



Policy

**CLN-POL-0000043 Global Human Rights & Anti-Slavery Policy**

**Effective Date:** 14-Feb-2023

DocuSigned by:

*AM*

Signer Name: Andreea Moldovanu  
 Signing Reason: I approve this document  
 Signing Time: 31-Jan-2023 | 10:16 AM 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   3:14 PM GMT A9C3474BE8DF4B29A92620948036808B	20-Jan-2023   3:14 PM GMT

Reviewer	Title:	Signature:	Date:
Guy Strutton	Chief People Officer	DocuSigned by: <i>Guy Strutton</i> Signer Name: Guy Strutton Signing Reason: I approve this document Signing Time: 31-Jan-2023   8:42 AM GMT 64F9E766915046E083B646E95A47F5E1	31-Jan-2023   8:42 AM 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: 31-Jan-2023   9:51 AM GMT 1901AB6C30DE4D2893D107ADF86BB79D	31-Jan-2023   9:51 AM GMT

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

**TABLE OF CONTENTS**

1. Executive Summary .....	3
2. Purpose .....	3
3. Scope .....	3
4. Commitment to Respect Human Rights .....	3
5. Principles.....	3
6. Policy.....	3
7. Human Rights Due Diligence .....	4
8. Grievance and remediation .....	4
9. Implementation .....	5
10. Dialogue and Consultation .....	5
11. Disclosure .....	5
12. References .....	5
13. Document History.....	5

## 1. Executive Summary

Clinigen's Human Rights and Anti-Slavery Policy ("Policy") is based on an understanding of the human rights expressed in the "International Bill of Human Rights" and the core labor standards of the International Labor Organization (ILO) as a minimum, and we will respect these human rights. In addition, this policy is formulated in accordance with the United Nations (UN) "Guiding Principles on Business and Human Rights", the OECD "Guidelines for Multinational Enterprises", and the ILO "Tripartite Declaration of Principles Concerning Multinational Enterprises and Social Policy".

Clinigen will comply with the laws and regulations applicable in each country or region in which it operates. Where there is a conflict between internationally recognized human rights and the national laws of each country, Clinigen will seek ways to maximise respect for international human rights principles.

## 2. Purpose

The purpose of this policy is to set out and communicate Clinigen's position with regard to human rights and modern slavery.

## 3. Scope

This Policy applies to all Clinigen directors and employees. We also expect our Business Partners to respect and adopt the principles of this Policy, which is addressed in our [Global Responsible Business Partner Policy \(CLN-POL-0000041\)](#). This Policy applies to Clinigen Limited, its subsidiaries and affiliates.

## 4. Commitment to Respect Human Rights

Clinigen will fulfil its responsibility to respect human rights by ensuring that its business activities do not infringe on the human rights of those affected by its business activities, and by taking appropriate action to correct any negative human rights impacts that may arise from its business activities.

We recognise that our business is not limited to our own operations, but is comprised of our global supply chain, we place importance on engagement with our suppliers and work to respect human rights in the supply chain.

## 5. Principles

Clinigen will:

- seek to avoid causing or contributing to adverse human rights impacts through our own activities and address such impacts, if they do occur, in a timely and appropriate manner;
- seek to prevent or mitigate adverse human rights impacts that are directly related to our operations, products and services through our business relationships;
- provide for, or cooperate in their remediation through legitimate processes, if we identify that we have caused or contributed to adverse human rights impacts;
- continue to look for ways to support the promotion of human rights within our operations and our sphere of influence.

## 6. Policy

This Policy sets out Clinigen's position with respect to human rights and modern slavery and sits alongside our Employee Handbook ("Clinigen Compass"), [Global Health and Safety Policy \(CLN-POL-0000038\)](#), Modern Slavery Statement, and the [Global Responsible Business Partner Policy \(CLN-POL-0000041\)](#).

Please refer to Clinigen's latest Modern Slavery Statement (accessible on the company website), to learn about the actions taken to uphold this, Policy. The statements below draw upon the International Bill of Human Rights and the ILO Declaration on Fundamental Principles and Rights at Work:

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

- i. **Child Labour:** Clinigen will not use child labour and will comply with all relevant laws in this regard. We do, however, support legitimate workplace apprenticeships, internships, and other similar programmes that comply with the applicable laws and regulations.
- ii. **Modern slavery:** Clinigen will not use forced, bonded or involuntary labour, and workers are not required to lodge 'deposits' or identity papers with the company and can leave after giving reasonable notice, with all wages owed to be paid. We have a zero-tolerance approach towards human trafficking.
- iii. **Health, Safety and Hygiene:** All Clinigen employees will work in an environment that is both safe and healthy, in line with our [Global Health and Safety Policy \(CLN-POL-0000038\)](#).
- iv. **Discipline:** Clinigen prohibits physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation. Disciplinary and grievance procedures are clearly documented and communicated to all employees in our Employee Handbook. All disciplinary measures of a serious nature are recorded and actioned.
- v. **Freedom of Association and Employee Representation:** Clinigen recognises that all its employees have the right to form and join organisations of their own choosing. The company takes active measures to seek employees' views about the business, respects employees' rights to belong to trade unions and fully complies with our legal obligations to inform and consult employees.
- vi. **Working Hours:** Clinigen will ensure that working hours are reasonable and comply with the law and industry standards.
- vii. **Equality of Treatment:** Clinigen is fully committed to eliminating discrimination in recruitment, training and working conditions, on grounds of race, colour, sex, age, religion, political opinion, sexual orientation, disability or social origin and to promoting equality of opportunity and treatment as outlined in the Employee Handbook and [Global Diversity, Equity & Inclusion Policy \(CLN-POL-0000039\)](#).
- viii. **Employment Terms:** Clinigen will provide written and clear contracts which detail the terms and conditions of its staff employment. We will ensure that work performed by employees is on the basis of recognised employment law and practice.
- ix. **Remuneration:** Clinigen will, at a minimum, provide wages and benefits that meet national standards. We are an accredited Living Wage employer, which also extends to key suppliers working on our premises. We will provide employees with clear written information on their pay and conditions. The company prohibits deductions on employees' wages as a disciplinary measure. Clinigen is committed to equal pay and benefits for men and women for work of equal value.

## 7. Human Rights Due Diligence

Clinigen will establish and continuously improve a human rights due diligence mechanism. Through the implementation of human rights due diligence, we will identify potential negative human rights impacts of our business activities and prioritise appropriate actions throughout the value chain to prevent and mitigate such impacts.

## 8. Grievance and remediation

Where a human rights violation is identified, Clinigen will work with all parties involved to seek access to remedy, compensation, and justice for the victim. Clinigen shall also investigate the root cause so that appropriate steps can be taken to prevent such a violation reoccurring. An anonymous reporting portal (see the [Global Freedom to Speak Up Policy \(CLN-POL-0000044\)](#) for further details) is available to all employees who come across unethical behaviour that can't be resolved locally or for which the normal consultation process is not suitable.

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

Anyone raising a genuine concern which is in the public interest will be protected from victimisation. Third parties (including suppliers) should report concerns directly to Legal.

## 9. Implementation

To ensure that this Policy is embedded in our business activities, we will reflect it in the necessary procedures and provide the necessary education and training to our directors, employees, and suppliers. We will also reflect this Policy in relevant policies and necessary procedures to ensure that it is firmly established throughout our business activities.

This Policy and the Modern Slavery Statement are both accessible to our staff via Clinigen Connect (SharePoint), to other interested parties via our website, or on request.

## 10. Dialogue and Consultation

We will consult with relevant internal and external stakeholders to confirm our response to potential and actual human rights impacts and the effectiveness of our response.

## 11. Disclosure


Clinigen will appropriately report its decision-making and business activities and their impact on society and the environment in accordance with the principles and commitments set out within our ESG Strategy.

We will regularly report on our efforts to respect human rights and the implementation of human rights due diligence through various reports and our website. In addition, relevant departments within the company will work together to provide appropriate information so that our stakeholders can understand our efforts.

## 12. References

- [International Bill of Human Rights](#)
- [The International Labour Organisation \(ILO\) Declaration on Fundamental Principles and Rights at Work](#)
- [The United Nations Guiding Principles on Business and Human Rights](#)

## 13. Document History

Change No.	Change Description (include previous policy reference if available)	Effective Date
01	New Global Controlled Policy	14-Feb-2023  DocuSigned by: <i>AM</i>  Signer Name: Andreea Moldovanu Signing Reason: I approve this document Signing Time: 31-Jan-2023   10:16 AM GMT E66126E6CAAB47169CFDFE780424B1C

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

**Certificate Of Completion**

Envelope Id: 1B299861625141348B24AD8221435B5B	Status: Completed
Subject: Please DocuSign CLN-POL-0000043 Global Human Rights & Anti-Slavery Policy	
Source Envelope:	
Document Pages: 5	Signatures: 3
Certificate Pages: 2	Initials: 2
AutoNav: Enabled	Envelope Originator:
Enveloped Stamping: Disabled	Andreea Moldovanu
Time Zone: (UTC) Dublin, Edinburgh, Lisbon, London	Pitcairn House
	Burton-on-Trent, NA DE14 2WW
	andreea.moldovanu@clinigengroup.com
	IP Address: 185.81.101.11

**Record Tracking**

Status: Original	Holder: Andreea Moldovanu	Location: DocuSign
1/20/2023 3:09:59 PM	andreea.moldovanu@clinigengroup.com	

**Signer Events**

	<b>Signature</b>	<b>Timestamp</b>
Mark Ashton-Blanksby mark.ashton-blanksby@clinigengroup.com Head of Risk, Assurance & ESG Clinigen Security Level: Email, Account Authentication (Required), Logged in	<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 3:12:43 PM Viewed: 1/20/2023 3:13:18 PM Signed: 1/20/2023 3:14:54 PM

**Electronic Record and Signature Disclosure:**  
Not Offered via DocuSign

Guy Strutton guy.strutton@clinigengroup.com Interim Global HR Director Clinigen Group plc Security Level: Email, Account Authentication (Required)	<i>Guy Strutton</i>  Signature Adoption: Pre-selected Style Signature ID: 64F9E766-9150-46E0-83B6-46E95A47F5E1 Using IP Address: 89.197.194.34  With Signing Authentication via DocuSign password With Signing Reasons (on each tab): I approve this document	Sent: 1/20/2023 3:14:57 PM Resent: 1/31/2023 8:41:11 AM Viewed: 1/31/2023 8:42:21 AM Signed: 1/31/2023 8:42:52 AM
--	--	--

**Electronic Record and Signature Disclosure:**  
Not Offered via DocuSign

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: 31.221.18.146</p> <p>With Signing Authentication via DocuSign password  With Signing Reasons (on each tab):  I approve this document</p>	<p>Sent: 1/31/2023 8:42:55 AM  Viewed: 1/31/2023 9:51:11 AM  Signed: 1/31/2023 9:51:26 AM</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: 51.194.229.130</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: 1/31/2023 9:51:30 AM  Viewed: 1/31/2023 10:15:30 AM  Signed: 1/31/2023 10:16:48 AM</p>
--	--	---

**Electronic Record and Signature Disclosure:**  
Not Offered via DocuSign

In Person Signer Events	Signature	Timestamp
<b>Editor Delivery Events</b>	<b>Status</b>	<b>Timestamp</b>
<b>Agent Delivery Events</b>	<b>Status</b>	<b>Timestamp</b>
<b>Intermediary Delivery Events</b>	<b>Status</b>	<b>Timestamp</b>
<b>Certified Delivery Events</b>	<b>Status</b>	<b>Timestamp</b>
<b>Carbon Copy Events</b>	<b>Status</b>	<b>Timestamp</b>
<b>Witness Events</b>	<b>Signature</b>	<b>Timestamp</b>
<b>Notary Events</b>	<b>Signature</b>	<b>Timestamp</b>
<b>Envelope Summary Events</b>	<b>Status</b>	<b>Timestamps</b>
Envelope Sent	Hashed/Encrypted	1/20/2023 3:12:44 PM
Certified Delivered	Security Checked	1/31/2023 10:15:30 AM
Signing Complete	Security Checked	1/31/2023 10:16:48 AM
Completed	Security Checked	1/31/2023 10:16:48 AM
<b>Payment Events</b>	<b>Status</b>	<b>Timestamps</b>