

Modern Slavery & Human Trafficking Statement

Inizio Topco Limited and each of its subsidiaries (together the 'Group')

This statement has been published in accordance with the Modern Slavery Act 2015. It sets out the steps taken by the Group during the year ended 31st December 2025 to prevent modern slavery and human trafficking in its business and supply chains.

The Business

The Group comprises two global brands to distinguish its service offerings to the market:

- **Inizio**, is a market-leading commercialisation platform and strategic partner for health and life sciences companies with a complete suite of medical, advisory, marketing, communications and patient-engagement services that spans the full commercialisation lifecycle from the initial stages of research and discovery into product launch and growth. Further detail on all of Inizio's operations can be found at <https://inizio.com>.
- **Accordience**, is a network of specialist, award winning agencies, with deep expertise in public relations, crisis communications, public affairs, financial and corporate communications that uniquely combine best-in-class, specialist consultancy services, helping brands and businesses reach and influence audiences that matter. Further detail on Accordience's operations can be found at <https://www.accordience.com>.

Protecting Staff

The Group is committed to providing its workers (which are deemed to include directors, employees, staff, contractors, freelancers and workers (together, '**Workers**')) with safe, legal employment in a stimulating and rewarding environment. The Group is opposed to any form of slavery and human trafficking ('**Modern Slavery**') and strives to ensure that it is prevented from occurring in its business or supply chains.

The Group aims to carry out all business dealings in full compliance with applicable laws and with respect to internationally recognised, human rights standards in every location in which it operates.

Policies and Training

During 2025, the Group revisited and considered its policies and procedures to ensure that its business is conducted in an ethical and transparent manner. Workers are made aware of such policies, including during the induction period upon joining the Group and through a mandatory, annual learning program. Workers can access policies on internal learning management systems.

In the context of preventing Modern Slavery, these policies currently include the following:

- **Code of Ethics and Commitments:**
The Group's Code of Ethics (the **Code**) establishes the behaviour expected of every person in the Group and those representing the Group. Integral to the Code are the Group's Leadership Commitments (our **Commitments**) which set out in more detail how we should all act and interact, and help to foster a positive, supportive, and ethical culture. The Group's Code and Commitments empower our Workers to 'Do the right thing', and to challenge and report situations that appear unusual or clearly wrong. All Workers are accountable for the Code, our Commitments, and championing our diverse culture. We believe this allows us to better serve our clients, communities, and each other.
- **Human Rights Policy:**
The Group's Human Rights Policy sets out our zero-tolerance stance to any violations of human rights and any manifestations of modern slavery. The Group will not knowingly support or conduct business with any organisation involved in such activities. The Group strives to act in accordance with internationally recognised human rights 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

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Business and Human Rights and the International Covenant on Economic, Social and Cultural Rights. We work to guard against complicity with human rights violations and to uphold the human rights of our own workforce, our supply chain, our clients, and our communities. We also expect our suppliers to respect and adhere to this policy.

- **Speak Up Policy:**

The Group's Speak Up Policy encourages anyone who works for or with the Group to raise ethical and legal concerns, including potential human rights and Modern Slavery issues. The Group's confidential reporting process allows individuals to do so 24/7, confidentially, and where the law allows, anonymously.

The Group does not tolerate retaliation, retribution, or threats of such in any form, including such related to Speak Up reports made in good faith. Any Worker found to be undertaking, or threatening to undertake, retaliatory measures is subject to disciplinary action up to and including dismissal.

All incidents reported are taken seriously and are investigated thoroughly and appropriate remedial action taken.

Each of the above policies may be viewed at <https://inizio.com/about-inizio/what-matters-to-us/> or <https://accordience.com/privacy/>. Employee training on the Group's policies is monitored and attested through tools such as Vita and Learn Amp.

The Group's Supply Chains

The Inizio Supplier Code of Conduct establishes Inizio's expectations from suppliers, vendors, contractors, consultants and other third parties who work with us or act on Inizio's behalf. The Inizio Supplier Code of Conduct sets standards around Ethical Business Practices, Workplace Standards, including the fair and equal treatment of employees and the requirement not to use forced or trafficked labour, Systems and Reporting which, amongst other matters, encourage suppliers to manage their own supply chains in a manner that is consistent with the Inizio Supplier Code of Conduct. Inizio maintains a Sustainable Procurement Policy which sets a benchmark when engaging with suppliers. Both the Inizio Supplier Code of Conduct and the Inizio Sustainable Procurement Policy are available at www.inizio.com. These policies establish minimum standards for all suppliers including a requirement to ensure that slavery, human trafficking and corruption is not taking place in their business or supply chains. Similarly, Accordience maintains the Accordience Supplier Code of Conduct with the same objectives.

To further support these expectations, the Group operates a third-party due diligence and vendor assessment process. New suppliers undergo proportionate screening which includes information security and data protection evaluations, designed to ensure that partners handling data or providing technology related services maintain appropriate governance and controls. As part of this process, the Group reviews relevant industry certifications—such as ISO/IEC 27001 for information security management and ISO 27701 for privacy information management, alongside evidence of suppliers' own policies, technical safeguards and organisational practices.

Given the service-oriented nature of the Group's business, the Group does not have extensive supply chain networks and is generally at low risk of exposure to slavery and human trafficking. The Group's supply chain includes, amongst others, recruitment agencies, cleaning services, car leasing companies, IT hardware and software providers, insurance providers and property management companies. Few suppliers to Group companies are significant in terms of the volume of business conducted with them, and many of them are small in size and based in the US, UK, Ireland or other jurisdictions where Group companies operate.

The Group continues to recognise that it is vital to preserve the highest standards of integrity and transparency within its supply chains, so that those employed within them are not exposed to any form of exploitation. Whilst it is also acknowledged that suppliers may have their own complex supply chains and it is therefore not practicable for the Group to have direct oversight or management of the working conditions of each supplier, nevertheless within Inizio, a commitment has been made through the governance pillar of Inizio's sustainability strategy, to manage Inizio's supply chain responsibly and sustainably, in line with UN Sustainability Development Goal 8.3 – to support suitable jobs, entrepreneurship and Small and Medium -Sized Enterprises.

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Since becoming a signatory in 2022, Inizio continues to support the Ten Principles of the United Nations Global Compact on human rights, labour, environment and anti-corruption. Inizio is committed to making the Global Compact, including the Ten Principles, part of Inizio's strategy, culture and day-to-day operations.

Modern Slavery Risk Assessment and Management

The Group operates sanctions screening processes, where appropriate, covering clients, vendors, partners, and other relevant third parties with whom the Group works with. Prior to engagement, and periodically thereafter, where appropriate, these parties are screened against applicable international sanctions lists, including those issued by the UK, EU, US, and the United Nations.

The purpose of this process is to prevent business relationships with sanctioned individuals or entities and to reduce risks associated with financial crime, corruption, human rights abuses, and modern slavery. Where potential matches are identified, further review and escalation procedures are followed in accordance with internal compliance policies before any engagement proceeds.

Effectiveness in Combatting Modern Slavery

During 2025 specifically there were a number of initiatives aimed at combatting Modern Slavery in our business or in any part of our supply chains, including, amongst other matters, the following:

Inizio:

- Continued with annual all-employee training and attestation procedure for policies which includes Human Rights and Speak Up policies.
- Continued implementation of the Sustainable Procurement Policy which includes provisions based on internationally recognised human rights standards including human trafficking and child labour.
- A new enterprise risk assessment process has been initiated in 2025 with the view of implementation in 2026, to consist of a rolling process of quarterly reviews of the risk registers by each Division of Inizio, with updates to be shared with principal risk owners, improving risk awareness and to capture real time updates.
- Conducted sanction checks to ensure that we review and flag any opportunities generated out of countries that are subject to international sanctions.

Accordience:

- Continued implementation of the learning tool for employees, which includes a module on Modern Slavery awareness which is mandatory for all employees.
- Continued implementation of Accordience Supplier Code of Conduct. Additional enhancements to the supplier onboarding processes to promote consistency and ensure all suppliers are made aware of the Accordience Supplier Code of Conduct.
- Similarly to Inizio, the new enterprise risk assessment process has been initiated in 2025 with the view of implementation in 2026 within Accordience, consisting of a rolling process of quarterly reviews of the risk registers by each Division of Accordience, with updates to be shared with principal risk owners, improving risk awareness and to capture real time updates.
- Worked with Accordience leadership to enhance sanctions risk awareness, focussing on geographic regions and client lists, with assessments being carried out where appropriate.

The Group is not aware of any incidents of Modern Slavery having been notified or identified during 2025.

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The Group believes that its culture of openness and accountability, when coupled with its policies and procedures, is effective in combatting the risk that Modern Slavery could be found in the Group or discovered within its supply chains. If an instance of Modern Slavery were to be uncovered, the Group believes that it would be well placed to take swift and appropriate remedial action in line with the ethical values that underpin its business. The Group remains committed to further enhancing and strengthening effective integrated systems and controls, on an on-going rolling basis, to safeguard against and mitigate the risk of Modern Slavery taking place within the Group or its supply chains.

This statement was approved on 10 March 2026 by the Board of Directors of Inizio Topco Limited, in its capacity as operating parent to the Group.

Signed



Ryan Quigley
Chief Executive Officer

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Entities required to publish a statement under the Modern Slavery Act 2015 and therefore covered by this Group statement include: CD&R Artemis Holdco 0.75 Limited, CD&R Artemis Holdco 2 Limited, CD&R Ulysses UK Holdco 2 Limited, Inizio Group Limited, Inizio Holdings Limited, Hunter UK Bidco Limited, Huntsworth Limited, Huntsworth Proton UK Bidco Limited, Nucleus Holdings Limited, UDG Healthcare (UK) Holdings Limited, UDG Healthcare UK (HoldCo) Limited, Knowledgepoint360 UK AcquisitionCo Limited, Knowledgepoint360 Group (Holdings) Limited, Ashfield Health Limited, Inizio Engage XD Limited, The Creative Engagement Group (Holding Co) Limited, WRG Group Limited, WRG Worldwide Limited, The Research Partnership Limited, Ulysses Odin Bidco Limited, Huntsworth Holdings Limited, Accordience Group Limited and Huntsworth Health Limited.