



CEPI'S Statement relating to Slavery and Human Trafficking and Human Rights Due Diligence made under the Norwegian Transparency Act And UK Modern Slavery Act

Introduction from the Chief Executive Officer

At CEPI we oppose violations of human rights and indecent working conditions, and we are committed to preventing and mitigating the risks of human right violations and indecent working conditions in or linked to our operations, including through our supply chain and business partners. CEPI was established in 2017 and is a young organisation. We are committed to continuously improving our practices to respect and promote human rights and decent working conditions, and to increasing our understanding of and improving the effectiveness of our responses to any human right risks related to our activities.

CEPI is now more than mid-way through its current strategy, CEPI 2.0 which sets out our aims to mitigate or even dramatically reduce the threat of future pandemics and epidemics. In parallel we are continuing our work to mitigate the risks of human rights violations and indecent working conditions and have strengthened our compliance resources to manage this. We have improved, and continue to improve, the way we mitigate the risks of human rights violations in or linked to CEPI's activities, including via our business partners and supply chain.

Pursuant to Section 5 of the Norwegian Transparency Act and Section 54 of the UK Modern Slavery Act 2015 we hereby set out the steps we have taken to identify and mitigate risks of human right violations and indecent working conditions, slavery or human trafficking in our operations and pertaining to our business partners and supply chain.

This statement outlines the responses we have implemented since 2024 and describes our 2025 targets. This Statement was approved by the Executive and Investment Committee (EIC) and Board of CEPI and covers the financial year ending 31 December 2024 and extending to the date of this report.

Richard Hatchett
Chief Executive Officer CEPI

1. Our organisation

We are a global coalition of public, private, philanthropic, and civil society organisations, launched in Davos in 2017 to develop vaccines to stop future epidemics. Our mission is to accelerate the development of vaccines against emerging infectious diseases and enable equitable access to these vaccines for people during outbreaks. We are primarily a grant-giving organisation, aiming to stimulate, finance and coordinate vaccine development against diseases with epidemic potential where market incentives fail.

CEPI is a Norwegian-registered not-for-profit association. CEPI's headquarters are in Oslo, Norway, with offices in London, UK and in Washington DC, USA. We have 335 employees as of March 2025.

The primary governing body of CEPI is the Board, which has 12 voting members (four investors and eight independent members representing competencies including industry, global health, science, resource mobilisation, finance) and five observers. All CEPI sovereign donors are invited to join our Investors Council, which nominates Investor representatives to the Board and has additional rights as set out in CEPI's Articles of Association (available on our website).

Two additional bodies support and guide CEPI's work: the Scientific Advisory Committee is the principal scientific advisory group to the Board and Secretariat, and the Joint Coordination Group works with critical external stakeholders to advance CEPI's portfolio of vaccines.

2. Our partners and supply chains

Our supply chain includes sub-contractors for services relating to vaccine development and manufacturing, including from clinical laboratories, equipment suppliers, and vaccine manufacturers.

In addition, we use suppliers to support the operations of our organisation. The key areas in which we engage suppliers are:

- facilities management
- information technology
- professional services such as finance and legal

Important partners to CEPI that do not form part of CEPI's supply chain are:

- Awardees/grant recipients (including sponsored vaccine developers, biotech companies, or research organisations)
- Sponsored global health non-profit organisations
- Clinical trials conducted by sponsored vaccine developers and global health non-profit organisations

Although the above partners formally are outside the scope of CEPI's due diligence obligations under the Norwegian Transparency Act, CEPI is committed to mitigating risks of human rights violations pertaining to these partners, including their supply chain engaged in CEPI funded projects.

3. Business integrity and compliance governance

CEPI has established a dedicated Ethics and Compliance function within the Governance, Risk & Compliance (GRC) department. The responsibility for the design, implementation and continuous improvement of our business integrity work lies with the Ethics and Compliance team. The business integrity scope encompasses inter alia human rights and decent working conditions. The GRC Director

has dual reporting lines to the General Counsel and the Board of CEPI via the Audit and Risk Committee (ARC).

GRC is responsible for ensuring that CEPI maintains a risk-based and effective compliance programme and supports implementation of the programme. GRC assesses risk, develops and maintains relevant policies, procedures, guidelines and tools; designs and provides training and recommends training requirements; performs integrity due diligence and ongoing monitoring on Third Parties; prepares, participates in and manages audits and reviews; and manages the CEPI whistleblowing channel.

4. Risk management processes – our policies and procedures

As a voluntary funded organisation, CEPI depends on the confidence of its donors to fulfil its mandate. CEPI operates in a global environment and is exposed to continuously changing factors which could affect CEPI's risk profile. Linking risk management to practical decision making on a day-to-day basis is important to ensure sound judgement.

Risk management in CEPI means handling risks in a transparent, consistent, and continuous manner, providing a better understanding of the nature of the risks and their likely impact, and implementing appropriate mitigations.

As an integrated part of our risk management processes, we are committed to promoting the respect of fundamental human rights and decent working conditions in our supply chains or in any part of our operations. Currently, a standalone human rights policy has not been developed in CEPI. Rather, the principles are covered in several of CEPI's internal and external facing policies, which set out our standards and expectations. CEPI continues to review policies and in 2025 will keep under review the most appropriate way to reflect our commitment to acting ethically and with integrity in all our business relationships, and to implementing and enforcing effective systems and controls to ensure that violations of human rights and decent working conditions are not taking place anywhere in our supply chain.

CEPI policies¹ and procedures addressing human rights and decent working conditions currently include inter alia:

Third Party Code

The CEPI Third Party Code requires third parties to respect and uphold international human rights and not contribute to any violation of human rights. The Code defines third parties in the broadest sense as being engaged with CEPI via contract, including (i) individuals, organisations and companies that provide or are intending to provide goods or services, (ii) Awardees receiving funding, and (iii) other business Partners of CEPI ("Third Parties"). CEPI requires Third Parties to accept the provisions of the Third-Party Code when entering into an agreement with CEPI.

The Code also addresses labour and employment practices in line with the acknowledged human rights, such as freely chosen labour, a prohibition on child labour and young workers, non-discrimination, fair treatment, and fair wages, benefits and working. Third Parties shall ensure that workers have a healthy and safe working environment in accordance with internationally recognized standards and applicable health and safety laws and regulations. The Code has been revised in 2025 and rolled out to all partners, reflecting CEPI's commitment to the highest standards.

Code of Conduct

This outlines CEPI's commitment to respecting all internationally recognised human rights. All employees of CEPI must adhere to the Code of Conduct, which was last updated in September 2024.

¹ Note that CEPI's policies are published on its external website, cepi.net.

Currently new joiners to CEPI read and sign the Code of Conduct before commencing work. Mandatory annual confirmation for employees and consultants is in place on CEPI's online learning management platform.

Anti-Corruption Policy and Procedure

The fight against corruption is a crucial aspect of the fight against modern slavery and trafficking, and CEPI's zero-tolerance stance is set out in the anti-corruption policy. Moreover, the anti-corruption framework sets out the expectations for CEPI staff, consultants and Third Parties to take steps to identify and report any improper or suspicious behaviour or situations.

Whistleblowing Policy and Procedure

This policy and procedure ensure that CEPI has a whistleblowing system for the reporting of both internal and external suspected wrongdoings related to CEPI or its activities, including human rights breaches. It also dictates how whistleblowing cases are handled within CEPI.

Risk Management Policy and Procedure

CEPI's risk management approach is designed to detect and mitigate risks relevant for CEPI, including human rights and decent working conditions, and keeping CEPI in line with relevant laws and regulations, including modern slavery laws and regulations.

During 2024-2025, CEPI has enhanced the process to identify and document response to risks associated with our projects, including risks related to Human Rights breaches

Due Diligence Procedure

CEPI has implemented an integrity due diligence process which sets out the approach to screening Third Parties against sanctions and watchlists, as well as assessing their background and reputation, and identifying any published instances of illegal or unethical behaviour, including human rights violations. This risk-based process has been fully implemented in CEPI's funding recipients since 2021 and in CEPI's supply chain since 2022 and is periodically reviewed and assessed against best practice to identify potential enhancements.

The objective of the due diligence processes in CEPI is to enable CEPI to accurately identify, evaluate and manage adverse information and risks associated with any potential Third Parties. We have in place processes to:

- identify and mitigate potential risk areas in our supply chains and funded projects
- identify and mitigate the risk of violations of human rights and decent working conditions occurring in our supply chains and funded projects
- monitor potential risk areas in our supply chains and funded projects
- protect whistleblowers

CEPI's integrity due diligence process includes adverse media screening on human rights infringements, modern slavery, and trafficking to ensure that we do not engage with entities or individuals with a history of such behaviour.

Human Resources Policy and Accompanying Procedures

CEPI's work to achieve diversity, equity, and inclusion is anchored inter alia in CEPI's HR policy and accompanying procedures. There is a zero tolerance for bullying and harassment.

A sub-committee of the Board – the Nominations, Compensation, Diversity and Inclusion Committee (NCDIC) has advised CEPI and informed CEPI's approach on these issues. The NCDIC reports back to the Board on this work and support provided to CEPI management. Employees' perceptions of diversity & inclusion, discrimination, and fair treatment regardless of gender, age, ethnic background, and other

differences are also monitored by the means of an annual Employee Engagement Survey. Every year the results of the survey inform work to further develop awareness and build skills in these areas.

We conduct appropriate background checks to ensure that all our staff have appropriate right to work documents and ensure that they are paid fairly and enjoy a competitive remuneration package. When recruiting, CEPI carefully details skills, experience, qualifications, and attributes essential for the role to ensure job profiles and advertisements do not discriminate against candidates, either directly or indirectly.

Procurement process

A risk-based approach is also in place for CEPI's supply chain. Adverse media screening is undertaken to identify any relevant potential areas of concern, including human rights and decent working conditions.

Commitment to tackling racism statement.

A statement on tackling racism has been published on CEPI's external website.

Clinical Trials Policy

This Policy requires awardees to have in place relevant regulatory and ethical approvals and appropriate governance mechanisms, impose standards for consent for research from vulnerable individuals and children, and include audit rights for CEPI.

GxP Quality and Compliance expectations and requirements

A new document in 2025, this is designed to formalise CEPI's existing requirements across development and manufacturing to ensure (amongst others) that patient safety is achieved and maintained.

Scientific Integrity Policy

This Policy is designed to ensure that all CEPI-funded research and development activities are conducted ethically and with integrity, and includes provisions addressing misrepresentation of interest, lack of informed consent, and abuse of research subjects.

Security Policy

This Policy provides a framework with the aim of establishing a safe and secure working environment for CEPI employees, associates and partners, by setting out the intentions, responsibilities and principles for CEPI's security management system.

5. Training on human rights and decent working conditions

To ensure a high level of understanding of the risks of human rights violations and decent working conditions in our supply chains and our activities, we have embedded these topics into our business integrity training, which is mandatory for all new employees and consultants working part-time and full-time for CEPI. In addition, the importance of human rights is included in the annual Code of Conduct refresher training completed by all employees.

6. Our 2024 activities and 2025 targets

In 2024 and to date, CEPI has not identified any actual adverse impacts or significant risks of adverse impacts during its activities. Since June 2024, CEPI has carried out the following activities aimed at lowering the risk of violations of human rights or decent working conditions occurring in CEPI's operations and activities:

1. Updated CEPI's Code of Conduct to reflect stronger commitment to areas such as harassment, sexual exploitation and abuse, amongst others. The implementation of the Code of Conduct included mandatory sign off from all employees and consultants, as well as awareness activities, and role-based training delivered across the organisation.
2. Continued to deliver human rights training as part of business integrity training which is mandatory and delivered to all new employees and to all consultants working more than 50% for CEPI for three months or longer, as well as mandatory e-learning course on human rights for all new starters.
3. Published a Child Protection statement on CEPI.net, highlighting CEPI's commitment to safeguarding the well-being and rights of all children and communicating CEPI's zero-tolerance approach to exploitation and abuse, including in relation to children.
4. Continued to develop our integrity due diligence and monitoring of our Third Parties for grant recipients and suppliers. Our software screening tool helps us to detect and mitigate adverse information related to human rights infringements, modern slavery, corruption, fraud, and sanctions.
5. Continued the development and implementation of an investigations framework, in addition to the whistleblowing framework, to formalise our internal and external response to allegations or instances of illegal or unethical conduct, including potential human rights infringement.
6. Conducted an organisation-wide policy review to ensure that our policies are aligned to our legal obligations, as well as investor expectations and industry best practice. Updates include to the Whistleblowing Policy, to ensure that reports are encouraged and concerns are managed in accordance with legal requirements.
7. Revised CEPI's Third Party Code to reflect our ongoing commitment to upholding the highest ethical standards in our funded work. The revised Code includes stronger requirements on anti-corruption, fraud, as well as working conditions including prevention of sexual exploitation abuse and harassment. We have also published a resource hub on CEPI.net²² for partners, which includes guidance on how to comply with the Code as well as improving and aligning with industry recognised standards across many of the topics, including having a positive working environment free from harassment.

CEPI will continue to work towards the following targets during 2025:

- Continue to strengthen Third Party Code guidance to reflect CEPI's commitment in respect of human rights related topics, including working conditions and human rights related topics. The team will continue to engage with our partners and provide guidance and training on a risk-based approach.
- Implementation of the recommendations arising from the 2024 human rights gap analysis review, in further development of CEPI's human rights programme, including further consideration of embedding human rights topics within CEPI's policies and procedures and monitoring.

²² Navigating CEPI's Third Party Code: Your guide to compliance [insert link]

- Strengthen CEPI country-based risk assessment methodology, to ensure CEPI focuses efforts proportionate to risks faced, including if and how human rights considerations can be further integrated into monitoring of our partnerships, including through partner assurance work.
- Initiate reporting on ESG topics to promote transparency to CEPI's stakeholders, with a focus on sharing in more detail some of our ongoing work under the environmental, social and governance topics, including future plans. The reports will be published on CEPI.net.

CEPI will conduct updated risk assessments regularly and will update this account in case of any substantial changes in CEPI's risk assessment or targets.

Reviewed and sanctioned by the CEPI Board on 12th June 2025.

7. APPENDIX – THE DUTY TO ACCOUNT FOR DUE DILIGENCE, NORWEGIAN TRANSPARENCY ACT

Section 5. *Duty to account for due diligence*

The enterprises shall publish an account of due diligence pursuant to [Section 4](#). The account shall at least include

- a) a general description of the enterprise's structure, area of operations, guidelines and procedures for handling actual and potential adverse impacts on fundamental human rights and decent working conditions
- b) information regarding actual adverse impacts and significant risks of adverse impacts that the enterprise has identified through its due diligence
- c) information regarding measures the enterprise has implemented or plans to implement to cease actual adverse impacts or mitigate significant risks of adverse impacts, and the results or expected results of these measures.

[Section 6](#), second paragraph (c) and (d), third and fourth paragraph correspondingly apply to the duties pursuant to the first paragraph.

The account shall be made easily accessible on the enterprise's website and may form part of the account on social responsibility pursuant to Section 3-3 (c) of the Accounting Act. The enterprises shall in annual reports inform of where the account can be accessed.

The account shall be updated and published no later than 30 June of each year and otherwise in case of significant changes to the enterprise's risk assessments. It shall be signed in accordance with the rules in Section 3-5 of the Accounting Act