Voluntary Modern Slavery and Human Trafficking Statement

1. Our Commitment

Proveca is committed to ethical and transparent business practices and has zero tolerance for modern slavery, forced labour, child labour or human trafficking in its operations and supply chains. This voluntary statement outlines the steps taken during the 2025 calendar year to identify and manage these risks, in line with section 54 of the Modern Slavery Act 2015.

2. Our Organisation and Supply Chain

Proveca is a specialist pharmaceutical company that develops and supplies medicines for children.
The Proveca Group comprises:

- Proveca Ltd — *UK parent company*
- Proveca Pharma Ltd — *Irish subsidiary responsible for the EU market*
- Proveca France SAS — *French subsidiary*
- Proveca GmbH — *German subsidiary*
- Proveca Italy s.r.l. — *Italian subsidiary*

Our work covers pharmaceutical research and development, regulatory and quality activities, medical affairs, medicine supply, sales and marketing supported by employees of the group companies and third-party providers.

Key suppliers include:

- manufacturers and active ingredient suppliers;
- packaging, logistics and distribution providers;
- clinical research and specialist consultants; and
- IT, professional and facilities service providers.

Although many pharmaceutical suppliers operate in regulated environments, risks may remain in complex international supply chains, particularly where subcontracting, temporary labour or higher-risk locations are involved.

3. Policies and Governance

Our controls include policies on ethics, anti-bribery, whistleblowing, equality, health and safety, supplier management and ESG.
The Proveca Board oversees this statement, while each business function manages relevant risks.

4. Due Diligence and Supplier Management

All suppliers carrying out regulated activities are approved and qualified before work begins and remain subject to oversight.
Controls may include:

- pre-engagement checks and approval;
- verification of licences, qualifications and governance;

- contractual compliance requirements;
- audits, monitoring and reassessment; and
- enhanced due diligence and escalation for higher risks.

If modern slavery is suspected, Proveca will seek to protect affected individuals, investigate and take proportionate remedial action without causing further harm.

5. NHS Supplier Compliance

Proveca is committed to meeting applicable NHS supplier requirements, including relevant procurement rules, the NHS Supplier Code of Conduct, labour standards, human rights, environmental responsibilities and supply-chain transparency. We expect suppliers supporting NHS contracts to comply with applicable law, maintain suitable policies and due diligence, and provide evidence when requested. Any identified concerns will be investigated and addressed through proportionate corrective action and ongoing improvement.

6. Our Employees and Workforce

Proveca considers the risk of modern slavery within its directly employed workforce to be low. This assessment is supported by our recruitment, employment and people-management practices.

We are committed to ensuring that all employees and workers are engaged voluntarily, treated fairly and provided with clear terms and conditions of employment. Our employment practices include appropriate pre-employment and right-to-work checks, transparent pay and employment arrangements, and compliance with applicable employment, working time and minimum wage legislation.

Proveca does not tolerate forced or compulsory labour, child labour, worker-paid recruitment fees, the withholding of identity or immigration documents, restrictions on an individual's freedom to leave employment, or threats, intimidation or coercion in connection with employment.

We recognise that potentially greater workforce-related exposure may arise through agency labour, contractors, subcontracting and international outsourced services, where Proveca has less direct oversight of recruitment and employment practices. Where temporary workers, agency workers or contractors are engaged, we expect the organisations supplying those workers to comply with applicable employment and modern slavery legislation and to maintain appropriate recruitment and employment practices.

Employees and workers are encouraged to raise any concern about exploitation, coercion, inappropriate recruitment practices or other suspected modern slavery through their manager, Human Resources or Proveca's whistleblowing arrangements. Concerns may be raised without fear of retaliation and will be investigated appropriately, with the welfare and safety of potentially affected individuals considered throughout.

7. Monitoring and Continuous Improvement

We will monitor effectiveness through:

- concerns raised and their outcomes;
- modern slavery clauses in relevant contracts; and

- periodic review of controls and this statement.

Proveca will introduce proportionate modern slavery awareness training for employees, with targeted training for colleagues in higher-risk or relevant roles, including Human Resources, procurement and supplier management.

8. Approval

This statement was approved by the CEO of Proveca Group.

Signed: **Date:**



29-Sep-2026

Name: Dr Simon Bryson
Title: CEO