



MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

Introduction

At Novumgen, we are committed to ethical and responsible business practices. We recognize the global challenge posed by modern slavery and human trafficking and acknowledge our responsibility to take proactive steps to prevent and eliminate these egregious practices.

As a result, we have a zero-tolerance approach to modern slavery and are fully committed to preventing it in our operation and supply chain.

As part of our commitment, we have developed comprehensive policies, implemented due diligence procedures, and fostered a culture of awareness and vigilance among our employees.

We have taken concrete steps to tackle modern slavery, as outlined in our statement. This Modern Slavery Act statement is a response to Section 54(1), Part 6 of the Modern Slavery Act 2015 (the "MSA") outlining our commitment to comprehensively addressing potential modern slavery risks associated with our business. It underscores our dedication to upholding human rights, fostering transparency, and ensuring freedom from forced labour or exploitation across our operations and supply chains. Our aim is to implement measures that prevent slavery and human trafficking, promoting a positive impact within our sphere of influence.

Our Business and Supply Chains

Novumgen is a pharmaceutical company which is in the business of developing generic medicinal products for human consumption targeted mainly for the UK market.

We aim to successfully sell our manufactured products to the UK market at a sustainable and cost-effective rate that adds product value to the end customer. For more information about the Company, please visit our website: <https://novumgen.com/>.

We establish a relationship of trust and integrity with all our suppliers, which is built upon mutually beneficial factors. Our supplier selection and on-boarding procedure includes due diligence of the supplier's reputation, respect for the law, compliance with health, safety and environmental standards, and references.

We have not been made aware of any allegations of human trafficking/slavery activities against any of our suppliers, but if we were, then we would act immediately against the supplier and report it to the authorities.

Our Policies

Novumgen Limited operates the following policies for identifying and preventing slavery and human trafficking in our operations:

- **Recruitment and selection policy** - We conduct checks on all prospective employees to verify that they are eligible to work in the UK. Certain roles require a Disclosure and Barring Service (DBS) check for individuals occupying higher roles within the organization
- **Whistleblowing Policy** - we encourage all employees, customers, and suppliers to report any suspicion of slavery or human trafficking without fear of retaliation.



- **Code of Conduct** - our code encourages employees to do the right thing by clearly stating the actions and behaviour expected of them when representing the business. We strive to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing our supply chain.
- **Purchasing Code** - We operate this policy to ensure our suppliers operate in full compliance with the laws, rules and regulations of the countries in which they operate, and to seek similar commitments across their own supply chain.

We have updated our Purchasing Code and supplier contracts to make explicit reference to slavery and human trafficking.

- **Safeguarding policy** - This policy highlights the potential risks of modern slavery and human trafficking, including how to identify signs of exploitation and how to report concerns.

We make sure our suppliers are aware of our policies and adhere to the same standards.

Due Diligence processes for Slavery and Human Trafficking

Novumgen Limited conducts due diligence on all new suppliers during on-boarding and on existing suppliers at regular intervals as part of our efforts to monitor and reduce the risk of slavery and human trafficking occurring in our supply chains.

- Identify inappropriate employment practices.
- Identify, assess, and monitor other potential risk areas.
- Risk assesses new suppliers according to our standard operating procedures.
- Mitigate the risk of slavery and human trafficking occurring.
- Protect whistle-blowers
- Investigate reports of Modern Slavery.
- Internal Supplier Audits.

Effectiveness

The Company uses Key Performance Indicators (KPIs) to measure its effectiveness and ensure that slavery and human trafficking is not taking place in its business and supply chains. These KPIs are as follows:

- We contact suppliers regarding their modern slavery practices every 6 months.
- We train our staff about modern slavery issues and increase awareness within the Company.
- We carry out regular audits of suppliers.

Training & Awareness

Novumgen Limited has raised awareness on modern slavery issues by providing all staff with specific training and ongoing refresher courses which explain the following:

- Understanding the definition of Modern Slavery.
- Red flags for potential cases of slavery or human trafficking.
- Taking the correct action if you suspect a case of Modern Slavery.
- What external help is available.

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Next Steps

In the next financial year, we intend to take the following steps to tackle slavery and human trafficking:

- Continuing to conduct thorough risk assessments across operations and supply chains to identify potential vulnerabilities.
- Providing refresher training to employees to raise awareness about modern slavery signs and reporting mechanisms.
- Continuing to enhance our procedures to help us identify, prevent and mitigate any risks of modern slavery or human trafficking in relation to new and existing suppliers.
- Collaborating with industry peers, NGOs, and government bodies to share best practices and advocate for stronger measures.
- Continuously reviewing and improving anti-slavery policies based on evolving risks and legislation changes.
- Ensuring transparent disclosures in accordance with the Modern Slavery Act about the company's efforts to address modern slavery.
- Demonstrating strong leadership commitment to prioritize and drive initiatives against modern slavery.

Statement

This statement is made pursuant to Section 54(1) of the Modern Slavery Act 2015 and constitutes the slavery and human trafficking statement for Novumgen Limited. It will replace any previous statements published, effective upon approval.

Yours Sincerely,

DocuSigned by:

A blue ink handwritten signature that reads "Krutarth Kothari".

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Krutarth Kothari,

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