

Human Rights Policy

UDG Healthcare plc (“UDG”) is a global leader in healthcare advisory, communications, commercial, clinical, and packaging services. UDG is organised and managed across two divisions: Ashfield and Sharp, and employs 9,000 people in 29 countries, working to achieve our purpose-led strategy: We are united by our purpose to partner with clients to deliver innovative healthcare solutions that improve patients' lives.

We seek to act in accordance with internationally-recognised human rights and standards, including the European Convention on Human Rights, the International Bill of Human Rights, the International Labour Organization’s Declaration on Fundamental Principles and Rights at Work, the United Nations Guiding Principles on Business and Human Rights and the International Covenant on Economic, Social and Cultural Rights.

We are working to guard against being complicit in human rights violations and to uphold the human rights of our own workforce, our supply chain, our clients, and our communities.

Our Commitment to Human Rights

This policy applies to all UDG employees, contractors, and business partners. We also expect our suppliers to respect and adhere to this policy, which is addressed in our Supplier Code of Conduct.

Where we participate in existing joint ventures as a non-controlling shareholder, we shall make the other shareholder(s) specifically aware about the significance to us of this policy and shall encourage them to apply the same policy or a similar standard to the joint venture. For contemplated new minority joint venture co-operations, we shall strive to commit the other shareholder(s) to adopt the policy or a similar standard for the joint venture.

We strive to fully comply with applicable human rights legislation in the countries in which we operate. We are completely opposed to slavery and human trafficking and will not knowingly support or conduct business with any organisation involved in such activities. Where international human rights standard and applicable law conflict, we respect national law while seeking to respect the principles of internationally recognized human rights.

We aim to ensure that where applicable national laws differ from international human rights standards or our own policies and procedures we will, so far as possible, follow the higher standard.

We will:

- a) seek to avoid causing or contributing to adverse human rights impacts through our own activities and address such impacts, if they do occur, in a timely and appropriate manner;
- b) seek to prevent or mitigate adverse human rights impacts that are directly related to our operations, and services through our business relationships;
- c) provide for, or cooperate in their remediation through legitimate processes, if we identify that we have caused or contributed to adverse human rights impacts;
- d) continue to look for ways to support the promotion of human rights within our operations and our sphere of influence.



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Our Policy

This Policy sets out our position with respect to human rights and modern slavery and sits alongside our Health and Safety Policy, and Supplier Code of Conduct. Please also refer to our Modern Slavery Statement, to learn about the actions we have taken to uphold this policy in the most recent year.

Our statements below draw upon the International Bill of Human Rights and the International Labour Organization Declaration on Fundamental Principles and Rights at Work:

- a) **Child Labour:** We will not use child labour and will comply with all relevant laws in this regard. We do, however, support legitimate workplace apprenticeships, internships and other similar programmes that comply with the applicable laws and regulations.
- b) **Modern Slavery:** We will not use forced, bonded or involuntary labour. We have a zero-tolerance approach towards human trafficking.
- c) **Health, Safety and Hygiene:** All of our employees will work in an environment that is both safe and healthy, in line with our Health and Safety Policy.
- d) **Freedom of Association and Employee Representation:** We respect the rights of our employees to form, join or not join a labour union, or other organisation of their choice, and to bargain collectively in support of their mutual interests without fear of punitive actions such as intimidation, harassment or termination of employment.
- e) **Working Hours:** We will ensure that working hours are reasonable and comply with the law and industry standards.
- f) **Equality of Treatment:** We are fully committed to eliminating discrimination in recruitment, training and working conditions, on grounds of race, colour, sex, age, religion, political opinion, national extraction, sexual orientation, disability or social origin and to promoting equality of opportunity and treatment as outlined in our statements and policies on diversity, equity and inclusion.
- g) **Employment terms:** We will provide written and clear detail of the terms and conditions on which it engages its employees. We will ensure that work performed by employees is on the basis of recognised employment law and practice.
- h) **Remuneration:** We will, at a minimum, provide wages and benefits that meet national standards. We are committed to equal pay and benefits for men and women for work of equal value.

Reporting, Monitoring and Review

If an adverse human rights impact is identified, we will work with all parties involved to provide a remedy, compensation, and justice for the victim. We will also investigate the root cause so that we can take appropriate steps to prevent such an impact reoccurring.

Our SEE SOMETHING SPEAK OUT program as detailed in our Conduct Code of Conduct is available to all employees who see or encounter behaviour that concerns them. Third parties (including suppliers) can also telephone the helpline/contact the team.



Human Rights Policy

The Board has overall responsibility for ensuring our commitment to respect human rights is put into practice and for the implementation of this policy.

The Deputy General Counsel has day-to-day responsibility for the implementation of this policy and for ensuring that any breaches are investigated.

All employees must be aware of and adhere to this policy and may be liable to disciplinary action in the event of failure to comply with the provisions of this policy or related policies and procedures.

We will periodically review this policy in-line with UDG's policy review framework and provide information and/or training on any changes we make.

