

Novotech Health Holdings Modern Slavery Statement

Novotech Health Holdings (**NHH**) is internationally recognized as the leading biotech specialist Clinical Research Organisation (**CRO**) in the Asia-Pacific.

NHH is committed to respecting human rights. Our commitment includes supporting and adopting respectful and fair employment policies to ensure that modern slavery and human trafficking practices do not take place in our supply chain or in any part of our business.

As a CRO, NHH is committed to protecting the safety of clinical trial participants throughout the clinical trial process. NHH complies with Good Clinical Practice in the conduct of clinical trials and related services. NHH also complies with all local laws and regulatory requirements in relation to the conduct of clinical trials.

In this statement, we outline our structure, operations, supply chain, and the steps we have taken to identify, assess, and mitigate potential modern slavery risks within our business operations.

NHH Structure, Operations, and Supply Chain

We are a full service CRO with labs, phase I facilities, and drug development consulting services and accumulated experience in over 3,700 clinical projects, including Phase I to Phase IV clinical trials and bioequivalence studies.

Our operations include clinical development services across all clinical trial phases and therapeutic areas including feasibility assessments, ethics committee and regulatory submissions, data management, statistical analysis, medical monitoring, safety services, central lab services, report write-up to ICH requirements, project, and vendor management. We act in a supporting, advisory, consulting and/or management capacity in relation to these clinical trials.

We work with third-party health institutions and vendors in the clinical trial supply chain (such as laboratories and clinical services). They are expected to maintain the highest ethical standards and to operate in compliance with all applicable laws and regulations which include prohibition of modern slavery and like practices. Any breach of these standards would be considered a material breach of contract by NHH.

Risk Assessment and Governance

Our people are vital to our workforce, and we are committed to creating an exceptional workplace. As of August 2022, NHH has over 2300 FTEs working across our offices in Asia-Pacific, Europe and the United States.

Our people are skilled and educated professionals with project management, medical, clinical, commercial and operational backgrounds who are engaged under a framework of well-established policies, processes and who are subject to regular internal and sponsor audits to ensure compliance. Our people work within a controlled clinical trial environment and we believe reduces the risk of modern slavery in our workforce.

NHH Policies and Procedures

We believe that our culture of upholding high standards of corporate conduct in our business dealings will reduce the risk of unethical practices including the risk of modern slavery. At NHH, our Code of Conduct and supporting policies are used by our people to navigate and guide our decisions and actions to assist us reinforce a culture of integrity and ethical behaviour and support fair employment practices and vendor engagement.

- **Our Code of Conduct**

Our Code of Conduct defines the responsibilities we share for ethical business conduct including, amongst others, our commitment to practice a zero-tolerance policy towards modern slavery in our business and supply chain. The Code clearly defines what we stand for as an organisation, and what we expect of ourselves. It applies to all employees and contractors.

- **Employment Policies**

Our employment policies set out our high expectations of ethics and integrity to establish a great workplace for our people. Our employment policies include:

- Anti-discrimination, Bullying & Harassment;
- Gender Equality in the Workplace;
- Domestic & Family Violence;
- Recruitment and Selection (Equal Employment Opportunity);
- Workplace Safety;
- Learning and Development;
- Remuneration;

- Promotion; and
- Organisational Change.

We also report to the Workplace Gender Equality Agency and participate in the Employer of Choice for Gender Equality initiative.

▪ **Whistle-blower Policy and Independent Whistleblowing Channel**

We enable all employees and others to raise concerns about possible breaches of our Code of Conduct (including detection of modern slavery in our supply chain) through our independent third-party Whistleblowing Channel (available on our website at www.novotech-cro.com).

▪ **Vendor and Partner Policies**

We contract various business-related activities to specialized third-party partners (known as Vendors). We incorporate quality risk management principles in our Vendor Assessment and Approval Standard Operating Process and only work with vendors that can provide an appropriate level of assurance to deliver consistent quality products and services, be compliant with the applicable laws and regulations, and uphold ethical business practices in compliance with our Vendor's Code of Conduct.

We ensure our Vendors are managed according to their associated risks and receive consistent oversight about their performance and compliance throughout the contracting period.

Our policies also ensure anyone who raises concerns of unethical practices in the workplace are protected and is offered support, consistent with our core values of Uncompromised Integrity and Open Engagement. Our Chief Legal and Compliance Officer oversees the NHH corporate compliance program. We have multiple teams who manage compliance and risk management including Legal and Compliance, Quality Assurance, Vendor Management and Human Resources. We have consulted with these teams to support our compliance with modern slavery requirements. Corporate compliance policies are regularly reviewed to ensure that they remain current and relevant.

Due Diligence

As part of our initiative to identify, assess and monitor the risk of Modern Slavery in our supply chain, we perform quality assurance assessments on our vendors based on their location and type of services. We assess all clinical vendors prior to working with them and regularly audit their compliance with Good Clinical Practice and other clinical and compliance requirements.

As the vendors, third parties and partners who we work with are mostly professional service providers with their own policies and procedures in place to ensure good ethical conduct of business, we believe the risk of Modern Slavery in our supply chain is low.

Measuring Effectiveness

To establish the modern slavery framework for NHH we have put in place a series of measures which include updating our Code of Conduct, vendor and partner agreements and vendor assessments and advised our board and executive management of our modern slavery compliance obligations.

We will continue to promote adherence to ethical business standards in the way we operate. We recognise that our 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 commit to continue to build upon. To this end, we will assess and report on the effectiveness of our approach.

This statement covers the following entity and Directors of the reporting entity have approved this statement.

Novotech (Australia) Pty Limited ABN 26 071 874 881



Dr. John Moller
Chief Executive Officer