

Simbec-Orion Modern Slavery and Human Trafficking Statement

This statement sets out Simbec-Orion's actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains. This statement relates to actions and activities during the financial year 1 January 2023 to 31 December 2023 as well as to plans for 2024.

This is the first time we are publishing an update on modern slavery risks, since the year 2023 is the first year we fulfil the criteria stated by the law in terms of revenue.

As part of the healthcare service sector, we recognise that we have a responsibility to take a robust approach to slavery and human trafficking.

Our organisation is committed to preventing slavery and human trafficking in its corporate and operational activities, and to ensuring that its supply chains are free from slavery and human trafficking.

Organisational structure

This statement covers the activities of Simbec-Orion:

- Simbec-Orion is a Global Clinical Research Organisation, working for Biotech and pharma companies to perform drug development activities, ranging Phase 1 healthy volunteer and patient studies to Phase 2, 3 and 4 (post marketing) clinical trials. We have a full range of functional inhouse capabilities, including our own laboratory and IMP facilities. For certain services we may use other specialised vendors, like patient concierge services, ePRO and other data generating devices.

Countries of operation

We currently operate in the following countries:

- We have offices in the UK (England and Wales) as well as in France, Hungary and the US.
- We have employees in many other countries, including Spain, Italy, Germany, the Netherlands, Belgium, Poland, Czech Republic, Romania, Canada and Sweden.

The following is the process by which the company assesses whether or not particular activities or countries are high risk in relation to slavery or human trafficking:

- Our activities are expert scientific services, requiring qualified, highly educated staff which are closely monitored by us. As such we believe we do not engage in activities which can be classified as high risk in relation to slavery or human trafficking.
- As an equal opportunities employer, we're committed to creating and ensuring a non-discriminatory and respectful working environment for our staff. We want all our staff to feel confident that they can expose wrongdoing without any risk to themselves.
- Our recruitment and people management processes are designed to ensure that all prospective employees are legally entitled to work in the UK or other countries we operate in and to safeguard employees from any abuse or coercion.

- We do not enter into business with any organisation, in the UK or abroad, which knowingly supports or is found to be involved in slavery, servitude and forced or compulsory labour.

Our policies in relation to the Modern Slavery Act 2015

The following policies are available to all Simbec-Orion staff:

- Bullying and harassment policy
- Diversity and inclusion policy
- Employee Concern Policy
- Global Whistleblowing Policy
- Recruitment and selection policy
- Modern Slavery and Human Trafficking Policy

Embedding the principles

We will continue to embed the principles through:

- providing awareness training to staff on the Modern Slavery Act 2015 and informing them of the appropriate action to take if they suspect a case of slavery or human trafficking
- ensuring staff involved in procurement activity are aware of and follow modern slavery procurement guidance on GOV.UK for the UK and other relevant jurisdiction for other areas.
- ensuring that consideration of the modern slavery risks and prevention are added to Simbec-Orion's policy review process as an employer and procurer of goods and services
- making sure Simbec-Orion's procurement strategies and contract terms and conditions include references to modern slavery and human trafficking
- continuing to take action to embed a zero tolerance policy towards modern slavery
- ensuring that staff involved in buying or procurement and the recruitment and deployment of workers receive training on modern slavery and ethical employment practices

Due diligence

We undertake due diligence when considering taking on new suppliers, and periodically review existing suppliers. Our due diligence and reviews include:

- evaluating the modern slavery and human trafficking risks of each new supplier
- creating a risk profile for each supplier;
- invoking sanctions against suppliers that fail to improve their performance in line with an action plan or seriously violate our supplier code of conduct, including the termination of the business relationship.

Performance indicators

We have reviewed our key performance indicators (KPIs). As a result, we are:

- requiring all managers involved in vendor selection and employee selection supply to have completed training on modern slavery by December 31, 2024;
- reviewing our existing supply chains / vendors expected to be completed by December 31st 2024, whereby we evaluate all existing suppliers.

This statement was approved by Fabrice Chartier, CEO Simbec-Orion Group.

Fabrice Chartier

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