

Modern slavery statement (global)

Key facts

- Oxford PharmaGenesis has a zero-tolerance approach to modern slavery and human trafficking and is dedicated to acting ethically and with integrity in all business dealings and relationships.
- All persons working for or on behalf of Oxford PharmaGenesis in any capacity must adhere to our anti-slavery and human trafficking policy.

Introduction

This statement addresses the UK Modern Slavery Act 2015, the US Trafficking Victims Protection Act (as amended) and the Australian Modern Slavery Act 2018, and applies to all Oxford PharmaGenesis Limited entities and employees for the financial year ending 2026.

This policy sets out the actions of Oxford PharmaGenesis Limited to understand potential modern slavery risks related to its business, and puts in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and/or in its supply chains, when it is practicable to do so.

Organizational structure

Oxford PharmaGenesis is a leading HealthScience communications consultancy, operating through registered business entities in the UK, USA and Australia. There are approximately 500 people employed by the company across these jurisdictions. Oxford PharmaGenesis has multiple leadership groups across its entities, comprising Local Management Teams, a Global Business Team and the Board, to provide oversight and governance across the entire organization.

Policy statement

Oxford PharmaGenesis is committed to protecting human rights globally and acting ethically and with integrity in all our business relationships. Every employee and supplier working with Oxford PharmaGenesis has the right to live and work in decent and safe conditions with dignity, and to earn fair rates of pay. We have a responsibility to ensure good social and ethical practices in our own operations and in our supply chain, when it is practicable to do so.

The company has a zero-tolerance approach to modern slavery and human trafficking, and it is dedicated to acting ethically and with integrity in all business dealings and relationships. Our policies reflect our commitment to implementing and enforcing effective systems and controls to prevent any form of modern slavery in our operations and supply chains where possible.

We are committed to ensuring there is transparency in our business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the legal acts listed above. We expect our suppliers to comply with all applicable anti-slavery and human trafficking laws, statutes and regulations in force from time to time including, but not limited to, the Modern Slavery Act 2015 and shall not engage in any activity, practice or conduct which would constitute an offence under this Act, and shall promptly report to Oxford PharmaGenesis as soon as it becomes aware of any breach, or potential breach, or any actual or suspected slavery or human trafficking in a supply chain.

Our **anti-slavery and human trafficking policy** applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors (including non-executive directors), agency workers, seconded workers, interns, agents, contractors, freelancers, external consultants, third-party representatives and other business partners.

Modern slavery risk

Through due diligence processes, we undertake the following actions to mitigate the risk of modern slavery.

- When practical, mitigate the risk of slavery and human trafficking occurring in our supply chains.
- Enforce mandatory review of our anti-slavery and human trafficking policy by all employees to ensure an understanding of modern slavery and human trafficking risks in our business.
- Review recruitment processes and employee benefits.
- Invest in diversity, equity and inclusion support for employees.
- Provide whistle-blowing channels and protect whistle-blowers.

Throughout our business, we undertake our own recruitment practices and ensure that all terms of employment are voluntary. When there is a need to source labour from external companies, we only work with reputable employment agencies which carry out appropriate

background checks for all employees. When necessary, and if required, we may request demonstration of compliance with our anti-slavery and human trafficking policy.

We recognize that our supply chain is crucial in the fight against modern slavery and human trafficking. With this in mind, our business is expected to follow procedures in the selection of key suppliers, in line with our Supplier Assessment procedure. All suppliers are expected to be able to evidence compliance with the Modern Slavery Act (and other relevant acts) and are expected to have their own anti-slavery and human trafficking policy in place.

This policy applies to all key suppliers providing the following services to Oxford PharmaGenesis:

- recruitment agencies
- suppliers of IT equipment, software and services
- professional services from lawyers, accountants, freelancers, consultants and other advisers
- office cleaning and other office facilities services
- print and promotional material production.

Other relevant policies

Oxford PharmaGenesis is committed to conducting its business with honesty and integrity and it expects all employees to maintain high standards at all times. Our **whistle-blowing policy** facilitates the reporting of any suspected wrongdoing or dangers in relation to the activities of the company. Our whistle-blowing policy provides both an anonymous reporting line and an internal mechanism for reporting, investigating and remedying any wrongdoing in the workplace, and we will support any whistle-blowers who honestly and reasonably believe that underhand or illegal practices are taking place. We have an **equality, diversity and inclusion policy** to reduce biases and encourage openness and accessibility to all.

Compliance with the policy

Our Board has overall responsibility for ensuring that our anti-slavery and human trafficking policy complies with our legal and ethical obligations, and that all those under our control comply with it.

The Chief Executive Officer and Chief Operating Officer share primary and day-to-day responsibilities for implementing the anti-slavery and human trafficking policy, monitoring its use and effectiveness, dealing with queries about it, and auditing internal control systems and procedures to ensure that they are effective in countering modern slavery.

All employees are responsible for ensuring that all dealings with suppliers comply with our policy where practical to do so.

Global Human Resources will review and update the anti-slavery and human trafficking policy and this statement on an annual basis.

Key performance indicators

The following key performance indicators have been agreed for 2026/2027.

- To share our expectations with key suppliers to our business, in line with values established in our Supplier Assessment procedure.
- Publication of **modern slavery statement** on all group company websites and on the Government Modern Slavery Statement Register.
- Completion of annual review and confirmed understanding of anti-slavery and human trafficking policy by all employees.
- Acceptance of all policies relating to human rights and modern slavery by all employees.
- Annual review of all policies relating to human rights and modern slavery to ensure relevance and compliance with legislation.
- Reporting the number of concerns raised in relation to human rights and modern slavery to the Board, as part of the monthly reporting process.

This policy statement was approved by the Board of Oxford PharmaGenesis Limited on 1 June 2026 and signed by Richard White, Chief Operating Officer.

A handwritten signature in black ink, appearing to read 'Richard White', is positioned above a horizontal line.