

# Modern Slavery & Human Trafficking Statement

## Inizio Topco Limited and each of its subsidiaries (together the 'Group')

This statement has been published in accordance with the Modern Slavery Act 2015. It sets out the steps taken by the Group during the year ended 31<sup>st</sup> December 2023 to prevent modern slavery and human trafficking in its business and supply chains.

### The Business

The Group comprises two global brands to distinguish its service offerings to the market:

- **Inizio**, is a market-leading commercialisation platform and strategic partner for health and life sciences companies with a complete suite of medical, advisory, marketing, communications and patient-engagement services that spans the full commercialisation lifecycle from the initial stages of research and discovery into product launch and growth. Further detail on all of Inizio's operations can be found at <https://inizio.com>.
- **Accordience**, is a network of specialist, award winning agencies, with deep expertise in public relations, crisis communications, public affairs, financial and corporate communications that uniquely combine best-in-class, specialist consultancy services, helping brands and businesses reach and influence audiences that matter. Further detail on Accordience's operations can be found at <https://www.accordience.com>.

### Protecting Staff

The Group is committed to providing its workers (which are deemed to include directors, employees, staff, contractors, freelancers and workers (together, '**Workers**')) with safe, legal employment in a stimulating and rewarding environment. The Group is opposed to any form of slavery and human trafficking ('**Modern Slavery**') and strives to ensure that it is prevented from occurring in its business or supply chains.

The Group aims to carry out all business dealings in full compliance with applicable laws and with respect to internationally recognised, human rights standards in every location in which it operates.

### Policies and Training

During 2023 the Group continued to further develop and build on its policies and procedures to ensure that its business is conducted in an ethical and transparent manner. Workers are made aware of such policies, including during the induction period upon joining the Group and through our mandatory learning program. Workers can access our policies on our internal systems or via the Inizio and Accordience websites.

In the context of preventing Modern Slavery, these policies currently include the following:

- **Code of Ethics and Commitments:**  
The Group's Code of Ethics (the **Code**) establishes the behaviour we expect of every single person in the Group and those who represent us. Integral to the Code are the Group's Leadership Commitments (our **Commitments**) which set out in more detail how we should all act and interact, and help to foster a positive, supportive, and ethical culture. Our Code and Commitments empower our Workers to 'Do the right thing', and to challenge and report situations that appear unusual or clearly wrong. All of our Workers are accountable for the Code, our Commitments, and championing our diverse culture. We believe this allows us to better serve our clients, communities, and each other.

# Modern Slavery & Human Trafficking Statement

- **Human Rights Policy:**

The Group's Human Rights Policy sets out our zero-tolerance stance to any violations of human rights and any manifestations of modern slavery. The Group will not knowingly support or conduct business with any organisation involved in such activities. The Group strives to act in accordance with internationally recognised human rights standards, including the European Convention on Human Rights, the International Bill of Human Rights, the International Labour Organization's Declaration on Fundamental Principles and Rights at Work, the United Nations Guiding Principles on Business and Human Rights and the International Covenant on Economic, Social and Cultural Rights. We work to guard against complicity with human rights violations and to uphold the human rights of our own workforce, our supply chain, our clients, and our communities.

- **Speak Up Policy:**

This policy encourages anyone who works for or with the Group to raise ethical and legal concerns, including potential human rights and Modern Slavery issues. The Group's confidential reporting process allows individuals to do so 24/7, confidentially, and where the law allows, anonymously.

The Group does not tolerate retaliation, retribution, or threats of such in any form, including such related to Speak Up reports made in good faith. Any Worker found to be undertaking, or threatening to undertake, retaliatory measures is subject to disciplinary action up to and including dismissal.

All incidents reported are taken seriously and are investigated thoroughly and appropriate remedial action taken.

## The Group's Supply Chains

During 2023 we launched our Supplier Code of Conduct, which establishes our expectations from suppliers, vendors, contractors, consultants and other third parties who work with us or act on our behalf. The Supplier Code of Conduct sets standards around Ethical Business Practices, Workplace Standards, including the fair and equal treatment of employees and the requirement not to use forced or trafficked labour, Systems and Reporting which, amongst other matters, encourage suppliers to manage their own supply chains in a manner that is consistent with our Supplier Code of Conduct.

Given the service-oriented nature of the Group's business, the Group does not have extensive supply chain networks and is generally at low risk of exposure to slavery and human trafficking. The supply chain includes recruitment agencies, cleaning and catering services, IT hardware and software providers, through to office fit out, maintenance services and document retention services. Few suppliers to Group companies are significant in terms of the volume of business conducted with them, and many of them are small in size and based in the US, UK, Ireland or other jurisdictions where Group companies operate. For our largest spend suppliers, we will shortly be initiating a supply chain sustainability engagement programme which will require suppliers within this category to confirm that they meet minimum environmental and social standards, including compliance with forced labour and modern slavery laws.

The Group recognises that it is vital to preserve the highest standards of integrity and transparency within its supply chains, so that those employed within them are not exposed to any form of exploitation. Furthermore, we have committed through the governance pillar of Inizio's sustainability strategy, to manage our supply chain responsibly and sustainably, in line with UN Sustainability Development Goal 8. Inizio is therefore selective in its choice of suppliers and conducts appropriate due diligence checks. However, we also acknowledge that suppliers may have their own complex supply chains and it is therefore not practicable for the Group to have direct oversight or management of the working conditions of each supplier. To counter this, where possible, the aim is to reduce complexity in supply chains, so that any weaknesses can be more readily determined and dealt with through a risk-based assessment.

# Modern Slavery & Human Trafficking Statement

## Effectiveness in Combatting Modern Slavery

A number of initiatives were introduced during 2023 aimed at ensuring that Modern Slavery was not taking place in any part of the business or in any part of our supply chains, including, amongst other matters, the following:

- The Group maintained globally applicable policies that establish our values (via our Code of Ethics and our Commitments), a commitment to act in accordance with internationally recognised human rights standards (our Human Rights Policy), and our mechanism to raise issues when our values and commitments are challenged or clearly disregarded (our Speak Up Policy). Each may be viewed at <https://inizio.com/about-inizio/what-matters-to-us/> or <https://accordience.com/our-policies/>.
- Launched a global all employee training and attestation procedure for policies within Inizio.
- The Group developed and launched a Supplier Code of Conduct which includes provisions based on internationally recognised human rights standards including human trafficking and child labour.
- During the year, the Group embarked on a review of its supplier lifecycle management operating model, to incorporate various sustainability considerations. The Group's senior leadership team has agreed to explore the use of a digital platform to assist us with engaging our largest spend suppliers on various environmental and social standards, including forced labour and modern slavery.

The Group is not aware of any incidents of Modern Slavery having been notified or identified during 2023.

The Group believes that its culture of openness and accountability, when coupled with its policies and procedures, is effective in combatting the risk that Modern Slavery could be found in the Group or discovered within its supply chains. If an instance of Modern Slavery were to be uncovered, the Group believes that it would be well placed to take swift and appropriate remedial action in line with the ethical values that underpin its business. The Group remains committed to further enhancing and strengthening effective integrated systems and controls, on an on-going rolling basis, to safeguard against and mitigate the risk of Modern Slavery taking place within the Group or its supply chains.

This statement was approved on 20<sup>th</sup> March 2024 by the Board of Directors of Inizio Topco Limited, in its capacity as operating parent to the Group.

Signed



**Paul Taaffe**  
**Chief Executive Officer**

*Entities required to publish a statement under the Modern Slavery Act 2015 and therefore covered by this Group statement include: CD&R Artemis Holdco 0.75 Limited, CD&R Artemis Holdco 2 Limited, CD&R Ulysses UK Holdco 2 Limited, Inizio Group Limited, Inizio Holdings Limited, Hunter UK Bidco Limited, Huntsworth Limited, Huntsworth Proton UK Bidco Limited, Nucleus Holdings Limited, UDG Healthcare (UK) Holdings Limited, UDG Healthcare UK (HoldCo) Limited, Knowledgepoint360 UK AcquisitionCo Limited, Knowledgepoint360 Group (Holdings) Limited, Ashfield Health Limited, Ashfield Meetings & Events Group Limited, The Creative Engagement Group Limited, The Creative Engagement Group (Holding Co) Limited, WRG Group Limited, WRG Worldwide Limited, The Research Partnership Limited, Ulysses Odin Bidco Limited, Huntsworth Holdings Limited and IG Communications Limited.*