



**This statement is made pursuant to section 54 of the Act and constitutes the Modern Slavery and Human Trafficking Statement for the Financial year ended 31<sup>st</sup> December 2023 for Napp Pharmaceuticals Limited**

## Overview

Napp Pharmaceuticals Limited, including the holding company Napp Pharmaceutical Holdings Limited and the wholly owned subsidiary, Qdem Pharmaceuticals Ltd (together “**Napp**”), are all privately-owned, UK pharmaceutical companies (based in the heart of the Cambridge science community) within the Mundipharma network of independent associated companies (Mundipharma). Napp has grown up with the NHS, providing innovative medicines to patients in the UK since the 1920s. We know how to navigate its complexities and we have shaped our structure to its unique needs, so as the NHS changes, we change too. We foster a flexible culture at Napp where our people thrive on the ability to be agile and autonomous in response to the needs of our partners. From launching the UK’s first monoclonal antibody biosimilar to introducing innovative primary care medicines in respiratory and diabetes, we are always striving to move medicine forward for doctors and patients in the UK.

Our business is committed to operating in an ethical and transparent manner. In line with this commitment, the business is cognisant to incorporate and follow and have incorporated the requirements of the Modern Slavery Act 2015 (the “**Act**”) into our Code of Business Ethics and our Compliance Framework. Napp have additionally also conducted both SECR and ESOS Phase 3 scoping reports (part of its Environmental, Social and Governance reporting obligations). During 2023 Napp has committed dedicated resources to ensure compliance, and during 2024 Napp issued an initial Carbon Reduction Plan (published on our website) to begin the net zero journey.

We take the upholding of these high standards seriously and do not tolerate slavery, human trafficking, or child exploitation within our organisation or by those from whom we buy products or services.

We annually analyse the risks within our own business and our supply chain network. Following the introduction of the Act and having analysed the risks within our own business and our supply chain we do not believe that our risks within our supply chains have changed since our previous Statement in 2023 for the financial year ended 31 December 2022. Due to the nature of our business, we currently consider ourselves to be at low risk of exposure to slavery, human trafficking or child exploitation. We are not aware of any areas in our operations likely to lead to a breach of human rights and modern slavery laws. However, we remain committed to never knowingly dealing with any organization or third party connected to slavery, human trafficking or child exploitation.

## **Policies, contract clauses, training, communication and the raising of concerns**

Napp recognizes that a key component of managing and mitigating modern slavery risks in our operations and supply chain is the ongoing raising of awareness of modern slavery and the ensuring of ethical and fair practices in our business operations. The Mundipharma Global Code of Conduct and Global Anti-Bribery and Anti-Corruption Policy provide a foundation for acting with integrity for all employees. We have a Whistleblower Protection Policy and a culture of encouraging reporting of misconduct including the reporting of ethical concerns through our on-line reporting hotline [integrityline.mundipharma.com](https://integrityline.mundipharma.com). Napp has an environment which encourages open and frank two-way communication, and its employees are encouraged and expected to raise any concerns about known or suspected violations of its Code of Business Ethics or of illegal or unethical business conduct. Any such concern can be raised in confidence without fear of retaliation, by approaching Management, HR, Legal or Compliance. Alternatively, individuals may report their concern, and if desired remain anonymous, through our independent Integrity Line which is available 24 hours a day. We do not tolerate any form of bullying, discrimination or harassment as outlined in our Anti-Bullying Policy and our Equal Employment Opportunity, Anti-Discrimination and Harassment Policy. Any concern raised will be fully investigated and acted upon as appropriate. We have also implemented a Code of Conduct for Third Parties that sets out our expectations of our third-party partners across multiple areas including health and safety, human rights (modern slavery, human trafficking, child labour) and sustainability. Human rights concerns (and any form of forced labour, child labour, slavery or human trafficking) are



specifically mentioned in our Third-Party Code of Conduct as practices that we require our suppliers to prohibit. We have begun to incorporate modern slavery clauses and our Code of Conduct for Third Parties into procurement agreements.

Napp aims on an ongoing basis to continue to equip those employees involved in procurement activities, with both the knowledge and understanding of the importance of the Act and the roles that employees play in helping to eradicate modern slavery, trafficking and child exploitation.

### **Employment Practices**

Our employment practices are compliant with applicable employment and health and safety legislation, and as a result, we are confident that there is no slavery, human trafficking or child exploitation taking place within our organisation. Furthermore, we shall ensure that the employment agencies that we deal with are also fully compliant with the applicable legislation and have enshrined within their policies and processes, mechanisms for identifying the risks associated with such practices that have led to the introduction of various laws in the employment field.

### **Due Diligence**

It is our aim not to work with any supplier that we suspect is connected in any way with slavery, human trafficking, or child exploitation. As part of our Compliance Programme, we take steps to assure ourselves that we only partner with third parties who act ethically, compliantly and within the laws of the jurisdiction in which they operate. We operate a risk based due diligence procedure covering third party relationships or partners. The due diligence process involves assessing the third party, where appropriate, through completion of a questionnaire, business justification review and background checks (including screening against watchlists and adverse media) on third party organisations. From a direct procurement perspective regular contact is maintained and meetings held with all key suppliers on a regular basis, which may include site visits of the key suppliers' facilities (as deemed appropriate).

### **Monitoring and Enforcement**

Napp will continue to raise awareness and to monitor third party supplier and partner relationships and continue to mitigate the risk of modern slavery. We acknowledge that there is more to be done in relation to preventing modern slavery and are committed to continually enhancing the Modern Slavery framework in future years.

Any suspected breach of our Compliance Programme or of our Third-Party Code of Conduct, including the Act, will be investigated and such investigations could lead to the termination of supplier contracts and other actions, as appropriate.

### **Conclusion**

Napp is not aware of any slavery, human trafficking or child exploitation taking place in its business.

Due diligence activities during the financial year ending 31 December 2023 did not identify any instances of slavery, human trafficking or child exploitation within the business or the businesses of its suppliers, customers or service providers.

Napp will continue to raise awareness, apply and monitor appropriate risk based due diligence processes to supplier relationships as part of its ongoing Compliance Programme to mitigate the risk of modern slavery.

This Statement was approved by the Board of Napp Pharmaceuticals Limited on 27 June 2024.

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Bryan Lea  
Director

28 June 2024