



Modern Slavery Act Statement

Introduction

Norgine Limited and Norgine Pharmaceuticals Limited (“Norgine”) are committed to acting in an ethical manner, with integrity and transparency in all its business dealings. In this statement we describe our business and how we responsibly operate to prevent modern slavery and human trafficking. 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 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 1,000 people across our commercial, development and manufacturing operations and manages all aspects of product development, production, marketing, sale and supply.

Our Policy on Modern Slavery and Human Trafficking

Our Norgine Business Code establishes the framework for achieving our vision of providing innovative healthcare solutions that transform 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 in all their dealings with us must comply with the Norgine Business Code as well as all financial, legal, ethical, social and governance compliance principles, to which Norgine holds itself. 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 by which they are bound.

Governance

Norgine is committed to acting with ultimate integrity across all of its business operations, and compliance with this high standard of integrity is also expected from all of our external partners. To make sure we are partnering with companies and individuals that agree with, and maintain, our full suite of compliance standards, we must perform compliance diligence on



them before contracting (new partnerships) or at appropriate risk-based time intervals for existing relationships. Norgine has designed and implemented a robust process of company and individual checks so we can understand any risks involved in continuing to do business with them. This is appropriate for both new potential partnerships as well as those already embedded within the organisation. Compliance certifications and/or contractual adjustments to include compliance statements ensure that those companies we want to do business with are also acting in an appropriate manner. We continue to:

- Complete risk assessments with respect to Modern Slavery and Human Trafficking.
- Review incumbent suppliers from a compliance perspective.
- Ensure updated compliance-related clauses are included in Norgine's Agreements and its Terms and Conditions.
- Request a Compliance Certificate completed by third parties and re-validate every 1-3 years (dependent upon the compliance risk based assessment).
- Conduct third party risk assessment, which takes into account a number of factors including the Transparency International Corruption Index and the responses to our Proposed Business Partner Compliance Information Questionnaire, considering key compliance areas such as but not limited to Modern Slavery to determine the Supplier's ultimate 'risk rating'.

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 2023.

This statement was approved by the Board of Directors of Norgine Limited and Norgine Pharmaceuticals Limited on **JUN 2024**.

Christopher Bath, Chief Executive Officer

Director

Norgine Limited, U.K.

Sheila Hopkins, Chief Legal Officer

Director

Norgine Pharmaceuticals Limited, U.K.