



# Modern Slavery and Human Trafficking Statement

**For the year ended 31 December 2025**

**Made pursuant to Section 54 of the UK Modern Slavery Act 2015**

# Contents

1. Our Organisation
2. Modern Slavery
3. Modern Slavery Risk Assessment
4. Policies
5. Mitigating the Risk of Modern Slavery
6. Monitoring, KPIs and Governance
7. Conclusion and Approval

# 1. Our Organisation

Norstella is comprised of five business units: Citeline, Evaluate, MMIT, Panalgo and The Dedham Group. Both Citeline and Evaluate are trading names of Pharma Intelligence U.K Limited, registered in the UK.

Pharma Intelligence U.K Limited exceeds the statutory turnover threshold and is required to publish a Modern Slavery statement. Norstella has chosen to report at group level across all five businesses.

Norstella primarily operates in the United States, the United Kingdom, and India. Our supply chain is predominantly comprised of technology vendors, data providers, and professional services firms.

Our mission: to help patients gain access to life-saving therapies, navigating each step of the drug development lifecycle, from pipeline to patient.

**norstella**

**CITELINE**

**Evaluate**

**MMIT**

**panalgo**

**The  
Dedham  
Group**

**norstella**  
Guiding you from pipeline to patient

## 2. Modern Slavery

### What is Modern Slavery?

Modern Slavery is a crime and a violation of fundamental human rights. The UK Modern Slavery Act 2015 recognises four principal forms:

- **Slavery and servitude:** treating a person as if owned, depriving them of their freedom.
- **Forced or compulsory labour:** work exacted under threat of penalty, not offered voluntarily.
- **Human trafficking:** arranging or facilitating travel with a view to exploitation.
- **Child labour:** work that deprives children of their childhood, dignity and development.

Together these practices deprive individuals of their liberty so that others can exploit them for personal or commercial gain.

### Our commitment

Norstella has a zero-tolerance approach to Modern Slavery. We are committed to acting ethically and with integrity in all our business dealings.

#### How we put zero tolerance into practice

- **Standard contractual terms** designed to prevent Modern Slavery in our supply chain.
- **Supplier Code of Conduct** with an explicit prohibition on Modern Slavery.
- **Speak Up Line** accessible to all employees and third parties to raise concerns.

We maintain transparency in our approach, consistent with our obligations under the UK Modern Slavery Act 2015 and applicable U.S. Government policies, contract obligations and regulations prohibiting trafficking in persons.

### 3. Modern Slavery Risk Assessment

#### Risk factors reviewed

- Geographic locations of Norstella's operations and regulatory controls within those territories
- Policies adopted by Norstella and the assurance processes in place
- Norstella's recruitment processes
- Absence of reported concerns or incidents regarding Modern Slavery to date

**Residual risk:** Norstella considers the residual risk of Modern Slavery in our own operations to be low, recognising that risks may arise indirectly through global supply chains, outsourced services, recruitment channels and suppliers in higher-risk jurisdictions.

#### Mitigation steps taken

- Standard contractual terms designed to prevent Modern Slavery across the supply chain
- Due diligence in recruitment and vendor onboarding, including comprehensive Third-Party Risk Assessments covering Modern Slavery
- Annual Code of Conduct and Whistleblowing Policy refresher training for all employees
- Supplier Code of Conduct with explicit prohibition on Modern Slavery
- Speak Up Line: a safe and confidential channel to report compliance concerns
- Updated Employee Handbooks reflecting Modern Slavery commitments

## 4. Policies

### Code of Conduct

*Reviewed annually.*

The Code clarifies what we expect from employees and requires all to act with the highest levels of integrity.

It sets out our approach to Modern Slavery and supports the Ten Principles of the UN Global Compact on human rights, labour, the environment and corruption.

### Speak Up / Whistleblowing Policy

Our Whistleblowing Policy encourages employees and those doing business on behalf of Norstella to report any instances of wrongdoing.

Our policy ensures those reporting are protected from retaliation and all reports will be investigated confidentially.

### ESG Policy

Our ESG Policy documents our approach to social, ethical, and environmental matters. It sets out our commitment to protect the health, safety and welfare of employees, visitors and third parties.

It also supports equal opportunity, diversity and inclusion, fair remuneration, and annual gender pay gap reporting.

### Training & Awareness

All Norstella employees globally complete annual Code of Conduct refresher training, which incorporates Modern Slavery and Human Trafficking awareness.

Training covers recognising indicators of Modern Slavery, individual responsibilities under the Code, and how to raise concerns via the Speak Up Line. Completion is tracked and reported to the Audit Committee.

## 5. Our Supply Chain

### Supply chain governance

Norstella has established a central functions team supporting the onboarding and assessment of the supply chain, drawing on IT, Legal, Compliance, InfoSec, and Privacy.

#### Supply chain composition

Predominantly technology vendors, data providers, and professional services firms supporting operations across the US, UK, and India.

#### Tools and controls

Implemented tools to review contracts, conduct due diligence, and assess risk across the supply chain, supported by standard contractual terms designed to prevent Modern Slavery.

### Supplier expectations

We expect our suppliers, their employees, and their supply chains to operate in a way that supports our commitment to strong ethical standards.

#### Third-Party Code of Conduct

Suppliers confirm their commitment by agreeing to comply with our Third-Party Code of Conduct, which sets explicit obligations on Modern Slavery and Human Trafficking.

#### Standard purchasing conditions

Where possible, vendors are encouraged to agree to our standard purchasing conditions and Modern Slavery policies, or to terms that closely align with them, so their practices match our expectations.

## 6. Mitigating the Risk of Modern Slavery

### Combating Trafficking in Persons

As a supplier to the United States Government and U.S. Government prime contractors, we support the U.S. Government's zero-tolerance policy on trafficking in persons.

Where required by applicable U.S. regulations and contract obligations, we maintain a Compliance Plan with mandatory procedures to combat Modern Slavery, extended across our entire company as current best practice.

### Speak Up Line & HR Processes

Our confidential, anonymous Speak Up Line is run by an independent provider; disclosures go to the Head of Compliance and are investigated independently of management. The toll-free number is publicised on the intranet and via the Speak Up Policy.

Employees are encouraged to report any behaviour inconsistent with the Code of Conduct, including suspected Modern Slavery.

No substantiated Modern Slavery concerns were reported in 2025. Any substantiated report would be remediated to protect individuals, address root causes and prevent recurrence.

HR uses reputable employment and temporary labour agencies plus pre-employment screening; the India HR team has been strengthened for higher-risk regions.

### Purchasing & Payment Practices

Vendors are encouraged to agree to our standard purchasing conditions and comply with our Modern Slavery policies or equivalent standards.

We maintain fair working relationships with our vendors, recognising the correlation between poor payment practices and modern slavery risk.

# 7. Monitoring, KPIs and Governance

## Governance

Compliance with all Norstella policies is monitored by the Audit Committee, which reports to the Board of Directors.

This includes oversight of training deployment and the avenues for employees to raise concerns in confidence.

**No matters of concern were raised in 2025.**

## 2025 KPIs tracked

**100%** Annual Code of Conduct training completion (including Modern Slavery awareness)

**All** Third-Party Risk Assessments completed for new and renewed vendor engagements

**Nil** Speak Up Line reports relating to Modern Slavery received during 2025

## 2025 progress

- Rolled out a new Third Party Risk Management programme with all new vendors and engagements assessed for modern slavery risk.
- Completed the roll out of our Annual Code of Conduct training for all employees, which also covers Modern Slavery as one of its sub-topics.

## 2026 priorities

- Expand Third-Party Risk Assessment coverage across renewed and new vendor engagements.
- Refresh Modern Slavery training content and roll out to relevant employees.
- Continue strengthening supplier due diligence to be specific to risk profiles of individual suppliers.

# Conclusion

Norstella has a zero-tolerance approach to Modern Slavery and is committed to acting ethically and with integrity across the Group's global footprint.

Across the entire organisation, Norstella has and continues to implement and enforce effective systems and controls to ensure Modern Slavery is not part of its business or supply chain.

This statement is made for the Norstella group with Caerus PIKCO S.à r.l as its parent, and applicable subsidiary companies Pharma Intelligence U.K Limited (13787459) and Evaluate Ltd (05876322), in accordance with the requirements of the UK Modern Slavery Act 2015.

Approved by the Board of Directors of Caerus PIKCO S.à r.l on 7<sup>th</sup> May 2026.

Signed by: **Michael Gallup**, Chief Executive