Modern Slavery Act Statement

Introduction

It continues to be a top priority for Norgine Limited and Norgine Pharmaceuticals Limited ("Norgine") to ensure that we operate ethically, source responsibly and work to prevent modern slavery and human trafficking throughout our organisation and in our supply chain. We are also committed to adhering to international human rights standards such as the UN Declaration of Human Rights and the ILO's Declaration on Fundamental Principles and Rights at Work, as well as other applicable national legislation. In this statement we describe our business and supply chain, and how we responsibly conduct them. We take a **zero-tolerance** approach to any form of modern slavery or human trafficking in our supply chains and in any other part of our business. Detailed below are our current policies and procedures and the plans that are in place to ensure continued compliance with the Modern Slavery Act 2015.

Our Business

Norgine is a leading European specialist pharmaceutical company operating as a single integrated business with a direct commercial presence in all major European markets and Australia and New Zealand. Norgine employs over 1,500 people across our commercial, development and manufacturing operations and manages all aspects of product development, production, marketing, sale and supply.

Norgine owns a R&D site in Hengoed, Wales and two manufacturing sites in Hengoed, Wales and Dreux, France.

Our Policy on Modern Slavery and Human Trafficking

We have appropriate policies in place that underpin our commitment to ensure that there is no modern slavery or human trafficking in our supply chains or in any part of our business. We continuously review and update all our policies.

Our Norgine Business Code establishes the framework for achieving our vision of providing innovative healthcare solutions that transforms lives. High standards of ethical conduct and trust are key components of the frameworks and are integral to all our relationships. Our responsibility to respect human rights extends throughout our operations, from laboratory to patient.

Due Diligence Processes for Modern Slavery and Human Trafficking

Norgine is aware, in this era of rapid global migration, that the potential for human trafficking is more prevalent than ever before, with no sector or industry immune. Norgine has identified areas within its organisation where there could be a potential risk of modern slavery. Suppliers and business partners are informed of our expectations and must comply with the Norgine Business Code in all their dealings with us. We identify and assess potential risk areas and as appropriate seek compliance assurances from third parties with whom we work. New business activities such as mergers and acquisitions or market expansion carry additional risk and therefore, are subject to comprehensive due diligence.

Where a potential risk has been identified, suppliers and business partners are required to demonstrate compliance and provide Norgine with any ethical code/policy or rules they have by which they are bound.

Governance

We have a dedicated Compliance Management Committee which consists of representatives from Legal, Manufacturing & Supply, Commercial, Alliance Management, Finance, Purchasing and Medical Affairs. Within Norgine we have also established a working group that continues to monitor and address the requirements of the Modern Slavery Act, supported by external advisors. Periodic risk assessments are conducted to ensure continued compliance.

Norgine's Business Code affirms our commitment to compliance, ethics and operational excellence, to ensure the quality and efficacy of our products and to responsibly promote and manage all Norgine Personnel and third parties who act for or on behalf of Norgine. Norgine sources materials from approved suppliers, manufactures in accordance with Good Manufacturing Practice ("GMP") and distributes products in compliance with Good Distribution Practice ("GDP").

All Norgine Personnel are required to undergo training and acknowledge their understanding of the Norgine Business Code. It is the responsibility of Norgine Personnel to speak up when they have concerns that someone working for Norgine or on behalf of Norgine, is not acting in a manner consistent with the values and requirements of the Norgine Business Code. Norgine will investigate all concerns, in the manner appropriate to the circumstances and whistle blowers will be protected.

As part of its commitment to the Modern Slavery Act, Norgine will:

- Review and act upon the recommendations set out within our risk assessment
- Continue to require significant suppliers and business partners and those operating in high risk areas, to provide a compliance statement confirming that they have put steps in place to ensure that there is no modern slavery and human trafficking;
- Build specific Modern Slavery and Human Trafficking questions into the risk assessment process of the supplier review and approval process.

This statement has been published in accordance with section 54 (1) the Modern Slavery Act 2015 and constitutes Norgine's modern slavery and human trafficking statement for the financial year ending 31st December 2022.

This statement was approved by the Board of Directors of Norgine Limited and Norgine Pharmaceuticals Limited via written resolution on **JUN 2023.**