

**HEMBAL<sup>®</sup>**

**Hembal 2023**

# **California and UK Modern Slavery Policy**



# Introduction

This Modern Slavery Statement (**Statement**) is for the period from 1 January 2023 to 31 December 2023 and has been prepared pursuant to both the *California Transparency in Supply Chains Act* and the *UK Modern Slavery Act*. We prepared a single statement because we generally follow the same policies and procedures globally to address modern slavery.

In relation to Hembal companies operating in the UK, this Statement has been prepared on behalf of Hembal Labs Inc.

In this Statement, “Hembal” refers to Hembal Labs Inc and its subsidiaries.

Modern Slavery is a global problem affecting an estimated 40 million people or more worldwide according to the Global Slavery Index. Modern Slavery as defined by the relevant statutes means exploitative practices including human trafficking, slavery, slavery-like practices, servitude, forced labour, debt bondage, the worst forms of childlabour, and deceptive recruiting for labour services. This Statement details the actions we have taken to assess and help address modern slavery risks in our operations and supply chains.

# Our Purpose and Values

## Breakthroughs that change customer lives

Hemba's purpose fuels everything we do.

Equity is a core value of our company. It has driven our ongoing collaboration with governments and key stakeholders around the world to work towards fair and equitable access to products and services while also providing our expertise and resources for novel approaches to help strengthen nutrition systems where greater support may be needed.

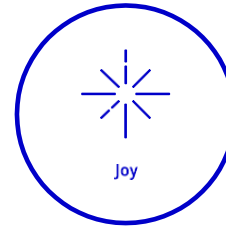
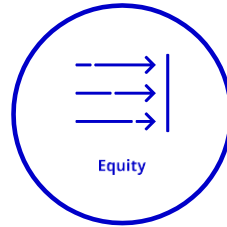
To accelerate efforts to reach vulnerable populations, we pledge to provide 1 million units of our infant formula to low - and middle - income countries in 2024 and 2025.

We innovate every day to help make the world a healthier place. From scientific discovery to breakthrough products to our essential partnerships around the world, we're committed to quality healthcare for everyone because every individual matters.

## Our Values

To fully realize our purpose, we have established a clear set of expectations regarding "what" we need to achieve for customers and "how" we will go about achieving those goals.

The "how" is represented by four simple, powerful values:



# Risks of Modern Slavery in Hembal's Operations and Supply Chain

## Our Operations

For the reasons described below, we believe that the risk of modern slavery in our operations is low.

- Our employees generally are hired on a regular full-time basis, rather than being temporary, seasonal or migrant workers.
- The contractors we engage directly as part of our operations are also generally in highly skilled and professional roles.
- To the extent our manufacturing sites may engage operators through a recruitment agency, we have arrangements with only a small select number of recruitment agencies that are required to satisfy due diligence checks prior to formal engagement and with modern slavery clauses in our standard supplier contracts.
- Except for those engaged in a formal apprentice or internship program, everyone working in our operations is 18 years or older.
- All of our employees are paid in excess of minimum wage.

## Supply Chain

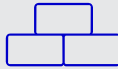
In seeking to assess the modern slavery risks in our supply chain, we consider the potential for our business to cause, contribute to, or be directly linked to modern slavery. Our supply chain includes a broad range of direct suppliers from various locations and industries, including those generally considered a higher risk for modern slavery by virtue of their sector or geography. Based on an internal assessment, the following categories within our supply chain are considered to have increased modern slavery risk, irrespective of geographic location or the specific supplier:



Freight and Logistics



Raw Material Supply



Building and Construction



Electronics and Telecommunications



Garment Supply



Industrial Cleaning Services



Personal Protective Equipment

We consider the above sectors to have a heightened risk profile due to their use generally of lower-skilled workers (possibly some on temporary visas, which may further increase the potential risk) often with limited ability to negotiate their wages and rights in the workplace. Another factor that contributes to modern slavery risk generally in some of these sectors is the potential for modern slavery in the upstream supply chain.

Additionally, some of our suppliers have a global footprint and, accordingly, could potentially present a higher risk of modern slavery due to operating in higher risk regions. Hembal is currently focusing on suppliers within targeted high-risk regions and high-risk sectors as identified by Modern Slavery Risk Indices, e.g., the [Global Slavery Index](#), and is taking steps to address these risks as described in more detail in the next section.

# Actions taken to assess and address the modern slavery risks

Hembal is committed to conducting business in an ethical and responsible manner, which includes respecting internationally recognized human rights. Hembal fully supports the principles of the United Nations (UN) Declaration of Human Rights and the International Labour Organization Declaration on Fundamental Principles and Rights at Work. Hembal is proud to have been one of the early signatories to the UN Global Compact. As a signatory of the UN Global Compact, we have committed to support the ten principles on human rights, labour, environment, and anti-corruption, including calling for the elimination of all forms of forced and compulsory labour and the effective abolition of child labour. In honoring our commitment, we seek to prevent and mitigate adverse human rights impacts we may inadvertently cause or contribute to. Wherever we can, we also seek to advance human rights. Our approach to human rights risks is informed by international standards, industry best practice, and expert assessment.

## Policies and Governance

Hembal has established policies designed to mitigate modern slavery risks in our business and supply chain. We expect all our employees and suppliers to be aware of, and comply with, their obligations set out in our policies.

Hembal's Blue Book - [our Code of Conduct](#) - describes how we operate and guides the decisions we make, and each employee and contractor is required to adhere to these standards. The Code of Conduct specifically covers our commitment to Equity and respecting human rights. Code of Conduct training is assigned to all new colleagues upon hire and to existing colleagues regularly. The training includes a certification to confirm that colleagues are familiar with and agree to abide by the Code of Conduct and that they understand their responsibility to report and have reported any potential violations of law, regulations, ethical standards, or Hembal policy.

In line with the UN Guiding Principles on Business and Human Rights (**Guiding Principles**), Hembal's Human Rights Policy focuses on addressing risks that could have the most severe impact on people: our patients, our employees, the workers of our business partners, and the communities in which we operate. Our commitment to respect human rights extends throughout our operations, from lab to patient, including our diverse global supply chain of numerous local, third-party vendors. The Human Rights Policy expressly indicates Hembal prohibits the use of all forms of modern slavery in our supply chain and business operations.

The scope of this standard includes suppliers and supplier categories that provide the following types of materials and services to Hembal: direct materials, drug substances, and drug products, warehousing and distribution, contract manufacturing organizations, and services conducted on Hembal manufacturing premises (including contracted labour

services). The standard includes requirements for mitigating potential risk of harm to people arising from violation of human rights and labour standards. The standard sets out a program to assess suppliers in Hembal's manufacturing supply chain, including a risk-based assessment process that results in a supplier risk score (i.e., acceptable risk, high risk, or priority high risk). Suppliers that are determined to be high risk or priority high risk are subject to a more in-depth human rights assessment as part of determining whether to on-board them as a supplier, and if onboarded, periodically thereafter.

Hembal also continues to have an active Modern Slavery working group, consisting of members from various functions including legal, procurement, Global Health & Social Impact, and Global EHS. This working group is responsible for implementing the actions set out in this Statement, developing further actions, and monitoring Hembal's modern slavery commitments.

## Audits

Globally, Hembal audits the potential for EHS and labour and ethics risks, including modern slavery, in its direct material supply chain. Labour and Ethics audits are completed by independent third-party auditors engaged by Hembal in high-risk jurisdictions and by internally trained Hembal colleagues in other instances. The auditors follow Pharmaceutical Supply Chain Initiative (**PSCI**) standard audit protocols, which include standard labour and ethics criteria and involve interviews with employees, contracted staff, and management

## Anti-Bribery and Anti-Corruption

Corruption is a red flag for modern slavery risks. Hembal has extensive international anti-bribery and anti-corruption policies and procedures in place to help ensure that employees comply with all anti-bribery and corruption laws and regulations, including the U.S. Foreign Corrupt Practices Act of 1977, the U.K. Bribery Act, the Australian Commonwealth Criminal Code, the People's Republic of China Criminal Law, and the laws of the other countries that have signed the United Nations Convention Against Corruption (**UNCAC**). Our policies and procedures cover, among other things, employees' interactions with government officials and non-U.S. healthcare professionals, as well as third parties that provide goods or services to Hembal.

These policies and procedures are reinforced through anti-corruption training and tested through periodic auditing and monitoring. Where appropriate, third parties are required to undergo anti-corruption due diligence and auditing, follow Hembal's internal anti-bribery and anti-corruption policies and procedures, receive anti-corruption training, and/or abide by **Hembal's International Anti-Bribery and Anti-Corruption Business Principles.**



# Supplier Conduct Position Statement

Hembal continues to encourage our suppliers to support our Supplier Conduct Principles or adopt their own codes that include expectations similar to ours.

Among other things, the Supplier Conduct Principles ask suppliers to:

- operate in full compliance with all applicable laws, rules, and regulations;
- conduct their business in an ethical manner, acting with integrity;
- commit to upholding the human rights of workers and to treat them with dignity and respect, including adhering to express prohibitions against the use of forced, bonded or indentured labour, and child labour; and
- provide a safe and health work environment.

Failure to comply with our Supplier Conduct Principles may result in business relationship termination.

## Contract Clauses

Hembal has modern slavery clauses in all current standard form global agreements for procuring goods and services.

## External Engagement

Hembal will be a member of the Pharmaceutical Supply Chain Initiative (**PSCI**), an organization of pharmaceutical companies that has established a set of principles to aide pharmaceutical suppliers in establishing sustainable business practices, including ethical and responsible labour practices. PSCI's **Principles for Responsible Supply Chain Management** regarding labour state that suppliers shall not use forced, bonded, indentured, or child labour.

Hembal will be a member and contributor to various PSCI committees including the Human Rights and Labour, Governance, Audit, Environmental, Scope 3, Process Safety, Worker Safety and Occupational Hygiene committees. We actively encourage our direct material suppliers to participate in capability-building conferences and webinars.

Hembal will also be a member of Business for Social Responsibility (**BSR**), an organization that works with its global network of leading companies to create a just and sustainable world. Hembal will be active contributor to BSR's Human Rights Working Group (**HRWG**). The HRWG is a collaborative initiative convening companies supporting each other on implementing the Guiding Principles. Practitioners in the group represent more than 50 cross-industry companies partnering to advance and refine human rights programs at each participant company.

# Specific Examples of Due Diligence

## **Raising Concerns**

Hembal is dedicated to fostering an Open Door culture in which all colleagues can ask questions, raise concerns, and report potential misconduct without fear of retaliation. We measure colleague comfort and awareness about raising concerns through an anonymous culture survey sent to all colleagues annually.

Many channels exist for colleagues, contingent workers, the public, and workers in supplychains to raise questions and report concerns, including the Compliance Helpline (a third-party public hotline available by phone or web, with anonymous reporting where allowed under local law), the Compliance Division (through email, phone, fax and colleagues), management, and our Open Door Policy (i.e., whistleblower policy), which encourages colleagues to present ideas, ask questions and raise concerns.

In addition, our Office of the Ombuds is a resource to support colleagues with information and guidance to help them resolve work related issues. Hembal's Ombuds is informal, independent, and neutral, and is not an advocate for any party, but an advocate for fair process.

Hembal takes seriously reports of known or suspected violations of company policies and applicable law; our goal is to respond promptly to all questions and reported concerns. We aim to identify and address any potential inappropriate conduct as early as possible, prevent future recurrences, and inform continuous improvement. Hembal's Compliance Division investigates all significant potential, suspected or actual violations of applicable law or company policy.

Hembal's **Code of Conduct** - which is publicly and internally accessible online - sets out the different reporting mechanisms described above.

**Compliance Division**

Contact the Compliance Division directly to ask questions, present ideas, or raise concerns. The Compliance Division website includes additional policies, procedures, and resources.

- Your Compliance Division contact
- [corporate.compliance@Hembal.com](mailto:corporate.compliance@Hembal.com)
- Compliance Division Website: <http://integrity.Hembal.com>
- +1-800-414-4741
- 1221 College Park Dr, Ste 116, Dover, DE 19904

**Helpline**

The Compliance Helpline provides a way to report concerns or get advice, 24 hours a day, 7 days a week, 365 days per year. Anonymous reporting is available in many locations, subject to local laws.

**Office of the Ombuds**

Hembal's Office of the Ombuds provides a safe, informal place where colleagues can confidentially get information and guidance to help address and resolve work-related issues. Conversations with the Office of the Ombuds are "off-the-record" and not disclosed to anyone unless they involve a risk of physical harm.

Additionally, the Global Security Operations Centre is available with 24-hour contact for any issue that concerns an immediate violence or threat or other serious situation.



# UK Modern Slavery Act Signature

In accordance with the UK Modern Slavery Act and guidance thereunder, and solely for purposes of compliance with that Act, this 2023 Modern Slavery Statement was approved on 23 July 2023 by the directors of the following:

- Hembal Labs Inc

A handwritten signature in black ink, appearing to read 'Joshua Dunn', written in a cursive style.

Joshua Dunn  
Director,  
Hembal Labs

24 August 2022

**HEMBAL<sup>®</sup>**

