

INCEPTUA MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

INTRODUCTION

At Inceptua, we acknowledge our responsibility to adopt a robust approach to combating slavery, forced labour, child labour and human trafficking. We are committed to acting ethically and with integrity in all our business dealings and relationships, implementing and enforcing effective systems and controls to ensure modern slavery, forced labour, child labour and human trafficking do not occur in our business or supply chains.

Inceptua is a member of the United Nations Global Compact (UNGC) and upholds the principles of the Universal Declaration of Human Rights. We are committed to assessing our operations and supply chain in accordance with the human rights due diligence (HRDD) principles outlined in the UN Guiding Principles on Business and Human Rights (UNGPs).

OUR BUSINESS OPERATIONS AND SUPPLY CHAIN

We are a pharmaceutical wholesaler and a next generation partner to the pharmaceutical, biotech, and healthcare industries. We bring medicines to patients through Clinical Trial Services and Early Access programs. Inceptua is operating globally with local presence across three regions: Europe, North America, and Asia.

We take pride in sourcing pharmaceutical products as close to the origin as possible. Most of our products are sourced directly from the manufacturers; where this is not feasible, we procure them exclusively from authorized distributors. All our sourcing partners are licensed by their local competent authorities and undergo audits by Inceptua to ensure compliance with high industry standards. Each product is physically inspected at one of our contracted facilities to verify its authenticity before entering the supply chain. Additionally, all pharmaceutical transportation is conducted in strict adherence to current GDP standards.

OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING

Inceptua does not tolerate any form of modern slavery, forced labour, child labour and human trafficking. Therefore, we are committed to ensuring compliant and lawful operations and supply chains by adhering to our **Modern Slavery and Human Trafficking Policy**. This policy reflects our commitment to acting ethically and with integrity in all our business relationships and implementing and enforcing effective systems and controls.

Moreover, our global **Code of Conduct**, and our company **values** provide clear guidance to all Inceptua Group companies and employees, encouraging ethical behaviour and the respect and preservation of human rights. At Inceptua, we actively encourage staff members to report any concerns they may have. We provide training to employees on how to **Speak Up** and report matters related to potential human rights violations, enabling us to address, investigate and offer timely support and grievance mechanisms whenever needed.

DUE DILIGENCE AND CONTRACTING PRACTICES

As part of our initiative to identify, assess and mitigate potential risks in our supply chains and business operations, Inceptua regularly trains staff members on the Modern Slavery and Human Trafficking Policy. This training ensures they understand the policy and are equipped to detect any non-compliant actions or behaviours.

Regarding our supply chain and business relationships with third parties, we:

- Clearly communicate our standards and commitment to combatting all forms of modern slavery, forced labour, child labour and human trafficking, including distribution of our “Supplier’s Code of Conduct”.
- Conduct a screening process of customers and suppliers prior to engaging in any business relationship to ensure compliance with the Modern Slavery Act requirements.
- Contractually require all counterparties to comply with all applicable laws and regulations, including those related to Modern Slavery and Human Trafficking.
- Conduct recruitment checks on employees to confirm that they have the legal right and necessary permits to work.

TRAINING ON MODERN SLAVERY AND TRAFFICKING

Inceptua provides mandatory training on the Modern Slavery and Human Trafficking Policy to ensure a high level of understanding regarding the risks of Modern Slavery and Human Trafficking, not only in our supply chain department and business operations but throughout the whole organisation.

EFFECTIVENESS AND 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 operations and supply chains, we intend to implement the following additional measures to continue combating slavery and human trafficking:

- **Increase Awareness:** we will continue to raise awareness of modern slavery through communications and training sessions to ensure colleagues better understand the associated risks. This initiative will empower our staff to identify and report concerns related to modern slavery.
- **Qualification Process:** we will maintain our practice of subjecting all potential new suppliers and manufacturers to due diligence checks, ensuring compliance with applicable Anti-Human Trafficking and Modern Slavery laws and regulations.
- **Governance Structure:** improving implementation for governance framework documentation and reporting.

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 ending 31 December 2024.

Stefan Fraenkel

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Stefan Fraenkel
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