



ANTI-SLAVERY AND HUMAN TRAFFICKING STATEMENT – 2021

This statement is made pursuant to the Modern Slavery Act 2015 and sets out the steps that Ergomed plc has taken and is continuing to take to ensure that modern slavery and human trafficking are not taking place within its business or supply chains. This statement relates to the financial year ending 31st December 2021.

Introduction

Ergomed plc is committed to ensuring that there is no slavery and human trafficking in our supply chains or in any part of our business.

We published our first Anti-Slavery and Human Trafficking Statement in 2018 and adopted our group-wide Anti-Slavery Policy shortly thereafter. In 2022 we intend to continue our efforts to prevent all forms of slavery and human trafficking in our business and supply chains.

For the purposes of this statement, **slavery and human trafficking** refers to forced labour, child labour, domestic servitude, trafficked labour and workplace abuse.

This statement also covers the activities of our subsidiary, PrimeVigilance Limited.

Our business

Ergomed plc and its subsidiary undertakings (together “Ergomed” or “we”) is a global provider of clinical research, pharmacovigilance and GxP auditing services in the pharmaceutical sector. Ergomed has over 1,350 employees worldwide and operates globally. We do not consider that our business sectors have particular risks associated with them for slavery and human trafficking.

Our supply chains

Ergomed engages third party product suppliers and service providers throughout the world which supply it

with goods and services for business purposes, including but not limited to staffing, IT systems, records storage and courier services.

Our policy on slavery and human trafficking

Our Anti-Slavery Policy applies to all our employees and consultants and reflects our commitment to implement and enforce effective systems and controls to ensure slavery and human trafficking are not taking place anywhere in our business or supply chains.

Our Anti-Slavery Policy explains:

- the nature of slavery and human trafficking;
- key signs that could indicate that someone is a victim of slavery or human trafficking; and
- how to report a suspected incident of slavery or human trafficking.

We are committed to acting ethically and with integrity in our business relationships and, in keeping with this commitment, and in addition to our Anti-Slavery Policy, we have implemented the following policies and actions on global and/or local levels:

- **Whistleblowing Policy** - this policy was introduced to enable our staff to raise any concerns they may have about a range of matters at an early stage and in the right way. The policy provides clear procedures for reporting of suspected situations. It provides assurance that all disclosures will be taken seriously and treated as confidential.

- **Anti-Bribery Policy** – this policy applies to all employees and consultants of Ergomed, wherever they are located. The aim of this policy is to provide guidance for compliance with applicable anti-corruption and anti-bribery laws and regulations and ethical standards.
- **Labour Bylaws and Employee Handbooks** – our group companies have adopted, in accordance with applicable local laws, bylaws and employee handbooks which regulate procedures for the protection of employees' rights on a national level.
- **Safety at Work Committees** – depending on the applicable local law, certain group companies have Safety at Work Committees whose main task is to ensure safe conditions of employment, as well as basic healthcare conditions.
- **Commissioners for Protection of Employees' Dignity** – in accordance with applicable local law, some group companies have appointed Commissioners for the Protection of Employees' Dignity. The Commissioners' scope of work is to receive and resolve employees' complaints regarding the protection of their dignity.

Due diligence processes and steps taken to combat modern slavery and human trafficking

We are in the business of improving and monitoring patients' quality of life through healthcare. Our operational staff are highly trained and perform their work in a heavily regulated environment.

When recruiting new staff, we only work with reputable recruitment agencies, or manage the process internally in accordance with our policies. We perform stringent vendor assessments to ensure our contractors working on clinical trials are legitimate and comply with our standards in all respects, especially with the EMA

Guideline on Good Pharmacovigilance Practice, the ICH Guideline for Good Clinical Practice and other ICH Guidelines, as applicable.

Before being engaged, potential suppliers are subjected to a qualification process. After engagement they are subjected to regular re-assessment to ensure they are complying with their contractual obligations. In our clinical trial agreements and other business agreements we require the other parties to comply with all applicable laws, statutes and regulations and to protect the rights and welfare of clinical trial subjects.

We do not allow suppliers to sub-contract services to third parties without our prior written consent, to ensure we maintain transparency in our supply chain at all times. Where appropriate, we will provide support and guidance to our suppliers to help them address their concerns in their own business and supply chains.

We make sure our employees are protected by ensuring for them the conditions of employment provided by local labour laws.

All employees and consultants are required to adhere to our Anti-Slavery Policy, and to report any form of modern slavery or human trafficking in accordance with the process set out in that policy.

All employees receive our Anti-Slavery Policy as part of their onboarding process and are required to confirm that they have read and understood it. Our Anti-Slavery Policy is clear and concise and we believe that our business is at relatively low risk in respect of modern slavery. In this context, we consider that our current process for employee training is appropriate at this time, although we will keep this under review.

Effectiveness of our measures

In our Modern Slavery Statement for the financial year ending 31 December 2020, we set ourselves certain goals to enhance our effectiveness in combating modern slavery and human trafficking during the

financial year ending 31 December 2021. These are reported upon below:

- **Implement a global anti-bullying and anti-harassment policy** - as part of our commitment to ensuring a work environment in which everyone is treated with dignity and respect, our global anti-bullying and anti-harassment policy was rolled out to all group employees and consultants during 2021.
- **Review our existing Anti-Bribery and Whistleblowing Policies to ensure they remain fit for purpose as the Group's geographic footprint expands** – our Anti-Bribery and Whistleblowing policies were reviewed and refreshed with clearer language and reporting lines during 2021, and rolled out to all group employees. In addition, we implemented an external Whistleblowing Hotline, which enables employees to make anonymous and confidential reports on matters including slavery and human trafficking.
- **Continue to monitor the nature of our business and supply chains, as they evolve, to ensure that the procedures and policies we have in place to prevent and detect slavery and human**

trafficking are adequate and fit for purpose – a cross-functional group has re-considered the risk of modern slavery in our business and our current policies and procedures and we do not consider that material changes are required at this time. However, we will continue to keep this under review.

Next steps

During 2022, we intend to:

- increase employee awareness of our external Whistleblowing Hotline;
- continue to monitor the nature of our business and supply chains, as they evolve, to ensure that the procedures and policies we have in place to prevent and detect slavery and human trafficking are adequate and fit for purpose; and
- ensure that our Anti-Slavery Policy is implemented within the ADAMAS business which we acquired in February 2022.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Ergomed plc's slavery and human trafficking statement for the financial year ending 31 December 2021.

This statement was approved by the Board of Directors of Ergomed plc on 10 June 2022.



Dr. Miroslav Reljanović
Executive Chairman, Ergomed plc
Date: 10 June 2022