



*Advancing medicine,
improving lives.*

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 and dignity of all people. This statement is made under section 14 of the Modern Slavery Act 2018 (Cth) for the year ended 31 December 2023.

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. 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 US and Australia, our reputation is underscored by a commitment to excellence, specialised knowledge, and the welfare of employees and clinical trial participants. Nucleus Network has completed over 1,500 trials in our history 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 team of skilled and educated professionals including over 600 individuals, of which contractors represent less than 5%. Nucleus Network operates 3 clinical trial facilities in Brisbane, Melbourne and Minneapolis.

Given our depth of experience and global scale, we understand that modern slavery is not confined to any particular industry or geographic region and recognise the importance of vigilance throughout our supply chain.

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.

Nucleus Network Pty Ltd
nucleusnetwork.com

Melbourne
Level 3, 549 St Kilda Road,
VIC 3004, Australia

Brisbane
Level 5, Clive Berghofer Cancer
Research Centre (CBRC Building)
300C Herston Rd,
Herston, QLD 4006, Australia

Minneapolis
1000 Westgate Drive, Suite 149
St. Paul, Minnesota, 55114, US

These vendors are expected to comply with the applicable laws and regulations, including maintaining anti-corruption and anti-bribery policies and prohibiting modern slavery practices. 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) which we view as common to large organisations and are manageable through the policies set-out below. 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 potentially carries a higher modern slavery risk compared to the engagement of employees.
3. The use of cleaning service providers in Australia and the United States. We acknowledge that these are high risk sectors for modern slavery practices.

Actions Taken to Assess and Address Risks

Nucleus Network seeks to mitigate these potential risks through our vendor qualification processes and contract terms where possible. The vendor qualification process involves a vendor self-assessment questionnaire covering employee policies and procedures, data privacy and certifications among other things. 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 / the matter would be escalated to senior management within the business for further consideration.

Nucleus Network is a science-based research organisation caring for trial participants in a medical setting, and being a services business, the quality of our people and processes are critical to our success. The calibre of our people and the risk-averse and controlled clinical trials environment reduce the risk of modern slavery in our workplace and in our supply chain.

Our Policies

We are dedicated to ensuring that our policies reflect our commitment to acting ethically and with integrity in all our business relationships. Our Employee Handbook outlines the policies in effect at Nucleus Network's workplace and forms part of the conditions of employment. All employees, agents, workers, and contractors of Nucleus Network are expected to comply with the policies in this Handbook.

Specifically, our policies which operate to mitigate the risk of modern slavery and human trafficking include:

- **Employee Code of Conduct:** Our code sets forth our expectations regarding staff behaviour towards their colleagues, superiors, and clients. Our Code of Conduct sets forth the obligations and duty of care, which includes, amongst others, the obligation to comply with prevailing community standards of equity, justice, fairness, and compassion 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. Additionally, the Employee Handbook outlines legal protections available to eligible whistleblowers, the process for raising concerns or making disclosures, and the investigation procedure. It also details how Nucleus Network will support whistleblowers and protect them from detriment.
- **Due Diligence Processes:** We conduct thorough vendor qualification processes as described above.

Regarding continuous training practices, all employees are required to:

- Complete induction training upon commencement of their employment, which includes the Code of Conduct and Employee Handbook.
- Undertake annual reviews of the Employee Handbook. This includes that all employees must read and acknowledge comprehension of our Employee Handbook, ensuring awareness and understanding of new, existing and updated policies.

Assessing the Effectiveness of Our Actions

Nucleus Network is dedicated to improving our practices to combat slavery and human trafficking. We will continue to review our policies and procedures to ensure they are effective in preventing modern slavery in our business and supply chain.

Nucleus Network is also committed to implementing a specific Modern Slavery and Human Trafficking policy alongside appropriate training modules to ensure our staff are equipped with the knowledge and tools to assess, report and mitigate modern slavery risks. Our People & Culture and Quality teams will oversee the implementation of the policy and training modules and will report on progress regularly to senior management.

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.

Approval

This statement was endorsed and approved by the Board of Napa TopCo Pty Ltd on 28 June 2024 on behalf of that company and Napa BidCo Pty Ltd, NN HoldCo Pty Ltd and NN BidCo Pty Ltd.



Teena Pisarev, CEO and Director of Napa TopCo Pty Ltd