

# Modern Slavery Transparency Statement

of PPD Global Ltd., pursuant to Section 54(1) of the UK Modern Slavery Act 2015, as approved by the Board of Directors on 19 June 2019



The UK Modern Slavery Act 2015 (the “Act”) requires companies doing business in the UK to prepare and publish a statement of the steps, if any, they have taken to ensure that slavery and human trafficking are not taking place in the business or in the companies’ supply chains (Section 54 of the Act). PPD Global Ltd. and its vendors are subject to this Act and are publishing this statement in compliance with the Act.

We, PPD Global Ltd. and all affiliated PPD companies, are committed to improving our practices to combat slavery and human trafficking. Although we operate in a services industry, in which the risk of such unacceptable practices is arguably reduced, we do of course buy goods as well as services from third parties. We also operate in a global environment, and as such it is important that our global best practices are maintained regardless of the cultures and customs of the countries from which we buy goods.

PPD has adopted a Code of Conduct for its employees and directors, as well as a separate Code of Conduct for its vendors. As clearly explained in our employee Code of Conduct, PPD is committed to legal and ethical behaviour, and to acting professionally and fairly in all business dealings and relationships. We seek to maintain high ethical standards and to comply with all applicable laws and regulations. We expect integrity in all that we do, including with respect to our relationships with vendors. With these things in mind we welcome the introduction of the Modern Slavery Act 2015 and respect its intentions.

---

## **ORGANISATION’S STRUCTURE**

PPD Global Ltd. is a part of the global PPD group of companies. PPD is a leading global contract research organization providing comprehensive, integrated drug development, laboratory and lifecycle management services. Our clients and partners include pharmaceutical, biotechnology, medical device, academic and government organisations. With offices in 48 countries and more than 21,000 professionals worldwide, PPD applies innovative technologies, therapeutic expertise and a firm commitment to quality to help clients and partners bend the cost and time curve of drug development and optimize value in delivering life-changing therapies to improve health.

The supply chain for PPD is mostly indirect products and services with a few directs to support lab operations and clinical trials from a decreasing number of vendors. Products and services are purchased and delivered globally from a due-diligence controlled, preferred vendor basis for high risk products and services.

Whilst our business is organised into a number of different functional units, all such units are required to comply with PPD’s global Purchasing Policy. This Policy sets out the criteria on which PPD purchases goods and/or services, and the procedures which must be followed when making any such purchase. The Policy includes the importance of ethics in the selection of vendors to PPD and references the Vendor Code of Conduct.

## OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING

We are committed to ensuring that there are no modern slavery or human trafficking in our supply chains or in any part of our business. Our selection of vendors is governed by the Code of Conduct and Purchasing Policy, mentioned above. In turn, our material vendors are required to comply with the PPD Vendor Code of Conduct. This requires them to treat their workers with dignity and respect, and to uphold their human rights. Vendors are specifically required not to use any form of slave or forced labour, including involuntary prison labour, or child labour in their businesses. They are also required to implement due diligence procedures for their own suppliers and subcontractors to ensure that there are no human rights violations, including but not limited to slavery, child labour or human trafficking, in their entire supply chains.

**PPD's commitment to operating ethically and with integrity and PPD Code of Conduct:** <http://www.ppd.com/About/Ethics>

**PPD Vendor Code of Conduct:** <http://www.ppd.com/About/Procure-to-Pay/Vendor-Code-of-Conduct>

## DUE DILIGENCE PROCESSES REGARDING SLAVERY AND HUMAN TRAFFICKING

As part of our initiative to identify and mitigate risk, we conduct due diligence prior to engaging with a vendor. The level and content of the due diligence depends on the vendor's risk profile and proposed activities. Our internal due diligence process includes completion and assessment of a compliance and litigation questionnaire. "High-risk" vendors are screened by an external party, reporting on litigation, adverse media and similar.

We perform periodic risk-oriented due diligence updates on vendors based on perceived risk and on the type or category of the products and services that we obtain. These will be assessed against published modern slavery indexes and country-specific risk analysis made available to the public by dedicated reputable organisations (such as the Walk Free Foundation). Vendors identified as high-risk with respect to human rights and modern slavery will be subject to specific and more frequent assessment.

Our Corporate Compliance Committee will assess any actual or suspected offence in connection with modern slavery and determine specific remedial actions. The Committee consists of senior executive leaders from Legal, Global Quality and Compliance, Human Resources, Finance and the operational departments.

We have in place systems to enable and protect whistleblowers, which complement and strengthen our anti-slavery due diligence and monitoring processes.

## SUPPLIER ADHERENCE TO OUR VALUES AND ETHICS

To ensure all those in our supply chain comply with our values we have included specific human rights and anti-modern slavery-related provisions in all our relevant vendor contracts.

## TRAINING

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we will provide general training to our staff. On a second stage, more targeted guidance will be delivered to the teams liaising more closely with relevant vendors, in order to provide them with specific tools and methods to combat and identify any potential situations of modern slavery.

## OUR CONTINUED COMMITMENT

As a company operating with strong commitment to high legal and ethical standards, we will continue to assess our business at all times. Any issues identified will be addressed promptly, and we are committed to combatting the use of any form of modern slavery at all levels of our supply chains.

This statement applies to the financial year ending 31 December 2018.



**Julia James**

A handwritten signature in black ink that reads "James".

Director of PPD GLOBAL LTD.  
June 2019