

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**). It covers the reporting period 1 January 2023, to 31 December 2023 (collectively the **Modern Slavery Acts**).

About Us

Emerald ROW Holdco Pte Ltd. (UEN 202349130M) is incorporated in Singapore and registered at 12 Marina View #11-01, Asia Square Tower 2, Singapore (018061), (**GC International/Our/We**). Since 07 January 2024, GC International is the operational holding company of the international business of all its affiliates, including George Clinical Pty Ltd (Australia) and George Clinical (UK) Limited.

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.

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

GC International through its Affiliates are 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 500 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 who ensure We deliver Our services with care, help patients receive treatments and support sponsors to focus on developing medicines and treatments for diseases impacting individuals worldwide. Our providers and suppliers are required to comply with all applicable laws, regulations and industry standard practices and are contractually bound to be aligned with Our standards on quality, ethics, and human rights.

C. Risk Assessment and Risk Controls

We have assessed the risks that may arise under the Modern Slavery Acts in its supply chain and business activities.

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.

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.

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 includes a commitment to anti bribery and corruption, anti-discrimination and harassment, safe workplace and combatting modern slavery and human trafficking in business activities and supply chains and upholding Our policies.

Modern Slavery & Human Trafficking Policy

Our Modern Slavery & Human Trafficking Policy (the **Policy**) details Our commitment to respecting and supporting human rights in preventing, identifying, and combatting modern slavery and human trafficking in Our business and supply chains.

The Policy reminds Staff that the prevention, detection and reporting of modern slavery and human trafficking is the responsibility of all Staff.

Whistleblower Policy

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

The Whistleblower Policy encourages Our Staff to report disclosures of wrongdoing, suspected unethical and illegal activities involving GC International 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.
- undertake ad hoc training on changes to the relevant policies.

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

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 undertake site selection and monitoring visits to ensure their operations are safe and in compliance with laws and regulations.

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. These include:

- Legal
- Quality Assurance, including Internal Audit
- Regulatory Affairs
- Human Resources
- Chief Medical Office

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 2023 financial year, GC International and George Clinical Pty Ltd (an affiliate of GC International registered in Australia) did not control any other Australian entities.

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

This statement has been published in accordance with the *Modern Slavery Acts* and sets out the risk considerations and actions taken by GC International and its Affiliates during the financial year ending 31 July 2023 to prevent against human trafficking and modern slavery in the conduct of Our business activities.

James Cheong
Chief Executive Officer
George Clinical Pty Ltd and Emerald ROW Holdco Pte. Ltd.