



ICON Anti-Slavery and Human Trafficking Statement



For the financial year ending
31 December 2021

[ICONplc.com](https://www.iconplc.com)

This statement is made for the purposes of Section 54, Part 6 of the UK Modern Slavery Act 2015 and sets out the steps that ICON plc and its subsidiaries (ICON) have taken to ensure that modern slavery and human trafficking is not taking place in our supply chains or in any part of our business.

On 1 July 2021, ICON acquired PRA Health Sciences, Inc and its subsidiaries, including Pharm Research Associates (UK) Limited, Pharm Research Associates Russia Limited, Sterling Synergy Systems Limited and IMP Logistics UK Limited (collectively referred to as “PRA”). This statement is made on behalf of the new ICON that includes PRA.

Our business

ICON is a world leading contract research organisation powered by healthcare intelligence. We provide outsourced development and commercialization services on a global basis to pharmaceutical, biotechnology, medical device, and government and public health organisations. ICON's mission is to improve the lives of patients by accelerating the development of our customers' drugs and devices through innovative solutions. ICON is committed to fostering and maintaining its strong ethical corporate culture both throughout our own organisation and when dealing with our suppliers, promoting our core values of Collaboration, Agility, Integrity and Inclusion. ICON employs more than 38,000 people worldwide across 53 countries.

Our Environmental, Social and Governance (ESG) Committee

ICON's ESG Committee is a cross-functional management committee established to drive ESG initiatives across the company. The committee is chaired by ICON's Chief Administrative Officer who is responsible for reporting to the ICON executive leadership team and Board of Directors on ESG matters, including company policy and mitigation efforts designed to combat modern slavery and human trafficking. ICON's 2020 ESG report is available [here](#).

Our supply chain

ICON's supply chain consists of suppliers of goods and services required to conduct our clinical studies and research activities and other ancillary goods and services.

Our policies on slavery and human trafficking

ICON remains committed to human rights and the adoption and pursuit of compliance with the United Nations Guiding Principles on Human Rights. Prior to its acquisition by ICON, PRA shared a commitment to human rights through its policies and practices.

ICON's zero tolerance policy on forced labour, slavery and human trafficking is set out in its [Global Code of Ethical Conduct](#). ICON's Global Code of Ethical Conduct strictly prohibits the use of child labour in line with ILO Convention 138 on the Minimum Age, and Convention 182 on the Elimination of the Worst Forms of Child Labour. This Code is provided to employees when they join ICON. It is also publicly available on ICON's website, in a number of languages

ICON's [Global Supplier Code of Conduct](#) also address ICON's zero tolerance stance to slavery and human trafficking. The ICON Global Supplier Code of Conduct incorporates the Pharmaceutical Supply Chain Initiative (PSCI) principles for Responsible Supply Chain Management, including for ethics and labour. This code prohibits our suppliers from using

any forced, bonded or indentured labour and involuntary prison labour and mandates that suppliers follow policies and procedures to ensure that all workers have freely chosen to perform their role and prohibits the retention of identity documents and papers unless required by local law. The Supplier Code also prohibits any form of labour from children below the local minimum working age, the age of compulsory education or the ages set out in the international labour organisation core conventions (whichever is higher).

Before doing business with any supplier, we require suppliers to certify that they will comply with the ICON Global Supplier Code of Conduct or to their own materially equivalent internal code. Suppliers are directed to ICON's webpage, where a copy of the Global Supplier Code of Conduct is available in a number of languages. ICON's policy is also to contractually prohibit suppliers from sub-contracting services without ICON's prior written consent.

Risk Assessment

Taking into consideration the nature of ICON's services, the type of work it performs, the countries in which such services are performed and the type of labour used, we believe the risk of modern slavery and human trafficking in our operations is relatively low. The clinical research industry is highly regulated and our employees and contractors work in controlled environments where there are established policies and processes.

Notwithstanding this assessment, as outlined in this statement. ICON recognizes the importance of remaining vigilant to the risks of modern slavery and human trafficking in our business and supply chain.

Supplier Due diligence processes

As part of our global risk management strategy, ICON performs pre-engagement due diligence on all of our suppliers. This includes screening of sanctions lists, debarment and adverse media. All suppliers are periodically re-screened to ensure any potential new findings are captured and acted upon. As part of this process, suppliers are subject to a risk assessment, with suppliers deemed higher risk subject to enhanced due diligence which may include periodic training, auditing and assessments.

Training

All ICON employees receive training on the principles contained in our Global Code of Ethical Conduct, as well as how to confidentially report ethical concerns.

Our employment practices

ICON has a dedicated talent acquisition team who, with the assistance of third party providers, conduct background checks on all prospective employees, to include education, employment, national ID, criminal background and debarment checks. ICON does not employ any one below the minimum employment age in the jurisdictions in which we operate.

Reporting

ICON is committed to ensuring a Speak Up culture that encourages compliance, openness and accountability. This commitment is established in the [Speak Up Policy](#) which identifies a number of escalation channels, including our confidential reporting hotline (Ethics Line) for employees to report suspected illegal or unethical activity or to raise questions regarding company policies. Ethics Line is also available to our suppliers and other third parties with details provided in the Global Supplier Code of Conduct.

ICON has a strict policy of non-retaliation and thoroughly investigates all concerns raised on an impartial and confidential basis.



Accountability

At ICON, employees are responsible for:

- adhering to the values and standards contained in our Global Code of Ethical Conduct;
- complying with relevant company policies; and
- for raising concerns if they believe that values and standards are not being met.

Violations of the Global Ethical Code of Code (and supporting policies) may result in a variety of corrective actions and in some cases may result in disciplinary action up to and including termination of employment.

We hold our suppliers accountable for meeting their contractual obligations with ICON, including commitments that are made with regard to our Global Supplier Code of Conduct and regulatory compliance. Contract non-compliance can result in termination of the business relationship with the supplier and exclusion from future business with ICON.

Dr Steve Cutler, CEO & Director

ICON plc



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About ICON

ICON is a world-leading clinical research organisation. From molecule to medicine, we advance clinical research providing outsourced development and commercialisation services to pharmaceutical, biotechnology, medical device and government and public health organisations. We develop new innovations, drive emerging therapies forward and improve patient lives. With headquarters in Dublin, Ireland, ICON employed approximately 38,330 employees in 142 locations in 53 countries as at 31 December 2021.

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