

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.

OUR BUSINESS

Nucleus Global is the umbrella operating name for all subsidiary agencies of Nucleus Holdings with Headquarters in UK and operates out of 7 countries worldwide. This statement applies to all such identities. Nucleus Global is committed to supporting an ethical and sustainable company that conducts its business with honesty and integrity, and it expects all staff to maintain high standards at all times.

INTRODUCTION

Nucleus Global is the largest privately owned global medical communications company with a wide range of suppliers and other commercial third-party relationships. We are committed to acting ethically and with integrity in all our business dealings and relationships, ensuring that everyone who works for Nucleus Global, whether that relates to a staff member or supplier, benefits from a working environment in which their fundamental rights and freedoms are respected.

POLICY STATEMENT

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.

In response to Modern Slavery Act 2015, we are implementing 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 policy 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

Given the nature of our business and that most of our people are direct employees, we believe that currently, no incidents have been reported of trafficking or modern slavery in our sector. Training on Modern Slavery, our policies and associated procedures is to be mandatory for all employees of the Group.

Our divisions 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 will be expected to follow standardised procedures in the selection of suppliers. All suppliers are expected to be able to evidence compliance with the Modern Slavery Act 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.

UNDERSTANDING, INFORMATION AND REPORTING

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains, and our business, we provide ongoing information to all staff through both the Anti-Slavery policy and give the opportunity for anyone to disclose concerns through our whistleblowing policy which facilitates the reporting of any suspected infringements, wrongdoing or dangers in relation to Nucleus Global's activities. Our policy aims to provide an internal mechanism for reporting, investigating and remedying any wrongdoing in the workplace, and we will support any whistleblowers who raise genuine concerns under this policy, even if they turn out to be mistaken.

DUE DILIGENCE PROCESS

The Corporate Governance team will 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.

Our Anti-Slavery Statement is available on the Nucleus Global website and applies to all business entities within the Group.

FURTHER STEPS

To ensure the awareness of all staff about slavery and human trafficking in our operations and supply chain, we intend to review, and update the following as and when needed

- employee training levels
- actions to strengthen supply chain auditing and verification
- steps to risk-stratify suppliers and assess their ability to detect and mitigate the risk of slavery and human trafficking.

APPROVAL

This statement was approved on 23 April 2019 by the Chairman and Corporate Governance Committee, who review and update it annually.



Stephen Cameron, Chairman
23 April 2019