



EUSA Pharma (UK) Ltd Modern Slavery Act Statement 2022

This statement has been published in accordance with the Modern Slavery Act 2015. The Act requires businesses to state the actions they have taken during the financial year to ensure that modern slavery is not taking place in their operations and supply chains.

The aim of this statement is to provide an update on the progress that EUSA Pharma (UK) Limited ("EUSA") has made during the financial year ending 31 December 2022, and will continue to make, to prevent modern slavery in the business and our supply chains.

Over the past few years we have taken measures to establish anti-modern slavery practices in our business and supply chains in the UK. We continue to implement these measures as we are committed to our responsibilities under the Act.

Structure and Business

EUSA based in the UK and is part of the Recordati S.p.A group ("Recordati Group"). Recordati S.p.A is one of Europe's leading pharmaceutical and healthcare companies, with headquarters in Milan. Recordati S.p.A acquired EUSA in March 2022 in order to expand its rare disease portfolio and reach more patients globally.

Supply Chains

EUSA's supply chains include 1) the manufacture and supply of active pharmaceutical ingredients and excipients for pharmaceutical products; 2) the manufacture and packaging of finished pharmaceutical products; and 3) the promotion, sale and distribution of finished pharmaceutical products globally.

Recordati Group recognises the importance of protecting and promoting human rights throughout the entire supply chain and guarantees respect for fundamental human rights, renouncing the exploitation of labour, and is committed to ensure that our suppliers do the same. To this purpose, we ask our partners (including suppliers) to comply with the ethical and behavioural standards given in our Code. This obligation is formalised through dedicated contractual clauses.

Actions taken

EUSA has:

- Continued to ask anti-modern slavery compliance questions in our due diligence questionnaire used for new third parties we engage with.
- Implemented an Anti-Slavery and Human Trafficking Policy across the business which is mandatory for all employees and contractors to read and accept.
- Implemented mandatory annual training for its management and employees across the business through an e-learning platform.
- Adopted the Recordati Group's Code of Ethics which ensures the highest standards of ethics.
- Implemented an ethics hotline to facilitate the reporting of any modern slavery concerns our employees or third parties may have.



- Updated our partner distribution contract templates to include clauses around anti-modern slavery and human trafficking in high-risk jurisdictions.
- Identified high risk suppliers (such as pre-wholesalers and manufactures) and have conducted further in-depth due diligence on such suppliers with a focus on anti-modern slavery and human trafficking.

This Statement has been approved by EUSA Pharma (UK) Ltd as of 13th June 2023

DocuSigned by:
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Name: Scott Pescatore

Title: Executive VP RRD

Date: 13-Jun-2023