

MODERN SLAVERY STATEMENT

Commitment to ethical supply chains

Reporting period: 1 July 2024 to 30 June 2025



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At Akesa, we embrace the spirit of exploration and innovation that fuels drug discovery. We understand that pioneering new treatments and therapies requires a unique combination of creativity, persistence, and courage. We strive to find solutions where others may not and support the discovery and development of groundbreaking technologies.

We believe in the transformative impact of these discoveries and are committed to providing them with the best possible chance of success.

**That is why, at Akesa, we say...
Let Discovery Live.**



A MESSAGE FROM OUR CEOs

At Akesa, we are steadfast in upholding human rights and combating modern slavery in all its forms, including forced labour, human trafficking, and other exploitative practices.

Recognising the hidden risks within complex supply chains, we take a zero-tolerance approach and proactively address these challenges through robust risk management and compliance with the Australian Modern Slavery Act 2018 (Cth).

By collaborating with suppliers, stakeholders, and industry partners, we strive to foster transparency, accountability, and continuous improvement, ensuring an ethical and exploitation-free supply chain.

Through this statement, we outline our commitments, actions, and ongoing efforts to build a more sustainable and responsible future.



Con Konstantopoulos
Co-CEO



George Vlachos
Co-CEO

REPORTING ENTITY

This Modern Slavery Statement is submitted on behalf of Akesa Pty Ltd (ABN 57 168 121 122) and its affiliated entities, for the period from 1 July 2024 to 30 June 2025. Akesa is a privately owned company headquartered in Victoria, Australia, specialising in clinical trial supply and pharmaceutical services.

Since its establishment in 2014, Akesa has developed into a leading provider of pharmaceutical solutions in the Asia-Pacific region, focusing on ethical sourcing of pharmaceutical products primarily for clinical trials, efficient supply chain management, and innovative software development.

This statement applies to Akesa's operations and supply chains, encompassing all areas of direct control and significant influence.

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“ Akesa operates with a zero-tolerance approach to modern slavery, fostering a culture of ethical compliance and transparency. ”



ABOUT AKESA

Established in 2014, Akesa is an end-to-end provider of clinical trial supplies and services.

With headquarters in Melbourne, Australia, Akesa boasts global reach with local APAC expertise. We work alongside clinical trial sponsors, contract research organisations (CRO), research institutions, clinical trial sites and contract development and manufacturing organisations (CDMO) to project manage the sourcing of finished products from validated suppliers and directly from manufacturers including:

- comparators,
- combination therapies, and
- standard-of-care medications.

By partnering with Akesa, our partners unlock extensive market intelligence, specialised clinical trial project management expertise and deep connections with manufacturers for a customised solution to their clinical studies.

Additionally, Akesa offers services including labelling, storage and distribution direct-to-site and to-patient, and on-demand site-based sourcing for supply of commercial and trial medicines for sponsors, hospital pharmacies and trial sites.

Structure

Akesa operates primarily through its Australian entity, which serves as the Group's headquarters and principal operating entity. During the reporting period, all strategic oversight, governance, operational management, and supplier engagement activities were conducted through the Australian business.

Akesa is governed by a senior leadership team responsible for strategic direction and ensuring compliance with ethical, legal, and regulatory standards across its operations and supply chains.

During the reporting period, Akesa did not have any foreign subsidiaries or controlled entities. Following the end of the reporting period, Akesa established legal entities in Japan and Singapore. These entities were not operational during the reporting period and are therefore not within the scope of this Statement.

Operations

Akesa's core business activities include:

- **Pharmaceutical supply services:** Sourcing, managing, and delivering medicines for clinical trials and other regulated access pathways.
- **Digital enablement:** Operating software platforms that support compliant ordering, visibility, and distribution of pharmaceutical products.

These operations are supported by partnerships with a global network of suppliers and service providers.



Supply chains

Akesa's supply chains span multiple industries and geographies, comprising:

- **Pharmaceutical manufacturing and distribution:** Engaging global suppliers to source finished products, prioritising ethical and regulatory compliance.
- **Logistics providers:** Partnering with local and international logistics companies to ensure the secure and efficient transportation and distribution of pharmaceutical products.
- **IT services:** Partnering with local providers for software development, hardware procurement, and technology support.
- **Facility services:** Using domestic suppliers for cleaning, maintenance, and operational needs.

Akesa actively manages these supply chains through rigorous policies, stringent supplier agreements, robust due diligence processes, continuous supplier engagement, and periodic risk assessments.



Our core values

At Akesa, our values define our identity and shape our vision, guiding every aspect of our business and positioning us as a pioneering, reliable, expert, and professional partner in the pharmaceutical industry.

Our ambition is clear: to transform the landscape of clinical trials, offering innovative solutions that benefit both our customers and suppliers.

Learn more about our values below.



PIONEERING

At Akesa, our relentless pursuit of innovation drives us to constantly explore new and ground-breaking ways to enhance the clinical trials experience. We refuse to rest on our laurels, understanding that the pursuit of excellence demands an unceasing commitment to finding novel solutions.



RELIABLE

Reliability is the cornerstone of our success. We firmly believe that our word is our bond, and we take our commitments seriously. This reliability extends to every stakeholder in our ecosystem, ensuring trust and confidence in our partnerships.



EXPERT

Expertise is the bedrock upon which Akesa is built. Our team consists of industry-leading experts who possess an unparalleled depth of knowledge in clinical trials. Customers and suppliers turn to us for our profound understanding of the complexities and nuances of our field. We are committed to sharing our expertise to navigate the challenges and intricacies of clinical trials successfully.



PROFESSIONAL

Professionalism is not just a buzzword at Akesa; it's a way of being. We conduct ourselves with the utmost professionalism in every aspect of our business. Whether we're engaging with customers, suppliers, or tackling industry challenges, our approach delivers the highest standard of service. Our commitment to professionalism ensures that every interaction with Akesa is characterised by excellence.

RISKS OF MODERN SLAVERY PRACTICES

Akesa recognises that modern slavery risks can manifest at various points within its operations and supply chains. These risks often stem from systemic vulnerabilities, including weak regulatory frameworks, lack of transparency, and exploitative practices in certain industries or regions. To effectively address these challenges, Akesa takes a risk-based approach to identify and prioritise areas of concern.

Risk assessment

Akesa's risk assessment focuses on two primary categories: domestic risks and international risks.

Domestic risks:

- **IT services:** Australia heavily relies on imported IT hardware, much of which is manufactured in countries with reported labour exploitation. Risks include forced labour and poor working conditions in electronics factories, often located in regions with weak labour protections. With global demand for IT products increasing, supply chain complexities exacerbate the challenge of ensuring ethical sourcing.
- **Cleaning services:** The cleaning sector in Australia often employs temporary and migrant workers who may lack knowledge of their rights, making them susceptible to underpayment and exploitative practices. Issues such as wage theft and unsafe working conditions are frequently reported, particularly among subcontracted or casual workers.
- **Outsourced labour:** Facilities management and maintenance services in Australia often involve layers of subcontracting, reducing transparency and increasing the likelihood of underpayment or poor treatment of workers. Vulnerable groups, including migrants on temporary visas, are particularly at risk due to limited access to support mechanisms.

International risks:

- **Pharmaceutical manufacturing:** Many pharmaceutical products and ingredients are sourced from countries like India and China, where labour protections can vary significantly. Reports of bonded labour, unsafe working conditions, and insufficient wages in chemical manufacturing plants highlight the importance of due diligence.
- **Raw material sourcing:** The procurement of raw materials, such as APIs (active pharmaceutical ingredients), often involves regions with documented child labour or forced labour in mining and agriculture. Weak enforcement of labour laws in parts of Southeast Asia adds another layer of complexity to supply chain management.
- **Subcontracting arrangements:** Third-party subcontractors, especially in countries with underdeveloped labour regulations, can obscure accountability and increase the risk of modern slavery practices.

High-risk industries and regions

Akesa identifies certain industries and regions as having heightened risks of modern slavery due to systemic vulnerabilities. These include:

- **Industries:** IT hardware manufacturing, outsourced cleaning services, and pharmaceutical ingredient production.
- **Regions:** Geographies with weaker labour protections or high instances of human rights violations.

Systemic vulnerabilities, such as weak regulatory frameworks and lack of transparency, demand proactive risk assessments in supply chains.

Emerging risks

The APAC region is experiencing rapid industrialisation and globalisation, introducing new risks:

- Increased reliance on temporary and migrant labour, often under informal or precarious contracts.
- Expansion of e-waste processing and recycling industries, which involve hazardous working conditions and exploitative practices.
- Rising global demand for pharmaceuticals, placing pressure on supply chains and increasing the likelihood of cost-cutting measures at the expense of worker rights.

As global dynamics evolve, new risks may emerge in the supply chain. Akesa continually monitors and evaluates factors such as:

- changes in legislation or enforcement standards,
- shifting supplier practices or operational models,
- developments in industries with systemic vulnerabilities.

By maintaining a proactive and adaptive approach, Akesa ensures that risks are promptly identified and addressed to uphold its commitment to ethical supply chain practices.



SUPPLIER ANALYSIS

Akesa engaged with a total of 128 suppliers in FY2025, spanning diverse industries and services.

These suppliers are categorised into the following key groups based on their contributions to Akesa’s operations:

- **Products:** Includes pharmaceutical manufacturers and wholesalers.
- **Business services:** Covers professional services, IT/software providers, and facility management.
- **Product services:** Warehousing, transport and logistics providers that support supply chain operations.

measures to address modern slavery risks, reinforcing Akesa’s commitment to partnering with ethical and responsible organisations.

By prioritising engagement with high-risk suppliers and implementing robust monitoring measures, Akesa is committed to fostering an ethical supply chain and mitigating risks of modern slavery across its operations.

Graph: Suppliers by industry category



- Professional and scientific services
- IT / software services
- Pharmaceutical manufacturing
- Office and maintenance services
- Industry body
- Pharmaceutical wholesaler
- Warehousing, transport and logistics
- Property and construction
- Event services
- Telecommunications
- Travel and accommodation services
- Pharmaceutical services
- Insurance
- Not-for-profit

High-risk industries

A targeted assessment identified 33 suppliers operated within high-risk industries, accounting for 25.8% of total suppliers. These suppliers primarily operate in sectors such as pharmaceutical manufacturing and warehousing / transport / logistics, where systemic vulnerabilities to modern slavery practices are recognised.

Risk mitigation measures

Of the 33 suppliers operating within high-risk industries, the top 18 suppliers by spend, collectively accounting for 97.3% of total supplier spend, had publicly published modern slavery statements or provided evidence of modern slavery policies.

An additional two suppliers within high-risk industries also demonstrated their commitment to ethical practices by holding modern slavery statements.

This demonstrates that the vast majority of Akesa’s high-risk suppliers have implemented



PREVENTION OF MODERN SLAVERY

Akesa is committed to upholding ethical standards and ensuring our supply chains are free from modern slavery.

This commitment is supported by the integration of the following key organisational policies, which align with Akesa's values and legislative requirements:

- **Anti-Bribery and Corruption Policy:** Ensures that all business dealings, including those with suppliers, are conducted transparently and ethically, reducing the risk of exploitative practices.
- **Code of Conduct:** Sets clear expectations for ethical behaviour among employees and suppliers, promoting integrity and respect for human rights.
- **Equal Opportunity Policy:** Reinforces Akesa's commitment to fairness, diversity, and the elimination of discriminatory practices across operations and supply chains.
- **Privacy Policy:** Safeguards personal data, including that of supply chain workers, ensuring compliance with privacy laws and ethical data management.
- **Whistle-blower Policy:** Provides a confidential and secure channel for reporting concerns, including potential instances of modern slavery or unethical behaviour in Akesa's supply chain.
- **Grievance Handling Policy:** Establishes a framework for resolving disputes fairly, ensuring the voices of all stakeholders, including supply chain workers, are heard and respected.
- **Anti-Bullying & Anti-Harassment Policy:** Promotes a workplace free from bullying, harassment, and inappropriate behaviour, ensuring all employees and suppliers are treated with dignity and respect.

- **Workplace Health and Safety Policy:** Outlines standards for maintaining safe working conditions, both within Akesa and in collaboration with suppliers.
- **Sustainability Policy:** Guides efforts to prioritise sustainable sourcing practices, minimise environmental impact, and ensure ethical labour practices within Akesa's supply chain.

By embedding these policies into its operations, Akesa creates a comprehensive framework to proactively prevent modern slavery and foster ethical practices within the organisation and supply chains.

Policy and process reviews

Regular reviews of Akesa's modern slavery policies and processes ensure their ongoing effectiveness:

- **Scheduled reviews:** Policies are formally reviewed at least every two years, or earlier if significant legislative or operational changes occur.
- **Feedback integration:** Insights from employees, suppliers, and industry stakeholders are incorporated into updates.



ACTIONS TO ASSESS AND ADDRESS RISKS

Akesa is committed to taking proactive and comprehensive measures to assess and address the risks of modern slavery in its operations and supply chains. These actions are grounded in a risk-based approach, ensuring resources are prioritised toward the highest-risk areas while maintaining vigilance across all activities.

Due diligence processes

Akesa employs robust due diligence measures to identify, assess, and mitigate modern slavery risks:

Supplier onboarding: All new suppliers operating in high-risk categories underwent a detailed assessment addressing:

- the absence of modern slavery within their organisation and supply chains,
- policies and processes to identify and mitigate modern slavery risks, and
- evidence of compliance with applicable modern slavery legislation

Alternative evidence, such as a current Modern Slavery Statement or equivalent documentation, may also be submitted to demonstrate compliance with modern slavery requirements.

This evidence must address key criteria, including the absence of modern slavery in the organisation and supply chains, existing policies and processes to mitigate risks, and adherence to applicable legislation.

Contractual obligations: Where possible, Akesa includes specific anti-slavery clauses in supplier agreements, which mandate:

- adherence to modern slavery laws and ethical labour practices,
- Implementation of policies and procedures to ensure compliance within their supply chains, and
- prompt disclosure of any known or suspected breaches.

Monitoring and auditing

Akesa conducts ongoing monitoring and periodic audits to ensure compliance with modern slavery obligations. These include:

- **Key supplier reviews:** For Akesa's top suppliers (ranked by spend), reviews include an assessment of mandatory or voluntary modern slavery statements and each supplier's approach to management of modern slavery risks.
- **High-risk supplier audits:** Suppliers in high-risk industries or regions (e.g., IT hardware and development services) are subject to enhanced due diligence, including requests for evidence of compliance, policies, and audit reports.
- **Annual audits:** Scheduled reviews of supplier practices, prioritised based on risk ratings.

Through robust due diligence, we mitigate risks and ensure compliance with modern slavery obligations.

Training and awareness

Akesa recognises the importance of equipping employees and suppliers with the knowledge to identify and address modern slavery risks:

- **Employee training:** Periodic training ensures staff understand modern slavery risks and their responsibilities under Akesa's policies.
- **Supplier collaboration:** Akesa engages with suppliers to share resources to improve understanding and compliance.

Grievance and reporting mechanisms

To support transparency and accountability, Akesa has established robust mechanisms for reporting concerns:

- **Whistleblower policy:** The policy outlines procedures for employees, suppliers, and other stakeholders to report incidents.
- **Investigation and remediation:** Reports are thoroughly investigated, and where breaches are identified, Akesa works with suppliers to implement corrective actions or terminates relationships where remediation fails.

Collaboration and industry engagement

Akesa actively participates in industry initiatives to combat modern slavery, leveraging collaboration to drive broader impact:

- **Supplier partnerships:** Akesa fosters open dialogue with suppliers to improve labour practices and ensure alignment with ethical standards.

By integrating these actions into its operational framework, Akesa strengthens its commitment to identifying, addressing, and preventing modern slavery within its operations and supply chains.



ASSESSING EFFECTIVENESS

Regular assessments ensure that Akesa's policies and practices remain relevant, impactful, and aligned with evolving legal and industry standards.

Key performance metrics

To measure the impact of our efforts, Akesa tracks and analyses key performance indicators (KPIs), including:

- **Supplier engagement:** The number and percentage of suppliers who have completed modern slavery questionnaires or audits.
- **Risk mitigation:** The number of identified risks addressed through corrective actions or supplier engagement.
- **Training participation:** Rates of employee participation in training and awareness programs.
- **Grievance reports:** The number and nature of issues reported through grievance mechanisms, along with resolution outcomes.

Supplier audits and monitoring

Akesa conducts risk-based audits and reviews of its supply chains to assess compliance and identify areas for improvement:

- **Audit findings:** Outcomes of supplier audits are documented, with corrective action plans implemented for any non-compliance.
- **High-risk supplier oversight:** Enhanced monitoring for suppliers in high-risk industries or regions, ensuring adherence to modern slavery policies.

Stakeholder feedback

Akesa values input from employees, suppliers, and industry partners to strengthen its approach:

- **Internal feedback:** Engagement with internal teams, including Customer Operations and Quality Assurance, to identify gaps or improvement opportunities.
- **Supplier consultation:** Collaboration with suppliers to understand challenges and refine risk management strategies.

Continuous improvement

Akesa embraces a culture of continuous improvement, leveraging insights from assessments to enhance its practices:

- **Refining training programs:** Updating training content to reflect emerging risks and industry best practices.
- **Strengthening due diligence:** Enhancing supplier onboarding, monitoring, and engagement processes.
- **Incorporating lessons learned:** Using findings from audits and reviews to drive better outcomes across operations and supply chains.

Measuring supplier engagement, addressing identified risks, and refining training programs are central to our continuous improvement.

STAKEHOLDER CONSULTATION

Akesa adopts a collaborative approach to addressing modern slavery risks by engaging with internal and external stakeholders. This ensures alignment across all teams and strengthens our collective ability to identify and mitigate risks.

Internal collaboration

- **Interdepartmental engagement:** Regular consultation between senior leadership, Quality Assurance, and Customer Operations teams ensures that all aspects of the supply chain are monitored and risks are addressed.
- **Leadership oversight:** Senior management provides strategic direction and reviews risk mitigation strategies to ensure alignment with organisational objectives.

External collaboration

- **Supplier engagement:** Akesa works closely with suppliers to improve awareness and compliance with modern slavery obligations.
- **Industry partnerships:** Participation in industry forums and collaborations with external organisations like EcoVadis enhance Akesa's understanding of systemic risks and innovative solutions.



COMMITMENT TO CONTINUOUS IMPROVEMENT

Akesa is committed to strengthening its efforts to combat modern slavery through a process of continuous improvement.

This commitment is reflected in ongoing investments in systems, policies, and practices to address emerging risks and align with global best practices.

Key initiatives

To measure the impact of our efforts, Akesa tracks and analyses key performance indicators (KPIs), including:

- **Policy enhancements:** Regularly updating modern slavery policies to reflect legislative changes, industry developments, and insights from audits and stakeholder feedback.
- **Advanced monitoring tools:** Exploring and adopting new technologies or methodologies for improved supply chain transparency and risk identification.
- **Training upgrades:** Expanding and refining employee and supplier training programs to include updated content on emerging risks and mitigation strategies.
- **Collaboration expansion:** Broadening partnerships with suppliers and industry organisations to drive collective improvements in ethical supply chain practices.

Through these initiatives, Akesa demonstrates its dedication to ethical practices and its role as a leader in addressing modern slavery risks.

Ongoing investments in training, monitoring tools, and policy enhancements underscore our commitment to ethical supply chains.



APPROVAL

This Modern Slavery Statement has been reviewed and approved by Akesa's Board, reflecting the company's commitment to ethical labour practices and compliance with the Australian Modern Slavery Act 2018.

The statement has been endorsed by:

Con Konstantopoulos
Co-CEO

George Vlachos
Co-CEO

Approval date: 17-DEC-2025

This statement will be reviewed annually to ensure its ongoing relevance and effectiveness in addressing modern slavery risks.

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