

Novotech Health Holdings Modern Slavery Statement (2022)

Novotech Health Holdings Pte Ltd (“NHH”) is internationally recognized as the leading Asia Pacific centred global biotech contract research organization (CRO). NHH is committed to improving people's health and well-being and is committed to operating business lawfully and ethically. Our commitment includes supporting and adopting respectful and fair labour policies, and we do not compromise on human rights standards and values in our supply chain.

Reporting Entity

This is our second modern slavery statement covering our subsidiary, Novotech (Australia) Pty Ltd (ACN 071 874 881) as a reporting entity under the Australia Modern Slavery Act 2018 (Cth) (Act). This statement outlines our structure, operations, supply chain, and the steps we have taken to identify, assess, and mitigate potential modern slavery risks within our business operations.

Entity Structure, Operations, and Supply Chains

NHH is a company incorporated in Singapore and the ultimate holding company of Novotech (Australia) Pty Ltd. Novotech has experience in over 5,000 clinical projects, including Phase I to Phase IV clinical trials and bioequivalence studies. Novotech is positioned to serve biotech clients conducting clinical trials in Asia Pacific, the US, and Europe. Novotech has over 3000 staff globally and 34 office locations.

Novotech provides clinical development services across all clinical trials including regulatory and drug development consulting, protocol design and writing, feasibility assessments, local ethics committee and regulatory submissions, clinical monitoring, project and vendor management, data management, statistical analysis, data visualization and analytics, DCTs, medical advisory and medical monitoring, pharmacovigilance, central lab services and clinical study report writing. We work to the highest quality standards, in line with ICH-GCP, global regulatory agencies, and underpinned by robust processes in line with our ISO 9001 accredited Quality Management system.

NHH acts in a supporting, advisory, consulting, and/or management capacity in relation to these clinical trials and does not actually and physically conduct clinical trials for the client. As part of NHH's supply chain, NHH entities including Novotech (Australia) Pty Limited contract some clinical trial services to third-party health institutions and vendors in the clinical trial supply chain that conduct and/or support sponsor clinical trials.

Novotech (Australia) Pty Ltd expects its vendors to maintain the highest ethical standards and to operate in compliance with all applicable laws and regulations including the prohibition of modern slavery and slavery-like practices.

Risks of Modern Slavery in Our Operations

Employees

Our employees are vital to our workforce and at NHH, we embrace open communication and a horizontal organisational structure that encourages inter-country and inter-department collaboration and knowledge-sharing. We are proud of our inclusive culture and committed to always looking for ways to improve and remain a leader in workplace flexibility and gender equality. As of December 2022, NHH globally has over 2500 FTEs with over 500 FTEs based in Australia across Sydney, Melbourne, and Brisbane.

The nature of our services involves the provision of professional services, and our staff are highly qualified clinical, medical, and project management professionals who are supported by ongoing training to deliver our services. Other parts of our operations include Business Development, Regulatory and Quality (which manages the licensing and GxP (“good practice”) of our company and services) and supporting services such as Finance, Legal and Compliance, People and Culture and Information Technology.

Our organization has low potential for modern slavery as we rely on highly educated staff, remunerate appropriately, and provide a working environment under a framework of established policies, and processes and we are subject to regular internal and sponsor audits to fulfill our service offerings.

Supply Chain

The risk of modern slavery in our supply chain is considered low given the nature of our vendors which are mainly local professional service providers to support clinical trial management around Asia Pacific, the United States and Europe such as laboratories, translation services, local investigational product providers and imaging service providers. We also source our IT systems from global software providers. The products and services supplied, and their source countries are considered as “not at risk” by the Global Slavery Index. Global vendors are also bound by their Codes of Conduct for ethical business practices.

Actions we have taken to Assess and Address Modern Slavery Risks

NHH continually assesses the risks of modern slavery in our operations, and we have taken the following initiatives:

- 1) Effective June 2022, we have distributed modern slavery questionnaires to clinical related vendors classified as high and medium risk to our business during their qualification period and reviewed their responses for adequacy. We note that:
 - 100% of our vendors declared compliance with the United Nations International Labour Organization Conventions on the prohibition on child labour, forced labour, bonded labour, and human trafficking.
 - 0% reported that there are any direct suppliers/subcontractors for the supplies of goods/services to NHH known as operating under High Risk of modern slavery.
 - 0% have been investigated/penalised for violation of fair labour practices.
- 2) We have also been asked by our customers to complete ESG-related questionnaires which we have comprehensively responded to, and our responses accepted by those customers.
- 3) We have analysed reported incidents via our third-party whistleblowing channel and People and Culture department on any areas of risk involving modern slavery practices (child labour, forced labour, bonded labour, or human trafficking). There are no submitted reports on these practices in our operations or supply chains in 2022.

Effectiveness of Our Actions

Based on the monitoring of our organization and vendors, NHH is not aware of modern slavery by any of its employees, suppliers, or service providers. We will continue to promote adherence to ethical business standards and recognise that our review and assessment of actions to identify and address modern slavery risks in our operations and across our supply chain will be an ongoing and evolving process that we are committed to continuing to build upon.

How We Consult with Entities We Control

All related entities operating under NHH are subject to a single Global Code of Conduct as a mandated requirement.

Other Relevant Information

There is no additional information required in relation to our commitment to the Act.

This statement has been approved by the Board of Directors of Novotech (Australia) Pty Ltd.



Dr. John Moller
Group CEO of Novotech Health Holding Pte Ltd including Novotech (Australia) Pty Ltd