

UK MODERN SLAVERY ACT STATEMENT

BioClinica, Inc. and its affiliates (“Bioclinica”) recognize that slavery and human trafficking are egregious crimes and that steps must be taken to eliminate the threat it poses to society. Accordingly, Bioclinica will not tolerate any form of slavery or human trafficking in our business.

OUR BUSINESS

Clinical trials are complex undertakings. Bioclinica supports the performance of clinical trials by providing comprehensive professional services and multifaceted technologies to pharmaceutical, biotechnology, medical device and contract research organizations through a network of offices in North America, Europe and Asia.

OUR POLICIES AND PROCEDURES

Bioclinica is dedicated to operating responsibly and with a high level of integrity. Our commitment to ensuring the absence of slavery or human trafficking in our business and supply chain is reflected in Bioclinica’s Code of Business Conduct and Ethics (the “Code”), Bioclinica’s Environmental, Social and Governance (“ESG”) Policy and our Standard Operating Procedures (“SOPs”). The Code expressly requires our employees to maintain certain ethical standards in all business relationships. The Code directly addresses slavery and human trafficking by outlining Bioclinica’s zero tolerance policy and our strict adherence to the Modern Slavery Act of 2015. The Code also encourages employees, officers and directors to report any and all suspicions of slavery and human trafficking. The ESG Policy sets forth Bioclinica’s core ESG principles, which include embodying integrity and accountability in the management of our business. All Bioclinica employees are required to review and agree to abide by the Code and the SOPs applicable to their position. They may access and review our Code, the ESG Policy and SOPs via our internal systems at any time. Employees also are trained annually on the Code and general ethics and compliance matters. Bioclinica maintains its Bioclinica Ethics & Compliance Portal where anyone, not just employees, can anonymously and securely report anything of concern, including, but not limited to, any suspicions relating to slavery and human trafficking. All of our directors, officers and employees must comply with the Code, the ESG Policy, SOPs and applicable laws.

BUSINESS PARTNERS AND SUPPLY CHAINS

Bioclinica does not knowingly support or deal with any business that is involved in modern slavery or human trafficking. Bioclinica and a vast majority of our customers are engaged in performing clinical trials, which is a heavily regulated business activity. Based on the nature of our services and the customers we support each day, Bioclinica believes the risk of slavery or human trafficking in its business and supply chain to be low.

Bioclinica often is subject to mandatory audits and inspections by regulatory authorities and its customers, ensuring Bioclinica’s services are performed in a lawful manner and in accordance with our SOPs (including those relating to the education, experience, qualifications, and training of Bioclinica’s employees). Bioclinica also adheres to industry adopted principles outlined in the 2015 Pharmaceutical Supply Chain Initiative, which specifically addresses forced labor and child labor. Additionally, Bioclinica implemented

a Procurement Manual in 2020, which provides guidance concerning supplier management and requires the engagement of suppliers that comply with all applicable laws. Bioclinica also requires suppliers to submit responses to Requests for Proposal that include descriptions relating to the suppliers' compliance with applicable laws and policies concerning labor and human rights. Bioclinica's customer and supplier contracts generally include provisions obligating the parties to adhere to all applicable laws. In the event Bioclinica identifies critical non-conformance issues, and the customer or supplier fails to adequately remediate such issues in a timely manner, the relationship would be re-evaluated and, if appropriate, terminated.

REPORTING

This statement is made pursuant to Section 54(1) of the Modern Slavery Act of 2015 and constitutes Bioclinica's anti-slavery and human trafficking statement for the financial year ending on December 31, 2020. This statement has been acknowledged and accepted by Bioclinica's Board of Directors.

Princeton, New Jersey

DocuSigned by:
Euan Menzies
 Signer Name: Euan Menzies
Signing Reason: I approve this document
Signing Time: 26-Feb-2021 | 11:39 AM EST
2E5E6389139B44DDB745B807563BE8AE

Euan Menzies
President & CEO
BioClinica, Inc.