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OPEN Health is committed to protecting human rights globally. We do not tolerate any form of modern slavery including forced labour or human trafficking.

Modern slavery is the severe exploitation of other people for personal or commercial gain. Forced labour is any work or service which people are forced to do against their will, under threat of punishment. Human trafficking is the process of trapping people using violence, deception or coercion and exploiting them for financial or personal gain.

OPEN Health strongly believes that none of these practices have a place in today’s world. We are fully committed to their prevention in our business and are taking meaningful steps to implement safeguards in our operations.
Who We Are

OPEN Health is a global healthcare marketing, research and communications agency in the Pharma sector founded in 2011. Our vision is to be the world’s most respected healthcare agency by acting with integrity in pursuit of excellence. **Doing things the right way with pride and integrity** is core to our values. We have approximately 1000 employees across 15 office locations in 6 countries.

Our purpose is to work in partnership with our clients to improve health outcomes and patient wellbeing. As a people business, we bring together the experience and knowledge of many to create innovative, customized, patient-centric solutions to improve patient outcomes.
Modern Slavery Risk in OPEN Health

As part of our global governance framework, modern slavery risks were assessed in OPEN Health.

As a specialist agency service provider, most of our staff and contractors are employed for their skill, education, and intellectual capacity. Our supply chain is focused on procuring business support services with limited product exposure.

Assessment - Risk of modern slavery is low:

Employees and contractors are mainly professionals, with a good level of higher education (medical, scientific, or other)

OPEN Health is a skills service provider and not a product or manufacturing business

Products sourced are limited

OPEN Health is not involved with hiring low-skilled, migrant, or seasonal workers

Exposure to known geographies of high risk of modern slavery is small

Controls have been implemented to mitigate remaining risks including those set out below
Achievements in 2021

Re-evaluated, revised, and relaunched our values

In June 2021, revised values based on principles of integrity and ethical behaviours were developed involving staff to reflect the OPEN Health ethos: (https://www.openhealthgroup.com/our-values)

Launched the Environmental, Social and Governance (ESG) Initiatives

Our ESG approach reflects our commitment to our customers, staff, partners, shareholders, suppliers, and the communities in which we work. The developing framework is focused on ensuring that our operations support people, social progress, equality, and environmental awareness.

Re-launched and updated our Global Ethical Business Conduct Code

This code sets our expectations for ethical and responsible behaviours and is mandatory for all staff and contractors (https://www.openhealthgroup.com/content-assets/content-images/Global-Ethical-Business-Conduct-Code.pdf). It is aligned with and supports the United Nations’ Guiding Principles on Business and Human Rights as well as the UK Modern Slavery Act 2015.

Procured a global confidential ethics helpline

Sourced a confidential 3rd party supported ethics helpline. This global ethics helpline is available 24 hours a day by phone, mobile, or online.

Governance and Compliance Team

Established a stand-alone Governance and Compliance Team to focus on privacy, business regulation, and doing things in the right way globally.

Enhanced Training

The services of a leading global external compliance training provider supplemented existing training and added global requirements to induction and mandatory training programmes.
Supply Chain Controls

Supplier Code of Conduct

Open Health’s Supplier Code of Conduct sets expectations on suppliers (https://www.openhealthgroup.com/content-assets/content-images/Supplier-Code-of-Conduct.pdf). This includes requirements for our Suppliers to commit to anti-slavery and no forced or child labour, inclusion and diversity, and to fairly compensate workers.

Compliance checks by OPEN Health companies in the UK

These include identity checks, sanction searches, director checks, and adverse media checks.

Commitment to our values and expectations

OPEN Health standard contract terms include the right to end relationships with its suppliers who fail to comply with its Global Ethical Business Conduct Code or Supplier Code of Conduct.
To cement our commitment to progress, we have identified the following key areas of focus in 2022 building on the achievements made in 2021:

**Targets for 2022**

**Enhanced risk-based vendor assessment**
Includes enhanced focus on key supplier risks including modern slavery and enhanced due diligence.

**“Speak up” culture and awareness of the ethics helpline globally**
Promoting a "speak up" culture encourages staff to report genuine concerns in our business. Training is provided regarding how to access and report.

**Develop ESG targets and framework**
Further development of the ESG framework (https://www.openhealthgroup.com/environmental-social-and-governance) will include targets focusing on people as key stakeholders and further governance controls to consider monitoring modern slavery risks.
Contact

Any questions, comments, or requests relating to this statement should be addressed to:
GovernanceandCompliance@openhealthgroup.com

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015, and outlines the steps taken by OPEN Health in the financial year ending 31st December 2021 to prevent modern slavery across our organisation. In this Statement, OPEN Health Communications LLP and its affiliated and subsidiary companies are collectively referred to as “OPEN Health.” For the purposes of this statement, these companies are OPEN Health Communications LLP, pH Associates Limited, Harvey Walsh Limited, OPEN Vie Limited, OPEN Health Patient Engagement Limited, and Pharmerit Limited. Details of the OPEN Health group companies can be found here https://www.openhealthgroup.com/statutory-details.

R. J. Barker, CEO
March 2022