

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 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 powered by healthcare intelligence. From molecule to medicine, we advance clinical research providing outsourced services 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 employed approximately 41,900 people worldwide across more than 50 countries as of 31 December 2024. More details about our services are available [here](#).

Environment, Social and Governance (ESG)

ICON's ESG strategy and initiatives are led by ICON's Chief Administrative Officer & General Counsel (CAO). The Nominating, Sustainability and Governance Committee of the Board has oversight responsibility of the company's strategies, activities and risks 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 has oversight responsibilities in respect to ESG-related reporting in the ICON financial statements. The Chief Financial Officer ("CFO") reports to the Audit Committee on ESG-related reporting matters. ICON has an ESG Committee which 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. ICON's [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, recruiting and staffing services.

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 recognises the importance of remaining vigilant to the risks of modern slavery and human trafficking in our business and supply chain.

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).

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 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.

Supplier due diligence processes

As part of our global risk management strategy, ICON performs pre-engagement due diligence on suppliers. 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-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 2024, we performed more than 177 supplier audits.

In 2024, ICON updated its comprehensive supplier due diligence questionnaire to include focused questions on its suppliers' approach to complying with legislation and mitigating and managing sustainability related risks including modern slavery and human trafficking.

Also, in 2024, ICON implemented sustainability engagement plans with key suppliers to gain an objective view of their current sustainability performance against the requirements we deemed important, as well as any upcoming developments. These plans also open a dialogue around any sustainability initiatives ICON and our suppliers can work on together.

ICON has engaged with EcoVadis, CDP and Supplier IO to assess our key suppliers and gather data about sustainability maturity, including GHG emissions and classifications. 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.

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.

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
- 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 non-compliance can result in termination of the business relationship with the supplier and exclusion from future business with ICON.



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