

# Modern Slavery and Human Trafficking Statement

May 2025

## 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 2024.<sup>1</sup>

## OPEN Health's Organization and Supply Chain Structure

OPEN Health is a large organization with 1000+ employees, operating across the United Kingdom, United States, Germany, the Netherlands, 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 Belgium, Canada, Switzerland, Germany, Spain, France, Ireland, India, Italy, the Netherlands, the United Kingdom, and the United States and mainly operate in the medical, marketing, IT, office supplies, and professional services industries. For a full list of supplier locations and industries, please see Appendix A.

---

<sup>1</sup> As reflected in Engage PIKCo Ltd.

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 a number of 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](#).

### **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 confirm 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 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 is 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 Regus, who have a transparent approach to mitigating forced labor, and have anti-slavery policies in place. More information is available on the Regus 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 are no known incidents in relation to modern slavery within our organization and supply chain in 2024.

### 2024 Improvements

In 2024, we signed up to the UN Global Compact, solidifying our commitment to aligning to the 10 principles. We also incorporated new policies to reflect our IMPACT strategy pillars, including topics relating to our zero-tolerance approach to any form of modern slavery and reflecting our commitment to the UN Global Compact principles and ILO’s Declaration on Fundamental Principles and Rights at Work. This enhanced clarity helped us to achieve a score

increase of 20 points to 70/100 in the Labor and Human Rights category of our EcoVadis sustainability assessment.

### **Future Goals**

In 2025 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](mailto:GovernanceAndCompliance@openhealthgroup.com).

### Approval

This statement was approved by the board of Engage PIKCo Limited (operating as OPEN Health) on 15 July 2025 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,

*Matthew D'Auria*

Matt D'Auria | CEO

## Appendix A – Tier 1 Suppliers Main Operational Countries and Industries

<b>Supplier Countries</b>
Argentina
Australia
Austria
Belgium
Brazil
Canada
China
Czech Republic
Denmark
Egypt
Finland
France
Germany
Greece
Guernsey
Hong Kong
Hungary
India
Ireland
Israel
Italy
Japan
Jersey
Kuwait
Lebanon
Luxembourg
Mexico
Netherlands
New Zealand
Norway
Poland
Portugal
Puerto Rico
Romania
Serbia
South Africa
South Korea
Spain

Sweden
Switzerland
Taiwan
United Kingdom
United States

<b>Supplier Industries</b>
Medical
NHS Trust
IT Equipment/Services/Software
Audio/Filming/Photography/Images/Visual
Legal and Professional
Independent Consultant
Research
Advertisement/Printing/ Marketing
Office supplies
Events/Hotels
Office/Building services
Translation & Transcriptions
Journals
Recruitment
Subscriptions
Travel and Accommodation
Property & Maintenance
Telephones and Mobiles
Training
Legal and Professional