# Modern Slavery Statement 2025

MUNDIPHARMA PTY LIMITED, AUSTRALIA Reporting period: 1 Jan 2024 to 31 Dec 2024





#### Introduction

This statement on modern slavery (the "Statement") is made pursuant to the *Modern Slavery Act 2018* (Cth), as amended by the Modern Slavery Amendment (Anti-Slavery Commissioner) Bill 2023 (the "Act"). The reporting entity covered by this Statement is Mundipharma Pty Limited (the "Company").

This Statement refers to the financial year ended 31 December 2024 and describes the risks of modern slavery in our business and the current steps taken to identify, manage and mitigate risks identified in our operations and supply chains.

#### Structure and business

The Company is a member of a global (excluding United States) network of independent associated companies within the Mundipharma global business ("Mundipharma") engaged in research, development, production and marketing of prescription medicines and consumer healthcare products.

The Company, a leader in the development and provision of medicines for pain, has expanded its portfolio to include treatments for cancer care, ophthalmology, respiratory and first aid.

The Company's workforce as at 31 December 2024 comprised approximately 28 employees within Australia. Just over half of the Company's employees are field based, the remaining employees being office based at the Company's head office.

Our supply chain operates on a global basis across many different countries and suppliers (Bard Pharmaceuticals Limited is for example based in the UK and part of the Mundipharma global business), the supply chain is broadly divided into two areas – centrally planned products and locally planned products. Central planning procures products on behalf of the Mundipharma global business (in consultation with the local entities), while local planning procures products for the local requirements only (includes suppliers of direct materials, packaging, indirect services as well as warehousing and distribution). The Company's assessment is that the greatest risks of modern slavery are likely to occur in the (indirect) informal economy and lower tiers of the supply chains (in the creation of the base components used in the manufacture of



the raw materials formulated into the products sold by the Company). The Company has relationships with various contract manufacturing organizations fulfilling procurement requirements both in Australia and overseas. The Company always seeks to only contract with suppliers whose values and commitments meet the Company's own requirements.

The Company continues to remain committed to never knowingly dealing with partners, third parties or organizations connected to modern slavery and will not tolerate any of these practices within its operations and supply chain. The Company during 2024 adopted the "Modern Slavery Prevention Policy" (the "Policy"), which recognizes the Company's responsibilities (regarding the identification, evaluation, prevention, mitigation and the remediation of modern slavery risks within the Company's business operations and the supply chains), and outlines the modern slavery principles and objectives of the business. The Policy applies to all employees and supports Mundipharma's framework for complying with the legislative reporting obligations. In conjunction with the adoption of the Policy, the Company also implemented the "Modern Slavery Questionnaire" (the "Questionnaire"), designed to strengthen the due diligence and assessment processes undertaken by the Company. During 2024 Mundipharma set up the ESG Steering Group, the primary purpose being to oversee and identify principal risks, and implement appropriate measures to effectively monitor, manage, and drive patient centricity and sustainable operations within Mundipharma.

The Company is not currently aware of any areas within its operations and supply chain which will likely lead to a breach of the Act. The Company remains committed to continually monitor all risks and to never knowingly deal with any organization connected to slavery or human trafficking.

## **Employment practices**

The Company's employment practices are compliant with applicable employment and health and safety legislation. Furthermore, we continue to ensure that the employment agencies with which we deal with, are fully compliant with the Act and we remain confident that there is no slavery or human trafficking taking place within our organization.



# **Due diligence**

The Company assesses and manages its modern slavery risks within its operations and supply chain, by amongst others, having in place a risk-based due diligence process which aims to improve transparency and ensure that contract manufacturers, suppliers and third parties or intermediary with which we deal with remain committed to minimize the risk of modern slavery within their organizations and businesses. Our aim remains to not work or collaborate with any third-party suppliers or intermediaries that we suspect are connected in any way with slavery or human trafficking. It remains critical that our Quality Team, prior to the engagement of any third party suppliers or intermediaries continue to perform thorough assessments (due diligence is undertaken through, amongst others, the completion of the Questionnaire, a business justification review and where appropriate background checks on the third-party organizations including their key personnel, which may include site visits to review processes and procedures in place as appropriate). Assessments of third-party organizations may also include regulatory status checks, compliance with regulatory bodies as well as financial stability checks.

#### Good Manufacturing Practices (GMP) Audit

The Company also conducts regular GMP surveillance audit of our contract manufacturers premises directly involved in the manufacture of our products to interview personnel, gather information, and observe current practices and processes (such as personnel and training process, health, and safe working conditions, fair labour standard practices etc.).

# Policies, contract clauses and training

The Company recognises that a key component of managing and mitigating modern slavery risks in our operations is the ongoing raising of awareness of modern slavery and ensuring that ethical and fair practices are present within our business and throughout the organization.

Our Global Code of Conduct and Global Anti-Bribery and Anti-Corruption Policy provides all employees with a foundation for acting with integrity. We have a Whistleblower Protection Policy and a culture which encourages reporting of misconduct including the reporting of ethical concerns through our on-line reporting hotline (available 24 hours a



day). The Company does not tolerate any form of bullying, discrimination or harassment as outlined in our Anti-Bullying Policy and our Equal Employment Opportunity, Anti-Discrimination and Harassment Policy.

We have also implemented a Code of Conduct for Third Parties that sets out our expectations of our third-party partners across multiple areas including health and safety, human rights (modern slavery, human trafficking, child labour, etc.) and sustainability.

We have further incorporated modern slavery clauses and our Code of Conduct for Third Parties into the procurement agreements with third party suppliers.

The Board, senior management and senior leaders, including the Supply Chain and Procurement functions are aware of our Modern Slavery obligations and Policy. The goal remains to provide training to relevant team members and to ensure that there is a high level of understanding of the Company's responsibilities and the risks of modern slavery and human trafficking.

## **Effectiveness and Monitoring**

The Company and Mundipharma will continue to raise awareness and monitor thirdparty supplier and intermediary relationships, always remaining alert and continuing to mitigate modern slavery risks. We acknowledge that there is more to be done in relation to preventing modern slavery, we remain committed to continually enhancing the Modern Slavery framework going forward.

This Statement has been approved by the board of directors of the Company and is signed by a director of Mundipharma Pty Ltd.



#### Steven Van den Bossche

Director of Mundipharma Pty Ltd

Date: 17 June 2025