

Modern Slavery Statement for Financial Year ended 31st December 2024

This is the modern slavery and human trafficking statement of Gennisium Pharma (hereinafter "Gennisium" or the "Company") for the financial year ending 31st December 2024.

This statement is made pursuant to section 54 of the Modern Slavery Act 2015 (the "Act", United Kingdom law) and is guided by the UN Universal Declaration of Human Rights and the conventions of the International Labour Organisation particularly relating to forced or compulsory labour. Modern slavery encompasses slavery, servitude, human trafficking and forced labour.

Gennisium opposes slavery and human trafficking in all its forms and make this statement to set out the steps that it is currently taking and will continue to take to ensure that modern slavery or human trafficking is not taking place within its business or supply chain. As part of the pharmaceutical industry, Gennisium has a zero-tolerance approach to any form of modern slavery and is committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

1. Our Business

Gennisium is a French Specialty Pharma Company set-up in 2018, which is dedicated to the development, registration and commercialization of special medicines for Neonatology and niche markets with global reach.

Gennisium has not any location and employees in United Kingdom and passes through a local partner for distributing its Health products. Our workforce mainly consists of full-time employees working from our Head Office in France regarding our "technical" activities (regulatory affairs, Quality Assurance, Secondary Packaging & release, Distribution), and some European countries outside United Kingdom (Germany, Italy, France, Portugal) for our sales force.

Gennisium is currently working with some German and French industrials to supply active ingredients and manufacture its medicines ("Upstream" Supply Chain). Gennisium is directly running the commercialization of its medicines in most of European Union and is working with some exclusive license partners with more and less the same human size and interest in respecting Human rights in some European countries and outside Europe ("Downstream" Supply Chain).

The risks of occurrence of modern slavery within Gennisium are considered low due to the nature of the workforce and the strength of our on-boarding training, internal policies, and procedures on business and ethical conduct. These policies and procedures set out our guiding principles and establish that in performing job duties Gennisium employees should always act lawfully and ethically.

2. Our Policies

Gennisium is currently implementing internal policies to ensure that it is conducting business in an ethical and transparent manner from 2024. These include:

- Employee controls: All employees are on full written contracts of employment with pay and conditions of a high standard and above legislative requirements.
- Whistleblowing policy: all employees know that they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals.
- Code of Ethics and business conduct: this code explains the manner in which we behave as an organisation and how we expect our employees and suppliers to act.
- Dignity at Work: The Company encourages and maintains a professional and friendly working environment where everyone is free to work without harassment, victimisation or bullying for any reason and where everyone in the workplace is treated with dignity and respect. It applies to all workers, job applicants, agency employees, contractors, consultants, suppliers and customers.
- Anti-Bribery and Corruption: The Company is committed to the highest standards of ethical conduct and integrity in its business activities in the UK and overseas. This policy outlines the Company's position on preventing and prohibiting bribery, in accordance with the Bribery Act 2010. The Company will not tolerate any form of bribery by, or of, its employees, agents or consultants or any person or body acting on its behalf.
- Equality and Diversity: The Company is committed to being an equal opportunity employer and to ensuring that all employees, job applicants, customers/clients, and other people with whom we deal are treated fairly and are not subjected to unfair or unlawful discrimination.

3. Our Supply Chain

The Company purchases medical products as well as pharmaceutical ingredients and componentry from third party suppliers.

From 2024, suppliers will have to complete a questionnaire prior to the Company doing business with them (and where relevant entering into a formal supply contract). The supplier is required to provide information with regard to its policies on human rights and workplace conditions to ensure these are consistent with the requirements of the Universal Declaration of Human Rights and the International Labour Conventions.

Effective from 2024, this supplier questionnaire will also require the supplier to provide information and evidence to demonstrate that it is also fully compliant with the requirements of the Modern Slavery Act 2015. All future commercial contracts will, where relevant, also include appropriate clauses and undertakings regarding supplier compliance with the Modern Slavery Act and UN Universal Declaration of Human Rights and the conventions of the International Labour Organisation.

4. Training

Gennisiium will provides periodic training to relevant members of staff on the subject of modern slavery and our policies to address the risks to help increase education and awareness of the risks of modern slavery in our supply chains and our business.

5. Our Effectiveness

Gennisium will know the effectiveness of the steps taken to ensure that slavery and/or human trafficking is not taking place within the business or supply chain if no reports are received from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified.

6. Approval for this Statement

This statement constitutes the Company's Slavery and Human Trafficking Statement and is hereby approved by the company owners of Gennisium in March 2024.

Franck Pigache
CEO & Company owner

