

CD&R Artemis Holdco 1 Limited and each of its subsidiaries  
(together the 'Group')

## **MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT**

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 2021 (the '**Reporting Period**') to prevent modern slavery and human trafficking in its business and supply chains.

### **The Business**

The Group was formed following the acquisitions of Huntsworth ('**Huntsworth**') on 1<sup>st</sup> May 2020 and UDG Healthcare ('**UDG**') on 16<sup>th</sup> August 2021. UDG had two key business segments, Ashfield (healthcare support services) and Sharp (contract packaging services). Since the acquisition of UDG, Sharp has been run independently and was legally separated from the rest of the Group on 31<sup>st</sup> December 2021. Sharp's activities, pursuant to the Modern Slavery Act 2015, are outside the scope of this statement.

Ashfield and Huntsworth create a differentiated set of global solutions to support Pharma and Biotech clients across the life cycle of a drug, from development to launch and beyond patent expiry, across all therapeutic areas.

### **Protecting Staff**

The Group is committed to providing its workers (which is deemed to include 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.

### **Ashfield and Huntsworth's Policies and Training**

During 2021 Ashfield and Huntsworth each had their own set of policies and training procedures and the integration of these policies is an on-going focus. Ashfield and Huntsworth's policies and training procedures are regularly reviewed to ensure that they are fit for purpose and consistent with any changes in legislation and that business is conducted in an ethical and transparent manner. Workers and Directors are made aware of these policies, including during the induction period upon joining the Group. All Workers and Directors can access applicable policies through policy management portals.

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

- ***Codes of Conduct and Ethics Policies***, which together explain the manner in which the Group behaves and how Workers, Directors and suppliers are expected to act. Each Worker and Director is responsible for upholding the principles and practices set out within the policies.

The overriding aim is to continue to build and support a culture which values openness, accountability and disclosure;

- Human Resource Policies, that govern recruitment, equal opportunities and diversity in the workplace, and which include, where appropriate, background checks for all Workers to safeguard against human trafficking or individuals being forced to work against their will;
- Confidential Reporting and Whistleblowing Policies, which allow all Workers across the Group, through multichannel 24/7 confidential reporting services, to voice any concerns about the treatment of colleagues, or practices within the business or supply chains, without risk of reprisals. All incidents reported via the helplines are taken seriously and are investigated and appropriate remedial action taken; and
- Sanctions Policies, which make clear to Workers and Directors that the Group will not do business with any organisation or individual that is subject to economic or other sanctions issued by bodies such as the US, UK or EU Governments, or the United Nations.

### **The Group's Supply Chains**

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 chains include recruitment agencies, cleaning and catering services, IT hardware and software providers, through to office fit out and 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 or other jurisdictions where Group companies operate.

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. The Group is therefore selective in its choice of suppliers and conducts requisite due diligence checks. However, 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.

### **Effectiveness in Combatting Modern Slavery**

During 2021 the Group continued to prioritise its commitment to initiatives aimed at ensuring that slavery and human trafficking are not taking place in any part of the business or in any part of its supply chains, including the following:

- Huntsworth Workers and Directors were required to (i) watch an awareness video on Modern Slavery and (ii) read the applicable policies referred to above, attest to having done so, and agree to comply with such policies.
- Ashfield Workers and Directors completed a Code of Conduct training course, where they attested and agreed to comply with the policies which fall under such Code of Conduct including the applicable Human Resource, Confidential Reporting and Sanctions policies.
- All Ashfield suppliers were expected to understand and comply with the UDG Healthcare Supplier Code of Conduct.

The Group is not aware of any incidents of Modern Slavery having been notified or identified during the period covered by this statement.

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 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 25<sup>th</sup> April 2022 by the Board of Directors of CD&R Artemis Holdco 0.5 Limited, in its capacity as parent to the Group following a group restructuring on 4<sup>th</sup> March 2022, after the Reporting Period.

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 2 Limited, CD&R Ulysses UK Holdco 2 Limited, Hunter Holdco 3 Limited, Hunter Holdco 4 Limited, Hunter UK Bidco Limited, Huntsworth Limited, Huntsworth Investments Limited, Huntsworth Proton UK Bidco Limited, Nucleus Holdings Limited, UDG Healthcare (UK) Holdings Limited and UDG Healthcare UK (HoldCo) Limited.*