

## **Clinigen Modern Slavery Statement 2024**

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the Clinigen Group's slavery and human trafficking statement for the financial year ending 30 June 2024.

### **Our commitment**

Triley Midco Limited and its subsidiaries (the "**Company**" or "**Clinigen Group**") recognises our responsibility to identify, address and mitigate the risk of modern slavery and human trafficking in our operations and supply chains, and we continue to be committed to doing so by operating to the highest ethical standards.

While the risk of modern slavery and human trafficking is relatively lower in the highly regulated pharmaceutical services industry, we recognise that this responsibility also extends to our business relationships.

We have established and maintain systems and controls to safeguard against slavery and related human trafficking in our supply chain.

### **Our business and structure**

Clinigen is a global, specialist pharmaceutical services company focused on providing ethical access to medicines. Its mission is to accelerate access to medicines for patients in every corner of the globe. The Clinigen Group supports pharmaceutical and biotech companies across the medical product lifecycle, from clinical through to commercial and operates from sites in North America, Europe, Africa and the Asia Pacific. Clinigen has more than 1,000 employees across five continents in 15 countries and provides access in more than 130 countries every year.

The Clinigen Group is headquartered in the United Kingdom. The Clinigen Group has operating entities incorporated in the UK, Ireland, mainland Europe, Japan, Hong Kong, China, Malaysia, Singapore, Korea, Australia, New Zealand, South Africa, Kenya, and the USA.

### **Our supply chains**

Our supply chains include:

- Componentry suppliers (packaging, vials, etc);
- Pharmaceutical and biotechnology companies;
- Freight forwarders;
- Warehouse storage;

- Distributors;
- Raw material/API suppliers; and
- Contract manufacturers (CMOs).

## **Our policies on slavery and human trafficking**

In keeping with our values, many of our policies assist with the ongoing prevention of modern slavery or trafficking in our business. We continuously review and update all our policies:

Our **Global Human Rights and Anti-Slavery Policy** reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains. The policy has been developed in line with the UN Guiding Principles on Business and Human Rights and our employment policies detail our high standards of employment practices including respecting diversity and complying with national legal requirements regarding wages and working hours.

Our **Code of Conduct** sets out our values and our behavioural standards. It contains a requirement for our employees to interact with others in an ethical and proper manner and highlights our employment principles and other ethical standards. It specifically prohibits the use of modern slavery or human trafficking in our business. The Code of Conduct applies to all Clinigen employees, whether permanent or on fixed term contracts.

The **Global Freedom to Speak Up (Whistleblowing) Policy** encourages an environment of accountability and integrity. The Clinigen Group offers all employees a confidential process through which complaints can be raised within the organisation in the knowledge that they will be taken seriously and dealt with in an appropriate and professional manner.

In addition to our policies, as a signatory of the **United Nations (UN) Global Compact** we have committed to advance the Ten Principles on human rights, labour, environment and anti-corruption and the UN Sustainable Development Goals.

## **Assessing risk in relation to slavery and human trafficking in our business and supply chains**

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 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 vulnerable groups (migrant workers, refugees, women, or children) within our existing supply chain.

Our exposure to the risk of modern slavery marginally increases when we engage with third parties, particularly in categories such as protective equipment and clothing, manufacturing, and distribution and logistics. 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, we provide access in more than 130 countries for patients with unmet medical needs, of which many were developing countries where access to important medicines can be hugely delayed and, in some cases, would never happen without our work.

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 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:

- Clearly communicate our expectations to suppliers within our Supplier Code of Conduct.
- Include in our contracts requirements for our suppliers to follow applicable laws in the countries in which they operate. This would include any applicable laws regarding human trafficking, forced labour and other forms of modern slavery.

### **Due diligence processes for slavery and human trafficking**

As part of our initiative to identify and mitigate risk we have in place systems to:

- Identify and assess potential risk areas in our supply chains.

- Mitigate the risk of slavery and human trafficking occurring in our supply chains.
- Monitor potential risk areas in our supply chains.
- Encourage the reporting of illegal or unethical conduct.

We have established a formalised approach to third party due diligence on our key suppliers, distributors, and other companies whose activities may impact the quality, safety or efficacy of our products. Our third-party due diligence checks form part of our continuous improvement programme.

### **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, we provide compulsory training to all our employees on this topic.

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

### **Measuring our effectiveness in combating slavery and human trafficking**

Clinigen will continue to review the effectiveness of its modern slavery processes and controls through its established enterprise risk management program and will action any issues identified. This includes assessing those systems and controls in place to detect and mitigate modern slavery risk within the supply chain.

Clinigen recognises that as a complex issue, modern slavery requires more effort to uncover, particularly in lower tiers of supply. As such, the Clinigen Group will continue to develop its onboarding and due diligence activities of tier 1 suppliers (i.e. critical suppliers such as Contract Management Organisations / Active Pharmaceutical Ingredient suppliers) and will consider the need for additional ways to assess the effectiveness of its actions.

### **Modern slavery statement**

The Board of the Company continues to work with management to ensure the Clinigen Group is effective in combatting modern slavery.

The Board can confirm that in the last 12 months:

- No slavery or human trafficking issues have been identified;

- No reports were made under the Global Human Rights and Anti-Slavery Policy or under the Freedom to Speak Up (Whistleblowing) Policy with respect to modern slavery and human trafficking; and,
- No remedial actions have been required.



**Jerome Charton**

*Chief Executive Officer*

*Clinigen Group*

18 November 2024