

# NEUREN PHARMACEUTICALS LIMITED MODERN SLAVERY STATEMENT 2024

#### 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 201, 697 Burke Rd, Camberwell, Victoria, 3124, Australia.

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

This is Neuren's second modern slavery statement, and it sets out the actions Neuren has taken to assess and address modern slavery risk in our operations and supply chains during the year ended 31 December 2024.

## 2. Operations and supply chains

Neuren's operations are 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's supply chains include:

- Goods and services provided to deliver our research and development activities, such as clinical trial support, expert regulatory, research and laboratory services.
- Goods and services provided to manufacture, store and deliver our exploratory drug products required for our clinical trial research and development programs, such as pharmaceuticals ingredients, packaging, transportation and warehousing.
- Goods and services provided as support for corporate services, including IT, finance, tax, legal and human resources.

### 3. Risks of modern slavery practices in operations and supply chains

During the reporting period, we reviewed our operations and supply chains to identify and assess modern slavery risk and have assessed the following key areas.

### Workforce

We acknowledge 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's direct operations and geographic footprint undertaken by our workforce are in Australia and the United States. We consider the risk of modern slavery in our directly employed workforce to be low, due to the regulated nature of the pharmaceutical industry, our employees being highly educated or skilled and the small size of our workforce. Neuren's small workforce of 19 people all work from home and no office or other facility is maintained.

# **Suppliers**

The risk of modern slavery increases as we engage with third parties in the delivery of the abovementioned research and development activities.

We recognise the potential risk of Neuren contributing to Modern Slavery as a result of the geographic location of contract manufacturers or suppliers of ingredients and components used to manufacture the exploratory drug product and conduct clinical research activities and laboratory services. Most of Neuren's suppliers of these goods and services are based in the regions of North America, Western Europe and Asia. Within Asia, Neuren's suppliers are located in China and Neuren recognises the increased risk of state-imposed forced labour in China. Whilst no sector is immune to modern slavery risk, there are generally higher modern slavery risks in the manufacture of mass produced electronics, garments and consumables which are not procured by Neuren.

Neuren requires third party manufacturers to be compliant with the US Food and Drug Administration (FDA) Good Manufacturing Practice (GMP) procedures.

# 4. Actions taken to assess and address modern slavery risks

Due to the reasons set out in Section 3, Neuren believes there is reduced likelihood of modern slavery in Neuren's operations and supply chain, however we continue to review our ethical and corporate responsibility obligations.

Neuren has several corporate governance policies in place, the following of which are most relevant to preventing Modern Slavery:

- 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; and
- undertaking internal audits and commissioned third party audits of several suppliers.
   Neuren notes most of its major suppliers have policies in regards to labour rights and modern slavery issues.

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

#### 5. Effectiveness of the actions taken

During this reporting period, Neuren focused on gaining an understanding of our modern slavery risks and how identifying the risks that may be present in our operations and supply chains. During these early stages, we recognise that our review and assessment of our actions to identify and address modern slavery risks will be an ongoing process. We will continue to work on developing frameworks and processes to ensure we can review the effectiveness of actions we take to assess and address modern slavery risks in our operations and supply chains.

Neuren has a Whistleblower Policy, which is published on its website and provides an avenue for raising and addressing any concerns or risks, including in our supply chain. During the reporting period, Neuren did not receive any reports relating to modern slavery.

# 6. Consultation and approval

We consulted the relevant companies we own or control in the development of this Modern Slavery Statement.

This Modern Slavery 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 30 June 2025 and signed on its behalf by:

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Patrick Davies
Chair of Neuren Pharmaceuticals Limited