

MODERN SLAVERY STATEMENT

INTRODUCTION

At Inceptua, we acknowledge that we have the responsibility to take a robust approach towards slavery and human trafficking and are committed to acting ethically and with integrity in all of our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our business or in any of our supply chains.

OUR SUPPLY CHAIN

We are a pharmaceutical company, and the next generation partner to pharma, biotech, and healthcare. We bring medicines to patients through clinical trial services, early access programs and commercialization of pharmaceutical products. We deliver high-quality medicines in a way that demonstrates our responsibility as a business by ensuring we adhere to the highest standards of medical practice. We firmly believe that this includes fair and honest management of our supply chains.

We pride ourselves in procuring pharmaceutical products as close to the source as possible. All our sourcing partners are licensed by their local competent authorities and audited by Inceptua against high industry standards. All products are physically inspected at one of our contracted facilities to ensure only genuine products move through the supply chain. All transport of pharmaceuticals is done in accordance with current GDP standards.

OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Anti-slavery Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

Our global Code of Conduct requires all Inceptua Group companies and employees to act in a professional and ethical manner and to respect and preserve the human rights of others.

DUE DILIGENCE

As part of our initiative to identify, assess and mitigate potential risk areas in our supply chains and business, we:

- clearly communicate to our suppliers our standards and attitude towards Modern Slavery and expect from them the same approach.
- the board of directors, represented by Inceptua's CEO, communicates with employees regarding the importance of ethics and legal compliance.
- conduct a screening process of third parties prior to engaging in any business relationship to ensure that they are in compliance with Modern Slavery Act requirements.
- contractually require all counterparties to comply with all laws and regulations (including those in relation to modern slavery and human trafficking).
- conduct recruitment checks on employees to confirm that they have the right or permits to work.

Inceptua's Code of Conduct and Supplier's Code of Conduct provide important guidelines for interactions with third parties.

All colleagues are encouraged to raise concerns, including potential violations to the Codes of Conduct, company policies and the laws of the countries in which we operate.

We have a policy in place to cover Anti-Slavery and Human Trafficking and all staff are trained in this policy.

FURTHER STEPS

Following a review of the effectiveness of the steps we have taken this year to ensure that there is no slavery or human trafficking in our supply chains, we intend to take the following further steps to continue to combat slavery and human trafficking:

- **Increase Awareness:** we will continue to raise awareness of Modern Slavery through communications and trainings to ensure colleagues better understand the risks. The intention is that this will enable our staff to identify and flag concerns related to Modern Slavery and take action to mitigate such risks.
- **Vendor Qualification Process:** we will continue to ensure that all potential new suppliers and manufacturers are subject to due diligence checks, which will include compliance with the applicable Anti-Human Trafficking and Modern Slavery laws and regulations.
- We will continue to review our policies to ensure they provide adequate protection against modern slavery.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year period ending 31 December 2022.

Stefan Fraenkel
CEO Inceptua Group