

Introduction

At Alira Health, we are committed to upholding human rights and ensuring that slavery and human trafficking have no place in our operations or supply chain. We recognize our responsibility to take a robust approach to these issues and to promote ethical practices.

Pursuant to Section 54 of the UK Modern Slavery Act of 2015, this statement is published to promote transparency about the steps taken during the financial year ending in April 2025 to prevent modern slavery and human trafficking within our business and supply chain.

Our Business and Structure

At Alira Health (<https://alirahealth.com/who-we-are/>), our mission is to humanize healthcare and life sciences, in partnership with patients, through innovative technologies and expert guidance to make a positive impact in the life of every patient. We complement our clients' expertise with a full spectrum of patient-centric data and technology-enabled services to uncover opportunities, accelerate innovation, and improve outcomes for patients around the world. Our global workforce of over 600 is comprised of scientists, strategists, economists, clinicians, biostatisticians, and other experts that collaborate to fully understand every aspect of our clients' business and to offer an unmatched continuum of support throughout the healthcare product lifecycle

Headquartered in Framingham, Massachusetts USA, and with operations in Canada, France, Germany, Italy, Netherlands, Spain, Switzerland, the United Kingdom, our global turnover totaled approximately £ 63 million for the year ending in December 2024.

Our Supply Chain

Our supply chain includes laboratories, software and database providers, service providers, logistics partners, and professional services firms.

We understand that certain areas of our supply chain, particularly those involving low-skilled or outsourced labor, may carry a higher risk of modern slavery or forced labor.

Policies and Governance

We have implemented the following policies to mitigate modern slavery risks:

- *Code of Business Conduct and Ethics*: Provides guidance that fosters an open and honest culture of trust and integrity. Together with our organizational values — Be Accountable, Be Courageous, Be Honest, Be Inclusive and Elevate Others — the Code defines the framework for business and personal behavior across our organization.

- *Whistleblowing Policy and Integrity Line:* Encourages reporting of concerns, including unethical behavior or human rights violations, and ensures the protection of anyone who – in good faith – reports known or suspected violations.
- *Supplier Code of Conduct:* Embedded in our contracts, it defines our expectations for ethical behavior and labor standards, and helps hold our supply chain accountable.
- *Vendor Qualification, Management and Oversight procedure:* Defines the risk-based framework for the selection, qualification, management, and performance oversight of suppliers. It considers the vendor's impact on Alira Health's information security, compliance and business sustainability postures, their Environmental, Social and [Corporate] Governance (ESG) objectives, and their ability to comply with international labor and human rights standards.
- *Supply Chain Sustainability Policy:* Currently under development and targeted for release by 31-Aug-2025, it will provide guidance for purchasing decisions.

In alignment with the requirements of our global Quality Management (QMS) and Information Security Management (ISMS) systems, our policies and procedures are minimally reviewed and updated every three years. Policies and procedures are approved by Executive Management and business unit leaders, and communicated across the organization.

Due Diligence

We conduct risk-based due diligence on our suppliers and contractors, which includes:

- Pre-engagement assessment
- Contractual clauses requiring compliance with anti-slavery laws
- Annual performance evaluation and risk assessment
- Periodic requalification

Suppliers deemed high-risk are subject to enhanced checks and monitoring.

Training and Awareness

Alira Health has not yet implemented a training and awareness program that helps employees recognize indicators of modern slavery and understand how to respond appropriately. We aim to define a comprehensive training strategy that will be applicable to all staff by the end of 2025.

Effectiveness and KPIs

To measure our effectiveness in preventing modern slavery, we monitor the number of supplier risk assessments and audits conducted. While none have been received to-date, we also track the number of reported concerns or incidents related to modern slavery.

As our program evolves, we also plan to track the following metrics:

- Percentage of contracts containing anti-slavery clauses (older contracts may not yet include these clauses)
- Employee training completion rates.

We are committed to continuous improvement and regularly assess the impact of our actions.

Approval

This statement is approved by the Chief Executive Officers of Alira Health and will be reviewed and updated annually.

Signed by:
Gabriele Brambilla
Signer Name: Gabriele Brambilla
Signing Reason: I approve this document
Signing Time: 08-Jul-2025 | 12:55:35 PDT
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Gabriele Brambilla

Signé par :
Benjamin Chambon
Nom du signataire : Benjamin Chambon
Motif de la signature : J'approuve ce document
Heure de signature : 08-juil.-2025 | 13:16:21 PDT
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