Modern Slavery Statement

May 2025 | Nxera Pharma UK Limited



Table of Contents

Introduction 3
Our Approach and Commitment 3
Organisational structure and supply chains 3
Countries of operation and supply 3
High Risk Activities 3
Relevant Policies 4
Due Diligence 4
Training 5
Ongoing Commitment 5
Helpline 5
Board Approval 5

Introduction

Nxera Pharma UK Limited (the "**Company**") is publishing this statement in accordance with section 54, Part 6 of the Modern Slavery Act 2015 (the "**Act**"). This statement relates to our actions and activities during the period between 1 January 2024 to 31 December 2024.

Our Approach and Commitment

Our Company is committed to ensuring that our policies and standards comply with all current national and international laws, regulations and codes to prevent modern slavery in our business dealings. We are committed to ensuring that we identify and eliminate to the fullest extent possible all potential modern slavery risks related to our business. We do not tolerate forced labour either within our business itself or within our supply chain. Accordingly, we expect our contracting partners within our supply chain to share the same values.

Organisational structure and supply chains

Our Company is part of an international biopharmaceutical group focused on the design and development of new medicines.

We require our contracting partners, suppliers and other third parties to operate in line with internationally recognised human rights and promote and maintain a culture of equal opportunities and respect. We do not expect, or would not knowingly support, any third-party suppliers who used any form of forced, involuntary or bonded labour.

Our supply chain includes over 1000 third-party suppliers supporting all areas of our business. The majority of our third- party suppliers are located in the UK, but there is also a significant number located in Europe and the US. Some work is provided by suppliers who are located further afield, for example in India, China and Canada and certain materials are sourced from China. The supplier base is very diverse and includes for example: contract research organisations (CROs), suppliers of chemicals and scientific materials, contract manufacturers, chemistry organisations, manufacturers and maintainers of equipment, utility companies, general business support companies, specialist consultancy firms and professional advisory firms.

Since the war in Ukraine began in February 2022, management has taken measures to ensure that the Company does not trade directly with any Russian suppliers and does not breach any international sanctions.

Countries of operation and supply

Our Company currently operates in the United Kingdom – provision of medical development and research and clinical trial services.

High Risk Activities

We have analysed the risks, both within our supply network and business, within the geographical locations we operate and against the industry in which we operate. As at the date of this statement, we are not aware of any areas that would be currently considered high risk and we are not aware of any third-party company and/or supplier activity that may contravene our Modern Slavery Statement. We continue to assess our position regularly and we will not knowingly work with any company who, to our knowledge, has a high risk for modern slavery.

Relevant Policies

Our Company is committed to ensuring ethical business practices across our business and acting as a responsible member of society in all of our business endeavours. In particular, our Company operates the following policies, which set out our approach to the identification of modern slavery risks and steps to be taken to prevent modern slavery in our operations:

- **Whistleblowing Policy**: Our Company encourages all of our employees, workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, our Company. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. Our Company's whistleblowing procedure is designed to facilitate for our employees and workers to make disclosures in confidence, without fear of retaliation. Employees, customers, suppliers or others who have concerns can use our confidential helpline available through Health Assured on 0800 028 0199;

- **Code of Conduct**: Our Company's Code of Conduct makes clear to our employees and workers the actions and behaviour expected of them when representing our Company. We strive to maintain the highest standards of worker conduct and ethical behaviour when operating abroad and managing our supply chain; and

- **Practice of Use of Recruitment Agencies**: Our Company uses only reputable employment agencies to source labour and always ensures verification steps are taken prior to any new agency are instructed. In the event of a risk of modern slavery being identified in relation to agency workers, we will notify the relevant agency and cease to use that agency to source agency workers.

Due Diligence

Our Company undertakes due diligence when considering taking on new suppliers and aims to continuously review our existing suppliers. We will not work with any supplier whom we suspect has connections to modern slavery. Neither we nor, to the best of our knowledge, our supply chain, make use of forced labour.

We are taking the following steps to assess and mitigate any risk to ensure that our supply chain is not connected to modern slavery:

- all new suppliers undergo a supplier approval process which includes a risk assessment based on qualitative and economic factors to identify any indicators of modern slavery;

- where potential new suppliers are deemed high-risk based on our supplier approval process, a deeper level of assessment is conducted including requiring such third parties to answer specific questions about their policies, procedures and controls taken to manage their modern slavery risks. Further screening for modern slavery will be conducted by utilising publicly available information and reviewing website published statements on the subject of ethics and modern slavery to ensure that they are taking what appears to us to be appropriate steps to prevent modern slavery;

- our Company ensures that remuneration to all its UK workers meets the National Living Wage guidance from the Government; and

- we are in the process of launching a Supplier Code of Business Ethics which will formalise the requirements we already place on our suppliers and the commitment that similar expectations are placed on their sub-contractors and supply chains.

Training

To ensure a high level of understanding of the risks of modern slavery in our supply chains and our business, our Company requires all staff to complete training on modern slavery. Mandatory on-line courses must be undertaken annually by all UK staff and all newcomers must undertake the training when they join the Company. Compliance by our staff with training requirements is monitored.

The Company's modern slavery training covers:

- how to assess the risk of modern slavery in relation to various aspects of the business, including resources and support available; how to identify the signs of modern slavery;
- what initial steps should be taken if modern slavery is suspected;
- how to escalate potential modern slavery issues within our organisation; and
- the law in relation to Modern Slavery.

Ongoing Commitment

We continue to review the activities of our Company and suppliers as well as our policies, processes and training to ensure that these support and further our commitment to combatting the risks of modern slavery in our business and our supply chains.

Helpline

Our Company encourages customers, suppliers and other business partners to raise any concerns under this statement in the first instance with their contact in our Company. Alternatively, the confidential helpline available through Health Assured on 0800 028 0199, is available to them as well as to all workers of our Company.

Board Approval

This statement was approved on 23 May 2025 by Nxera Pharma UK Limited's Board of Directors.

Board Member Name: Christopher Cargill	
Position: Chief Executive Officer	Date:
Signature: Signed by: Christopher Cargill Signer Name: Christopher Cargill Signing Reason: I approve this document Signing Time: 23 May 2025 | 02:49 BST F98065541FBB484FBB8E176FC9F3E4DB	23 May 2025