



**OPEN HEALTH**



# **Modern Slavery Statement 2023**

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# Zero-Tolerance Approach to Slavery and Human Trafficking

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This statement addresses the UK Modern Slavery Act (2015), the Californian Transparency in Supply Chain Act (2010), the Canadian Fighting Against Forced Labour and Child Labour in Supply Chains Act, Australia Modern Slavery Act 2018 (Cth) and applies to all OPEN Health Group companies for the financial year ending in 2023.

**OPEN Health is committed to protecting human rights globally.** We do not tolerate any form of modern slavery, including forced, bonded or child labour, or any forms of human trafficking. We support the UN Guiding Principles on Business and Human Rights. We support and respect the protection of internationally proclaimed Human Rights including the elimination of all forms of forced or compulsory labour and the abolition of child labour.

Modern slavery is the severe exploitation of other people for personal or commercial gain.<sup>1</sup> Forced labour is any work or service which people are forced to do against their will, under threat of punishment.<sup>2</sup> Human trafficking is the process of trapping people using violence, deception, or coercion and exploiting them for financial or personal gain.<sup>3</sup>

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.

<sup>1</sup> <https://www.antislavery.org/slavery-today/modern-slavery/>

<sup>2</sup> <https://www.antislavery.org/slavery-today/forced-labour/>

<sup>3</sup> <https://www.antislavery.org/slavery-today/human-trafficking/>

# Who We Are

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OPEN HEALTH

OPEN Health is a global healthcare marketing, research, and communications agency in the Pharma sector, founded in 2011. We are 1000+ employees with office locations in the UK, US, Netherlands, Germany, and India and we work with Clients worldwide.

**Our vision** is to create high-performing strategic partnerships with biopharma clients, delivered through world-class scientific and creative expertise, unlocking possibilities to improve the lives of patients. We bring together the experience and knowledge of many to create innovative, patient-centric solutions.

# Modern Slavery Risk Assessment Considerations

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The following factors were considered in an assessment of modern slavery risk within OPEN Health:

1. Reliance on low-skilled workers
2. Working in countries with minimal enforcement of international human rights standards, or in areas of conflict or very low standards of living
3. Working in countries with a high presence of migrant workers
4. Involvement in product production or manufacturing
5. Usage of complex supply chains with limited transparency
6. Known usage or presence of child labour

# Risk Assessment

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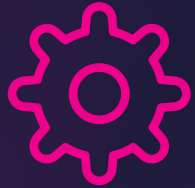
**Risk of modern slavery within OPEN Health is low.**



1. Employees and contractors are mainly professionals with a good level of higher education (medical, scientific, or other.)
2. OPEN Health is a skills service provider and not a product or manufacturing business
3. Products Sourced are limited and mainly relate to offices and IT infrastructure.
4. OPEN Health is not involved with the hiring of low-skilled, migrant, or seasonal workers.
5. Exposure to known geographies with high risks of modern slavery is low
6. Controls have been implemented to mitigate remaining risks, including those set out below.

# Governance

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## Ethical Business Conduct Code

This code sets out our expectations for ethical and responsible behaviours and is mandatory for all staff and contractors. It includes international standards, including the International Labour Organisation's core conventions, and prohibits any form of forced labour or child labour. This policy also outlines our **non-retaliation policy**, and is available [here](#).

## Global Whistleblowing & Reporting Policy

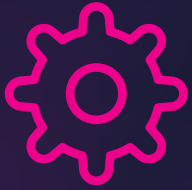
This policy outlines how to access an independent reporting line for reporting misconduct including employee malpractice and OPEN Health's approach to protecting and supporting all those working for OPEN Health. This reporting line is available 24 hours per day by phone, mobile device, or online. An escalation route is available to suppliers so that they may report ethics issues directly.

## Supplier Code of Conduct

This code of conduct enforces OPEN Health's approach to labour and human rights, which encompasses international standards including the International Labour Organisation's requirements and sets out a minimum standard of behaviour expected by all our suppliers. This supplier code is referenced in our terms and conditions and is available [here](#).

## Governance (cont.)

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### Anti-Bribery and Corruption Policy

This policy sets out standards to avoid bribery and corruption, the prohibition on acceptance of any incentives, and outlines potential personal liabilities.

### Global Social Responsibility Policy

This policy establishes our approach to fair working conditions, including aligning with the International Labour Organisation's standards to prevent modern slavery and human trafficking, our commitment to the 10 principles of the UN Global Compact, and our alignment with the UN Sustainable Development Goals.

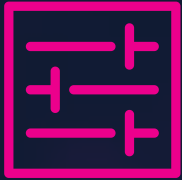
### Global Health & Safety Policy

This policy sets out OPEN Health's arrangements related to assessing and preventing health and safety risks and incidents, and information provision on safe working and emergency procedures.



## Other Controls

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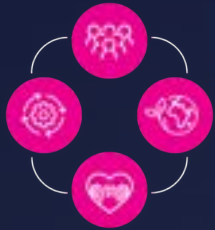


1. OPEN Health has standard processes in recruitment including job specifications, pre-employment due diligence including verification of the right to work, identification, reference checks, and qualifications accreditation.
2. Transparency on standards of qualification needed.
3. As a specialist agency service and consulting provider, most of our staff and contractors are employed for their higher education, scientific research experience, or communication skills.
4. OPEN Health does not employ individuals who are under the age of 18
5. Corruption checks are completed on OPEN Health suppliers during onboarding via our specialised third-party provider.

**In 2024, we will pledge formal support to the UN Global Compact and its 10 principles.**

# Environmental, Social and Governance (ESG) Initiatives

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Our **ESG IMPACT Strategy** and our dedicated team ensures that our approach reflects our commitment to our customers, staff, partners, shareholders, suppliers, and the communities in which we work in, in line with international standards.

With the enhancement of our responsible business focus, our governance framework is developing to focus on risks including modern slavery risks in our business and supply chain.

More information on our ESG IMPACT Strategy can be found [here](#).

# Contact

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Any questions, comments, or requests relating to this statement should be addressed to [GovernanceAndCompliance@openhealthgroup.com](mailto:GovernanceAndCompliance@openhealthgroup.com)

In this statement, OPEN Health Communications LLP and its affiliated and subsidiary companies are collectively referred to as "OPEN Health". For purposes of this Statement, these companies include OPEN Health Communications LLP, pH Associates Limited, Harvey Walsh Limited, OPEN Vie Limited, OPEN Health Patient Engagement Limited, Pharmerit Limited, and other group companies as set out at [www.openhealthgroup.com/statutory-details](http://www.openhealthgroup.com/statutory-details).

A handwritten signature in white ink, appearing to read "Vivid Sehgal".

Vivid Sehgal  
Chief Executive Officer  
July 2024