

Modern Slavery and Human Trafficking Statement

March 2026 (For FY2025)

Introduction

OPEN Health has a zero-tolerance approach to any form of modern slavery and human trafficking and makes this statement to set out the steps taken to assess, manage, and mitigate the risks of modern slavery and human trafficking in our business and supply chain. This statement addresses the UK Modern Slavery Act 2015, the Canadian Fighting Against Forced Labour and Child Labour in Supply Chains Act, and the Australia Modern Slavery Act 2018 (Cth), and covers all the trading entities of OPEN Health Group as set out here for the financial year ending on 31 December 2025.¹

OPEN Health's Organization and Supply Chain Structure

OPEN Health is a large organization with 1000+ employees, operating across the United Kingdom, United States, Canada, Germany, the Netherlands, Belgium, Ireland, France, and India. We deliver marketing, research, and communications services to the healthcare and pharmaceutical sectors, serving the top 100 biopharmaceutical companies. Our services are rooted in intellectual capacity, and we employ highly trained individuals with professional qualifications to deliver services to clients. Most of our workforce are enabled to work from home, or in an office if they are located near one. Revenues from our services are available in publicly audited accounts.

OPEN Health's Tier 1 suppliers are concentrated in The United States, United Kingdom, Netherlands, Germany, Spain, Italy, France, Belgium, Canada, Ireland, Australia, India, and

¹ As reflected in Engage PIKCo Ltd.
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Switzerland, and mainly operate in the Honoraria, Academic, Work Force Supplier, and IT industries. For a full list of supplier locations and industries, please see Appendix A.

Our intention is to enhance our supplier management processes to further map our suppliers. We have implemented policies and procedures to support risk-based due diligence during supplier selection which includes the consideration of modern slavery statements and anti-corruption checks.

Policies

OPEN Health has several policies which form a framework for acting ethically and with integrity in all our business relationships, and to implement and enforce effective systems and controls to mitigate modern slavery risks in our operations and supply chain. Our staff are trained on relevant policies through our learning management system when they are onboarded and continue to complete policy training regularly thereafter. These policies include:

Global Ethical Business Conduct Code

This code of conduct sets out our expectations for ethical and responsible behavior. Adherence to this code is required for all staff and contractors. It includes international standards such as International Labour Organization's core conventions, prohibits any form of forced or child labor, and outlines our **non-retaliation policy**.

This code is available [here](#).

Global Modern Slavery Policy

This document outlines our approach to understanding modern slavery risks within our business and the measures we have put in place to ensure there is no presence of slavery or human trafficking in our operations or supply chain. The policy considers the United Nations Guiding Principles on Business and Human Rights and the Organization for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises and explicitly rejects forced labor and child exploitation.

Supplier Code of Conduct

This code of conduct enforces our approach to labor and human rights within our supply chain. It encompasses international standards, including the International Labour Organization's requirements and sets the minimum standards we expect our suppliers to meet. This includes not participating in any form of forced or compulsory labor, including slavery, human trafficking, sexual exploitation, child labor, mental or physical coercion, or verbal abuse. Additionally, any employment of young persons should conform with the International Labour Organization Conventions 138 and 182 and comply with all applicable laws and regulations concerning age, hours, compensation, health, and safety.

The supplier code of conduct is incorporated by reference in our PO terms and conditions and is available [here](#).

IMPACT Strategy Policies

Our Global IMPACT Strategy policies including the Global People Pillar Policy, Global Communities Pillar Policy, and Global Responsible business Pillar Policy cover our approach to social dialogue and freedom of association, and our zero-tolerance approach to any form of modern slavery and child labor which encompasses the principles of the UN Global Compact, ILO declaration on fundamental principles and rights at work, and the UN Universal Declaration of Human Rights.

Anti-Bribery and Anti-Corruption Policy

OPEN Health strictly prohibits all forms of bribery and corruption and complies with all international laws related to these topics. This policy commitment supports human and labor rights by promoting ethical business practices that help prevent exploitation and abuse.

Whistleblowing and Reporting Policy

OPEN Health has a Global Whistleblowing and Reporting Policy which allows all staff and suppliers to report concerns including those related to modern slavery and forced labor, anonymously and confidentially 24/7 through a third-party helpline. Upon receipt of a report, the Governance and Compliance Team will ensure appropriate investigation and response.

Assessment of Modern Slavery Risk

OPEN Health assesses the risks of modern slavery annually as part of our modern slavery statement. Our Governance and Compliance Team reviews our modern slavery risks, with support from our operations team who manage supplier onboarding and our People Team. The following factors were considered in our assessment:

- Reliance on low-skilled or unskilled labor
- Dangerous or physically demanding work
- Presence of migrant workers
- Presence of labor intermediaries
- Usage of complex supply chains with limited transparency
- Known usage or presence of child labor
- Working in countries with minimal enforcement of international human rights standards, in areas of conflict, or areas of very low standards of living.

Modern Slavery Risk in our direct workforce is LOW

OPEN Health takes actions to mitigate the risk of modern slavery and forced labor in our direct workforce:

- We hire professionals with educational credentials, which are verified in our onboarding process in addition to checks on identity and right to work.
- We only hire individuals of legal hiring age in the areas we employ staff.
- We utilize our own recruitment practices and ensure all terms of employment are voluntary (staff may occasionally use recognized, sector-specific agencies, who perform appropriate checks).
- The risk of migrant worker presence is extremely low in our direct workforce due to the nature of our services.
- Most of our workforce are located in lower risk countries.
- In higher-risk territories where we have a presence, we use skilled analysts whose qualifications are checked.

Modern Slavery Risk in our Supply Chain is LOW:

OPEN Health takes action to mitigate and prevent the risk of modern slavery in our supply chain:

- We take steps to ensure our suppliers meet our minimum standards outlined in our supplier code of conduct.
- Child labor and other forms of forced labor are prohibited in our Supplier Code of Conduct.
- Tier 1 suppliers are subject to risk-based due diligence that includes questions on their approach to mitigating the risk of modern slavery and human trafficking.
- Within our supply chain, we use accredited organizations who mainly operate in regulated industries, including Pharmaceutical and Information Technology.
- We utilize accredited sourcing routes for phones and computers to minimize the risk of limited supply chain transparency
- Office spaces in higher-risk countries are provided by WeWork, who have a transparent approach to mitigating forced labor, and have anti-slavery policies in place. More information is available on the WeWork website [here](#).
- Our IT service provider is based in the United Kingdom and has policies in place to manage risk. For more information, see Exponential-e Governance Conduct and ethics.

Education and Training

OPEN Health ensures that staff are trained on relevant topics to help mitigate the risk of modern slavery in our business and supply chain. All staff are required to complete a module on human rights and our Global Ethical Business Conduct Code as part of our compliance training program. This training must also be renewed annually by all staff.

The training module includes examples of human rights violations, emphasizes our commitment to zero-tolerance for abuses to human rights in our own operations and supply chain, and educates on “red flags” in the workplace that might indicate a potential human rights violation. This training was developed by a compliance training provider and is provided to all staff through our learning management system.

Performance Evaluation and Improvement

We produce sustainability reporting every six months, which includes performance on our target to maintain a 0% corruption rate year on year. This target encompasses labor and human rights and modern slavery. We also aim to ensure the publication of a modern slavery statement on all group websites by 6 months from year-end.

There were no known incidents in relation to modern slavery within our organization and supply chain in 2025.

2025 Improvements

In 2025, we issued our Global Modern Slavery Policy to help strengthen our position against any form of modern slavery or human trafficking. We also continued to improve our score in the EcoVadis sustainability assessment including in the labor and human rights category with an increase of 3 points.

Future Goals

In 2026 and beyond, we are looking to gain a better understanding of our supply chain to help further understand and mitigate any risks. We are currently working with key stakeholders to understand their supply chains. We also plan to maintain careful management of employment in the high-risk territories we operate in and add our voluntary submission to the UK Government Modern Slavery register.

Contact Us

Any questions, comments, or requests related to this statement should be addressed to GovernanceAndCompliance@openhealthgroup.com.

Approval

This statement was approved by the board of Engage PIKCo Limited (operating as OPEN Health) on 22/04/2026 and signed by Matt D'Auria, Chief Executive Officer.

This statement will be reviewed each year in conjunction with our financial year which runs from 01 January to 31 December.



Signed,

A handwritten signature in black ink, appearing to be "Matt D'Auria", written over a horizontal blue line.

Matthew Dauria (Apr 22, 2026 05:19:29 EDT)

Matt D'Auria | CEO

Appendix A – Tier 1 Suppliers Main Operational Countries and Industries

Supplier Countries
United States
United Kingdom
Netherlands
Germany
Spain
Italy
France
Belgium
Canada
Ireland
Australia
India
Switzerland
Austria
Czech Republic
Portugal
China
Poland
Finland
Japan
South Africa
Greece
Israel
Sweden
Denmark
Hong Kong
New Zealand
Brazil
Hungary
Lebanon
Mexico
Norway
Puerto Rico
Singapore
The Republic of Türkiye
Colombia
Croatia
Egypt
Kuwait
Malaysia
Qatar
Romania
Slovenia

South Korea
Taiwan
Thailand

Supplier Industries
Honoraria
Academic
Work Force Supplier
IT Equipment/ Services/ Software
Legal and Professional
Advertisement/ Printing/ Marketing
Audio/ Filming/ Photography/ Images/ Visual
NHS Trust
Research/ Incentives
Independent Consultant
Travel and Accommodation
Events
Office supplies (Stationery/ Postage etc.)
Translation & Transcriptions
Recruitment
Medical journal
Government Agency
Staff Welfare
Subscriptions
Training
Office/ Building services
Property Maintenance/ Overheads
Staff Costs
Telephones and Mobiles
Biotechnology
Charity
Credit Card
Data Provider
Intercompany
Medical Devices
Pharmaceutical