

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

**MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT**

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 31<sup>st</sup> December 2022 to prevent modern slavery and human trafficking in its business and supply chains.

**The Business**

In 2022 the Group launched two separate new global brands, to distinguish its service offerings to the market:

- **Inizio** was launched in June 2022, bringing together the expertise and capabilities of Ashfield and Huntsworth's healthcare communications agencies. Inizio is a strategic partner for health and life sciences with a full suite of advisory, medical, marketing, communications and patient and stakeholder engagement services. Further detail on all of Inizio's operations can be found at <https://inizio.health>.
- **Accordience** was launched as a separate operating brand to Inizio in May 2022, and comprises Grayling, Citigate Dewe Rogerson, Red and Cirkle. Accordience is a distinctive communications group that uniquely combines 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 is deemed to include 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**

2022 saw the transition from Ashfield and Huntsworth each having their own set of policies and training procedures, into an integrated set of policies and procedures for the Group. The Group's policies and procedures are aimed at trying to ensure that its business is conducted in an ethical and transparent manner. Workers and Directors are made aware of these policies, including during the induction period upon joining the Group. All Workers and Directors can access applicable policies through policy management portals.

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 we expect of every single person in the Group and those who represent us. 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. Our Code and Commitments empower our Workers to 'Do the right thing', and to challenge and report situations that appear unusual or clearly wrong. All of our 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 is completely opposed to slavery and human trafficking and 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 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.

- *Speak Up Policy:*

This allows all our Workers across the Group, through multichannel 24/7 confidential reporting services, to voice any concerns about the treatment of colleagues, or practices within the business or supply chains, without risk of reprisals. All incidents reported via the helplines are taken seriously and are investigated thoroughly and appropriate remedial action taken.

2023 will see us further develop and build on our policies and procedures, including those of our supply chains and those that govern recruitment, equal opportunities and diversity in the workplace.

### **The Group's Supply Chains**

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 supply chains include recruitment agencies, cleaning and catering services, IT hardware and software providers, through to office fit out and maintenance services and document retention services. 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 or other jurisdictions where Group companies operate.

The Group recognises 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. The Group is therefore selective in its choice of suppliers and conducts requisite due diligence checks. However, 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. To counter this, where possible, the aim is to reduce complexity in supply chains, so that any weaknesses can be more readily determined and dealt with through a risk-based assessment.

2023 will see us launch a Supplier Code of Conduct, which will set out our expectations from suppliers who work with us or act on our behalf.

### **Effectiveness in Combatting Modern Slavery**

A number of initiatives were introduced during 2022 aimed at ensuring that slavery and human trafficking are not taking place in any part of the business or in any part of its supply chains, including, amongst other matters, the following:

- The Group introduced globally applicable policies that established our values (via our Code of Ethics and our Commitments), a commitment to act in accordance with internationally recognised human rights standards (our Human Rights Policy), and our mechanism to raise issues when our values and commitments are challenged or clearly disregarded (our Speak Up Policy). Each may be viewed at [inizio.health/what-matters-to-us/policies/](https://inizio.health/what-matters-to-us/policies/)
- Developed a global all employee training and attestation procedure for these policies, which commenced on February 1<sup>st</sup>, 2023.
- The Group commenced the development of a Supplier Code of Conduct which includes provisions based on internationally recognised human rights standards including human trafficking and child labour. The Supplier Code of Conduct is due for approval and publication in 2023.
- The Group took preliminary steps to enhance its life cycle management processes by establishing a working group to develop a responsible life cycle management framework. This working group comprises representatives from Risk Management, Sustainability, Master Data, Finance and Internal Audit. Whilst we are at the early stages of this project, we are confident that it will strengthen our supply chain processes and in doing so, help to combat modern slavery in our supply chain.

The Group is not aware of any incidents of Modern Slavery having been notified or identified during the period covered by this statement.

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 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 23<sup>rd</sup> March 2023 by the Board of Directors of Inizio Topco Limited, in its capacity as operating parent to the Group.

Signed



**Paul Taaffe**  
**Chief Executive Officer**

*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 Investments 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, Ashfield Healthcare Limited, Ashfield Meetings & Events Group Limited, The Creative Engagement Group Limited, The Creative Engagement Group (Holding Co) Limited, WRG Group Limited and WRG Worldwide Limited.*