

Nucleus Holdings Limited

and each of its subsidiaries (together, Nucleus Global)

ANTI SLAVERY STATEMENT

OVERVIEW

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 address slavery and human trafficking through the consolidation of previous legislation and the introduction of new measures. This Anti-Slavery Statement sets out the steps taken by Nucleus Global during the year ended 31 December 2020 to prevent modern slavery and human trafficking in its business and supply chains.

OUR BUSINESS

Nucleus Global is a group of 14 medical communications and creative agencies that together provide complete in-house consulting and communications services to the pharmaceutical and biotechnology industries. Nucleus Global is headquartered in the UK and operates out of 7 countries worldwide. This statement applies to all such identities.

Nucleus Global joined the Huntsworth Group on 10th December 2020 and as a result, are in the process of implementing new policies and procedures.

POLICY STATEMENT

Nucleus Global is committed to supporting an ethical and sustainable company that conducts its business with honesty and integrity, where fundamental rights and freedoms are respected in all business dealings, including with suppliers, and expects all staff to maintain high standards at all times.

Nucleus Global does not tolerate any use of slavery within its business and we expect our officers, employees and those providing services to, for, or on behalf of the Group to conduct themselves in accordance with our policy statement.

In response to the UK Modern Slavery Act 2015, we have implemented systems and controls to reduce the risk of modern slavery taking place anywhere in our own business or in any of our supply chains. This Anti-Slavery Statement 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.

PRINCIPLES

We fully acknowledge the principles and our responsibilities as provided for in the Modern Slavery Act 2015. These principles apply within our business and within our supply chain and include:

- respect for the dignity of the individual
- recognition of the importance of each individual's human rights
- securing and increasing equality of opportunity and inclusion
- not accepting any form of discrimination, harassment or bullying
- not tolerating any form of slavery, human trafficking or forced or compulsory labour.

RESPONSIBILITY FOR THE POLICY

The Corporate Governance and Human Resources teams have primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it. All employees are responsible for ensuring that all dealings with suppliers comply with our policy.

We undertake our own recruitment practices within Nucleus Global 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 always verify the practices of any new agency that we work with and always request evidence of compliance with this policy through acceptance of our Suppliers Code of Conduct.

ORGANISATIONAL APPROACH TO SLAVERY AND HUMAN TRAFFICKING WITHIN OUR SUPPLY CHAINS

Our agencies source both direct goods and indirect services from several external suppliers. 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 standardised procedures in the selection of suppliers. All suppliers are expected to evidence compliance with the Modern Slavery Act 2015 as outlined in our Suppliers Code of Conduct. We continue to review our suppliers regarding compliance in this area.

SUPPLIER ADHERENCE TO OUR VALUES AND POLICIES

We expect all third-party suppliers to follow our Suppliers Code of Conduct, we will investigate any supplier on suspicion of any violation of this Code of Conduct. Outcomes of any such violation could result in the termination of our contract with that supplier and if required, reporting to authorities.

SPECIFIC ACTIONS IN 2020

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains, and our business, we continued to ensure that all staff were familiar with the Nucleus Global approach to modern slavery through mandatory reading materials with follow up for any staff members who had not done so.

We also provided the opportunity for anyone to disclose concerns through our whistleblowing policy which facilitated the reporting of any suspected infringements, wrongdoing or dangers. Our aim was to provide an internal mechanism for reporting, investigating and remedying any wrongdoing in the

workplace, and to support any whistleblowers who raised genuine concerns under this policy, even if they turned out to be mistaken.

As regards Nucleus Global's supplier chain, the Corporate Governance Committee mandated that all new suppliers were provided with the Supplier Code of Conduct stipulating the expected principles by which Nucleus Global will agree to engage with any 3rd party company. Risk profiles for all suppliers were developed with a view to audits of any supplier felt to be at potential risk of non-adherence to the UK Modern Slavery Act 2015 or cessation of trading.

DUE DILIGENCE PROCESS

The Corporate Governance Committee will continue to review the progress on the Anti-Slavery Policy and required training on an annual basis. This review will:

- identify and assess potential risk areas in our supply chain
- mitigate the risk of slavery and human trafficking occurring in our supply chains
- monitor potential risk areas in our supply chain
- implement remedial action if required.

This Anti-Slavery Statement is available on the Nucleus Global website.

To ensure the awareness of all staff about slavery and human trafficking in our operations and supply chain we have taken action to strengthen our supply chain auditing and verification in 2020.

We will continue to:

- Focus on employee training levels
- Continue to take steps to risk-stratify suppliers and assess their ability to detect and mitigate the risk of slavery and human trafficking.

APPROVAL

This statement has been approved by the Board of Nucleus Holdings Limited.

A handwritten signature in black ink, appearing to read 'S. Cameron', written over a horizontal line.

Dr Stephen Cameron

Director and Chairman, Nucleus Holdings Limited

30th June 2021