

# Slavery and Human Trafficking Statement for Financial Year ending 31 December 2025

## Introduction

This statement is made by Halcyon Topco Limited, Sciensus Pharma Services Limited and Sciensus Logistics Limited, which are all part of the Sciensus group of companies (the “**Sciensus Group**”) pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our modern slavery and human trafficking statement for the financial period ending 31 December 2025. Sciensus Pharma Services Limited and Sciensus Logistics Limited shortened their accounting period in October 2025, so this Statement refers to the reduced period 1 April to 31 December 2025.

## Our position:

We recognise that modern slavery and human trafficking are crimes and a violation of human rights and acknowledge that modern slavery may take on various forms, including slavery, servitude, compulsory labour, and human trafficking for exploitation, and that any aspect can have a significant adverse impact on individuals, families, and communities across the world.

As a business we have a zero-tolerance approach to modern slavery and human trafficking in both our organisation and supply chain. We address this by ensuring that our staff are appropriately trained to identify issues and to raise any concerns; that we have policies and procedures in place for dealing with any issues arising; and that we have robust procurement processes which can identify potential risks in our supply network and address these.

## Our Background:

The Sciensus Group is a European life sciences services group supporting patients, health care providers and the pharmaceutical industry with medicines access, through digital tools, technology and market insight. Specialising in providing services for Chronic, Cancer, plus Rare & Speciality therapies for over 30 years we have proudly sat at the intersection of patients and their medicines, helping patients make the most of their medicine.

The Sciensus Group’s unique portfolio of services combines the scale and operational strength needed to reach patients across Europe and wider with the human expertise that ensures treatments are delivered safely, effectively and with compassion. Our integrated hub of services includes digitally enabled, clinician-led care, patient support programmes and compliance, patient insight and analytics, pharmacy services, market access and reimbursement, clinical logistics, inventory management, business process outsourcing services, nurse supported medication, and aseptic compounding.

We partner with healthcare providers including the NHS, health insurers, life science companies and physicians to optimise the medicine and healthcare outcomes and experience for over 300,000 patients a year across the UK and Europe.

The Sciensus Group employs over 1550 people including our specialist teams and support staff.

We maintain a governance and risk management framework with ongoing review of risk throughout the year. This process covers all our business areas and is reportable at Board level.

### **Our supply chains and how we are managing risk**

The Sciensus Group operates in a highly regulated industry and given the nature of our business, we believe there is a low risk of slavery, human trafficking or child labour having a connection with our commercial activities. Many of our key suppliers are members of the Pharmaceutical Supply Chain Initiative (PSCI) and this body has established a set of principles to support suppliers in establishing sustainable, ethical, and responsible labour practices. Further details relating to the PSCI are available at <https://pscinitiative.org/home>.

We, however, recognise that there may be areas of our business where the risk of slavery is greater; for instance, business operations which are outsourced, for example, security, cleaning and logistics or where parts of our supply chain may involve workers in countries which have a low record of human rights protections, low paid staff or where staff may work excessive hours. We identify and manage these risks as part of our robust procurement process.

We use the Global Slavery Index, produced by the human rights group Walk Free which identifies countries with the highest prevalence of modern slavery to help us identify suppliers where there may be a risk of slavery in our supply chain. This list is regularly reviewed in respect of each procurement process we undertake. This review is carried out alongside our established supplier vetting processes.

To our knowledge our supply chain does not include suppliers from countries classified as medium or high risk.

Although we consider the Sciensus Group has a low risk of direct involvement with modern slavery and human trafficking we continue to monitor our contracts and apply a risk and assurance-based approach.

We recognise there could be a risk of slavery or child labour being part of our wider supply chain and have developed a supplier questionnaire form which is mandatory for all new suppliers. This includes information and assurance around their ethical business practices, including confirmation of anti-bribery policies, anti-fraud and corruption policies, and confirmation that they have published their modern slavery statement, where relevant, including checking that relevant training for staff has been provided. Responses are reviewed by our trained procurement team. before we enter any contracts. Non-compliance is escalated and we may require further assurances, remedial action and /or ongoing monitoring, or refuse to contract with a supplier.

For existing direct suppliers of medicines, we undertake monthly licence checks to ensure relevant licences continue to be held before submitting orders. The Medicines & Healthcare Products Regulatory Agency has stringent guidelines to be followed by suppliers of medicines and medical devices. If a supplier's licence is revoked the issue is escalated to our Director of Pharmaceutical Governance and Compliance for further advice.

Our commercial team manage the contracts and relationships with our key pharmaceutical company supply chain partners. All new and updated contracts include provisions which require adherence to ethical conduct principles including anti-slavery and human trafficking.

We have established safe recruitment practices in respect of our direct employees and where we use agency staff or consultants, we require confirmation from the agency of their recruitment arrangements including checking identity and the right to work in the UK. All non-compliance is escalated.

### **Compliance, awareness and training**

The Boards of the Sciensus Group companies and the Executive Leadership Team have overall responsibility to ensure that the Group maintains and is compliant with our legal and ethical obligations.

We have appointed an Executive Board Director as lead for Environmental Social and Governance matters within Sciensus and these matters are regularly reported at Board level.

All staff are required to complete Modern Slavery Awareness Training, together with other relevant training regarding our code of conduct and social responsibility including Safeguarding, Anti Bribery and Whistleblowing. The training includes guidance on what factors may raise concerns that a person is subject to a form of Modern Slavery and how to report issues. All training is by e-learning and requires participants to pass an assessment of their understanding of the training. Our training is reviewed to take account of any legislative or regulatory changes and is updated as necessary.

Completion of training and the required post training assessment is actively monitored. Any delay in undertaking training or non-compliance by an employee is referred to the relevant line managers for further action.

Our staff are also required to familiarise themselves annually with relevant policies which are available via our internal Document Management System (Master Control). Policies are reviewed and updated bi-annually, or as required. Our current Policies and procedures include the following list:

<b>Modern Slavery related policies and SOP:</b>
Human Rights Policy (drafted widely to include Modern Slavery, Human Trafficking, Child Labour and Working Hours)
Whistleblowing Policy
Grievance Policy
Disciplinary Policy
Managing Violence and Aggressive Behaviour Policy
Recruitment and Selection Policy
Equality and Diversity Policy
Safeguarding Adults Policy
Safeguarding Children and Young People Policy
Code of Conduct for employees
Employment Checks Policy

Fit and Proper Persons Policy
Annual Declaration of interests for Senior Leadership Team – includes confirmation of no involvement in companies who have breached the Modern slavery provisions
Corporate Social Responsibility Policy (includes Environment, Sustainability and Ethics)
Supplier Code of Conduct
Supplier Questionnaire Form (for completion by all new suppliers)
SOP for the Approval of Suppliers (for use by Procurement staff)

At an operational level, line managers are responsible for engaging with their teams to implement and maintain the processes; and ensure that all colleagues have completed the appropriate training in accordance with the relevant policy and procedures.

The Sciensus Group operates an open culture and colleagues can report concerns to their line manager and/or other relevant personnel and are encouraged to use the independent whistleblowing help line. In the event that a whistleblowing concern is raised our process includes escalation to nominated senior managers for investigation and, where appropriate, reporting, concerns to the relevant Sciensus Boards.

**2026 and next steps**

The Sciensus Group will continue to invest in its processes, procedures and awareness training for relevant staff to support its zero-tolerance approach to modern slavery, and ensure our approach remains proportionate to any identified risk.

We have been continuing to work to gain a better understanding of our suppliers and their supply chain and continue to use this information to classify all suppliers as either low, medium or high risk to support a targeted approach to reviewing our suppliers’ continued compliance.

Our procurement team has an ongoing objective to conduct Environmental Social and Governance Audits across our Direct Supply base to support the sustainability goals of Sciensus by improving the environmental, social and economic impact of procurement activity across third party expenditure. Part of this work includes validating that our direct suppliers and indirect suppliers are low risk on the basis that they have mature ESG policies in place covering the end-to-end supply chain which incorporates human trafficking prevention and Modern Slavery compliance.

We have introduced self-audit questionnaires for completion by our suppliers to confirm their compliance with modern slavery and human trafficking legislation, as well as other areas of business ethical compliance, and require copy statements and policies to be provided to us for review to verify the responses to the questionnaires.

Although we have not to date identified any of our suppliers as being at high risk of non-compliance, in the event that we do assess a supplier as being at high risk we have processes in place to review their compliance, identify any concerns, walk them through our Supplier Code of Conduct and carry out regular audits of their compliance. We continue to review our

new existing contractual relationships and develop opportunities for ongoing monitoring and review.

## Conclusion

As an organisation we continue to work to tackle the risk of modern slavery. Our engagement with our suppliers, both new and existing, includes robust processes to identify potential risks of modern slavery and human trafficking being present which we keep under review. We will continue to seek ways in which to reduce this risk and to take effective action in the event that non-compliance is identified.

## Signatures

This Statement has been approved by the Boards of Halcyon Topco Limited and Sciensus Pharma Services Limited.

Signed by:  
  
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Gordon Cox  
Interim Chief Executive Officer  
Dated: 30/6/2026