



This statement is made pursuant to section 54 of the Act and constitutes the Modern Slavery and Human Trafficking Statement for the Financial year ended 31st December 2025 for Napp Pharmaceutical Holdings Limited

Overview

Napp Pharmaceutical Holdings Limited, including the wholly owned subsidiaries Napp Pharmaceuticals Limited, Napp Pharmaceutical Group Limited and Qdem Pharmaceuticals Ltd (together “**Napp**”), are all privately- owned, UK pharmaceutical companies (based in the heart of the Cambridge science community) and members of a global network of independent associated companies (**Mundipharma**). Napp provides innovative medicines to patients in the UK since the 1920s, it has shaped its structure to meet the complexities and unique challenges and needs of our patients and NHS partners. We foster a flexible culture within Napp where our people thrive on the ability to be agile and autonomous in response to the needs of our partners and patients. We are a patient centric organization, always striving to make a meaningful impact on the lives of patients in everything we do.

Napp is cognizant of the requirements of the Modern Slavery Act 2015 (subsequently amended by the Modern Slavery (Amendment) Bill 2021) (the “**Act**”) and is committed to operating in an ethical and transparent manner. In line with this commitment, Napp has incorporated into its Code of Conduct the requirements of the Act. We take the upholding of these high standards seriously and do not tolerate slavery, human trafficking, or child exploitation within our organization or from those from whom we acquire products or services. We have implemented the Mundipharma Code of Conduct for Third Parties that sets out our expectations of our third-party partners across multiple areas including health and safety, human rights (modern slavery, human trafficking or child labour) and sustainability. Human rights concerns (and any form of forced labour, child labour, slavery, or human trafficking) are specifically mentioned in our Third-Party Code of Conduct as practices that we require our suppliers to prohibit. The Third-Party Code of Conduct has been incorporated into our procurement agreements, while the incorporation of modern slavery clauses within our supply agreements is ongoing. Napp continues to remain committed to never knowingly deal with any organization or third party connected to slavery, human trafficking or child exploitation and we are not currently aware of any areas likely to lead to a breach of human rights and the Act.

The Mundipharma Environmental, Social & Governance (ESG) Steering Group (the primary purpose being to oversee, identify principal risks and implement appropriate measures to effectively monitor, manage and drive patient centricity and sustainable operations within the Mundipharma business) issued the ESG Statement of Intent during 2025 confirming Napp’s and Mundipharma’s ongoing commitment to governance and ethical practice as well as social responsibility and is available here: <https://www.mundipharma.com/acting-integrity>

Mundipharma is also in the process of implementing its “Mundipharma Modern Slavery Policy” which will further enhance Napp’s modern slavery measures and controls currently in place. The “Mundipharma Modern Slavery Policy” will lay the groundwork and provide the foundation for the implementation of the risk assessment tools and measures required to further monitor the effectiveness of Napp’s modern slavery controls (details of the “Mundipharma Modern Slavery Policy” will be included in the Mundipharma ESG Statement of Intent to be issued during 2026).

Policies, contract clauses and training

The Napp Board of Directors, senior management and senior leaders, including the supply chain and procurement functions, are aware of the modern slavery obligations contained within the Act. Napp recognizes that a key component of managing and mitigating modern slavery risks in our operations and supply chain is the ongoing raising of awareness of modern slavery and the ensuring of ethical and fair practices within our business operations. As a consequence of the Mundipharma policies currently in place,



Napp has an environment which encourages open and frank two-way communication. All employees are encouraged and expected to raise concern about any known or suspected violation of the Code of Conduct or other illegal or unethical business conduct. The Code of Conduct and Anti-Bribery and Anti-Corruption Policy provide all employees with a foundation for acting with integrity. We have our Speak Up guidance and a culture to encourage reporting of misconduct including the reporting of ethical concerns. Therefore, the current business culture encourages reporting, any such concern can be raised in confidence without fear of retaliation by approaching Management, HR, Legal or Compliance. Alternatively, individuals may report their concerns, and if desired remain anonymous, through our independent Integrity Line, which is available 24 hours a day. We do not tolerate any form of bullying, discrimination or harassment as outlined in the Mundipharma Preventing Harassment in the Workplace Policy and our Equal Employment Opportunity Policy. Any concerns raised will be reviewed and, if required, investigated to determine appropriate action(s) where required. Napp aims on an ongoing basis to continue to equip those employees and senior members of the business involved in the supply chain and the procurement functions with both the knowledge and an understanding of the importance of the Act and the roles that employees play in helping to eradicate modern slavery, trafficking, and child exploitation.

Employment Practices

Our employment practices are compliant with applicable employment and health and safety legislation, and as a result, we are confident that there is no slavery, human trafficking or child exploitation taking place within Napp. Furthermore, we ensure that the employment agencies that we deal with are also fully compliant with the Act and applicable legislation (having enshrined within their policies and processes mechanisms for the identification of the risks associated with modern slavery including such practices leading to the introduction of various laws within the employment field), in short, these agencies too must be fully compliant with applicable legislation.

Due Diligence

We aim to continually improve transparency within our business and the supply chain and not to work with any supplier that we suspect is connected in any way with slavery or human trafficking. The due diligence process involves assessing the third party, where appropriate, through completion of a questionnaire, business justification review and background checks (including screening against watchlists and adverse media) of third-party organizations. Our third-party business partners are subject to Mundipharma's Third Party Risk Management process, which assesses a broader range of risks including areas such as ethics and compliance, anti-bribery and corruption and fraud. Mundipharma's ESG department also assesses third party suppliers' activities in relation to supply chain emissions and supply chain related risks through the issuing of questionnaires, which include questions around the supplier's modern slavery policies and procedures. Therefore, as part of our Compliance Programme, steps are continually being taken to carry out the required due diligence and on-boarding process to assure ourselves that we only partner with reputable third parties carrying out their business practices in a fit and proper manner and in full compliance with the requirements of the Act.

Monitoring and Enforcement

Napp will continue to raise awareness and to monitor third party supplier and partner relationships and continue to mitigate the risk of modern slavery. We acknowledge that there is more to be done in relation to preventing modern slavery and remain committed to continually enhance the Modern Slavery framework in future years.

Any suspected breach of our Compliance Programme or of our Third-Party Code of Conduct including the Act will result in appropriate steps being taken to investigate potential wrongdoing. Such investigations could lead to the termination of supplier third party contracts.



Conclusion

During 2025 no modern slavery, human trafficking or child exploitation incidents were reported or identified by Napp within the business or the businesses of its suppliers, customers or service providers. Napp will continue to apply appropriate risk-based due diligence processes to raise awareness and to monitor supplier relationships in order to mitigate the risk of modern slavery.

This Statement (made by Napp Pharmaceuticals Limited pursuant to section 54 of the Act) constitutes the Modern Slavery and Human Trafficking Statement for the Financial Year ended 31 December 2025 (covering the period 1 January to 31 December 2025) was reviewed and approved by the Board of Napp Pharmaceutical Holdings Limited on 29 June 2026.

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Bryan Lea
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Director

29 June 2026