsidiaries is committed to carrying out business responsibly, which includes ensuring that modern slavery and human trafficking are not taking place in any part of our business or supply chain. In addition, as a responsible business, we recognise the importance of engaging with the companies in which we partner to encourage them to take steps to adopt responsible supply chain processes.

This statement is intended to provide details of the steps we have taken as a business during the last financial year towards ensuring that modern slavery and human trafficking are not taking place in our organisation, or in our supply chain.

While the risk of modern slavery and human trafficking is relatively lower in the highly regulated pharmaceutical sector, we recognise that this responsibility also extends to our business relationships. We have established and maintain systems and controls to safeguard against modern slavery and related human trafficking in our supply chain.

1. Business overview

1.1 What we mean by 'our business' and 'our operations'

Clinigen is a global pharmaceutical products and services company with a unique combination of businesses focused on providing access to medicines to improve the quality of people's lives around the world. We are the global leading experts, trusted by both pharmaceutical and biotech companies and healthcare professionals, in providing access to medicines throughout the lifecycle of a medicine, clinical trials, unlicensed and commercial supply.

Clinigen is headquartered in the United Kingdom ("UK") and has operating entities incorporated in the UK, mainland Europe, Japan, Hong Kong, Malaysia, Singapore, South Korea, Australia, New Zealand, South Africa, and the USA.

1.2 Our supply chains

Our supply chains include:

- Raw material/Active Pharmaceutical Ingredient (API) suppliers;
- Componentry suppliers (packaging, vials, etc);
- Contract Manufacturing Organisations (CMOs);
- Pharmaceutical and Biotechnology companies;
- Freight forwarders;
- Warehouse storage; and,
- Distributors.

2. Our policies on modern slavery and human trafficking

2.1 Operations

Our **Human Rights & Anti-Slavery Policy** sets out our position in line with internationally recognised human rights principles, which include modern slavery. It is displayed in our offices, is hosted on our corporate website, and is circulated annually via our Learning Management System (“LMS”) to employees. All employees are required to confirm annually that they have read and understood the Policy.

The Policy is embedded in our culture through our global Employee Handbook (Clinigen Compass) and sets the tone from the top.

Accountability for human rights and modern slavery relating to our business resides jointly with the Chief Legal, Compliance & ESG Officer and Chief People Officer. Responsibility for the day-to-day management of the programme is split by the HR and Legal, Compliance & ESG Departments. An annual review of its effectiveness is conducted as part of preparing this statement.

This statement is reviewed and approved by the Executive Management Team.

Internal Audit have reviewed the information in this Statement and the processes supporting the disclosures made within the statement.

2.2 Third parties (suppliers and clients)

We include contractual obligations in all our contracts to comply with the Modern Slavery Act 2015.

We acknowledge, however, that: i) no contract or Policy, can address every situation that a third-party supplier/client may encounter; and ii) contractual obligations do not guarantee compliance. Accordingly, the Human Rights and Anti-Slavery Policy and our supplier contracts/agreements are not a substitute for a suppliers/client’s own accountability and responsibility to exercise good judgement and proper business conduct.

As set out in our Human Rights and Anti-Slavery Policy, where a violation of one or more internationally recognised human rights is identified, we would work with all parties involved to investigate the root cause and take appropriate steps with the third party to prevent recurrence. Ultimately, if we felt that a third-party providers response was unsatisfactory, we would consider terminating the contract.

3. Due diligence

We communicate our expectations to employees and third-party service providers/suppliers with regards to human rights and modern slavery and use a range of mechanisms to ensure that we can monitor standards and identify instances of modern slavery in both our operations and supply chain, outlined in sections 3.1. and 3.2 below.

3.1 Operations

Our key asset is our people, so we have processes in place which enable us to create a safe, fair and inclusive working environment. All our employees are asked annually to declare that they have read and understood the Employee Handbook (“Clinigen Compass”), which sets out the expected behaviours of our people.

Our Global Freedom to Speak Up Policy and anonymous reporting portal is available to any employee who have concerns about business conduct or suspected unethical behaviour, including

instances of modern slavery. Employees are made aware of the anonymous reporting portal through the Global Freedom to Speak Up Policy and an annual communication on Clinigen Connect (intranet). All reports are investigated by the Legal, Compliance & ESG Department.

In 2023, we plan to introduce targeted training on modern slavery, aimed at raising overall awareness and addressing potential risks related to the products and services we provide. We will also introduce a new employee Code of Conduct in 2023 which will include modern slavery information.

2.2 Third parties (suppliers and clients)

We are continuing to develop our approach to Third Party Risk Management (TPRM), to ensure we can consistently assess risks of human rights, modern slavery, and human trafficking in our supply chain. The implementation of a TPRM platform is planned in the next 12 months which will enable greater (automated) screening of third parties. This forms part of our continuous improvement programme and wider Environmental, Social, Governance (ESG) Strategy.

4. Risk assessment and management

The pharmaceutical and life sciences sector is typically considered a relatively low risk sector for modern slavery. Nonetheless, we have strong identification and mitigation processes in place for both reputational and regulatory risks.

To identify potential risk areas, we have conducted a desk-based analysis of our operations and supply chain. The results of which are set out below:

4.1 Global Slavery Index Analysis 2022

Modern slavery is a complex issue that can manifest at multiple tiers of the supply chain. To assess modern slavery risk, we have considered several globally recognised indices in our risk evaluation process and consulted other sources such as the **Global Slavery Index** to help determine areas of focus. To identify the business activities with greater exposure to modern slavery risk, we have considered the following factors:

- Reliance on low skilled, seasonal, and/or temporary workforce (low risk)
- Hazardous or undesirable work (low risk)
- Presence of migrant workers across the supply chain (low risk)
- High risk sectors we work with (low risk)
- Long, complex, or non-transparent supply chains (medium risk)
- Presence of child labour (low risk)
- Country risks i.e., poverty, conflict, weak enforcement of international human rights standards (using the Global Slavery Index).

Based upon our risk assessment and analysis, we believe that the risk of modern slavery and human trafficking in our directly employed workforce is **low**. This is due to the highly regulated nature of our industry, our employees being largely educated or skilled, or undertaking work in controlled and validated environments where there are established policies and processes. We have not assessed any high-risk types of work (i.e., seasonal, low-skilled, temporary) or found any vulnerable groups (migrant workers, refugees, women, or children) within our existing supply chain.

Our exposure to the risk of modern slavery and trafficking marginally increases when we engage with third parties, particularly in categories such as Personal Protective Equipment (PPE),

manufacturing, and our distribution and logistics network. In addition, as a global supplier of hard-to-reach medicines we recognise that our supply chain may operate in countries that may be more vulnerable to human rights abuses. For instance, in the last three years we have provided access into 128 countries for patients with unmet medical needs, of which 65 were developing countries where access to important medicines can be hugely delayed and, in some cases, would never happen.

4.2 Materials and Commodities assessment

Use of materials and commodities within our value chain, is also considered to be **low risk**, both in the prevalence and vulnerability to modern slavery abuse. We have made this assessment utilising the US Bureau of International Labor Affairs (ILAB) list of goods that are at higher risk of being produced by child labour or forced labour (<https://www.dol.gov/agencies/ilab/reports/child-labor/list-of-goods>).

To mitigate and help manage our zero-tolerance policy for any such abuses we ensure our contracts require suppliers to follow statutory requirements in the country in which they operate, including where appropriate, any applicable laws regarding human trafficking, forced labour and other forms of modern slavery.

5. Employee training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, targeted training will be rolled out in 2023 via our Learning Management System (“LMS”). The competency-based training will be ‘role’ based to ensure we specifically train those employees where modern slavery and human trafficking risk is of higher risk prevalence and vulnerability in their day-to-day activities (i.e. country and/or supply chain activities).

In respect of agency workers, Clinigen only engages with reputable employment agencies in relation the engagement of temporary or contract personnel.

6. Measuring our effectiveness in combating modern slavery and human trafficking

We will continue to review the effectiveness of our modern slavery and human trafficking processes and controls through our compliance management system. This will include assessing those systems and controls in place to detect and mitigate modern slavery and human trafficking risk within the supply chain.

Clinigen recognises that as a complex issue, modern slavery and human trafficking requires more effort to uncover, particularly in lower tiers of supply. As such, the company will continue to develop its in-take, onboarding and due diligence activities covering Tier 1 (Direct Suppliers) and Tier 2/3 (Indirect Suppliers), through the implementation of TPRM capability.

Statement

The Board can confirm that in the last 12 months:

- No modern slavery or human trafficking issues have been identified;
- No reports were made under the Freedom to Speak Up Policy with respect to modern slavery and human trafficking; and,
- No remedial actions have been required.

This statement is signed by:

DocuSigned by:

Mark Ashton-Blanksby



Signer Name: Mark Ashton-Blanksby
Signing Reason: I approve this document
Signing Time: 02-Feb-2023 | 4:00 PM GMT

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Mark Ashton-Blanksby
Director of Audit & ESG Programme Management