VOLUNTARY DISCLOSURE | GOVERNANCE | PROCUREMENT READINESS

# Modern Slavery Assessment & Statement

Prepared for Neuvior Pharmaceuticals Ltd as a voluntary modern slavery document covering all six disclosure areas commonly expected in a modern slavery statement.

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| Company<br>Neuvior Pharmaceuticals Ltd | Effective date<br>10 April 2026 |
| Reporting basis<br>4 August 2025 to 10 April 2026 | Status<br>Below Section 54 threshold; published voluntarily |

This document is designed for MAS upload and website publication once signed by a director.

NEUVIOR PHARMACEUTICALS LTD

AT A GLANCE

# Executive position

Neuvior publishes this document voluntarily to evidence ethical governance and supply chain controls at an early stage of growth. The company is not currently presenting this as a statutory annual Section 54 statement; instead, it is a voluntary disclosure aligned to the six areas the UK government says may be included in a modern slavery statement.

### Organisation and supply chains

Company profile, operating model and direct / indirect supply chain categories are set out clearly.

### Policies

Zero-tolerance position, supplier expectations, recruitment principles and governance controls are summarised.

### Highest-risk areas

Risk hotspots are identified using a sector-specific, risk-based approach proportionate to an early-stage pharma business.

### Due diligence

Supplier screening, enhanced due diligence, contractual protections, monitoring and remediation are documented.

### Training

Mandatory awareness and role-based training requirements are defined for directors, staff, contractors and supplier owners.

### KPIs

Quarterly metrics and annual review commitments are included so all six disclosure areas are covered.

### Legal position and publication basis

Neuvior currently states that it is below the turnover threshold in section 54 of the Modern Slavery Act 2015. This document is therefore published voluntarily, without prejudice to the company keeping its position under review as turnover, procurement activity and supply chain complexity grow. The company nevertheless adopts the same disciplines expected of larger organisations: clear governance, risk-based due diligence, training, measurable KPIs and public website availability.

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| Company number<br>SC857853 | Registered office<br>Clyde Offices, 2nd Floor, 48 West George Street, Glasgow, Scotland, G2 1BP |
| Incorporated<br>4 August 2025 | Business profile<br>Early-stage pharmaceutical, biotechnology and related healthcare activity with an evolving third-party supplier base. |

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| Review cycle<br>Annual, and sooner if there is a material change in suppliers, geography, operating model or product pathway. | Publication approach<br>MAS upload plus website publication or website summary with downloadable PDF. |

1 | ORGANISATION, BUSINESS AND SUPPLY CHAINS

# Business profile and supply chain scope

Neuvior Pharmaceuticals Ltd is an early-stage UK life sciences company. At the date of this statement its supply chain is comparatively narrow, but the company recognises that the healthcare and manufacturing ecosystem can present elevated labour-exploitation risk, especially where outsourced production, logistics, labour providers or lower-paid services are involved.

Neuvior's current and expected supply chain can be grouped into five broad categories. The company does not assume low spend or small size equals low risk. Instead, it applies a proportionate risk lens focused on worker vulnerability, labour model, geography, subcontracting and sector exposure.

| Supply chain category | Typical examples | Why it matters |
|---|---|---|
| Core scientific and operational delivery | Laboratory services, contract research, clinical or non-clinical testing partners, specialist consultants, future contract development / manufacturing support. | These relationships may move the company into higher-risk manufacturing or research supply chains over time. |
| Product and physical goods | Future active ingredients, excipients, packaging, lab consumables, devices, sample kits or other manufactured goods. | Manufacturing, raw-material sourcing and packaging can involve multi-tier supply chains and labour-intensive production. |
| Logistics and fulfilment | Courier services, warehousing, transport, cold chain, distribution and import / export support. | Warehousing and transport can involve agency labour, subcontracting and vulnerable workers. |
| Corporate support services | Facilities, office services, cleaning, security, catering, recruitment, payroll and temporary labour providers. | Lower-paid service sectors are well-recognised risk areas for labour exploitation. |
| Professional and digital services | Legal, accounting, design, software and cloud vendors. | Usually lower inherent forced-labour risk, but still within supplier governance and contract controls. |

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| Governance and accountability | Ultimate responsibility sits with the company director(s). Operational responsibility sits with the individual leading supplier engagement, procurement or contract ownership. Because the company is small, anti-slavery controls are embedded within supplier onboarding, contract review and management oversight rather than dispersed across multiple committees. All personnel are expected to raise concerns immediately. |

2 | POLICIES RELATING TO MODERN SLAVERY

# Zero-tolerance policy architecture

Neuvior opposes slavery, servitude, forced or compulsory labour and human trafficking in any part of its operations or supply chains. The company expects equivalent standards from suppliers, contractors and business partners.

Given the company's stage of development, some controls are maintained as a compact operating framework rather than a long suite of separate manuals. That does not reduce the standard expected. The company's minimum policy position is set out below.

| Policy / control | Minimum company requirement | Practical application |
|---|---|---|
| Zero-tolerance statement | No slavery, servitude, forced labour or human trafficking will be tolerated in Neuvior's operations or supply chains. | Included in this statement, supplier onboarding, contract templates and escalation procedures. |
| Ethical recruitment | No worker-paid recruitment fees, no retention of original identity documents, no coercion, and no restriction on lawful freedom of movement. | Relevant to employees, contractors, labour providers and third-party suppliers. |
| Worker protections | Respect for lawful wages, working time, rest, non-discrimination, and safe working conditions; no child labour; no compulsory overtime imposed by coercion. | Applied through supplier due diligence, contract clauses and risk escalation. |
| Supplier code expectations | Suppliers must comply with applicable labour laws and maintain systems to identify and address modern slavery risk in their own operations and supply chains. | High-risk or material suppliers may be asked for supporting policies, certifications or explanations. |
| Whistleblowing and escalation | Concerns must be raised promptly to a director or designated responsible person, with records kept and action tracked. | Used for internal concerns, supplier allegations, suspicious labour practices or adverse media. |
| Contractual enforcement | Relevant contracts should contain anti-slavery warranties, information rights, remediation obligations and termination rights where proportionate. | Material suppliers are expected to cooperate with reasonable information requests and corrective action plans. |

Where Neuvior engages new categories of suppliers or enters higher-risk jurisdictions, the company will expand this compact framework into more detailed standard operating procedures and supplier-code annexes.

3 | THE PARTS OF THE BUSINESS AND SUPPLY CHAINS WHERE RISK IS HIGHEST

# Salient risk areas

The company uses a risk-based approach informed by sector, workforce model, geography, subcontracting, use of recruiters, and the degree to which goods or services are labour intensive. For a pharmaceutical business, the highest-risk areas are not necessarily in head-office functions; they tend to sit where manufacturing, logistics, temporary labour or lower-paid services intersect.

| Area | Why it may carry higher risk | Current risk view | Control response |
|---|---|---|---|
| Contract manufacturing, packaging and future raw-material sourcing | Multi-tier supply chains, outsourced production, manufacturing labour, packaging lines and potential overseas sourcing can increase opacity. | High | Enhanced due diligence before onboarding, stronger contractual clauses, supply chain disclosure and periodic review. |
| Logistics, warehousing and transport | Agency labour, subcontracted transport, seasonal peaks and lower-paid work can increase worker vulnerability. | Medium | Risk screen all providers, ask about labour model, recruiters, subcontracting and grievance routes. |
| Cleaning, security, facilities and other lower-paid services | These sectors are commonly identified as susceptible to hidden exploitation, underpayment or coercive labour practices. | Medium | Prefer reputable providers, check workforce model, require contract clauses and escalate any warning signs. |
| Recruitment and temporary labour supply | Use of labour brokers, migrant labour or opaque fee structures can create trafficking and forced-labour risk. | Medium | No worker-paid recruitment fees, recruiter diligence, and disclosure of any subcontracting chain. |
| Professional services and software | Usually lower forced-labour exposure, but still requires legal and ethical screening where service delivery depends on subcontracted labour. | Low | Standard onboarding and contract review; escalate if delivery model changes or red flags emerge. |

**Current stage judgement**

Neuvior's present supplier footprint is still relatively limited, but the company is in a sector - healthcare and pharmaceutical manufacturing - where risk can rise quickly as outsourced scientific, manufacturing, packaging and logistics relationships scale. This is why the company chooses to document controls early rather than waiting until it becomes legally obliged to report.

4 | DUE DILIGENCE PROCESSES TO MANAGE AND PREVENT RISK

## Supplier due diligence, escalation and remediation

The company applies a proportionate but documented due diligence process. Higher-risk suppliers require deeper review before onboarding. The objective is not to collect paperwork for its own sake; it is to identify labour-risk indicators early and to create a credible escalation route if concerns arise.

Neuvior's minimum due diligence workflow is as follows:

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| 01 | Screen<br>Identify the supplier category, geography, workforce model, likely subcontracting and whether the service is in a recognised higher-risk sector. |
| 02 | Request information<br>Ask for relevant policies, a description of labour practices, use of agencies or recruiters, and any known allegations or enforcement history where proportionate. |
| 03 | Enhance where needed<br>For higher-risk or material suppliers, seek more detail, contract assurances, supply chain transparency and evidence of remediation capability. |
| 04 | Contract and monitor<br>Embed anti-slavery clauses, maintain records, and refresh risk assessments when contracts renew, supplier scope changes or red flags emerge. |
| 05 | Escalate and remediate<br>Investigate concerns promptly, act in a victim-centred way, document outcomes, and require corrective action or disengagement where appropriate. |

### Remediation principles

- The first priority is worker safety and harm reduction, not optics.
- The company will avoid reflexively terminating a supplier if that would worsen risk to workers without a better remedy pathway.
- Where a credible concern arises, the company will seek evidence, require corrective action, document decisions and consider expert or legal advice where appropriate.
- Material concerns will be escalated to a director and recorded with dates, actions and status.

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| Record keeping | The company maintains or will maintain a central compliance file containing supplier screening notes, due diligence responses, contract clauses, training logs, KPI tracking and any modern slavery concern records. These records are necessary to evidence that the framework is operational, not merely aspirational. |

5 | TRAINING AND CAPACITY BUILDING

## Mandatory awareness and role-based capability

Training is proportionate to the company's size but mandatory in concept. The aim is to ensure that directors, employees and contractors who touch supplier relationships can identify obvious warning

signs and know what to do next.

| Audience | Minimum content | Frequency | Evidence |
|---|---|---|---|
| Director(s) and senior decision-makers | Legal duties, company risk areas, escalation standards, approval responsibilities and remediation principles. | On adoption, then annual refresh. | Attendance note and policy attestation. |
| Employees and contractors | What modern slavery is, warning signs, reporting route, supplier expectations and personal responsibilities. | Onboarding plus annual refresher. | Training log or signed acknowledgement. |
| Supplier-facing or procurement owners | Risk triage, supplier screening questions, contract clauses, how to identify red flags in labour models and subcontracting. | On assuming supplier responsibilities and annually thereafter. | Role-based completion record. |
| Future operations / logistics / scientific leads | Sector-specific risks in manufacturing, logistics, research services and third-party operations. | Before taking responsibility for higher-risk suppliers. | Role-specific briefing record. |

The training package should be reviewed whenever the company enters new higher-risk supply chain categories, such as contract manufacturing, overseas sourcing or warehousing arrangements involving temporary labour.

6 | KEY PERFORMANCE INDICATORS USED TO MEASURE PROGRESS

# Quarterly dashboard for an early-stage business

To make progress measurable, Neuvior will track the KPI set below on a quarterly basis and reflect performance in the next annual refresh. These are intentionally practical process metrics suited to a young company; more advanced metrics should be added as the supplier base grows.

| KPI | Measurement basis | FY2026 / 27 target | Review cadence |
|---|---|---|---|
| New material suppliers screened before onboarding | Percentage of relevant new suppliers that complete documented initial risk screening before commitment or purchase. | 100% | Quarterly |
| Relevant contracts containing anti-slavery clauses | Percentage of new material supplier contracts or order terms containing appropriate anti-slavery language. | 100% | Quarterly |
| Higher-risk suppliers subjected to enhanced due diligence | Percentage of suppliers rated medium / high risk that receive additional review before onboarding or renewal. | 100% | Quarterly |
| Training completion for relevant personnel | Percentage of directors, employees and contractors with supplier exposure completing required training within 30 days. | 100% | Quarterly |
| Concerns triaged promptly | Percentage of reported concerns acknowledged and triaged within five working days. | 100% | Quarterly |
| Formal risk map refresh | Completion of at least one documented refresh of salient supply chain risks during the review cycle. | At least 1 full refresh | Annual |

**How these KPIs should be used**

These KPIs are designed to prove that controls are operating in practice. A low number of concerns reported should never be treated as success on its own; under-reporting can also indicate weak visibility. The company should therefore focus on screening discipline, training completion, escalation speed and the quality of review rather than claiming 'zero risk'.

APPENDIX A

# Supplier onboarding checklist (minimum screen)

This checklist can be used as the company's baseline form for new material suppliers and service providers.

| Checklist item | Evidence or note |
|---|---|
| Supplier name, legal entity, service / goods category and jurisdiction identified. | ..... |
| Risk tier assigned using sector, geography, workforce model and subcontracting profile. | ..... |
| Supplier confirms no forced labour, no human trafficking and no worker-paid recruitment fees. | ..... |

| Checklist item | Evidence or note |
| --- | --- |
| Supplier discloses use of temporary labour, migrant labour, labour agencies or recruiters. | ..... |
| Supplier confirms original identity documents are not withheld from workers. | ..... |
| Supplier confirms workers can leave employment in line with law and contract. | ..... |
| Supplier discloses any known enforcement action, adverse findings or credible allegations. | ..... |
| Supplier agrees to appropriate anti-slavery contract clauses and corrective-action cooperation. | ..... |
| Supplier discloses key subcontracting where the supplied goods / services depend on it. | ..... |
| Reviewer name, review date, outcome and any follow-up actions recorded. | ..... |

APPENDIX B

# Website publication wording

Use the copy below on the website. A full page is preferable; a short sentence can be used in the interim if development time is limited.

**Recommended page title: Modern Slavery Statement**

Suggested URL: www.neuvior.com/modern-slavery-statement

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| **Website page copy** | Neuvior Pharmaceuticals Ltd has adopted a voluntary Modern Slavery Assessment and Statement even though the company is currently below the turnover threshold at which section 54 of the Modern Slavery Act 2015 typically requires annual reporting. We do this because ethical growth, responsible supplier management and protection of workers are core governance expectations for the business.<br><br>Our approach is risk-based and proportionate to our current scale. It covers supplier screening, contractual controls, role-based training, escalation and remediation procedures, and measurable key performance indicators. As the company grows and its scientific, manufacturing and logistics supply chains develop, this framework will be reviewed and strengthened.<br><br>The current statement can be downloaded below. |
| **One-sentence fallback copy** | Neuvior Pharmaceuticals Ltd publishes a voluntary Modern Slavery Assessment and Statement as part of its commitment to ethical growth, supplier due diligence and protection of workers across its operations and supply chains. |

Placement recommendation: add a footer link under Legal, Governance or Company, and keep the downloadable PDF on the page in a clearly visible location.

APPROVAL

# Director sign-off and reference framework

For best practice and procurement credibility, this document should be approved and signed by a director before upload and website publication.

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| Approved for and on behalf of Neuvior Pharmaceuticals Ltd | |
| NAME<br>**Varun Sharma** | POSITION<br>**Director** |
| ELECTRONIC SIGNATURE<br>/s/ *Varun Sharma* | SIGNED ON<br>**17 July 2026**<br>16:29 BST - Europe/London |

### Reference framework used in preparing this document

- Modern Slavery Act 2015, section 54.
- Modern Slavery Act 2015 (Transparency in Supply Chains) Regulations 2015.
- Home Office, Transparency in supply chains: a practical guide, updated 1 December 2025.
- Cabinet Office, PPN 009: Guidance on tackling modern slavery in government supply chains, updated 16 October 2025.
- OECD Due Diligence Guidance for Responsible Business Conduct and the UN Guiding Principles on Business and Human Rights.

This document is intended as a governance and disclosure statement for publication and procurement use. It does not replace legal advice or sector-specific regulatory obligations.