

ICON's Anti-Slavery and Human Trafficking Statement



This statement is made for the purposes of Section 54, Part 6 of the UK Modern Slavery Act 2015 and other legislation as applicable and sets out the steps that ICON plc and its subsidiaries (ICON) have taken during the financial year ending 31 December 2025 to ensure that modern slavery and human trafficking is not taking place in our supply chains or in any part of our business.

Our business

ICON is a world-leading clinical research organisation. Offering deep operational and medical expertise we accelerate innovation, driving emerging therapies forward to improve patient outcomes. From molecule to medicine, we deliver integrated consulting, clinical development, commercialisation and post-marketing solutions to pharmaceutical, biotechnology, medical device, government and public health organisations worldwide. 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 employed approximately 40,100 people worldwide across 55 countries as of 31 December 2025. More details about our services are available [here](#).

Environment, Social and Governance (ESG)

ICON's ESG strategy and initiatives are led by the Chief Administrative Officer & General Counsel (CAO). The Nominating, Sustainability and Governance Committee of the Board has oversight responsibility of the company's strategies, activities, impacts, risks and opportunities with respect to ESG matters. Accordingly, the CAO reports to the Nominating, Sustainability and Governance Committee on ESG matters and reports to the Board on an annual basis, whilst also providing periodic updates to the executive leadership team. The Audit Committee oversees ESG-related reporting in the ICON financial statements. The Chief Financial Officer ("CFO") reports to the Audit Committee on ESG-related reporting matters.

ICON's ESG Committee is chaired by our CAO. It is a cross-functional management committee established to drive ESG strategy and initiatives across the company. The ESG Committee, has management-level oversight of human rights policies and practices, including tackling modern slavery and human trafficking regulatory requirements. The Nominating, Sustainability and Governance Committee of the Board has primary oversight of human rights matters. The ICON Cares [ESG reports are 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. ICON purchases various goods and services from many qualified suppliers, including for example clinical data management services, subcontractor CROs, logistics services, clinical and medical supplies, IT software and services, office facilities services and other various business support services. ICON's suppliers are located throughout the globe in many countries and regions, where ICON has business needs.

ICON has good visibility into direct suppliers. Given that the majority of our suppliers are services based, we will continue focusing our supply chain risk management programs on direct suppliers, while taking risk-based actions should we identify any need in relation to any indirect suppliers.

Risk assessment

ICON conducts periodic modern slavery risk assessments. 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 ICON's lower overall inherent exposure to modern slavery and human trafficking, identified risk areas are mainly in our supply chain, including the use of third party service providers in higher risk jurisdictions, subcontracted staffing services, and logistics providers supporting clinical trials. These risks are mitigated through risk based due diligence, contractual controls, supplier training and targeted audits, but remain areas requiring ongoing vigilance. In addition to supplier onboarding and periodic assessments and screening, ICON relies on training and contractual obligations imposed upon direct suppliers to confirm their continuous compliance, including sub-contractors. ICON also audits selected direct suppliers on their compliance program, activities and records, including their due diligence on subcontractors. Priority is given to suppliers operating in high-risk geographic locations.

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.

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 several languages.

ICON's [Global Supplier Code of Conduct](#) also addresses 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 ICON Global Supplier Code of Conduct 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).

All ICON's policies are reviewed periodically to ensure necessary adjustments in accordance with applicable regulatory requirements and evolving business needs.

Before doing business with any supplier, we require suppliers to certify that they will comply with the ICON Global Supplier Code of Conduct, which includes human rights protections, or to their own materially equivalent internal code. Suppliers are directed to [ICON's webpage](#), where a copy of the ICON Global Supplier Code of Conduct is available in a number of languages. ICON's policy is also to contractually prohibit suppliers from subcontracting services without ICON's prior written consent. Adherence to these policies is assessed through supplier onboarding reviews, periodic screenings, audits and, where relevant, investigations into reported concerns.

Supplier due diligence processes

As part of our global risk management strategy, ICON performs pre-engagement due diligence on suppliers as part of the onboarding process. This includes screening of sanctions lists, debarment and adverse media as well as assessing environmental sustainability, bribery and corruption risks. ICON suppliers are required to complete ethics and compliance training in the ICON format or their own materially equivalent format, and to further train suppliers' employees, as one of the essential requirements for onboarding.

All suppliers are periodically re-assessed and 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 auditing and enhanced assessments. In 2025, we performed more than 143 supplier audits. Findings from supplier audits are tracked and remediated through corrective action plans, with follow up reviews where required.

ICON reviews and updates its comprehensive supplier due diligence questionnaire periodically to ensure inclusion of questions on its suppliers' approach to complying with legislation and mitigating and managing sustainability related risks.

During 2025, ICON continued to implement and manage sustainability engagement plans with key suppliers to gain an objective view of their performance against the sustainability requirements we deem important, as well as any upcoming developments. These plans also open a dialogue around any sustainability initiatives ICON and our suppliers collaborate on together.

ICON has engaged with EcoVadis and Watershed to assess our key suppliers and gather data about sustainability maturity, and GHG emissions. This data allows us to factor sustainability related criteria into our supplier selection activities and embed sustainability into our procurement practices.

Training

All ICON employees receive training, including an annual refresher, on the principles contained in our Global Code of Ethical Conduct, as well as how to confidentially report ethical concerns. The refresher training materials are reviewed and updated annually to address updated risks and 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. We also perform debarment checks annually. 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 our Global Supplier Code of Conduct. Reportable events include, among others, concerns in relation to forced labour, human trafficking or other human rights abuses within ICON's operations or supply chain.

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

Effectiveness and monitoring

ICON monitors the effectiveness of its anti-modern slavery programme using indicators such as employee and supplier training completion rates, supplier audit outcomes, remediation actions, and concerns raised through Speak Up channels. ICON continues to refine these measures to strengthen outcome based assessment over time. ICON uses its modern slavery statement as part of a continuous improvement process to strengthen risk identification and mitigation year on year.

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
- raising concerns if they believe that values and standards are not being met.

Violations of ICON's Global Code of Ethical Conduct (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 noncompliance can result in termination of the business relationship with the supplier and exclusion from future business with ICON.

This statement was approved by the Board of Directors in April 2026 and is signed by the Chief Executive Officer on behalf of ICON plc.



Barry Balfe, CEO & Director
ICON plc





ICON plc Corporate Headquarters

South County Business Park

Leopardstown, Dublin 18

Ireland

T: (IRL) +353 1 291 2000

T: (US) +1 215 616 3000

F: +353 1 247 6260

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