



ICON Anti-Slavery and Human Trafficking Statement

For the financial year ending 31 December 2018

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.

Our business

ICON is a contract research organisation providing outsourced development services on a global basis to the pharmaceutical biotechnology and medical device industries. ICON's mission is to help customers accelerate the development of drugs that save lives and improve the quality of life. ICON is committed to fostering and maintaining its strong ethical corporate culture both throughout our own organisation and when dealing with our suppliers.

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'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 addresses our 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. It also prohibits the retention of identity documents and papers unless required by local law and sets out that reasonable notice periods must be permitted.

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.

Supplier Due diligence processes

As part of our global risk management strategy, ICON performs pre-engagement due diligence on our suppliers.



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 actively supports employees raising concerns via dedicated escalation channels and through our confidential whistle-blower hotline (ICON's *Ethics Line*) if they believe that anything illegal or unethical is taking place. ICON has a clear policy of non-retaliation and investigates all concerns raised.

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 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.

A handwritten signature in black ink, appearing to read 'Steve Cutler', written over a horizontal line.

Dr Steve Cutler, CEO & Director

ICON plc