

Modern Slavery Statement

Introduction

This statement is made pursuant to section 54(1) of the UK Modern Slavery Act 2015 and is published on behalf of Ennogen Healthcare International Limited and its group companies. Both Ennogen Healthcare International Limited and its group companies will be collectively referred to as “Ennogen” for the purpose of this statement. This statement refers to the financial year ending 31 December 2023 and sets out the steps we have taken to address modern slavery risks in our business and supply chains. This Modern Slavery Statement will outline Ennogen’s profile as a company, supply chain risks, as well as mitigating actions undertaken by Ennogen in the past year. However, many of the actions undertaken by Ennogen are recently created or in progress.

Ennogen’s structure, business and supply chains

Ennogen is a fast-growing medium-sized international pharmaceutical company headquartered in the United Kingdom. We prioritise consistency and robust supply chains to maintain continuous supply of medicines in the market, ensuring patients always have access to our treatments. In 2022, we delivered c.6.5 million packs of medicines. In 2024 Ennogen is now an international organisation with sales in 12 international territories. The UK represents our largest single commercial market, followed by European territories. Ennogen directly employs around 60 employees in the UK, complimented by distribution, regulatory and manufacturing partners inside and outside of the UK. Our manufacturing network includes 35 sites in 10 countries.

In 2024, Ennogen worked with a wider range of third parties that provided us with:

- Goods and services that are required for our research and development activities such as clinical trial support and laboratory equipment and supplies.
- Goods and services that we use to manufacture, store and deliver our products such as raw materials, pharmaceutical ingredients, bottles, tubes and packaging materials, warehousing and transportation.
- Goods and services that are required to run our business, including IT, marketing and other agency support.
- Facilities management, engineering and construction services.
- A network of external contract manufacturing organisations that supply finished and semi-finished products for sale and distribution by Ennogen such as tablets, ointments and creams.

Policies

Ennogen has launched a new Modern Slavery policy which reflects our purpose to provide reliable and consistent treatments to patients. Our new Code sets out the commitments we make as a company and to each other. This policy is reinforced by several standard operating procedures (“SOP”) to help mitigate the risk of modern slavery across the business:

- Ennogen’s Anti-Slavery and Human Trafficking Policy, outlining the organisation’s stance of modern slavery as a crime and a violation of fundamental human rights.
- Ethical Supplier Assessment/Management SOP, including an assessment of compliance with Modern Slavery laws, international labour standards and the Ethical Trading Initiative (ET) Base Code principles.

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- Supplier Code of Conduct policy, aligned with International Labour Organisation codes and the Ethical Trade Initiative Base Code
- Equality Opportunities Policy, a commitment to promote equal opportunities in employment regardless of age, race, colour, nationality, ethnicity or national origin, religion or belief, sex or sexual orientation.
- Whistleblower Policy, a mechanism to support employees in raising concerns to senior management regarding any breach of legal or professional obligations.

Assessment of Modern Slavery Risk

To assess modern slavery risk, we refer to external data sources (e.g. Alliance 8.7 Global Estimates of Modern Slavery and the US State Department's list of goods produced by child and forced labour) and consult with external experts. To identify the business activities with greater exposure to modern slavery risk, we consider the following factors:

- Reliance on low skilled workforce
- Presence of migrant workers
- Long, complex, or non-transparent supply chains
- Presence of child labour
- Country risks i.e. poverty, conflict, weak enforcement of international human rights standards

Ennogen believes that the risk of modern slavery in our direct workforce is low. This is due to the highly regulated nature of our industry, our employees being largely educated or skilled, undertaking work in controlled environments where there are established policies and processes and because Ennogen's direct operations either don't include or are minimal in high-risk work categories such as warehousing, distribution and manufacturing. Therefore, Ennogen's exposure to modern slavery risk mainly only applies when interacting with third parties in categories such as transportation, warehousing, manufacturing and packaging.

Due Diligence Processes

Ennogen has processes designed for both those directly employed by Ennogen and third parties in order to ensure that through all operations, direct or third party, Ennogen is engaged are embedded with sensitivities to Modern Slavery risks.

Direct Ennogen Colleagues

Everyone at Ennogen has been assigned mandatory training that aligns with company values, this is ongoing. In 2024, Ennogen invested in an online training system, working with external consultants, to ensure all colleagues are trained on Modern Slavery statements as well as Labour Standards in an accessible manner. Beyond this, Ennogen has shared a final draft of a new employee handbook that contains a series of policies that together create a framework of values, standards and behaviours that all colleagues should adhere to. This includes a whistleblower policy that gives colleagues an anonymous route to air any breach of Ennogen's legal or professional obligations, again supporting colleagues in ensuring that any Modern Slavery or Labour Rights breaches are made apparent to company management.

Third Party Management

In 2023 Ennogen has implemented an Ethical Supplier Assessment which will form part of the Ethical Supplier Management SOP. This will ask Ennogen colleagues to ensure the companies in Ennogen's supply chain conform with our values, including labour standards and modern slavery. This process is now standard practice and will identify high-risk or unsuitable third-party relationships. Depending on the outcome of the assessment, Ennogen will then either work with the third party to share policies and standards to help them improve their standings or will work to establish an alternative relationship that better aligns with Ennogen's values.

Continual Improvement

Ennogen has created a system of multiple policies in tandem with a standard operating procedure to attempt to consistently apply the company's values throughout its direct operations and through its third-party operations. Ennogen will continuously review and improve the Modern Slavery risk mitigation systems by assessing our suppliers' ability to detect and mitigate the risk and by taking a collaborative approach to engaging with stakeholders and implementing corrective actions. Over time Ennogen will aim to extend its operations beyond Tier 1 suppliers where possible, we recognise that modern slavery can be concealed within more complex supply chains and are committed to uncovering it within our organisation's operations.

The above statement was approved by Ennogen's senior management team and directors on 22nd June 2024.



Gurdev Ruprai

Managing Director