



OPEN HEALTH

Modern Slavery Statement **2022**

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Zero Tolerance Approach to Slavery and Human Trafficking



OPEN Health is committed to protecting human rights globally. We do not tolerate any form of modern slavery, including forced labour or human trafficking. We support the UN Guiding Principles on Business and Human Rights. We are committed to upholding the Universal Declaration of Human Rights and the core labour standards set out by the International Labour Organisation.

Modern slavery is the severe exploitation of other people for personal or commercial gain. Forced labour is any work or service which people are forced to do against their will, under threat of punishment. Human trafficking is the process of trapping people using violence, deception or coercion and exploiting them for financial or personal gain.

OPEN Health strongly believes that none of these practices have a place in today's world. We are fully committed to their prevention in our business and are taking meaningful steps to implement safeguards in our operations.

ZERO TOLERANCE



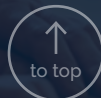
Who We Are



OPEN HEALTH

OPEN Health is a global healthcare marketing, research and communications agency in the Pharma sector founded in 2011. Our vision is to be the world's most respected healthcare agency by acting with integrity in pursuit of excellence. **Doing things the right way with pride and integrity is core to our values.** We have approximately 1400 employees across 15 office locations in 6 countries.

Our purpose is to work in partnership with our clients to improve health outcomes and patient wellbeing. As a people business, we bring together the experience and knowledge of many to create innovative, customised, patient-centric solutions to improve patient outcomes.



Modern Slavery Risk in OPEN Health

As part of our global governance framework, modern slavery risks were assessed in OPEN Health and our supply chain.

As a specialist agency service provider, most of our staff and contractors are employed for their skill, education and intellectual capacity. Our supply chain is focused on procuring business support services with limited product exposure.

Assessment - Risk of modern slavery is low:



1. Employees and contractors are mainly professionals, with a good level of higher education (medical, scientific or other)
2. OPEN Health is a skills service provider and not a product or manufacturing business
3. Products sourced are limited
4. OPEN Health is not involved with hiring low-skilled, migrant or seasonal workers
5. Exposure to known geographies of high risk of modern slavery is small
6. Controls have been implemented to mitigate remaining risks, including those set out below



2022 Achievements In Our Business



Updated and republished our Global Ethical Business Conduct Code

This code sets our expectations for ethical and responsible behaviours and is mandatory for all staff and contractors (https://openhealth-site-production.s3.eu-west-2.amazonaws.com/content-assets/content-images/Global-Ethical-Business-Conduct-Code-2022_CP_v02.pdf). It is aligned with and supports the United Nations' Guiding Principles on Business and Human Rights as well as the UK Modern Slavery Act 2015.



Successfully launched our global confidential ethics helpline

The confidential third-party-supported ethics helpline we sourced in 2021 was launched successfully in 2022. This global ethics helpline is available 24 hours per day by phone or mobile and online. An escalation route is available to suppliers so that they may report ethics issues directly.



Environmental, Social and Governance (ESG) Initiatives

Our ESG committee ensures that our approach reflects our commitment to our customers, staff, partners, shareholders, suppliers and the communities in which we work. Our evolving framework focuses on supporting people and the environment with accountability via external assessment of our processes in relation to equality, diversity and inclusion, governance and ethics, as well as reducing our environmental impact by monitoring our carbon footprint. This external assessment set a score for our approach to labour rights and modern slavery.



Historical Achievements



Re-evaluated, revised, and relaunched our values

In June 2021, revised values based on principles of integrity and ethical behaviours involving staff were developed to reflect the OPEN Health ethos (www.openhealthgroup.com/our-values)



Governance and Compliance Team

Established a stand-alone Governance and Compliance Team to focus on privacy, business regulation and doing things in the right way globally



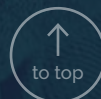
Compliance Checks on Suppliers

Performed compliance checks on the majority of high-risk companies and implemented process to check all companies being sourced in the UK and US



Enhanced Training

The services of a leading global external compliance training provider supplemented existing training and added global requirements to induction and mandatory training programmes



Supply Chain Controls

Supplier Code of Conduct

OPEN Health's Supplier Code of Conduct sets expectations on suppliers (https://openhealth-site-production.s3.eu-west-2.amazonaws.com/content-assets/content-images/Supplier-Code-of-Conduct_CP_v02.pdf), which includes requirements for our Suppliers to commit to anti-slavery and using no forced or child labour, along with inclusion and diversity, and to fairly compensate workers.



Compliance checks by OPEN Health companies in the UK

These include identity checks, sanction searches, director checks and adverse media checks.



Commitment to our values and expectations

OPEN Health standard contract terms include the right to end its relationship with suppliers who fail to comply with its Global Ethical Business Conduct Code or Supplier Code of Conduct.



Targets for 2023

To cement our commitment to progress and build on the achievements made to date, we have identified the following key areas of focus in 2023



Enhanced risk-based vendor assessment

This assessment includes enhanced focus on key supplier risks, including modern slavery and enhanced due diligence.



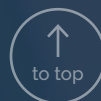
"Speak up" culture and awareness of the ethics helpline globally

Promoting a "speak up" culture encourages staff to report genuine concerns in our business. Training regarding how to access and report is provided.



Develop ESG targets and framework

Further development of the ESG framework (<https://www.openhealthgroup.com/environmental-social-and-governance>) will include targets focusing on people as key stakeholders and further governance controls to consider monitoring modern slavery risks.



Contact



Any questions, comments or requests relating to this statement should be addressed to GovernanceandCompliance@openhealthgroup.com.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015, and outlines the steps taken by OPEN Health in the financial year ending 31 December 2021 to prevent modern slavery across our organisation. In this Statement, OPEN Health Communications LLP and its affiliated and subsidiary companies are collectively referred to as “OPEN Health.” For the purposes of this statement, these companies are OPEN Health Communications LLP, pH Associates Limited, Harvey Walsh Limited, OPEN Vie Limited, OPEN Health Patient Engagement Limited, and Pharmerit Limited. Details of the OPEN Health group companies can be found at <https://www.openhealthgroup.com/statutory-details>.

Rob Barker

Rob Barker, CEO
June 2023





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