

**NEUREN PHARMACEUTICALS LIMITED
MODERN SLAVERY STATEMENT 2025**

1. Introduction

Neuren Pharmaceuticals Limited ACN 111 496 130 (Neuren) is a public company, incorporated in New Zealand and listed on the Australian Securities Exchange (ASX:NEU). Neuren's registered office is Suite 1.01, 117 Camberwell Rd, Hawthorn East, Victoria, 3123, Australia.

Neuren has a subsidiary in the United States, Neuren Pharmaceuticals, Inc.

This Modern Slavery Statement is Neuren's third statement and is made in accordance with the *Modern Slavery Act 2018 (Cth)*. It describes the actions Neuren has taken to identify, assess and address modern slavery risks in our operations and supply chains during the reporting period from 1 January 2025 to 31 December 2025.

2. Structure, operations and supply chains

Operations

Neuren's core operations involve the research and development of new drug therapies for highly debilitating neurodevelopmental disorders that emerge in early childhood and are characterised by impaired connections and signalling between brain cells.

Neuren is not involved in large-scale commercial manufacturing or the marketing and distribution of pharmaceutical products to consumers.

Neuren has a small workforce, and all employees work remotely. Neuren does not maintain a physical office or manufacturing facilities.

Supply chain

Neuren's supply chains support its research and development activities and include:

- Clinical trial support, expert regulatory, research and laboratory services;
- Contract manufacturing of exploratory drug products, including pharmaceuticals ingredients, packaging, storage and transportation; and
- Corporate services, including IT, finance, tax, legal and human resources.

Suppliers are primarily located in North America, Australia, Western Europe and Asia, including China.

3. Risk assessment of modern slavery practices in operations and supply chains

Neuren recognises that modern slavery risks can exist in all industries and geographies and may arise through both direct operations and extended supply chains.

During the reporting period, we reviewed our operations and supply chains to identify and assess modern slavery risk across three key dimensions:

Workforce risks

Neuren acknowledges some countries are associated with higher risks of modern slavery, due to poor governance, weak rule of law, conflict, migrant flows and socio-economic factors like poverty.

Neuren considers the risk of modern slavery in its directly employed workforce to be low due to:

- Operations located in Australia and the United States;
- Strong regulatory environment;
- Highly skilled workforce profile; and
- Small organisational size.

Supplier risks

Neuren recognises that the risk of modern slavery increases through engagement with third-party suppliers.

Key risk areas within Neuren's supply chain include:

- Contract research organisations and laboratory services providers supporting clinical and preclinical activities;
- Contract development and manufacturing organisations (CDMOs) engaged in the manufacture of exploratory active pharmaceutical ingredients (APIs) and drug products, including the sourcing of intermediates and pharmaceutical inputs;
- Logistics, warehousing and transportation providers operating across multiple jurisdictions.

These supply chain categories involve global operations and may extend to jurisdictions with elevated modern slavery risk profiles. Within Asia, including China, Neuren acknowledges the increased risk of state-imposed forced labour and other labour rights concerns.

While Neuren does not procure goods typically associated with high modern slavery risk (such as the manufacture of mass-produced electronics, garments and consumables), it recognises that modern slavery risks remain present in all sectors, including pharmaceutical research and manufacturing supply chains.

Suppliers engaged in these categories typically operate in regulated environments and are expected to maintain corporate governance frameworks addressing human rights and labour standards. This includes policies and controls aligned with international frameworks such as the United Nations Global Compact, International Labour Organization conventions, and pharmaceutical industry initiatives, which prohibit forced labour, child labour and human trafficking and support fair and safe working conditions.

However, Neuren recognises that the presence of such frameworks does not eliminate modern slavery risk, particularly where supply chains are complex and extend beyond direct contractual relationships. Accordingly, Neuren considers these structural and geographic risk factors in its assessment of supplier risk and continues to incorporate modern slavery considerations into supplier engagement and the development of its due diligence processes.

Based on this assessment, Neuren considers its highest inherent risks to arise within its indirect supply chain, particularly in manufacturing activities and supplier jurisdictions with elevated risk profiles.

4. Actions taken to assess and address modern slavery risks

Neuren maintains a range of governance controls and is in the process of strengthening its approach to modern slavery risk management.

Governance Framework

Neuren has established corporate governance policies that support ethical conduct and risk management, including:

- Code of Conduct
- Anti-bribery and Corruption Policy
- Risk Management Policy
- Whistleblower Policy
- Company Values

As part of Neuren's induction process, Neuren employees and consultants receive training on the corporate governance policies.

Neuren acknowledges without adequate due diligence, there is a risk Neuren could contribute to or be linked to modern slavery practices via arrangements with suppliers.

Actions taken during this reporting period to assess modern slavery risks include:

- reviewing the risk assessment of Neuren's operations and supply chain;
- visiting supplier facilities in North America and Western Europe;
- undertaking internal audits and commissioned third party audits of several suppliers; and
- reviewing publicly available policies, modern slavery statements and human rights frameworks of key contract development and manufacturing (CDMOs) to assess their approach to labour standards and ethical sourcing.

Neuren notes that many of its key suppliers, particularly within manufacturing and research service categories, maintain policies and governance frameworks addressing labour rights and modern slavery risks. These reviews form part of Neuren's broader approach to understanding supplier practices and informing its ongoing risk assessment and due diligence processes.

Neuren intends to further enhance its governance of modern slavery risks by developing a framework around the key areas: governance, risk assessment, monitoring, reporting and oversight.

5. Effectiveness of the actions taken

Neuren recognises that assessing the effectiveness of its actions to address modern slavery risks is an evolving process.

During the reporting period, Neuren has taken initial steps to better understand its exposure to modern slavery risks, including reviewing its supply chain, undertaking limited supplier engagement activities such as site visits, and reviewing publicly available supplier policies and disclosures.

Given the early stage of these activities, Neuren has not yet established formal processes to assess effectiveness. However, insights gained through these activities are informing Neuren's understanding of supplier risk profiles and supporting the development of a more structured approach to modern slavery risk management.

Neuren's Whistleblower Policy provides a mechanism for reporting concerns, including those related to modern slavery. No reports relating to modern slavery were received during the reporting period.

Neuren will continue to refine its approach to assessing effectiveness as its processes and governance framework develop.

6. Remediation process

Where potential modern slavery risks are identified, Neuren is committed to:

- Engaging with suppliers to implement corrective actions;
- Monitoring remediation progress; and
- Escalating or terminating relationships where risks are not addressed.

7. Continuous Improvement and Future Actions

Neuren is committed to continuous improvement of its modern slavery risk management approach.

In 2026, Neuren intends to:

- Incorporate modern slavery considerations into supplier onboarding processes for new suppliers;
- Increase internal awareness of modern slavery risks through targeted training or guidance for employees involved in procurement and supplier management;
- Consider incorporating modern slavery and human rights expectations into supplier agreements over time, where appropriate; and
- Continue developing internal processes to support the identification, assessment and management of modern slavery risks.

8. Consultation and approval

Neuren consulted relevant companies it owns or controls in the preparation of this statement.

This statement is made in accordance with the *Modern Slavery Act 2018 (Cth)*. This statement was approved by the Board of Directors of Neuren Pharmaceuticals Limited in their capacity as principal governing body of Neuren Pharmaceuticals on 23 June 2026 and signed on its behalf by:



Patrick Davies
Chair
Neuren Pharmaceuticals Limited