

## Avalere Health Modern Slavery Statement

November 2023

### Introduction

This statement sets out Avalere Health Group Limited's (operating as Avalere Health and herein "the Group" and all its affiliates) actions to understand potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains.

Modern slavery is the illegal exploitation of people for personal or commercial gain. It can take many forms such as forced and compulsory labour, servitude, slavery and trafficking. The UK Modern Slavery Act 2015 was introduced to tackle slavery and human trafficking through the consolidation of previous legislation and the introduction of new measures. It introduces new requirements for organizations' business and supply chains.

### Policy Statement

Avalere Health is committed to acting ethically and with integrity in all our business dealings and relationships, and to this end are committing to our Modern Slavery Policy. Every supplier and employee working with Avalere Health has the right to live and work with dignity and respect, in decent and safe conditions, and to earn fair rates of pay. We have a responsibility to ensure good social and ethical practices within our own operations and within our supply chain.

Avalere Health does not tolerate any use of slavery, or inaction against slavery within its business and we require our officers, employees and those providing services to, for, or on behalf of the Group to conduct themselves in accordance with our Policy.

We are committed to ensuring there is transparency in our business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We are committed to the abolition of working conditions constituting modern slavery including bonded labour, debt servitude, forced labour, human trafficking, indentured labour, state-imposed forced labour, prison labour, and any form of work performed involuntarily and under the menace of any penalty or coercion through the use of violence and intimidation. We set clear expectations to contractors and suppliers not to use forced, prison or compulsory labour and no payment of recruitment fees by workers. We expect contractors and suppliers to respect freedom of association and collective bargaining; to provide a safe, secure, and healthy workplace; and the provision of wages and benefits that meet or exceed the national legal standards. Our contractors and suppliers should

provide workers with whistleblowing mechanisms where grievances related to the above topics can be logged confidentially.

Our Modern Slavery Policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.

## **Organizational Structure**

Avalere Health operates through various business operations units under a number of registered business entities in the UK, USA, Singapore, Switzerland, Republic of Ireland, Greece and Canada. There are ~1600 people employed within the Group across these jurisdictions. The Group has centralized support services across all capabilities with leadership comprising an Executive Committee to provide oversight and governance across the entire organization.

## **Modern Slavery Risk**

We believe that the risk of trafficking or modern slavery is very low within our specific business setting as a professional service provider in our operating countries. This is in line with other companies operating in the healthcare commercialization sector. However, the Group takes a proactive view to be vigilant to the risks around modern slavery.

Through due diligence processes we undertake the following actions to mitigate the risk of modern slavery:

- Identify and assess potential risk areas in our supply chains;
- Where practical, mitigate the risk of slavery and human trafficking occurring in our supply chains;
- Train all employees on our Modern Slavery Policy to ensure a high level of understanding of modern slavery and human trafficking risks in our business;
- Review recruitment processes and employee benefits;
- Invest in Diversity, Equity, and Inclusion support for employees; and
- Provide whistleblowing channels and protect whistleblowers.

Training on modern slavery, and acknowledgment of our policies and associated procedures is mandatory for all employees of the Group and is completed on an annual basis.

Throughout our business we undertake our own recruitment practices and ensure all terms of employment are voluntary. Where there is a need to source labour from external companies, we only work with reputable employment agencies to do so and we carry out appropriate background checks for all employees. Where necessary, and if required, we may request demonstration of compliance with this Policy. We verify the practices of any new agency that we work with and always request evidence of compliance with this Policy through acceptance of our Third Party Code of Conduct.

Our teams source both direct goods and indirect services from a number of external suppliers. We are implementing systems and controls to reduce the risk of modern slavery taking place in our supply chains through the development of a consistent supplier procurement process across all group companies. The Group ensures that understanding the potential risk of modern slavery in our supply chain is a critical part of our Policy. As part of this, our businesses are expected to follow procedures in the selection of suppliers. All suppliers are expected to be able to evidence compliance with the Modern Slavery Act as outlined in our Third Party Code of Conduct. We continue to review our suppliers with regard to compliance in this area and are working towards auditing suppliers in line with this Policy.

Avalere Health's main supply chain areas include:

- Recruitment agencies;
- Suppliers of IT equipment, software, and services;
- Professional services from lawyers, accountants, freelancers, consultants, and other advisers;
- Office cleaning and other office facilities services;
- Print and promotional material production; and
- Marketing and PR services.

### **Responsibility for the Policy.**

The Compliance and Human Resources teams have primary and day-to-day responsibility for implementing our Modern Slavery Policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal systems and procedures to ensure they are effective in countering modern slavery. All employees are responsible for ensuring that all dealings with suppliers comply with our Policy.

### **Compliance with the Policy.**

The Group is committed to conducting its business with honesty and integrity and it expects all staff to maintain high standards at all times. Our Whistleblowing Policy facilitates the reporting of any suspected wrongdoing or dangers in relation to the Group's activities. Our Whistleblowing Policy provides both an anonymous reporting line and an internal mechanism for reporting, investigating and remedying any wrongdoing in the workplace, and we will support any whistleblowers who raise genuine concerns under this Policy, even if they turn out to be mistaken. We have an active Diversity, Equity, and Inclusion programme open to all employees to reduce biases and encourage openness and accessibility to all.

### **Review Process**

The Compliance team will review the progress on the Modern Slavery Policy and required training on an annual basis. Key Performance Indicators on this topic are incorporated into our Environmental, Social and Governance monitoring. Our Modern Slavery Statement is available on the website for all business entities within the Group.

### **Key Actions for 2023/2024**

- Development of Supplier Procurement Policy and review output of audit of supply chain.
- Incorporation of clauses regarding modern slavery laws as a key component of sub-contractor contracts.
- Ensure support for vulnerable workers through the company Diversity, Equity, and Inclusion initiatives.
- Processes for recording accurate overtime reinforced through all Group companies.

## Key Performance Indicators

The following KPIs have been agreed for 2023/2024

- Publication of Modern Slavery Statement on all group company websites and on the Government Modern Slavery Statement Register.
- Completion of annual Modern Slavery training by 100% of employees.
- Acceptance of all Policies relating to Human Rights and Modern Slavery by 100% of employees.
- Reporting on number of concerns raised in relation to Human Rights and Modern Slavery.

This statement was approved by the board of Avalere Health Group Limited (operating as Avalere Health) on 23 November 2023 and signed by Jon Koch, Chief Executive Officer.



This statement will be reviewed each year in conjunction with our financial year which runs from 1 April to 31 March.