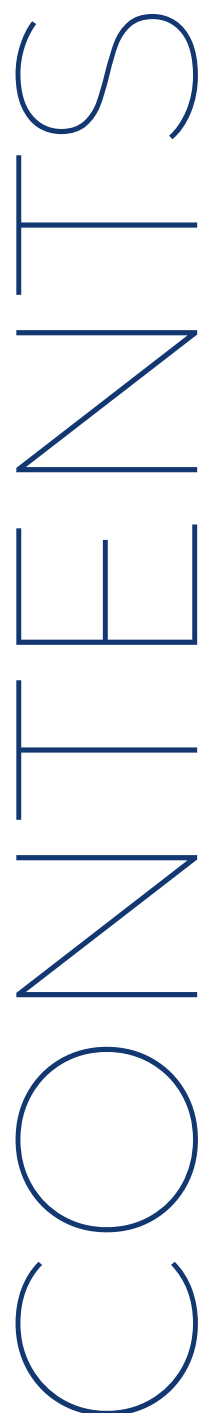




Innovations for advancement of healthcare

Modern Slavery Statement
FY 23/24



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01. BOARD APPROVAL

This Modern Slavery Statement of Novumgen has been formally approved by the Board of Directors on the 15th of May 2024 reaffirming our commitment to combatting modern slavery in all its forms. Our Financial Year ended on 5th of April 2024.

Although producing a modern slavery statement is not a mandatory requirement for us, we believe in protecting human rights and recognise the importance of addressing modern slavery and all its associated risks within our operations and supply chains. Our modern slavery statement outlines the steps we are taking to prevent and mitigate the risk of modern slavery, uphold human rights, and promote ethical business practices.

Novumgen's modern slavery statement has been made available on the Government Modern Slavery Statement Registry. This registry serves as a central platform for companies to publish their modern slavery statements, demonstrating our commitment to transparency and accountability in addressing modern slavery within our operations and supply chains.

This statement is made pursuant to Section 54(1) of the Modern Slavery Act 2015 and constitutes the slavery and human trafficking statement for Novumgen Limited. It will replace any previous statements published, effective upon approval.

Signed By

Kamlesh Patel
Chief Executive Officer

 Signer Name: Kamlesh Patel
Signing Reason: I approved this document.
Signing Time: 2024-06-03 11:12:18(BST)



02. INTRODUCTION

At Novumgen, we are committed to ethical and responsible business practices. We recognise the global challenge posed by modern slavery and human trafficking and acknowledge our responsibility to take proactive steps to prevent and eliminate these practices.

As a result, we have a zero-tolerance approach to modern slavery and are fully committed to preventing it in our operation and supply chain. As part of our commitment, we have developed comprehensive policies, implemented due diligence procedures, and fostered a culture of awareness and vigilance among our employees.

We have taken concrete steps to tackle modern slavery, as outlined in our statement. This Modern Slavery Act statement is a response to Section 54(1), Part 6 of the Modern Slavery Act 2015 outlining our commitment to addressing potential modern slavery risks associated with our business. It underscores our dedication to upholding human rights, fostering transparency, and ensuring freedom from forced labour or exploitation across our operations and supply chains. Our aim is to implement measures that prevent slavery and human trafficking, promoting a positive impact within our sphere of influence.

03. WHAT IS MODERN SLAVERY?

Modern slavery is a term that includes any form of human trafficking, slavery, servitude or forced labour, as set out in the Modern Slavery Act 2015. Victims are trapped in servitude which they were deceived or coerced into and feel they cannot leave.

Modern Slavery can take many forms including the trafficking of people forced labour, servitude and slavery. Children (those aged under 18) are considered victims of trafficking, whether or not they have been coerced, deceived or paid to secure their compliance. They need only have been recruited, transported, received or harboured for the purpose of exploitation. It is an international crime, affecting an estimated 45.8 million people around the world.

It is a global problem that transcends age, gender and ethnicity. It is not an issue confined to history or an issue that only

Modern Slavery can take many form and the Modern Slavery Act 2015 specifies the following types:

- Slavery, servitude and forced or compulsory labour
- Human trafficking
- Slavery, servitude and forced or compulsory labour
- *Sexual exploitation*
- *Forced and encouraged Removal of organs etc*
- *Securing services etc by force, threats or deception*
- *Securing services etc from children and vulnerable persons*

For more information, please visit [The United Kingdom's collection of documents pertaining to Modern Slavery](#) and [the most recent years statistics](#).



04. OUR BUSINESS AND SUPPLY CHAINS

Company Structure

Novumgen is a pharmaceutical company which is in the business of developing generic medicinal products for human consumption targeted mainly for the UK market.

We aim to successfully sell our manufactured products to the UK market at a sustainable and cost-effective rate that adds product value to the end customer. For more information about the Company, please visit our website: <https://novumgen.com/>.

Novumgen is structured as a privately-owned company with a board of directors responsible for overseeing corporate governance and strategic decision-making with Kamlesh Patel appointed as Chief Executive Officer.

Business Activities

Novumgen Limited specialises in multiple areas including

- Product Licensing (in and out)
- Co-development
- Technology Transfer & CMO
- Logistics Management
- Research & Development

Novumgen Limited holds its head office in the United Kingdom, with offices located globally.

Supply Chain

Novumgen Limited sources materials and services from a network of direct suppliers globally. Even though we are not causing or contributing to such instances, we remain aware that supply chains are a high-risk area, especially for locations with weak labour protections that are prone to exploitation and we prioritise these for due diligence and risk mitigation efforts.

We establish a relationship of trust and integrity with all our partners, which is built upon mutually beneficial factors. Our risk exposure remains largely the same since our previous years' Modern Slavery. Our qualification procedures include due diligence of their reputation, respect for the law, compliance with health, safety and environmental standards, their regulator, their policies and references.

We are aware of the higher risk supplier industries in our organisation and with our partners, such as commercial cleaners, caterers, and facilities management services, which are known for increased modern slavery risk. We actively monitor agreements in these areas for signs of elevated risk.

We have not identified any instances of modern slavery through risk assessments and we have not been alerted of any allegations or near instances of human trafficking/slavery activities against any of our partner companies. Nonetheless, we continue to improve our Modern Slavery Policy, whistle blower activities and continue with training on Modern Slavery Awareness using industry best practice.

05. ADDRESSING RISKS

This reporting year we have:

- Remain committed to adhering to the Modern Slavery Act 2015.
- Conducted risk assessments across operations and supply chains to identify potential vulnerabilities.
- Provided training to employees to raise awareness about modern slavery signs and reporting mechanisms.
- Improved procedures to help us identify, prevent and mitigate risks of modern slavery or human trafficking in relation to new and existing suppliers.
- Continuously reviewing and improving modern slavery policies based on evolving risks and legislation changes.
- Demonstrated leadership commitment to prioritise and drive initiatives against modern slavery.
- Issued questionnaires as part of our qualification process
- Due diligence on all new suppliers during on-boarding and on existing suppliers at regular intervals
- Regular audits completed on suppliers and Contractors

06. INTERNAL GOVERNANCE

Modern Slavery Policy

This policy highlights the potential risks of modern slavery and human trafficking, including how to identify signs of exploitation and how to report concerns.

Qualification Procedures/Technical Agreements

As part of our modern slavery policy, all technical agreements to ensure our suppliers operate in full compliance with the laws, rules and regulations of the countries in which they operate, and to seek similar commitments across their own supply chain. We have updated our contracts to make explicit reference to slavery and human trafficking.

Recruitment and selection

We conduct checks on all prospective employees to verify that they are eligible to work in the UK. Certain roles require a Disclosure and Barring Service (DBS) check for individuals occupying higher roles within the organisation

Whistleblowing

We encourage all employees, customers, and suppliers to report any suspicion of slavery or human trafficking without fear of retaliation.

Code of Conduct & Employee Handbook

Our code encourages employees to do the right thing by clearly stating the actions and behaviour expected of them when representing the business. We strive to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing our supply chain. Employee Handbook outlines employee terms & conditions and standards of behaviour

Education & Training

Novumgen Limited has raised awareness on modern slavery issues by providing all staff with specific training and ongoing refresher courses which explain the following:

- Understanding the definition of Modern Slavery.
- Red flags for potential cases of slavery or human trafficking.
- Taking the correct action if you suspect a case of Modern Slavery.
- What external help is available.



07. MEASURING EFFECTIVENESS

To measure our effectiveness, we have created the following Key Performance Indicators

| Key Performance Indicator | Indication |
|---|-----------------------|
| Upload Modern Slavery Statement to website | Not started |
| Upload Modern Slavery Statement to external provider for transparency | Not started |
| Issuing questionnaires that ask about their modern slavery statement | Not started |
| Complete a Modern Slavery Assessment as part of UK MSAT Tool | Not started |
| All staff to complete initial or refresher Modern Slavery Training | Completed and Ongoing |





08. NEXT STEPS

In the next financial year, we intend to take the following steps to tackle slavery and human trafficking:

Continuing the actions completed in the most recent reporting year

Documenting the number of Modern-Slavery questionnaires issued as part of requalification

Ensuring transparent disclosures in accordance with the Modern Slavery Act about the company's efforts to address modern slavery

Collaborating with industry peers, NGOs, and government bodies to share best practices and advocate for stronger measures

Transparently reporting and uploading our Modern Slavery Statement to our website and external parties to ensure stakeholders can easily access this information.



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Novumgen Company number

13510476