



Modern Slavery & Human Trafficking Statement

Introduction

Norgine is committed to operating as a responsible, ethical and transparent organisation and to conducting business with integrity in all of its activities. We recognise that modern slavery and human trafficking are serious violations of human rights that can occur in global supply chains, including within the pharmaceutical and healthcare sectors.

This statement constitutes Norgine's modern slavery and human trafficking statement for the financial year ending 31 December 2025, prepared in accordance with the UK Modern Slavery Act 2015.

"Norgine" refers to the Norgine Group of companies ("Norgine" or the "Group"). This statement describes our business and supply chain, and the actions we have taken during the financial year to assess, prevent and mitigate risks of modern slavery and human trafficking across our operations and supply chain. We take a zero tolerance approach to any form of modern slavery or human trafficking within our business or supply chains.

Norgine is committed to respecting internationally recognised human rights standards, including the UN Declaration of Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work, and the UN Guiding Principles on Business and Human Rights, as well as applicable national legislation.

Norgine's approach to preventing modern slavery and human trafficking is informed by internationally recognised standards, including legislative requirements relating to human rights due diligence and supply chain responsibility across Europe, the OECD Due Diligence Guidance for Responsible Business Conduct and the UN Guiding Principles on Business and Human Rights. While this statement does not constitute a formal vigilance plan or statutory due diligence report under specific national legislation, it is intended to support compliance with relevant European standard and the Australian Modern Slavery Act 2018 (Cth) transparency and reporting expectations.

Norgine adopts a risk based, proportionate and continuously improving approach to identifying, preventing and mitigating modern slavery and human trafficking risks across our operations and supply chain. We focus on identifying, preventing, mitigating and, where necessary, remediating potential adverse human rights impacts.



Our Organisational Structure, Business and Supply Chains

Norgine is a leading European specialist pharmaceutical company operating as a single integrated business, with a direct commercial presence across Europe, Australia and New Zealand. Our operations span product development, manufacturing, marketing, sale and supply of pharmaceutical products.

Our supply chain is global and includes raw material suppliers, third party manufacturers, distributors, logistics providers and service partners. We primarily engage directly with first tier suppliers and, where risk indicators warrant, seek increased visibility beyond our immediate contractual relationships.

We recognise that modern slavery and human trafficking risks may arise at different points across complex and multitiered supply chains, particularly in labour intensive activities and certain geographic regions. This understanding informs the design and prioritisation of our due diligence and risk management activities.

Policies in Relation to Modern Slavery and Human Trafficking

Norgine maintains a framework of policies designed to promote ethical conduct, protect human rights and prevent modern slavery and human trafficking across our operations and supply chain.

The Norgine Business Code sets clear expectations for employees and third parties regarding ethical behaviour, compliance with labour laws and respect for human rights. Our Supplier Code of Conduct requires suppliers to prohibit forced, compulsory or trafficked labour and to ensure that all work is undertaken voluntarily and under safe and fair conditions.

Where appropriate, compliance with these policies is embedded into contractual arrangements. Identified policy breaches or deficiencies are addressed through corrective actions, enhanced monitoring or escalation in line with our governance processes, reflecting our zero tolerance approach to modern slavery and human trafficking.

Assessing and Managing Modern Slavery Risks

Norgine adopts a risk based and proportionate approach to identifying and assessing the potential risk of modern slavery and human trafficking within our operations and supply chain. Risk assessments consider factors such as geographic location, industry sector, labour intensity, governance maturity and the nature of goods or services provided.

Certain supplier categories, such as logistics, facilities services, cleaning, promotional goods and specific raw materials, may present higher inherent risk. We also recognise that changes in our business, including mergers, acquisitions and market expansion, may increase risk exposure and therefore apply enhanced due diligence in such circumstances.

Risks are prioritised based on their potential severity and likelihood, enabling us to focus our resources on areas where the risk of adverse human rights impacts may be most significant.



Due Diligence and Remediation

Norgine conducts proportionate, risk based due diligence before entering into new business relationships and throughout the lifecycle of existing relationships. This may include reviewing supplier policies, employment and recruitment practices, and supply chain transparency, as well as requesting additional information where potential risks are identified.

Where actual or potential modern slavery risks are identified, we seek to work constructively with suppliers to strengthen controls and address issues through corrective actions and enhanced oversight. Our approach prioritises improvement and risk mitigation, with escalation applied where progress is insufficient or concerns are significant, in line with our governance processes

This reflects our commitment to addressing underlying risks and contributing to remediation where appropriate, rather than disengaging without seeking to prevent or mitigate harm.

Training and Awareness

Norgine provides targeted training to employees involved in procurement, compliance and supplier oversight to support the effective identification and management of modern slavery risks. Training focuses on recognising potential indicators, understanding reporting mechanisms and reinforcing expectations for ethical supplier conduct.

Training is reviewed periodically to ensure it remains relevant and proportionate to risk. By building internal capability and awareness, we aim to strengthen our ability to identify and respond to potential risks across our operations and supply chain.

Monitoring, Measuring Effectiveness and Continuous Improvement

Norgine monitors the effectiveness of its approach to modern slavery risk management through a combination of supplier assessments, training completion tracking, issue management and periodic policy review.

Insights from these monitoring activities are used to refine risk assessments, inform supplier engagement strategies and strengthen contractual and governance controls where appropriate.

We recognise that effectiveness is demonstrated not solely by the existence of processes, but by the extent to which those processes contribute to improved risk management outcomes over time. We are committed to continuous improvement and will continue to enhance our approach by strengthening data quality, refining risk prioritisation and embedding lessons learned into future due diligence activities.



Reporting and Investigating Concerns

Norgine promotes a speak-up culture and encourages employees, contractors and third parties to report concerns relating to modern slavery and human trafficking without fear of retaliation. Reports are handled confidentially, investigated appropriately and addressed in line with our governance processes.

Consultation with Owned or Controlled Entities

In preparing this statement, Norgine consulted with relevant entities within the Norgine Group, including those operating in Australia, that it owns or controls. This consultation informed the identification and assessment of modern slavery and human trafficking risks, as well as the actions described in this statement.

The consultation process supports a consistent, group-wide approach to managing modern slavery risks and reflects the shared responsibility for addressing these risks across Norgine's operations and supply chains.

This statement has been reviewed and approved by the Board of Directors of Norgine Limited, (registered in England and Wales), on 27th May 2026, Norgine Pharmaceuticals Limited (registered in England and Wales), on 23rd April 2026 and Norgine Pty Limited (registered in Australia) on 07 May 2026.

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