

Modern Slavery and Human Trafficking Statement

Costello Medical takes a zero-tolerance approach to modern slavery and human rights abuses. We recognise the crucial role that companies play in tackling modern slavery and human trafficking in the global economy and are committed to taking steps to address the risk in our own business. We seek to promote honest and ethical conduct throughout our operations, and we encourage our employees and suppliers to do the same.

In line with our responsibilities under the Modern Slavery Act 2015, the following statement outlines the steps that Costello Medical takes to combat modern slavery in our business and supply chains.

Our Company

Costello Medical is a service-based company that operates in the healthcare sector, providing medical communications, value and access, and evidence development consulting services to pharmaceutical and medical technology clients around the world, as well as to clients in the public and charitable sectors. As a [B Corporation](#), we are committed to pursuing purpose as well as profit and we continuously review our working practices to better improve our business for our colleagues, clients, the environment and our local communities.

Policy

In line with international and industry standards of best practice, we have policies in place that underpin our commitment to acting professionally, fairly and with integrity in all our business relationships. These policies include the following:

Equal opportunities: we have procedures in place to ensure that no job applicant or colleague is discriminated against, either directly or indirectly, because of race, colour, ethnic or national origin, religious belief, political opinion or affiliation, sex, marital status, sexual orientation, gender reassignment, age or disability. We continuously monitor our recruitment, training and promotion procedures to ensure they remain fair and transparent.

Corporate Social Responsibility: we have an extensive policy outlining our commitment to our community, paid volunteering leave, pro bono project work, employee wellbeing and personal development, equity and inclusion practices, customer service and the environment. We review our corporate social responsibility performance annually.

Anti-harassment: we believe that all our employees are entitled to work in an environment free of bullying and harassment and have procedures in place to ensure no colleague feels under threat or intimidated.

Preventing financial misconduct: we take a zero-tolerance approach to bribery and corruption, fraud, tax evasion, insider trading, and money laundering and have procedures in place to ensure that all our business activities are conducted to the highest ethical standards, and in accordance with all applicable laws, regulations and industry standards.

Protected disclosure and whistleblowing: we respect the right of our employees and third parties to make protected disclosures (regarding harassment, breach of law or regulations, or any other form of actual or potential malpractice) and have procedures in place to handle any such disclosure fairly.

Child and forced labour: we believe in providing opportunities for young people and offer work experience and apprenticeship roles for those under the age of 18. Young workers are only engaged in safe, non-hazardous work which supports their continued education and development.

Identifying and Mitigating Potential Risks

As a service-based company, Costello Medical has deemed the risk of modern slavery and human trafficking within our business to be low. Our global team is comprised of skilled professionals who collectively strive to be a force for good. We are committed to creating an equitable and diverse workplace, where we invest in our employees through a comprehensive rewards package and by offering opportunities for professional

growth and career progression. During our recruitment and onboarding processes, we conduct pre-employment due diligence and right to work checks as standard. We pay our employees in line with the National Living Wage or local equivalent and do not utilise zero-hour contracts, nor do we employ seasonal workers.

We recognise that the highest risk of modern slavery in service-based businesses like ours is presented by global supply chains. We conduct due diligence checks to identify our suppliers' commitments to tackling modern slavery in their own operations. While our checks consistently confirm that the risks to Costello Medical are low, we recognise the need for continuous reassessment and are committed to taking necessary steps to ensure the risks in our supplier network remain low.

Our supply chain provides a range of essential services, including IT and technology provisions, office leasing and maintenance. We operate a centralised procurement procedure informed by a designated policy and supplier engagement team. We carry out rigorous due diligence checks across the supplier engagement lifecycle, including impact assessments and requests for information to identify our supplier labour policies, operations and other sustainability-related commitments.

We aim to complete sustainability assessments across the majority of our existing supply chain, based on spend, and are committed to reviewing suppliers annually to ensure they continue to align with Costello Medical's ethics and values. Review processes like these allow us to evaluate our suppliers' commitments to their workforce, sustainability and the environment, as well as the procedures they have in place to address modern slavery.

Remediation

Where a supplier's existing policies are deemed unsatisfactory, Costello Medical will work with the supplier to understand and investigate the issue and remediate in line with our requirements. Where remediation is not possible, we may cease to engage or onboard a supplier as appropriate.

Actions taken since the last Statement

Since the publication of our previous statement, dated 23rd June 2025, we have continued to address the risk of modern slavery and human trafficking within our organisation and supply chain. By the end of 2025, we completed the significant step of integrating all active suppliers into our supplier risk management framework, enabling us to manage our suppliers proactively and mitigate risks related to modern slavery and human trafficking. In addition, we also launched two global policies, our Code of Ethics and our policy on Identifying and Raising Concerns. These policies strengthened our compliance framework, setting forth the high ethical standards that we expect of our employees and our broader delivery operations, while providing designated reporting channels for escalating concerns surrounding internal and external conduct, which would include breaches of modern slavery and human trafficking laws.

In December 2025, we completed our annual review of our suppliers' sustainability and ESG approaches. This process was focused on collecting data on our suppliers' commitments to their workforce, environmental sustainability and policies addressing modern slavery and human trafficking. No suppliers were identified as requiring specific remediation in terms of their compliance with modern slavery and human trafficking obligations under applicable laws. We plan to repeat this review process periodically to assess whether our supply chain remains aligned with modern slavery and human trafficking laws, and where applicable, implement remediation plans.

The company successfully re-certified as a B Corporation in November 2025. In order to complete the re-certification process, we furthered our approach to effective supply chain management by embedding best practices around sustainability, security and compliance into our value chain. This included, but is not limited to, assessing suppliers against positive standards beyond regulatory requirements regarding their labour practices, and seeking third-party certifications related to positive social practices where possible. As a result of this continued effort, we improved our Supplier Chain Management score by more than 100% during the B Corporation re-certification process. We will continue to seek improvements to our supply chain governance as we work towards the 2028 B Corporation certification requirements.

Declaration

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the slavery and human trafficking statement for the financial year ending 31st December 2025 by Costello Medical Consulting Limited, a private limited company with its registered office at 50/60 Station Road, Cambridge, CB1 2JH, United Kingdom, together with its subsidiaries, including the following:

1. Costello Medical Global Limited
2. Costello Medical Inc.
3. Costello Medical Singapore Pte. Ltd.
4. Costello Medical Shanghai
5. Costello Medical Canada Inc.



Sophie Costello

Director & CEO

Costello Medical Consulting Limited

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