

Northumbria Pharma Group Holdings Ltd Modern Slavery and Human Trafficking Statement

Introduction

This Modern Slavery and Human Trafficking Statement relates to actions and activities during the financial year May 2025 to April 2026 for Northumbria Pharma Group Holdings Ltd and the subsidiaries, Northumbria Pharma Ltd and Northumbria Thrombosis Ltd.

This statement sets out the commitment to preventing slavery and human trafficking in our business activities and the steps we have put in place with the aim of ensuring that there is no slavery or human trafficking in our own business and supply chains. We all have a duty to be alert to risks, however small. Staff are expected to report their concerns and management to act upon them.

Organisational structure and supply chains

This statement covers the business activities of the Company which include development, licensing and supply of pharmaceutical products.

The Company currently work with a range of suppliers, contractors and partners across Europe, the Middle East, Africa and Asia. The company also exports products in these countries.

Policies

The Company is committed to ensuring that there is no modern slavery or human trafficking in our business or our supply chains. This Statement affirms its intention to act ethically in our business relationships.

The following policies set down our approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in our operations:

- 2.1 **Whistleblowing policy** - the Company encourages all its workers, customers and other business partners to report any concerns related to its direct activities or its supply chains.
- 2.2 **Company Code of Conduct** - The Code of Conduct sets down the actions and behaviour expected of employees when representing the Company.

Due Diligence Processes for Slavery and Human Trafficking

The Company undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. The Company's due diligence process includes building long-standing relationships with suppliers and making clear our expectations of business partners and can include evaluating the modern slavery and human trafficking risks of each new supplier invoking sanctions against suppliers that fail to improve their performance in the event of non-compliance, including the termination of the business relationship.

Performance indicators

The Company requires prospective partners to verify their ethical practices as part of technical agreements with requests for policies which verify their ethical practices ensuring compliance with international standards for Human Rights. Where a partner cannot provide the assurance of their ethical practices we will ultimately review the use of that supplier going forward.

If it became apparent or there is a reasonable suspicion that any of our business partners were involved in forced labour, child labour or any practice in which people are exploited or exposed to dangerous conditions, we would review our business relationship with that partner and if unable to resolve the issue to our satisfaction, we would terminate our relationship with that business partner.

Training

To ensure a good understanding of the risks of modern slavery and human trafficking in our business and supply chains, the Company requires that all staff complete an online training course on an annual basis.

This Modern Slavery and Human Trafficking Statement has been approved and authorised by:

Name: Paul Watson

Position: Managing Director

Date: 03/02/26

Signature: *paul watson*