



Policy

CLN-POL-0000038 Global Health & Safety Policy

Effective Date: 03-Feb-2023

DocuSigned by:

AM

Signer Name: Andreea Moldovanu
 Signing Reason: I approve this document
 Signing Time: 20-Jan-2023 | 4:59 PM GMT

E66126E6CAAB47169CFDFE780424B1C1

Author	Title:	Signature:	Date:
Mark Ashton-Blanksby	Director of Audit & ESG Programme Management	DocuSigned by: <i>Mark Ashton-Blanksby</i> Signer Name: Mark Ashton-Blanksby Signing Reason: I approve this document Signing Time: 20-Jan-2023 12:06 PM GMT A9C3474BE8DF4B29A92620948036808B	20-Jan-2023 12:06 PM GMT

Reviewer	Title:	Signature:	Date:
Sam Herbert	Chief Operating Officer	DocuSigned by: <i>Sam Herbert</i> Signer Name: Sam Herbert Signing Reason: I approve this document Signing Time: 20-Jan-2023 12:10 PM GMT 46B025E6AF8449188B4F9D5ADAF86CD	20-Jan-2023 12:10 PM GMT

Quality Approver	Title:	Signature:	Date:
Najma Ali	Responsible Person and Quality Manager	DocuSigned by: <i>Najma Ali</i> Signer Name: Najma Ali Signing Reason: I approve this document Signing Time: 20-Jan-2023 4:48 PM GMT 1901AB6C30DE4D2893D107ADF86BB79D	20-Jan-2023 4:49 PM GMT

If this procedure is a printed copy it shall be considered an uncontrolled copy

TABLE OF CONTENTS

1. Policy Statement..... 3

2. Purpose..... 3

3. Scope 3

4. Our Health and Safety Principles..... 3

5. Our Commitments 3

6. Responsibility of Clinigen, its Employees and Management..... 4

7. Risks 5

8. Consequences Of Violations 5

9. Record-Keeping And Reporting 5

10. Communication And Training 5

11. Monitoring And Review 5

12. Document History..... 5

1. Policy Statement

Clinigen seeks excellence in every aspect of its business and is committed to ensuring compliance with all applicable Health and Safety laws, regulations, and other requirements, to ensure the Health and Safety of our employees, visitors to our places of business, and others directly affected by the relevant activities under our control.

It is our policy and commitment to ensure that we do business according to the highest ethical standards and that our practices comply with all applicable laws in any country we operate in through directly related companies or third parties.

This Policy was established referring to the laws, regulations, and other policy mechanisms concerning Health and Safety.

2. Purpose

This Policy sets out Clinigen's Health and Safety principles and commitments. This Policy represents our overarching commitment to provide a safe working environment and informs of our specific policies and practices relating to Health and Safety operated locally across the company.

3. Scope

This policy applies to Clinigen Limited, its subsidiaries and affiliates ("Clinigen"). All Clinigen directors and employees worldwide are expected to comply with this Policy. This Policy also applies to any visitor, and/or sub-contractors working or in attendance at a Clinigen controlled site.

This Policy should be considered as complementary to local Health and Safety policies in place. All the subsidiaries and affiliates should comply with this Policy and local policy. In case of absence of such policy, this Policy will be applicable.

4. Our Health and Safety Principles

We believe in the following principles to guide our actions:

- All injuries and work-related illnesses can and should be prevented;
- Management is accountable for the Health and Safety performance;
- Communication, involvement, and training of all employees are essential in Health and Safety excellence;
- Everyone continuously has a role to play in preventing injuries and illnesses;
- Excellence in Health and Safety supports excellent business results; and,
- Health and Safety must be integrated into all business management processes.

5. Our Commitments

It is the aim of Clinigen so far as reasonably practicable to:

- Eliminate hazards and reduce any Health and Safety risks associated with our activities;
- Prevent accidents and work-related ill health, to our people and visitors; and
- Develop a Health and Safety culture.

To achieve these aims, we will:

- Establish effective safety management systems across the business;
- Identify, evaluate, and eliminate Health and Safety risks to ensure that hazards are managed;
- Establish effective processes for preventing all injuries and work-related illnesses;
- Build a supportive culture that requires visible Leadership with clear accountability;
- Provide Personal Protective Equipment ("PPE") where required;

If this procedure is a printed copy it shall be considered an uncontrolled copy

- Ensure the safe handling, transport, storage, use and disposal of substances;
- Provide and maintain safe plant and equipment;
- Provide everyone with effective training so that we are all able to work safely;
- Investigate all incidents in order to prevent a recurrence;
- Establish measurable objectives to monitor progress through regular audits and reporting;
- Comply fully with all legal and other applicable requirements and meet or exceed these expectations wherever we operate in the world; and
- Update and test emergency procedures.

6. Responsibility of Clinigen, its Employees and Management

7.1 Management

The Chief Operating Officer (“COO”) is ultimately accountable and responsible for ensuring that this Policy is implemented. The COO is supported by the Executive Management Team and Senior Leadership Team (“Management”) to ensure Health and Safety risks are effectively managed and mitigated.

It is the responsibility of Management for our regional businesses, business units, and support functions to discharge the commitments stated within this Policy. Management is expected to:

- Promote a positive Health and Safety culture by providing visible and tangible leadership;
- Ensure a safety management system is maintained and implemented such that it meets or exceeds the requirements of this Policy, local laws and our “expectations for Health and Safety management”, and adequately addresses local Health and Safety risks;
- Make Health and Safety integral to everything we do, by ensuring it is given equal importance to other operational items and periodically reviewed at leadership meetings;
- Set Health and Safety objectives annually, communicate these to all employees, and monitor and report progress to the Board of Directors (“Board”) at least annually;
- Seek to continuously improve by encouraging the sharing of best practices and lessons learned across our global operations;
- Ensure that acquired businesses are integrated into our way of working;
- Ensure that all visitors and sub-contractors are aware of this Policy and that they have a duty to ensure their own safety and that of others;
- Ensure an appropriate level of resources and funding to support this, Policy;
- Communicate with employees on any Health and Safety matters which may affect them; and
- Provide feedback and recognition to employees who positively contribute to reducing Health and Safety risks.

7.2 Employees

The effective implementation of this Policy requires the involvement and the commitment of employees at all levels. Employees have a duty of care to themselves, and others potentially affected by our activities and are expected to be aware of, and encouraged to contribute to the delivery of this Policy, by:

- Knowing where they can access suitably qualified and experienced Health and Safety Advisors (or equivalent) for guidance and advice.
- Making Health and Safety personal by reporting any accidents, incidents, unsafe acts, near misses or observations where safety performance could be improved.
- Challenging the status quo, suggesting improvements, and proposing innovative ideas which can remove or reduce risk from our activities.
- Keeping Health and Safety a priority in our offices, on our sites and when working from home.

If this procedure is a printed copy it shall be considered an uncontrolled copy

7. Risks

Violations may trigger severe sanctions against Clinigen which includes, but are not limited to, the followings:

- Authorities may impose substantial fines on Clinigen;
- Criminal sanctions may lead to fines for individuals; and,
- Allegations of poor safety environments and bad labor conditions may lead to substantial reputational damage and may impact our business and value.

8. Consequences Of Violations

The consequences for violating this policy will depend upon the facts of each situation but may lead to disciplinary action which may include termination of employment.

9. Record-Keeping And Reporting

All accurate records shall be kept regarding Health and Safety matters in accordance with the related internal policies. All these records shall be clear and transparent.

All directors and employees are expected to report any violation of this Policy and other related requirements they become aware of. If you become aware of any actual or suspected breach, you must raise your concerns as soon as possible. This can be done by contacting the relevant local Health & Safety lead. Reporters can remain anonymous if they wish. How to report a concern anonymously is set out in the Global Freedom to Speak Up Policy.

It is the policy of Clinigen to report illegal acts to the appropriate authorities and to fully cooperate in any subsequent investigation.


10. Communication And Training

Communication and training are being implemented so that this policy is fully understood.

11. Monitoring And Review

The effectiveness of the implementation of this policy will be monitored and reviewed regularly considering its suitability, adequacy, and effectiveness.

12. Document History

Change No.	Change Description (include previous policy reference if available)	Effective Date
01	This Policy supersedes CLN-POL-0000014 (POL-08-002) GRP HSE Policy.	03-Feb-2023 DocuSigned by: <i>AM</i>  Signer Name: Andreea Moldovanu Signing Reason: I approve this document Signing Time: 20-Jan-2023 4:59 PM GMT E66126E6CAAB47169CFDFE780424B1C1

If this procedure is a printed copy it shall be considered an uncontrolled copy

Certificate Of Completion

Envelope Id: 4E2741D421E540C98C5A58173D681758	Status: Completed
Subject: Please DocuSign CLN-POL-0000038 Global Health & Safety Policy	
Source Envelope:	
Document Pages: 5	Signatures: 3
Certificate Pages: 5	Initials: 2
AutoNav: Enabled	Envelope Originator:
Enveloped Stamping: Disabled	Andreea Moldovanu
Time Zone: (UTC) Dublin, Lisbon, London	Pitcairn House
	Burton-on-Trent, NA DE14 2WW
	andreea.moldovanu@clinigengroup.com
	IP Address: 10.111.40.202

Record Tracking

Status: Original	Holder: Andreea Moldovanu	Location: DocuSign
1/20/2023 11:30:38 AM	andreea.moldovanu@clinigengroup.com	

Signer Events

Signer Events	Signature	Timestamp
Mark Ashton-Blanksby mark.ashton-blanksby@clinigengroup.com Head of Risk, Assurance & ESG Clinigen Security Level: Email, Account Authentication (Required)	<i>Mark Ashton-Blanksby</i> Signature Adoption: Pre-selected Style Signature ID: A9C3474B-E8DF-4B29-A926-20948036808B Using IP Address: 86.153.197.239 With Signing Authentication via DocuSign password With Signing Reasons (on each tab): I approve this document	Sent: 1/20/2023 11:35:58 AM Viewed: 1/20/2023 12:06:22 PM Signed: 1/20/2023 12:06:34 PM

Electronic Record and Signature Disclosure:
Not Offered via DocuSign

Sam Herbert Sam.Herbert@clinigengroup.com Chief Operating Officer Security Level: Email, Account Authentication (Required)	<i>Sam Herbert</i> Signature Adoption: Pre-selected Style Signature ID: 46B025E6-AF84-4918-8B4F-9D5ADAF86CD Using IP Address: 5.66.115.44 With Signing Authentication via DocuSign password With Signing Reasons (on each tab): I approve this document	Sent: 1/20/2023 12:06:37 PM Viewed: 1/20/2023 12:10:19 PM Signed: 1/20/2023 12:10:28 PM
---	--	---

Electronic Record and Signature Disclosure:
Accepted: 11/11/2022 4:48:27 PM
ID: 3f5cb895-bf7c-4a06-afab-75f1f896e0c8

Signer Events	Signature	Timestamp
<p>Najma Ali najma.ali@clinigengroup.com Responsible Person Clinigen Group Plc Security Level: Email, Account Authentication (Required)</p>	<p><i>Najma Ali</i></p> <p>Signature Adoption: Pre-selected Style Signature ID: 1901AB6C-30DE-4D28-93D1-07ADF86BB79D Using IP Address: 90.199.150.11</p> <p>With Signing Authentication via DocuSign password With Signing Reasons (on each tab): I approve this document</p>	<p>Sent: 1/20/2023 12:10:31 PM Viewed: 1/20/2023 4:47:08 PM Signed: 1/20/2023 4:49:58 PM</p>

Electronic Record and Signature Disclosure:
Not Offered via DocuSign

<p>Andreea Moldovanu andreea.moldovanu@clinigengroup.com Quality Administrator Security Level: Email, Account Authentication (Required)</p>	<p><i>Andreea Moldovanu</i></p> <p>Signature Adoption: Pre-selected Style Signature ID: E66126E6-CAAB-4716-9CFD-FE780424B1C1 Using IP Address: 151.229.120.227</p> <p>With Signing Authentication via DocuSign password With Signing Reasons (on each tab): I approve this document I approve this document</p>	<p>Sent: 1/20/2023 4:50:02 PM Viewed: 1/20/2023 4:58:23 PM Signed: 1/20/2023 4:59:51 PM</p>
--	---	---

Electronic Record and Signature Disclosure:
Not Offered via DocuSign

In Person Signer Events	Signature	Timestamp
-------------------------	-----------	-----------

Editor Delivery Events	Status	Timestamp
------------------------	--------	-----------

Agent Delivery Events	Status	Timestamp
-----------------------	--------	-----------

Intermediary Delivery Events	Status	Timestamp
------------------------------	--------	-----------

Certified Delivery Events	Status	Timestamp
---------------------------	--------	-----------

Carbon Copy Events	Status	Timestamp
--------------------	--------	-----------

Witness Events	Signature	Timestamp
----------------	-----------	-----------

Notary Events	Signature	Timestamp
---------------	-----------	-----------

Envelope Summary Events	Status	Timestamps
-------------------------	--------	------------

Envelope Sent	Hashed/Encrypted	1/20/2023 11:35:58 AM
Certified Delivered	Security Checked	1/20/2023 4:58:23 PM
Signing Complete	Security Checked	1/20/2023 4:59:51 PM
Completed	Security Checked	1/20/2023 4:59:51 PM

Payment Events	Status	Timestamps
----------------	--------	------------

Electronic Record and Signature Disclosure
--

ELECTRONIC RECORD AND SIGNATURE DISCLOSURE

From time to time, CLINIGEN GROUP (we, us or Company) may be required by law to provide to you certain written notices or disclosures. Described below are the terms and conditions for providing to you such notices and disclosures electronically through the DocuSign system. Please read the information below carefully and thoroughly, and if you can access this information electronically to your satisfaction and agree to this Electronic Record and Signature Disclosure (ERSD), please confirm your agreement by selecting the check-box next to 'I agree to use electronic records and signatures' before clicking 'CONTINUE' within the DocuSign system.

Getting paper copies

At any time, you may request from us a paper copy of any record provided or made available electronically to you by us. You will have the ability to download and print documents we send to you through the DocuSign system during and immediately after the signing session and, if you elect to create a DocuSign account, you may access the documents for a limited period of time (usually 30 days) after such documents are first sent to you. After such time, if you wish for us to send you paper copies of any such documents from our office to you, you will be charged a \$0.00 per-page fee. You may request delivery of such paper copies from us by following the procedure described below.

Withdrawing your consent

If you decide to receive notices and disclosures from us electronically, you may at any time change your mind and tell us that thereafter you want to receive required notices and disclosures only in paper format. How you must inform us of your decision to receive future notices and disclosure in paper format and withdraw your consent to receive notices and disclosures electronically is described below.

Consequences of changing your mind

If you elect to receive required notices and disclosures only in paper format, it will slow the speed at which we can complete certain steps in transactions with you and delivering services to you because we will need first to send the required notices or disclosures to you in paper format, and then wait until we receive back from you your acknowledgment of your receipt of such paper notices or disclosures. Further, you will no longer be able to use the DocuSign system to receive required notices and consents electronically from us or to sign electronically documents from us.

All notices and disclosures will be sent to you electronically

Unless you tell us otherwise in accordance with the procedures described herein, we will provide electronically to you through the DocuSign system all required notices, disclosures, authorizations, acknowledgements, and other documents that are required to be provided or made available to you during the course of our relationship with you. To reduce the chance of you inadvertently not receiving any notice or disclosure, we prefer to provide all of the required notices and disclosures to you by the same method and to the same address that you have given us. Thus, you can receive all the disclosures and notices electronically or in paper format through the paper mail delivery system. If you do not agree with this process, please let us know as described below. Please also see the paragraph immediately above that describes the consequences of your electing not to receive delivery of the notices and disclosures electronically from us.

How to contact CLINIGEN GROUP:

You may contact us to let us know of your changes as to how we may contact you electronically, to request paper copies of certain information from us, and to withdraw your prior consent to receive notices and disclosures electronically as follows:

To contact us by email send messages to: jake.scothern@clinigengroup.com

To advise CLINIGEN GROUP of your new email address

To let us know of a change in your email address where we should send notices and disclosures electronically to you, you must send an email message to us at jake.scothern@clinigengroup.com and in the body of such request you must state: your previous email address, your new email address. We do not require any other information from you to change your email address.

If you created a DocuSign account, you may update it with your new email address through your account preferences.

To request paper copies from CLINIGEN GROUP

To request delivery from us of paper copies of the notices and disclosures previously provided by us to you electronically, you must send us an email to jake.scothern@clinigengroup.com and in the body of such request you must state your email address, full name, mailing address, and telephone number. We will bill you for any fees at that time, if any.

To withdraw your consent with CLINIGEN GROUP

To inform us that you no longer wish to receive future notices and disclosures in electronic format you may:

- i. decline to sign a document from within your signing session, and on the subsequent page, select the check-box indicating you wish to withdraw your consent, or you may;
- ii. send us an email to jake.scothern@clinigengroup.com and in the body of such request you must state your email, full name, mailing address, and telephone number. We do not need any other information from you to withdraw consent.. The consequences of your withdrawing consent for online documents will be that transactions may take a longer time to process..

Required hardware and software

The minimum system requirements for using the DocuSign system may change over time. The current system requirements are found here: <https://support.docusign.com/guides/signer-guide-signing-system-requirements>.

Acknowledging your access and consent to receive and sign documents electronically

To confirm to us that you can access this information electronically, which will be similar to other electronic notices and disclosures that we will provide to you, please confirm that you have read this ERSD, and (i) that you are able to print on paper or electronically save this ERSD for your future reference and access; or (ii) that you are able to email this ERSD to an email address where you will be able to print on paper or save it for your future reference and access. Further, if you consent to receiving notices and disclosures exclusively in electronic format as described herein, then select the check-box next to ‘I agree to use electronic records and signatures’ before clicking ‘CONTINUE’ within the DocuSign system.

By selecting the check-box next to ‘I agree to use electronic records and signatures’, you confirm that:

- You can access and read this Electronic Record and Signature Disclosure; and
- You can print on paper this Electronic Record and Signature Disclosure, or save or send this Electronic Record and Disclosure to a location where you can print it, for future reference and access; and
- Until or unless you notify CLINIGEN GROUP as described above, you consent to receive exclusively through electronic means all notices, disclosures, authorizations, acknowledgements, and other documents that are required to be provided or made available to you by CLINIGEN GROUP during the course of your relationship with CLINIGEN GROUP.