

Modern Slavery Statement for Nucleus Network

Introduction

Nucleus Network is a dedicated Phase 1 clinical trial provider servicing the global biopharmaceutical industry. Our mission is to advance medicine and improve lives by pioneering and conducting complex and diverse early-stage clinical trial design for biotech and pharmaceutical companies safely and rapidly, underpinned by a commitment to quality. At Nucleus Network, we are committed to conducting our business in a manner that respects the rights, dignity and wellbeing of all people, including those engaged in our operations and supply chain. This statement is made under section 14 of the Modern Slavery Act 2018 (Cth) for the year ended 31 December 2025.

Reporting Entity

This Modern Slavery Statement is made by Napa TopCo Pty Ltd (ACN 654 627 504), jointly with consolidated Group entities Napa BidCo Pty Ltd (ACN 654 628 403), NN HoldCo Pty Ltd (ACN 623 535 982) and NN BidCo Pty Ltd (ACN 623 536 247), all trading as Nucleus Network. The companies trading as Nucleus Network are private Australian companies.

Other operating subsidiaries of Napa TopCo Pty Ltd, which are not reporting entities, include Q-Pharm Pty Ltd, Nucleus Network Sydney Pty Ltd, Nucleus Network Pty Ltd in Australia; and Nucleus Network USA, LLC, Prism Research Holdings, LLC and Prism Research, LLC in the United States and Hammersmith Medicines Research Limited in the United Kingdom. Nucleus Network's subsidiaries are phase 1 clinical trial providers, and some operate early-phase clinic trial facilities.

Our Business and Supply Chain

As a leader in our industry, and the only phase 1 operator with clinics in the UK, US and Australia, our reputation is underscored by a commitment to excellence, specialised knowledge, and the welfare of employees and clinical trial participants. As of August 2025, Nucleus Network operates an early phase clinical trial business in the United Kingdom with a reputation, experience and service delivery matching our existing sites and brings the trials completed by our Group from 1,500 to over 2,500 across the spectrum of therapeutic areas, for a global set of clients based primarily out of the United States, Europe and the Asia-Pacific region. Nucleus Network has a workforce of over 900 people, the majority of whom are directly employed, with contractors representing less than 5% of the workforce. Nucleus Network operates 4 clinical trial facilities in Brisbane, Melbourne, Minneapolis and London.

Our employment practices are supported by established recruitment, onboarding, policy and people processes designed to promote lawful, fair and respectful working conditions.

We recognise that modern slavery is not confined to any particular industry or geographic region and that maintaining visibility and appropriate oversight across our operations and supply chain is important to identifying and addressing potential risks.

We contract a range of services related to our business operations to third-party vendors. Given the nature of our work, these vendors are typically administrative or clinical in nature and proximate to our clinics. Some examples of key vendors include pathology lab service providers, transport services for medical samples and or documentation, medical consumable providers, and medical staff who provide on-site services for specialist procedures that Nucleus does not have in-house expertise. These vendors are expected to comply with the applicable laws and regulations, and to maintain standards and practices that support ethical conduct. Lawful labor practices and prohibition of modern slavery. The standard vendor terms which we seek to include in vendor contracts deem non-compliance with these matters as a breach of contract.

Risks of Modern Slavery

Nucleus Network acknowledges several potential modern slavery risks in our supply chain (and the supply chains of our subsidiaries) consistent with the types of risks that may arise across complex operations and supply chains, and which require ongoing oversight and appropriate controls. These include:

1. Contracting IT professional services vendors based in India who satisfy our vendor assessments described below. We acknowledge that the Global Slavery Index published by WalkFree indicates that India has an elevated country risk profile regarding modern slavery.
2. Utilising contract and agency staff (generally Medical Officers) in Australia and the United States, which we acknowledge may present increased modern slavery risk where employment conditions, recruitment practices or labor supply arrangements are not sufficiently transparent or monitored.
3. The use of cleaning service providers in Australia, UK and the United States. We acknowledge that outsourced cleaning services can represent a higher risk sector for modern slavery due to the nature of labor arrangements and visibility over employment practices.

Actions Taken to Assess and Address Risks

Nucleus Network seeks to mitigate these potential risks through vendor qualification processes, contractual controls and broader governance practices that support responsible engagement of suppliers and workers. The vendor qualification process involves a vendor self-assessment questionnaire covering matters such as workforce policies and procedures, compliance controls, data privacy and certifications. As described above, the standard vendor terms which we seek to include in vendor contracts deem non-compliance with applicable laws and regulations, including maintaining anti-corruption and anti-bribery policies and prohibiting modern slavery practices, as a breach of contract.

If Nucleus Network became aware of modern slavery risks as a result of the vendor qualification process, additional due diligence steps would be undertaken before onboarding the vendor, and the matter would be escalated to senior management within the business for further consideration. Where relevant, this may include consultation with appropriate internal stakeholders to assess workforce, legal, operational and reputational risk.

Nucleus Network is a science-based research organisation caring for trial participants in a medical setting, and being a services business, strong workforce oversight, established employment practices and the controlled nature of our clinical environment support a lower risk profile within our directly employed workforce. However, we recognise the importance of maintaining vigilance in relation to higher-risk supplier categories, outsourced services and contingent labor arrangements.

Our Policies

We are dedicated to ensuring that our policies reflect our commitment to acting ethically and with integrity in all our business relationships. Nucleus Network maintains a policy framework that sets out the standards, expectations and requirements that apply across the organisation. All employees, agents, workers and contractors of Nucleus Network are expected to comply with applicable policies and related standards.

Policies and processes that support the mitigation of modern slavery and human rights risks include:

- **Employee Code of Conduct:** Our Code of Conduct sets out the standards of behavior expected of employees in their interactions with colleagues, leaders, clients and others connected with our business. Our Code of Conduct sets forth the obligations and duty of care, which includes, amongst others, the obligation to comply with lawful, ethical and respectful standards of conduct in dealing with others within and beyond Nucleus Network.
- **Whistleblower Policy:** We encourage all our workers to report any concerns related to the direct activities, or the supply chains of the organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking, or any suspicions that Nucleus Network's supply chains may involve modern slavery. The Whistleblower Policy sets out the legal protections available to eligible whistleblowers, the process for raising concerns or making disclosures, how disclosures are assessed and investigated and how Nucleus Network supports and protects whistleblowers from detriment.
- **Due Diligence Processes:** We conduct thorough vendor qualification processes as described above. These processes are intended to support visibility over supplier practices and to identify areas requiring further review or escalation.

To support awareness and accountability, employees are required to:

- Complete induction training upon commencement of employment, which includes the Code of Conduct and key policies within Nucleus Network's policy framework.
- Review and acknowledge relevant policies on commencement and as material updates are made, helping ensure awareness and understanding of current and updated policy requirements. Depending on role and responsibility, additional guidance and training may also be provided to support awareness of modern slavery risks and escalation pathways.

Assessing the Effectiveness of Our Actions

Nucleus Network is dedicated to improving our practices to prevent, identify and address modern slavery risks. We will continue to review our policies and procedures to ensure they are effective in preventing modern slavery in our business and supply chain. This will include reviewing the implementation of relevant policies, training and due diligence processes, and considering whether these controls are operating as intended.

Nucleus Network is also in the process of designing and implementing a specific Modern Slavery and Human Trafficking policy alongside appropriate training modules to ensure relevant employees and leaders are equipped with the knowledge and tools to identify, escalate and respond to modern slavery risks. Our People & Culture and Quality teams are overseeing the implementation, alongside third-party validation and review of the policy and training modules and will report on progress regularly to senior management.

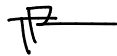
As these controls continue to mature, Nucleus Network intends to assess effectiveness through indicators such as policy implementation progress, training completion, due diligence activity, and the nature of any concerns raised through available reporting channels.

Joint Consultation

This Modern Slavery Statement has been prepared in consultation with the other reporting entities (Napa BidCo Pty Ltd, NN HoldCo Pty Ltd and NN BidCo Pty Ltd) as well as Napa TopCo Pty Ltd.'s subsidiaries (including Q-Pharm Pty Ltd, Nucleus Network Sydney Pty Ltd, Nucleus Network Pty Ltd in Australia and Nucleus Network USA, LLC, Prism Research Holdings, LLC and Prism Research, LLC in the United States). The statement has been reviewed by executive leadership team members whose responsibilities are consistent across each of those entities including leaders from functions relevant to governance, operations and workforce oversight.

Approval

This statement was endorsed and approved by the Board of Napa TopCo Pty Ltd on 30 June 2025 on behalf of that company and Napa BidCo Pty Ltd, NN HoldCo Pty Ltd and NN BidCo Pty Ltd.



Electronically signed by: Teena
Pisarev
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Date: Aug 18, 2026 12:38:23 GMT+10

Teena Pisarev, CEO and Director of Napa TopCo Pty Ltd