



Modern Slavery Statement

For year ending 2023

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We are Norstella

Norstella is comprised of five separate business units: Citeline, Evaluate, MMIT, Panalgo and The Dedham Group. Pharma Intelligence U.K Limited (trading name "Citeline") and Evaluate Ltd ("Evaluate") which are both registered in the UK.

Citeline and Evaluate each have an annual global turnover which exceeds the reporting threshold and therefore are required to publish a statement on modern slavery. Norstella has decided to report one statement which will cover all five businesses as an indication of our commitment to tackling modern slavery globally.

At Norstella, our mission is simple: to help patients gain access to life-saving therapies. We turn that into a reality by helping our clients navigate the complexities at each step of the drug development life cycle, from pipeline to patient.

We have a zero tolerance approach to Modern Slavery and are implementing effective controls to make certain that we are compliant with our obligations under the Modern Slavery Act 2015.



Michael Gallup - CEO



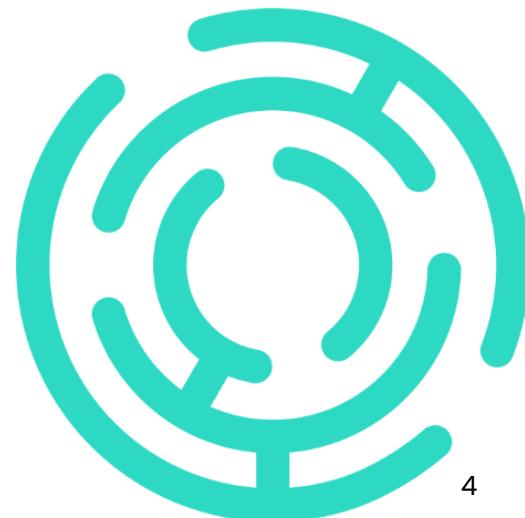
norstellaTM
Guiding you from pipeline to patient

What is Modern Slavery?

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour, child labour and human trafficking. All of which contribute to the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

Norstella has a zero-tolerance approach to modern slavery. We are committed to acting ethically and with integrity in all our business dealings. As a new group of companies, we are also implementing and enforcing effective systems and controls to ensure modern slavery is not part of our business or supply chain.

We seek to ensure transparency in our own business and in our approach to tackling modern slavery throughout our supply chain, consistent with our obligations under the UK's Modern Slavery Act 2015 as well as aligned United States Government's policy and contract obligations prohibiting trafficking in persons and other relevant regulations. We expect the same high standards from all of our contractors, vendors and other business partners which is documented in our 3rd Party Code of Conduct, available on www.norstella.com.



Overall Business Risk

The risk of modern slavery is considered through reviewing:

- the geographical locations of Norstella's operations and the low prevalence of forced labour in these areas;
- the policies adopted by Norstella and the assurance processes in place;
- Norstella's recruitment processes; and
- the absence of reported concerns or incidents regarding forced labour to date

We therefore consider the risk of modern slavery and human trafficking occurring within our operations to be low and the mitigating activities described below to be proportionate and effective.

Norstella committed to preventing modern slavery throughout our organisation and supply chain. We have undertaken the following steps to identify and mitigate the risk of modern slavery:

- Utilise where possible consistent and standard contractual terms to prevent modern slavery in our supply chain;
- Conduct due diligence in our recruitment process and our vendor onboarding process;
- Deploy our new global Code of Conduct and Whistleblowing Policy for all employees
- Roll out a new Supplier Code of conduct which includes a prohibition on modern slavery
- Communicate our Speak Up Line for all employees, to provide a safe and confidential means to report breaches; and
- The development of our internal training programme.



Our Policies

Norstella is committed to combatting modern slavery in all forms across our supply chain. We have created the below global internal policies and programmes during 2023, to help fulfil our commitment:

Code of Conduct

Our Code of Conduct clarifies what we expect from employees and offers guidance on how to embody our values on a daily basis. We require all Norstella employees to act with the highest levels of integrity and to follow our company principles.

The Code also contains our approach to Modern Slavery which applies to all employees. It emphasises our obligations and each employees' individual responsibilities.

The Code also sets out our commitment to uphold our employees' human rights and support the Ten Principles outlined in the United Nations Global Compact, relating to human rights, labour, the environment, and corruption.





Our Policies

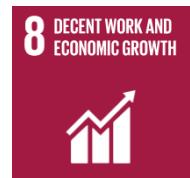
Speak Up / Whistleblowing Policy



Our Whistleblowing Policy encourages employees and those doing business on behalf of Norstella to report any instances of wrongdoing. Our policy ensures those reporting will be protected from retaliation and reports will be investigated confidentially.

ESG Policy

Our ESG policy documents our values in relation to the management of social, ethical, and environmental matters as it sets out our commitment to protect the health, safety and welfare of employees , visitors and third parties, as well as support the principle of equal opportunities in employment, diversity and inclusion, offering fair levels of remuneration alongside our annual Gender Pay Gap Report.



Our Supply Chain

As a new company, Norstella is setting up a central functions team which supports the onboarding and assessing of the supply chain. This includes support from IT, Legal, Compliance, InfoSec, and Privacy. Tools have been implemented to review contracts, due diligence, and risk in the supply chain.

As mentioned previously, we expect our suppliers, their employees, and their supply chains to operate in a way that supports our commitment to strong ethical standards and can commit to this by agreeing to compliance with the 3rd party Code of Conduct.



Mitigating the risk of modern slavery

Combatting Trafficking in Persons. As a supplier to the United States Government and US Government prime contractors, we fully support the US Government's zero tolerance policy prohibiting trafficking in persons and, as required by US Regulations, we are adopting a compliance plan to establish mandatory procedures to combat human trafficking and modern slavery in our organisation.

Whilst US regulatory requirements mandate that the Compliance Plan be implemented at certain sites which perform work on behalf of the US Government, we recognise that the Plan represents current best practice in this area and are extending it across our entire company.

Standard Purchasing Conditions. Where possible, vendors are encouraged to agree to our standard purchasing conditions and comply with our policies on slavery, human trafficking, forced labour and child labour or agree to terms and policies that are similar to ensure that their principles and practices are aligned with our expectations and standards.

Robust HR Processes. We have HR and operational processes which reduce the risk of modern slavery. Our HR function is responsible for all recruitment activities and in doing so follows standard recruitment procedures. We use reputable employment agencies and temporary labour agencies in sourcing labour and conduct appropriate due diligence on any new agency we engage as well as pre employment screening activities.



Speak Up Line. Norstella operates and encourages the use of a confidential and anonymous Speak Up Line. The hotline is operated by an independent external service provider, which allows employees to speak in confidence to someone who is neither an employee nor their line manager. The external provider reports all disclosures to the Head of Compliance, who is responsible for ensuring that calls are investigated independently from Norstella's management. The hotline is a free-phone telephone number, which is publicised on Norstella's intranet and via the Speak Up Policy.

Employees are actively encouraged to report any behaviour inconsistent with the Code of Conduct or any policy, including any actual or suspected incidents of modern slavery, via the Speak Up hotline.

Payment Practices. We understand the correlation between poor payment practices and modern slavery; therefore we remain committed to maintaining fair working relationships with our vendors at all times. The factors that determine our current payment periods are our standard terms and conditions or the individual agreements that we make with vendors.

0 concerns raised regarding modern slavery in 2023 88% of all employees completed Code of conduct training*

Governance

Compliance with all Norstella policies including the Code of Conduct is monitored by the Audit Committee to assess effectiveness, this includes the deployment of training and the adequacy for employees to raise concerns in confidence. The Committee reports to the Board of Directors on these activities. No matters of concern were raised in 2023 in relation to modern slavery.

This statement is made for the Norstella group of companies with Caerus PIKCO S.A.R.L as its parent, and applicable subsidiary companies Pharma Intelligence U.K Limited (13787459) and Evaluate Ltd (05876322) in accordance with the requirements of the UK Modern Slavery Act 2015.

Approved by the Board of Directors of Caerus PIKCO S.A.R.L on 30th April 2024.



Michael Gallup – CEO