

## Modern Day Slavery & Human Trafficking Statement

Effective Date: 30 June 2025

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### A. Introduction

This Statement is made in accordance with the Australian *Modern Slavery Act 2018 (Cth)* (**Australian MSA**) and the United Kingdom's *Modern Slavery Act 2015 (UK MSA)*, (collectively the *Modern Slavery Acts*), and in alignment with emerging international obligations and best practices, including the United Nations Guiding Principles on Business and Human Rights (UNGPs)

It outlines the actions taken by **Emerald Clinical (as defined below)** and its subsidiaries and affiliates, to assess and address modern slavery and human trafficking risks in our operations and supply chains for the reporting period 1 January 2024 to 31 December 2024.

We remain committed to ethical and lawful conduct in every jurisdiction in which we operate and strive to prevent any form of modern slavery, forced labour, or exploitation from occurring in our business or value chain.

In this Policy a reference to '**Emerald Clinical**' means Emerald ROW NewCo Pte Ltd and Emerald Clinical Trials Pty Ltd and their subsidiaries.

### **About Us**

Emerald ROW Newco Pte Ltd. is incorporated in Singapore and registered at 12 Marina View #11-01, Asia Square Tower 2, Singapore (018061), (**Emerald Clinical/ Our/We**). Emerald ROW NewCo Pte. Ltd., is the parent company of the international business of all Emerald Clinical entities, including Emerald Clinical Trials (UK) Limited and has operational and management oversight over Emerald Clinical Trials Pty Ltd (Australia).

Our mission is to improve the health of millions of people worldwide through clinical research supported by global service delivery, world-class scientific leadership, and therapeutic specialities. We are committed to the highest level of ethical compliance in Our business. At the heart of this are Our organisational values:

- Integrity
- Mutuality
- Can Do
- Empowerment
- Excellence

We conduct Our business in compliance with its organisational values and is committed to:

- acting professionally and with integrity in all Our business activities;
- ensuring there are no acts of modern slavery or human trafficking in Our supply chains or business activities; and
- creating and maintaining transparency in Our business activities.

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Through a combination of policies, procedures, contractual obligations, and training, we seek to prevent, identify, detect, and address human trafficking and modern slavery by applying high ethical standards both within Our business operations and Our supply chain.

### **B. Business Structure, Operations and Supply Chain**

Emerald Clinical is a leading global contract research organisation providing a full range of clinical trial services to biopharmaceutical, medical device, and diagnostic customers for all trial phases, registration, and post-marketing trials. We have more than 400 experienced people in more than 40 locations throughout the Asia-Pacific region, USA, and Europe. We combine scientific and clinical leadership with expert trial delivery to create distinctive world-class solutions. Further information on Our business can be found on Our [website](#).

We work with numerous partners, providers, and suppliers worldwide.

Our **global operations** include:

- Clinical trial site management
- Regulatory and ethics submissions
- Data management and statistical analysis
- Patient recruitment
- Medical and safety monitoring

We engage a network of suppliers, vendors, consultants, clinical trial sites, and professional service providers to deliver these services. These include:

- Clinical trial site partners (e.g., hospitals, universities, private practices)
- Clinical technology and data service providers
- Legal, HR, and administrative services
- Facilities, IT, and logistics vendors

All third-party providers and contractors are expected to comply with applicable laws and adhere to our contractual standards on ethics, labour rights, and human rights. We assess supplier risk based on geographic location, nature of services, and industry exposure to forced labour, child labour, and exploitation.

### **C. Risk Assessment and Risk Controls**

We routinely assess the risks that may arise under the Modern Slavery Acts in Our supply chain and business activities.

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While We operate in multiple jurisdictions, We believe that the risk of modern slavery or human trafficking in Our business activities or supply chains is low. This is because the vast majority of Our workforce is educated or skilled and work in controlled environments with a well-structured management system who has full visibility and management control of its business activities along with well-established policies, processes, and systems. Our employees and contractors are predominantly skilled professionals with scientific, medical, or other professional training who are not generally considered a class of persons at high risk of modern slavery or human trafficking.

While the direct risk within our core operations remains low due to our professional, highly skilled workforce, we acknowledge elevated risks may exist in:

- Clinical site operations outsourced in high-risk jurisdictions
- Temporary labour providers (eg.: cleaning/security services)
- IT or data service providers using subcontractors in risk-prone regions

In addition, We comply with all employment and social security laws in all Our business activities. As set out below, We mandate Our employees and other associates undertake compulsory training modules on a variety of ethics and compliance topics.

Our providers and suppliers are required to have similar standards and practices to ensure their ethical compliance with Our stringent approach to modern slavery and human trafficking. We audit each of its sub-contractors prior to working with them to ensure this and We retain termination rights if there is any breach of these requirements by Our providers and suppliers.

### **Policies and Training**

#### **Code of Conduct**

All Our employees, consultants, contractors, sub-contractors, and other associates (**Staff**) are required to comply with our company Code of Conduct (**Code**).

The Code articulates Our organisation values and the expectations of conduct in accordance with these values. Responsible practice is a key component of the Code.

All our Staff are required to understand and comply with the Code and identify concerns of non-compliance to be reported to management. Failure to comply with the Code may give rise to disciplinary action including termination of employment or contracts of engagement.

The Code outlines our commitment to upholding the highest ethical standards, including the prevention of bribery and corruption, the promotion of a safe, respectful, and inclusive workplace free from discrimination and harassment, and the active prevention of modern slavery and human trafficking within our operations and supply chains. It also reinforces the obligation to comply with all organisational policies and applicable legal requirements.

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### Modern Slavery & Human Trafficking Policy

Our Modern Slavery & Human Trafficking Policy (the **Policy**) outlines our commitment to respecting and supporting human rights by actively preventing, identifying, and addressing risks of modern slavery and human trafficking across our business operations and supply chains.

The Policy makes clear that prevention, detection, and reporting are shared responsibilities of all Staff, regardless of role or location.

It also sets out the procedures for reporting concerns, including internal and anonymous channels, and outlines protections against retaliation for whistleblowers.

The Policy is reviewed regularly to ensure it remains aligned with international standards, regulatory developments, and emerging risks in our industry and regions of operation.

Compliance with the Policy is a condition of employment and contracting, and all Staff are required to complete mandatory training to understand their obligations.

### Whistleblower Policy

Our Whistleblower Policy (**Whistleblower Policy**) reinforces a culture of ethical behaviour, strong corporate governance and effective compliance and risk management within Emerald Clinical.

The Whistleblower Policy encourages Our Staff to report disclosures of wrongdoing, suspected unethical and illegal activities involving Emerald Clinical or its affiliates without any fear of repercussions or intimidation. Reports can be made in writing and anonymously to dedicated Whistleblowing Protection Officers or to Our external whistleblower service. These channels are clearly communicated to Staff. Investigation of reports are undertaken promptly by the appropriate internal function or external third party, and where violations are substantiated, corrective actions are taken including reporting to the relevant authorities, where appropriate.

### Training

All Staff are required to:

- complete induction training upon commencement of their employment or engagement which includes the Code, the Policy, and the Whistleblower Policy.
- undertake annual reviews of the Code of Conduct to reinforce awareness of modern slavery risks, ethical standards, and reporting obligations.
- undertake ad hoc training on changes to the relevant laws, policies, or risk exposure (e.g., those involved in procurement, vendor management, or operations in high-risk jurisdictions).

All Staff are provided with access to the Code and policies upon commencement and on an ongoing basis throughout their employment.

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We develop our training content to ensure it is practical, relevant, and aligned with our values and legal obligations. Attendance and completion of training modules are monitored and recorded, and non-compliance may lead to disciplinary action.

### **D. Due Diligence**

We have implemented effective processes, systems and infrastructure designed to assess areas of potential risk of unethical practices. These ensure that We can pro-actively implement measures which can reduce these risks and at the same time protect those who identify them.

All Our commercial and business contracts contain provisions that require commitments from Our sub-contractors and suppliers to operate in a fair, ethical, and legal manner.

Vendors are subject to a pre-qualification process prior to engaging them and depending on the services they impart, are further subject to audit on a recurring basis to ensure ongoing compliance with contract and ethical requirements.

Our study teams regularly conduct site selection and monitoring visits to verify that clinical operations meet our standards for safety, ethics, and regulatory compliance.

### **E. Effectiveness of Our Actions**

We have global and local functional departments that are responsible for identifying and controlling risks and promoting an ethical and moral culture, including Legal, Quality Assurance, Regulatory Services, and Human Resources.

These functions uphold Our ethical and business interests through people management, Staff engagement, regular policy reviews and development and continuous improvement of Our governance of suppliers and third-party contractors.

We believe the risk of modern slavery and/or human trafficking in Our business is low, however We are committed to continuing to review and assess Our processes, systems, infrastructure, and commercial relationships to ensure the exposure and eradication of human trafficking and modern slavery.

### **F. Consultation**

During the 2024 financial year, Emerald ROW Newco Pte Ltd and Emerald Clinical Trials Pty Ltd did not control any other Australian entities.

All relevant areas of Our business have been consulted, including the Executive Leadership team of Emerald ROW Newco Pte Ltd , Emerald Clinical Trials Pty Ltd (Australia) and Emerald Clinical Trials (UK) Limited. The Directors of Emerald Clinical Trials Pty Ltd (Australia) and Emerald Clinical Trials (UK) Limited have approved this statement for publication.

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This statement has been published in accordance with the *Modern Slavery Acts* and sets out the risk considerations and actions taken by Emerald Clinical during the financial year ending 31 December 2024 to prevent against human trafficking and modern slavery in the conduct of Our business activities.

### G. RELATED POLICIES/GUIDELINES AND REFERENCES

- Code of Conduct
- Procurement Policy

### H. APPROVALS

#### Approver

Name: Glenn Kerkhof

Title: Interim CEO

E-Signature &  
date:

Signed by:  
  
Signer Name: Glenn Kerkhof  
Signing Reason: I approve this document  
Signing Time: 19-Nov-25 | 22:11 PST  
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