

Modern Slavery Act Statement

This is the Leadiant Biosciences Ltd. (Leadiant) modern slavery and human trafficking statement for the financial year from 1 January 2016 to 31 December 2016 pursuant to section 54 of the Modern Slavery Act 2015. It has been approved by the board of directors of Leadiant Biosciences Ltd. and outlines the company's policies and efforts to mitigate the risks of modern slavery and human trafficking in its business and supply chains.

Introduction

Leadiant is strongly committed to human rights and employees' rights and is supportive of the UK Government's objective of eradicating modern slavery and human trafficking. The Company is opposed to slavery and human trafficking and believes that the Modern Slavery Act is a significant step in encouraging companies to identify and understand the risks for modern slavery and human trafficking across business operations and in supply chain. This statement describes the steps already taken and the ones to take going forward to mitigate the risks of modern slavery and human trafficking in Leadiant's business and supply chain.

Leadiant business, structure and supply chains

Leadiant is a global pharmaceutical company which develops, registers and commercializes novel and effective therapies addressing patient needs and improving their quality of life. Leadiant's holding company is based in Rome, Italy and the Group has subsidiaries in the USA and in Europe, with ca 260 employees.

Leadiant policies on slavery and human trafficking

Leadiant will not tolerate modern slavery or human trafficking in its supply chains or in any part of its business. It is committed to ensuring that there is transparency in its own business and to tackling any modern slavery and human trafficking in its supply chains. Leadiant expects the same standards from its suppliers and contractors.

Leadiant recently reviewed its existing policies and procedures and is to develop and update these using a risk-based approach as necessary to reflect its policy commitments against modern slavery.



Leadiant will ensure consistent messaging of these policies is distributed throughout its business and management at all levels, and its supply chains.

CODE OF CONDUCT

Leadiant Group Code of Conduct requires to respect human rights and to not discriminate against any employee or applicant for employment because of race, colour, religion, sex, national origin, ethnicity, age, disability, marital status or any other legally protected status. It underlines that the Group does not use child labour, it prohibits any kind of harassment and it treats people fairly, equally and respectfully.

The Group is committed to ensure for its employees that the working environment is suitable to safeguard their health, safety and security, as well as their physical and moral integrity, in compliance with applicable laws and regulations. All employees and anyone else working on the premises of any company of the Group must be aware of the health and safety requirements associated with their jobs.

The Group is committed to maintain high standard of integrity in its dealing with all its business partners, bribery and all other forms of corruption being forbidden.

Steps to assess and manage risks

In order to identify and mitigate modern slavery and human trafficking risks, Leadiant adopts a risk-based approach and is putting in place processes to:

- identify and assess potential risk areas in its business and supply chains;
- monitor potential risk areas in its business and supply chains;
- mitigate the risk of modern slavery and human trafficking occurring in its business and supply chains; and
- protect whistle blowers.

As an initial step, Leadiant will be incorporating modern slavery and human trafficking issues into its ABAC protocols which will be introduced to its significant suppliers.

Training

To ensure that Leadiant staff understand and can identify modern slavery and human trafficking risks in Leadiant's supply chains and business, the Company will develop and provide appropriate training, with targeted training for personnel in procurement and/or with responsibility for supply chain management.



The staff will be informed about the government's 24-hour modern slavery public telephone helpline (0800 0121 700).

Leadiant effectiveness in eliminating slavery and human trafficking

The Company will review the effectiveness of the measures it takes to mitigate the risks of modern slavery and human trafficking in its business and supply chains, and it will use this to inform the development of its procedures and best practices.

Director, Leadiant Biosciences Ltd.

Date: 28 June 2017