



## MAYNE PHARMA GROUP LIMITED

# MODERN SLAVERY STATEMENT

### 1. INTRODUCTION

Mayne Pharma Group Limited (**Mayne Pharma**) is dedicated to upholding the principles of the Modern Slavery Act 2018 (**Act**) and operating its business lawfully, ethically, and transparently. Mayne Pharma is required to produce an annual modern slavery statement identifying actions that Mayne Pharma has taken to mitigate the risks of modern slavery in its supply chain and throughout its business. This report covers Mayne Pharma and all of its wholly owned subsidiaries for the period from 1 July 2022 – 30 June 2023.

### 2. ABOUT MAYNE PHARMA

At Mayne Pharma we believe that everyone deserves medicines that are better, safe and more accessible. That's why our people are determined to create innovative products and services for our changing world.

Mayne Pharma is an ASX-listed specialty pharmaceutical company (ASX:MYX) focused on commercialising novel pharmaceuticals, offering patients better, safe and more accessible medicines. Mayne Pharma also provides contract development and manufacturing services to clients worldwide. Mayne Pharma has a 40-year track record of innovation and success in developing oral drug delivery systems. These technologies have been successfully commercialised in products that continue to be marketed around the world.

During the relevant period, Mayne Pharma operated a product development and manufacturing facility based in Salisbury, Australia with expertise in formulation of complex oral and topical dose forms including modified-release products. Mayne Pharma divested its US contract services business, including the product development and manufacturing facility in Greenville, North Carolina USA in October 2022.

Mayne Pharma had 505 staff at 30 June 2023, with 244 based in the US and 261 in Australia. The Company works with over 950 suppliers that provide the materials, goods and services to conduct research and development, manufacture products, service our customers and supply our operations and facilities around the world. Key suppliers include approximately 30 contract manufacturing or packaging organisations and approximately 18 active pharmaceutical ingredient suppliers.

### 3. MAYNE PHARMA'S SUPPLY CHAIN

Mayne Pharma works with suppliers in the following categories:

**Direct suppliers:** suppliers that provide goods (such as ingredients and packaging) and services (such as manufacturing services) that are directly related to the production of pharmaceutical products that Mayne Pharma manufactures and distributes.

**Indirect suppliers:** suppliers that provide goods and services required to operate Mayne Pharma's business, such as new plant/equipment and ongoing maintenance to ensure Mayne Pharma's sites remain operational, professional services, sales and marketing support, clinical trials, business travel, IT and other support services.

Mayne Pharma's key suppliers in terms of the dollars spent are the direct materials suppliers and include approximately 30 contract manufacturing organisations and partners and approximately 18 active pharmaceutical ingredient suppliers based in the US, Europe, Canada and Asia. Mayne Pharma's review has focussed on assessing modern slavery risks associated with these key direct suppliers which provide active pharmaceutical ingredients, other raw materials and/or contract manufacturing services to Mayne Pharma. Our vendor assurance processes have been updated so that at the time of initiating contact with



such suppliers, we will ask suppliers to confirm that they are compliant with Mayne Pharma's Supplier Code of Conduct and certify that any source manufacturers are also compliant.

Certain suppliers that Mayne Pharma works with are classified as "GxP suppliers". These suppliers provide ingredients for the manufacture of pharmaceutical products and/or provide certain manufacturing services to Mayne Pharma. GxP suppliers must comply with certain quality guidelines and regulations (such as good manufacturing practices (GMP), good laboratory practice (GLP), good clinical practice (GCP) and good distribution practices (GDP)) to ensure that pharmaceutical products are safe, meet their intended use and adhere to quality processes during manufacturing, control, storage and distribution.

Mayne Pharma's quality department oversees the GxP suppliers used by Mayne Pharma to help ensure Mayne Pharma's compliance with stringent regulatory requirements for the manufacture and supply of pharmaceutical products. The activities undertaken by Mayne Pharma's quality team include desktop assessments of the GxP suppliers and onsite quality management system inspections.

#### **4. MODERN SLAVERY RISKS**

Mayne Pharma recognises that modern forms of slavery include human trafficking, forced labour, bonded labour and child slavery. Although the pharmaceutical industry is highly regulated, we have taken steps to understand what these risks are and to manage them accordingly.

The majority of staff working at Mayne Pharma's sites in Australia and the United States are employed directly by Mayne Pharma or its wholly owned subsidiaries. Given the level of control Mayne Pharma has over its direct workforce, the highly regulated nature of our industry, our employees being largely educated or skilled or undertaking work in controlled environments, and the processes we have in place when hiring employees, we believe the risk of modern slavery in our own operations is low.

Our exposure to the risk of labour exploitation increases when we engage with third parties, particularly in high risk countries where human rights are not well protected. For modern slavery risks, we consider the country of operation and the type of work being carried out by each supplier. Mayne Pharma's actions to mitigate these risks are set out in section 5 below.

#### **5. ACTIONS TO PREVENT AND MITIGATE MODERN SLAVERY**

Mayne Pharma's [Business Code of Conduct](#) outlines the values as well as the standards we expect from our suppliers and partners. Mayne Pharma strives to prevent or remove any adverse human rights practices that may be linked to our operations, products or services. Mayne Pharma's [Business Code of Conduct](#), which includes consideration of managing supplier relationships and ethical conduct, was revised and updated in 2023 and all employees received face-to-face training. The supply chain team are also trained on modern slavery risks.

As per our [Business Code of Conduct](#), Mayne Pharma endeavours to ensure our procurement processes are fair and equitable and that our expectations, requirements and relevant policies are clearly communicated to all suppliers. Mayne Pharma expects that our suppliers engage in lawful business practices, uphold ethical employment and management practices, minimise the impact on the environment and provide a safe and healthy workplace. Mayne Pharma works with its suppliers and external partners to communicate its expectations on ethical standards, for example, by ensuring that written agreements with suppliers and external partners contain obligations to comply with anti-bribery rules and regulations such as the Foreign Corrupt Practices Act (FCPA).

Mayne Pharma has a [Supplier Code of Conduct](#) which sets out in detail the expectations Mayne Pharma has of its suppliers related to labour, human rights, health and safety, environmental responsibilities as well as business integrity and ethics.



Mayne Pharma internally implements vetting and monitoring processes to identify, manage and respond to the risk of unethical conduct throughout our operations and supply chain. Particular care in such due diligence is taken when engaging new suppliers.

These vetting processes are being consistently reviewed and refined to respond to emerging and changing risks such as modern slavery and additional human rights concerns (eg unsafe labour standards and unfair treatment).

For example, Mayne Pharma plans to further improve its ability to assess the risks of modern slavery in its supply chain by:

- requiring suppliers to respond to questions which are designed to identify possible risks or issues related to modern slavery in their operations and supply chain;
- including a provision in any new or renewed agreements with suppliers to include a requirement that each supplier complies with Mayne Pharma's [Supplier Code of Conduct](#) and assesses and manage modern slavery risks; and
- asking suppliers to provide a certification that they are not using any forms of labour that would be considered to be a form of modern slavery.

These improvements are being progressively introduced, with Mayne Pharma initially focussed on those suppliers who operate in higher risk locations and/or industries. Consultation with each of Mayne Pharma's wholly owned subsidiaries was undertaken in the process of preparing this statement.

## 6. MEASURING EFFECTIVENESS

Mayne Pharma's [Misconduct and Whistleblower policy](#) provides a framework for staff and others to raise concerns about misconduct or activities that don't comply with Mayne Pharma's policies, and provides detail on our commitment to treat people with respect when they speak out if faced with an integrity or other ethical concern. Employees are encouraged to make reports as early as possible, and can raise matters of concern with individuals identified in the policy or by making an anonymous report to an independent third party. During the reporting period, Mayne Pharma did not receive any reports related to human trafficking or slavery and forced labour.

Mayne Pharma's ongoing approach to monitoring effectiveness includes the following:

- Increased percentage of agreements that require suppliers to comply with Mayne Pharma's [Supplier Code of Conduct](#) and assess and manage modern slavery risks (to be managed on an annual basis).
- Percentage of potential suppliers identified as medium or high risk as a result of responses to modern slavery related questions in due diligence questionnaires
- Number of substantiated instances reported through Mayne Pharma's whistleblower hotline or other reporting mechanism

## 7. STATEMENT APPROVAL

This statement was reviewed and approved by the Board of Directors of Mayne Pharma Group Limited on 22 December 2023 and signed on its behalf by:

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Shawn Patrick O'Brien  
Chief Executive Officer  
Mayne Pharma Group Limited