

## MODERN SLAVERY TRANSPARENCY STATEMENT

of Signant Health Management Limited, pursuant to Section 54(1) of the UK Modern Slavery Act 2015,  
as approved by the Board of Directors on 26 July 2023

The UK Modern Slavery Act 2015 (the “Act”) requires certain commercial companies that do business in the UK to prepare and publish a statement of the steps they have taken to ensure that slavery and human trafficking are not taking place in the business or in the companies’ supply chains (Section 54 of the Act).

Signant Health Management Limited (hereinafter referred to as Signant Health) is subject to this Act and we publish this statement in compliance with the Act. We and our affiliated companies are committed to carrying our business in an ethical and socially responsible manner and improving our practices to combat slavery and human trafficking. Forced labour, human trafficking, slavery or any type of human exploitation will not be tolerated in our operations, supply chain or otherwise in connection with our business.

### Our Business and Organisation’s Structure

Signant Health is a market-leading provider of technology solutions in support of clinical trials. The Group’s parent company is Buccaneer Holdco Limited, a limited company incorporated in England with a head office in Reading. In addition to the United Kingdom, we operate in the United States of America, Finland, Romania, Czech Republic, Ireland, Japan and India. Our operations comprise the bringing together of technology, people, process and know-how to provide ground-breaking solutions to customers and patients. Given the nature of our business as a software company and our supply chain, we assess ourselves as a low-risk organisation in the context of modern slavery. Nevertheless, we fully recognise that risks exist now and may take different forms in the future.

The supply chain for Signant Health is mostly indirect products and services with a few direct products. Products and services are purchased and delivered globally from carefully selected vendors.

### Our Policies

Signant Health has adopted a code of conduct for its employees (the “Signant Health Code of Conduct”), as well as a separate code of conduct for its vendors (the “Supplier Code of Conduct”). As reflected in the codes of conduct, Signant Health is committed to legal and ethical behaviour, and to acting professionally and fairly in all business dealings and relationships. We seek to maintain high ethical standards and to comply with all applicable laws and regulations. We expect integrity in all that we do, including with respect to our relationships with vendors. The Supplier Code of Conduct outlines expectations that we have for all our suppliers and vendors.

Our employees are expected to follow the Signant Health Code of Conduct and the Labor and Human Rights Policy. We have a zero-tolerance policy for forced and/or underage labor for ourselves, partners, and suppliers. We identify risks of forced or underage labor through our hiring practices and our formal

procurement process. Our selection of vendors is governed by our Supplier Qualifications Procedure. Our material vendors are required to comply with the Supplier Code of Conduct. ([Supplier Code of Conduct - Signant Health](#)). This requires them to comply with applicable anti-slavery and human rights laws. Vendors are required not to use any form of slave or forced labour or child labour in their businesses. They are also required to implement due diligence procedures for their own suppliers and subcontractors to ensure that their subcontractors comply with all applicable laws and adhere to the same standards set forth in the Supplier Code of Conduct.

The Supplier Code of Conduct specifically describes:

- Modern slavery / human trafficking: Signant Health does not tolerate slavery, forced labor, bonded labor or human trafficking in any form. Signant Health requires Suppliers to fully comply with the applicable legal requirements of slavery, forced labor and human trafficking laws and expects Suppliers to enact practices to ensure compliance with such laws.
- Child labor: Signant Health does not tolerate child labor in any form. Suppliers must act in compliance with all laws regulating minimum working age for each position, including any laws pertaining to the employment, apprenticeships, and internships of youths and students.
- Human rights: Signant Health does not tolerate human rights violations in any form. Signant Health expects Suppliers to enact practices to maintain a respectful and safe workplace and not tolerate physical violence, threats, corporal punishment, mental coercion, verbal abuse, disrespectful behavior, bullying or harassment of any kind.
- In order to ensure and demonstrate compliance with the Code of Conduct, Supplier shall keep records of all relevant documentation, and provide them to Signant Health upon request.
- Signant Health will evaluate Suppliers' compliance with the Code of Conduct during the Supplier selection process and periodically during the term of the agreement with the Supplier.

### **Due Diligence Processes, Risk Assessment and Management**

Our approach is embedded in our procurement processes, which provide for risk-assessment, due diligence and supplier auditing. The level and content of the due diligence depends on the vendor's risk profile and proposed activities. We aim to ensure that all relevant contractual arrangements place legally binding obligations on our suppliers to meet these standards and to allow compliance audits. We also perform periodic risk-oriented due diligence updates on vendors based on perceived risk and on the type or category of the products and services that we obtain. Our Legal, Risk & Compliance department assesses any suspected offence of the Supplier Code of Conduct and determine specific remedial actions.

We have in place systems to enable and protect whistleblowers, and a mechanism to report any violation of the Supplier Code of Conduct.

### **Training**

Compliance training is regularly undertaken by all employees. All new hires are trained on the Signant Health Code of Conduct and the Labor and Human Rights Policy. Current employees are also trained on these policies periodically, annually or biannually, per our training schedule. Our procurement specialists are also trained on our vendor selection and qualification process.

## Effectiveness of our efforts

Our Chief Legal & Compliance Officer is responsible for the monitoring of the effectiveness of our commitments under this statement, in conjunction with other relevant teams including Risk & Security Governance, Procurement and Human Resources. As a company operating with strong commitment to high legal and ethical standards, we will continue to assess our business at all times. Any issues identified will be addressed promptly, and we are committed to combatting the use of any form of modern slavery at all levels of our operation and supply chains.

This statement applies to the financial year ending 31 March 2023.

A handwritten signature in black ink, appearing to read 'Michael K. Tucker', written over a horizontal dotted line.

Michael K. Tucker

Chief Legal & Compliance Officer

26 July 2023