



## EVESTIA CLINICAL - MODERN SLAVERY STATEMENT

This statement is made by Evestia Clinical Limited in compliance with Section 54 of the United Kingdom's Modern Slavery Act 2015.

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### INTRODUCTION

Modern slavery is the illegal exploitation of people, depriving them of their liberty for personal or commercial gain. It covers a wide range of abuse and exploitation including sexual exploitation, domestic servitude, forced labour, forced marriage, criminal exploitation and organ harvesting. Human trafficking is the trading of people for these purposes. Clearly, such practices are illegal. They are also a fundamental violation of human rights.

Accordingly, Evestia Clinical Limited and its subsidiaries including Evestia Clinical, Inc., (referred to in this Statement as "**Evestia**") has a zero-tolerance approach to slavery and human trafficking and is committed to acting ethically and with integrity in all of its business dealings and relationships. Evestia is committed to effecting, enforcing and continuously improving its measures to detect and eradicate such practices, should they touch upon Evestia in any way, particularly in our supply chains. Evestia is also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the United Kingdom's Modern Slavery Act 2015. Evestia expects the same high standards from our contractors, suppliers, vendors and other business partners and as part of our contracting processes we oblige such third parties to maintain the same standards.

In order to ensure that this commitment is fully realised, Evestia has considered in depth the risks associated with our activities and identified and effected measures to mitigate such risks. Further details on this process and the measures identified and effected are set out in this Statement and Evestia's Anti-Slavery and Human Trafficking Policy.

### EVESTIA'S STRUCTURE AND BUSINESS

Evestia is a Contract Research Organisation (CRO), providing services to its biotechnology and pharmaceutical company clients across the globe in support of their clinical studies/trials. Our highly-skilled and experienced teams provide a fully comprehensive service, managing clinical trials at all stages throughout their cycles. We also supply related services such as pharmacovigilance and regulatory consultancy. Accordingly, we play a vital part in bringing innovative, life-changing and life-enhancing medicines to patients around the world, pioneering the way treatments are developed and accessed by patients.

The legal structure of Evestia is as follows. **Evestia Clinical Limited**, a company registered in England, trades globally and is the parent company of several other companies, including **Evestia Clinical, Inc.**, a Delaware-registered company based in the US.

This Statement is made on behalf of all of Evestia's entities.

#### DUE DILIGENCE PROCESSES FOR ANTI-SLAVERY AND HUMAN TRAFFICKING

In order to identify and mitigate the risks of slavery and human trafficking occurring anywhere within Evestia or its supply chain, we adopt the following due diligence processes:

- Regular reviewing of our Anti-Slavery and Human Trafficking Policy, taking into consideration whether any improvements to the policy should be made.
- Ensuring all Evestia personnel are aware of, and trained on, the above policy.
- Identifying and assessing potential risk areas, including in our supply chains.
- Putting in place measures to mitigate the risk of slavery and human trafficking occurring in Evestia or our supply chains.
- Monitoring the effectiveness of our measures, and potential risk areas (particularly in supply chains).
- Encouraging Evestia personnel to report any issues and protecting whistleblowers.

#### RISK ASSESSMENTS AND MANAGEMENT

Identifying the *risk* of modern slavery/human trafficking and *actual* slavery/human trafficking, when it occurs, is not always easy. Evestia takes a systematic approach to assessing modern slavery/human trafficking risks, considering two primary types of risk factor as follows: general risk factors; and specific risk factors associated with its own business.

##### General risk factors

General risk factors for slavery/human trafficking include the following, some of which risk factors clearly overlap:

- Living within a highly oppressive regime
- Living within a conflict zone (where laws/protections tend to break down)
- Living in extreme poverty
- Living within a country which has no protections/laws in place to prohibit slavery
- Being female - the risk for women and girls is much higher than for men and boys
- Being a young male - there is a much higher risk for boys and adolescents than for men
- Being a child - the risk for children generally is especially high
- Being a migrant/displaced person - there is a much higher risk for migrants/displaced person

- The country you live in - certain countries have a higher risk than others (for example, the 2023 Slavery Index\* stated that the following 10 countries have the highest estimated risk of slavery: North Korea, Eritrea, Mauritania, Saudi Arabia, Turkiye, Tajikistan, United Arab Emirates, Russia, Afghanistan and Kuwait)

\*The Slavery Index is published by 'Walk Free', a division of the Minderoo Foundation, and is an international human rights group focused on the eradication of modern slavery.

- Being in or seeking low-skilled work – such work is of a higher risk than highly-skilled, technical work
- Being in or seeking seasonal/temporary work - such work is of a higher risk than long-term/permanent work
- Being in or seeking hazardous/undesirable work – such work is of a higher risk than other work
- Being involved in lengthy, non-transparent supply chains

### **Specific risk factors**

Evestia has assessed the risk factors set out above and has assessed its activities as relatively low risk. However, we have identified two risk factors pertaining to our specific activities which may increase the risk level, although it should be stressed that the risk for Evestia remains very low:

- Evestia operates globally, including potentially (albeit rarely) in countries where the risk of slavery may be higher. It also employs staff in many different countries.
- Evestia uses many third party suppliers/vendors/contractors, in many countries, to assist in carrying out its activities. These may include third parties providing software solutions, and others performing regulatory services, medical support services, pharmacovigilance services and other services related to the conduct of clinical studies.

Evestia has assessed and implemented measures to combat these two specific risk factors, viewed in the light of the general risk factors, as set out in the following sections of this Statement.

### **GLOBAL OPERATION RISKS**

The following arrangements are in place to minimise the risks relating to global operation:

#### **Engagement of Staff/Consultants -**

- Evestia's central People Department (based in the UK) adheres to rigorous recruitment and engagement processes, wherever hires may be located, to ensure fairness and transparency in the recruitment process
- Evestia's People Department works with an external UK employment law practice to ensure that its HR processes and policies are of optimum quality and

content, and to ensure it receives appropriate employment law updates and advice in a timely manner

- Evestia's People Department ensures that Evestia's COR-POL-000002 Equal Opportunities Policy is adhered to at all times, no matter where a candidate lives or works
- Where recruitment agencies are used, their processes are checked before use
- Evestia's People Department takes legal/employment advice from country-specific sources where appropriate
- Personnel/candidate passports or other appropriate forms of personal identity are checked
- Those not eligible to work in the applicable country are not employed/engaged
- Children are not employed. We may occasionally employ young adults (i.e. over the age of 16) but only in appropriate roles, with appropriate supervision and pay. We may also occasionally accept young people on short, supervised work experience placements
- Employment contracts and benefits, to the extent reasonably possible, are kept uniform, regardless of country of employment/engagement
- It is very rarely necessary (if at all) to employ or engage Personnel living in conflict zones, repressive regimes or any of the listed high-risk countries

With these measures in place, and the fact that the roles offered by Evestia tend to be highly skilled/technical, the chances of Personnel being subjected to slavery or human trafficking is considered extremely low.

### **Engagement with Clients and other Third Parties -**

Clients and other third parties with whom Evestia interacts may also be situated all over the world. Due to the highly regulated and important (in terms of human health) work we do, all clients and third parties are subject to a detailed approval process prior to working with Evestia. It is unlikely we would operate in repressive regimes, conflict zones, or one of the listed high-risk countries, but in any event *all* clients and third parties are carefully vetted before any commitment is made to work with them, either in such locations or not. Our third party vendors tend to be highly-skilled, sophisticated entities (either large software providers, or smaller more local highly-skilled, experienced vendors). Evestia's clients tend to be well-funded, sophisticated biotechnology or pharmaceutical companies working in high-tech, highly regulated environments, employing highly-skilled and well-paid staff. Accordingly, the risk of encountering slavery within such third party or client organisations is assessed by Evestia as low. But as detailed above, that does not make us complacent – careful vetting still takes place.

## SUPPLIERS AND SUPPLY CHAINS

The UK's Modern Slavery Act 2015 particularly focuses on supply chains, and UK businesses putting in place effective measures to ensure that they do not unwittingly tolerate slavery in their supply chains. Evestia does not purchase much in the way of tangible goods, neither finished goods nor parts for goods. Nor does Evestia distribute tangible goods in any form. Evestia operates in the arena of highly-skilled *services* only. Accordingly, its supply chain tends to consist only of supply of third party *services*, from a number of hand-picked third party vendors. Such third party vendors may sometimes use their own sub-contractors on occasion, but only with our consent. Accordingly, we do not operate through lengthy, complicated and non-transparent supply chains. This fact decreases our risk in this area significantly.

In addition, wherever Evestia operates, it does so in a highly regulated, highly scrutinised environment and therefore compliance with regulatory and legal requirements comes naturally to Evestia and its people. As referred to above, the conduct of clinical trials is extremely carefully controlled, for obvious reasons, in all countries in which Evestia operates. The sector is tightly supervised by its many regulatory authorities. Just as in the UK, EU and US, other countries' regulatory authorities usually require businesses operating in this arena to be licensed and/or subject to regulatory authority supervision, and able to demonstrate their compliance with high ethical and quality standards. By its nature, there *must* be transparency in this arena, to ensure the quality of clinical trials and the integrity of data collected remains optimum. With these stringent requirements, and the high levels of scrutiny/transparency in our sector, these risks are further decreased.

Even so, Evestia is not complacent and remains vigilant in attempting to identify and eradicate any such problems from our supply chain. How we achieve this is set out in the section below.

### SUPPLIER/VENDOR ADHERENCE TO THE GROUP'S VALUES AND ETHICS

To ensure that all those in our supply chain comply with our values and ethics we have in place a rigorous supply chain assessment and compliance program. This is led by staff from the following departments: Legal, Quality Assurance, and the People/HR department. This supplier assessment and compliance program includes:

- Robust assessment of applicable new suppliers/vendors, prior to doing business with them, including requirement to complete approval forms and quality/compliance questionnaire
- Remote or (where applicable) in-person auditing of vendors/suppliers
- Checking of suppliers'/vendors' credentials, such as licences held (where required)
- Contractual obligation to comply with all applicable law, including that relating to anti-slavery and human trafficking (with right to terminate if such obligation is breached)
- Contractual right to audit suppliers periodically for the duration of the relationship

- Contractual obligation on suppliers, to ensure that they hold their own sub-contractors to the same standards
- Where applicable, effecting of quality/technical agreements setting out clear responsibilities and standards

#### OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING

Evestia has in place a robust Anti-Slavery and Human Trafficking Policy, which policy sits on our global compliance overlay, within our Quality Management System. This policy:

- reflects Evestia's commitment to anti-slavery and human trafficking in every company within Evestia, and to ensuring that there is no slavery or human trafficking in any part of our business or in our supply chains
- reflects Evestia's commitment to acting ethically and with integrity in all of its business relations
- sets out the risk identification steps and mitigating measures that are taken by Evestia to mitigate those risks
- ensures Evestia personnel understand their role in combatting slavery and human trafficking, encouraging escalation of any activities that they suspect could be slavery or human trafficking, and encouraging them to safely 'whistle blow' on such matters, if necessary

The Training section below sets out how staff are trained on this and other policies. In fact, there are many other Evestia policies in place which support ethical trading, and support us in our commitment to anti-slavery and human trafficking, including:

- Anti-Bullying and Harassment Policy
- Anti-Bribery and Corruption Policy
- Environmental, Social and Governance (ESG) Policy (including Corporate Social Responsibility and Ethical Trading)
- Equal Opportunities Policy
- Health and Safety Policy
- Whistleblowing Policy

#### TRAINING

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide training to our staff. Training may be in person or via our Evestia-wide electronic learning system, which allows full tracking of compliance with training requirements and creates full records of training. We train our staff

on our processes and policies, but also on 'red flags' which may indicate slavery in particular circumstances, to help our staff identify slavery if they encounter it.

## OUR EFFECTIVENESS IN COMBATING SLAVERY AND HUMAN TRAFFICKING

Evestia uses the following key performance indicators (KPI's) to measure how effective it is in ensuring that slavery and human trafficking is not taking place in any part of its business or supply chains:

1. Number of slavery or human trafficking events (or suspected events) identified during each financial year (within our own business or businesses within our supply chains).

**To date, no such incidences have been identified.**

2. Number of slavery or human trafficking concerns that have been raised to Evestia either within Evestia or relating to its supply chains during each financial year.

**To date, no such reports have been made.**

This statement is made pursuant to section 54 of the UK's Modern Slavery Act 2015 and constitutes the Group's anti-slavery and human trafficking statement for the financial year ending 31 December 2024. It is approved by the directors of the Evestia Clinical Limited Board and signed by its CEO below.

**Lewis Cameron**

**Director, Evestia Clinical Limited**

**CEO Evestia Clinical**

Signed by:

*Lewis Cameron*



Signer Name: Lewis Cameron  
Signing Reason: I approve this document  
Signing Time: 20-May-2025 | 12:19 BST

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