

A decorative graphic on the left side of the page, consisting of several concentric, incomplete red circles of varying radii, creating a spiral-like effect.

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



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CEPI is a global partnership working to accelerate the development of vaccines and other biologic countermeasures against epidemic and pandemic threats. Our mission is grounded in a commitment to global public health, equity, and responsible innovation.

We recognise that how we operate is inseparable from what we aim to achieve, and that our impact must be delivered in a way that respects human rights and promotes decent working conditions. CEPI opposes all forms of modern slavery, human trafficking and other violations of fundamental human rights and decent working conditions. We are committed to identifying, preventing and mitigating the risks of these in, or linked to, our operations, including through our supply chain, funded projects, and other business relationships.

Since our establishment in 2017, CEPI has grown in scale, reach and complexity into a global organisation that operates across diverse geographies and through a wide range of partnerships. We are now preparing for the organisation's next strategic period, CEPI 3.0, which will further elevate our ambition to transform the way the world tackles epidemic and pandemic threats. In 2026 we are reviewing CEPI's operating model to ensure the organisation is fit for purpose to deliver on this mission in a way that continues to uphold the highest standards of integrity.

CEPI is 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, including via our business partners and supply chain.

This statement outlines the steps CEPI has taken during 2025 to strengthen our Human Rights Programme and describes our priorities for 2026. This statement was approved by the Executive and Investment Committee (EIC) and Board of CEPI and covers the financial year ending 31 December 2025 and extending to the date of this report.

Richard Hatchett

CEO, CEPI





1. About this report

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.

The structure of this report aligns with the latest UK Government Transparency in Supply Chains Guidance. This statement reflects activities across CEPI, consisting of Coalition for Epidemic Preparedness Innovations (“CEPI”), Coalition for Epidemic Preparedness Innovations UK Limited (CEPI’s UK entity) and Coalition for Epidemic Preparedness Innovations U.S (CEPI’s US entity).

Information for this report is drawn from CEPI’s internal HR, procurement, grant management and compliance systems, as well as from audits, assessments and engagement across the organisation.

2. Key progress over 2025

Over 2025, CEPI:

- Refreshed and relaunched our Third Party Code to all current partners, including strengthening and clarification of our expectations of Human Rights;
- Implemented a number of recommendations arising from the 2024 human rights gap analysis review, including:
 - Updating our Integrity Due Diligence process, including a stronger country-based risk assessment methodology;
 - Updating our Human Rights Impact Assessment, including prioritisation of resulting actions; and
 - Including Human Rights (including Modern Slavery) in the Ethics and Compliance communications plan for the year of 2025, resulting in various internal engagement activity including a cross-functional presentation on the importance of Human Rights at CEPI.
- Delivered targeted training to Project Management and Project Finance teams, which had been identified as being at higher risk of encountering human rights issues on CEPI-funded projects, equipping them to identify red flags and report concerns.

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Our Organisation



3. Our Organisation

CEPI harnesses the latest scientific advances to accelerate the development of vaccines and other biologic countermeasures against epidemic and pandemic threats. CEPI is working to substantially reduce global epidemic and pandemic risk by delivering innovative, access-focused R&D programmes that help the world accelerate the development of safe, effective and globally accessible vaccines to 100 days — referred to as the 100 Days Mission. We are primarily a funding organisation.

During 2025, CEPI provided \$355 million in funding to research, development and manufacturing projects and other activities in furtherance of its 100 days mission.

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 347 employees as of March 2026.

3.1. Governance

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.

3.2. Business Integrity and Compliance Governance

CEPI has an established Ethics and Compliance function within the Compliance, Risk and Assurance (CRA) department. The responsibility for the design, implementation and continuous improvement of our business integrity programme lies with the Ethics and Compliance team. The business integrity scope encompasses inter alia human rights and decent working conditions. The CRA Director has dual reporting lines to the General Counsel and the Board of CEPI via the Audit and Risk Committee (ARC).

CRA is responsible for ensuring that CEPI maintains a risk-based and effective compliance programme and supports implementation of the programme. CRA 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 compliance audits and reviews; and manages the CEPI whistleblowing channel.

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4. Our partners and supply chains

Our supply chain includes 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
- Contractors to support in key activities

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

- 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.

Together, we refer to members of our supply chain and our other partners as our “Third Parties”, which are located across the globe.

Our Third Party selection and onboarding processes are designed to identify, manage and mitigate risks of human rights abuses included Modern Slavery throughout our value chain. See section 6 for more information on our approach to due diligence.

CEPI recognises that the highest human rights risks often lie within long and complex global supply chains, where visibility over labour conditions and recruitment practices is more limited. See section 8b for further details.

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Image credit: Institut Pasteur de Dakar



5. Reporting concerns to CEPI

CEPI's grievance and reporting mechanisms support employees, anyone working on behalf of CEPI and any other stakeholders to speak up, with the option to remain anonymous.

CEPI employees can raise concerns or queries, including about modern slavery, through various channels:

- Contracting our Ethics and Compliance team
- Contacting our People and Organisation team
- Reaching out to their line manager, or a member of leadership
- Using our Whistleblowing portal

Our Third Parties can report any concerns, including about modern slavery, through:

- An existing CEPI contact, for example the CEPI leader of any relevant project;
- The Contact Us option on our website (cepi.net)
- Using our Whistleblowing portal

Our Whistleblowing portal, operated by an independent organisation, is publicly accessible with clear reporting instructions on our website, allowing anyone with concerns to contact CEPI directly. Reporters can choose to remain anonymous whilst using the portal. The organisation undertakes an initial triage, prior to informing the Whistleblowing Committee, leveraging appropriate safeguards to ensure independence according to the subject of the complaint.

Investigating and aftercare

At CEPI, grievance and whistleblowing reports, including those from Third Parties and others external to CEPI, are treated in good faith. Grievances are managed by People & Organisation under a defined process for resolving differences. Whistleblowing reports are assessed by our Whistleblowing Committee, and may be referred or investigated internally or externally for relevant subject matter support where required.

Regardless of the type of report, CEPI takes measures to ensure that CEPI employees that speak up are aware that there will be no negative repercussions and that they are treated fairly and with respect.



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6. Risk Management processes

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.

CEPI's Risk management framework is designed to identify, assess and manage risks in a transparent, consistent, and continuous manner. This framework supports a better understanding of the nature of the risks, their potential impacts, and implementing appropriate mitigations.

Within this broader risk management framework, CEPI recognises that human rights risks - including risks related to modern slavery and decent working conditions - require specific attention due to their potential severity and impact on individuals. As an integrated part of our risk management processes, we are committed to promoting respect for fundamental human rights and decent working conditions in our supply chains or in any part of our operations. Further information on our approach to managing human rights related risks is included below.

6.1. Our policies and procedures

CEPI policies are published on our external website, and are therefore widely available to our Third Parties as well as employees. Our employees are supported in policy implementation through annual training (see section 7), and in 2025 CEPI published additional guidance on key topics alongside the refresh of our Third Party Code including on a Positive Work Environment (available at: <https://cepi.net/navigating-cepis-third-party-code-your-guide-compliance>).

CEPI continues to review policies and in 2026 will keep under review the most appropriate way to reflect our commitment to acting ethically, with integrity and aligned to international standards 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.

Currently, a standalone human rights policy has not been developed in CEPI. Rather, the principles are covered across CEPI's internal and external facing policies, which set out our standards and expectations. CEPI policies and procedures addressing human rights and decent working conditions currently include inter alia those over the next pages.



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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. CEPI requires Third Parties to accept the provisions of the Third-Party Code when entering into an agreement with CEPI.

The Third Party 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 was revised in 2025 and was as a result reshared with 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. 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.

Data Protection and Privacy Policy

CEPI is committed to respecting the right to privacy and protecting personal data in all its activities. CEPI's Data Privacy Policy sets out how personal data is collected, used, stored and protected, in line with applicable data protection laws.

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.

Commitment to tackling racism statement.

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

Whistleblowing Policy and Procedure

This policy and procedure ensure that CEPI has a whistleblowing system for the reporting of both internal and external suspected wrong doings related to CEPI or its activities, including human rights breaches. It also dictates how whistleblowing cases are handled within CEPI. The Whistleblowing mechanism is included in the Third Party Code for partners and their staff to also report any suspected wrongdoing.

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.



6.1. Our Policies and Procedures (continued)

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 a regular Employee Engagement Survey. 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.

Clinical Trials Policy

This Policy is being updated in 2026, and 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.

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.

Biosecurity policy

A new Policy in 2026, this is designed to formalise and strengthen CEPI's expectations and to uphold appropriate and robust Biosecurity and Biosafety measures that effectively manage the risks associated with CEPI-sponsored research.

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6.2. Assessing and managing human rights risks

CEPI first conducted a Human Rights Impact Assessment in 2022, and this was updated over the course of 2025 calling on insights from a range of internal teams. It is intended going forward that this will be refreshed on a regular basis, with engagement of external stakeholders being prioritised as an enhancement in future. As part of the Impact Assessment, CEPI considers whether our activities cause, contribute to or are directly linked to the impacts identified.

As part of our Ethics and Compliance framework, CEPI takes a risk-based approach to engaging with our Third Parties, including undertaking human rights due diligence in line with UNGPs, prioritising the most salient risks to focus efforts where to most effectively mitigate the risk of harm.

For more information on our pre-contracting risk assessment, see Section 6.

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Pre-contracting Due Diligence

CEPI has implemented a pre-contracting integrity due diligence process which includes 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 integrity 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, including those association with human rights. 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

Our risk assessment processes consider factors contributing to whether any new engagement with a third party creates a heightened exposure to human rights risks including those associated with modern slavery, including:

- Jurisdiction risk, determined using various external sources;
- Results of our Integrity Due Diligence questionnaire, where applicable; and
- Identification of adverse media screening on human rights infringements, including modern slavery and trafficking, to ensure that we do not engage with entities or individuals with a history of such behaviour.

Contracting

Contracts with our Third Parties require compliance to CEPI's Third Party Code, including Human Rights requirements such as modern slavery. Our contracts allow for termination in the event of a material breach of the Third Party Code or any applicable law, including the UK Modern Slavery Act (or local equivalent).

Ongoing monitoring

CEPI's project teams oversee the work of our Third Parties, and in 2025 we delivered training to these teams to strengthen their understanding of risk areas including Modern Slavery as well as guidance on reporting concerns.

We continue to monitor our Third Parties through use of a screening tool, which alerts us to any new adverse media and other relevant developments or changes.

We reserve the right to perform audits over our Third Parties.



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8. Training and engagement

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.

Enhanced business integrity training was designed by the CRA team and delivered to CEPI colleagues across teams identified as being at higher risk of observing breaches of human rights including modern slavery. In 2026, all training will be reviewed and updated with additional tailored training shared with teams with higher-risk roles.

In addition to the formal training programmes, further awareness activities were carried out including our annual Ethics and Compliance week activities, two Insight Hours (one-hour sessions open to all CEPI employees), and regular informative posts on our internal network including to mark Anti-Slavery Day.

9. Monitoring and evaluation – Human Rights KPIs

CEPI is in the process of developing an approach to monitor and report on a range of indicators to assess the effectiveness of identifying, managing, mitigating and reporting business integrity risks, including those associated with human rights.

We monitor external developments and benchmarks regarding modern slavery and human rights programmes to identify opportunities for improvement.





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Key Priorities over 2026



IO. Priorities over 2026

As well as building on and embedding measures developed through 2025, CEPI will work towards strengthening the Human Rights programme. CEPI will work towards the following targets during 2026:

- Develop an approach to engaging with external stakeholders to incorporate broader insights into CEPI's Human Rights programme, including in relation to the Human Rights Impact Assessment.
- Continue to strengthen CEPI's Third Party Code, including:
 - Review of relevant requirements against current good practice
 - Development of additional Human Rights Guidance, to support in the implementation of this
 - Continue to engage with our partners and provide training on a risk-based approach
- Implementation of remaining recommendations from the 2024 Human Rights Gap analysis review and additional enhancements identified during the 2025 Human Rights Impact Assessment.
- Continue to strengthen internal awareness and engagement, including the publication of a dedicated intranet page.
- Continue to include Human Rights in CEPI's Business Integrity training plan, including:
 - Inclusion of Human Rights in mandatory training for all employees
 - Develop bespoke training for key teams
 - Other awareness and communication activities

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.

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The logo for the Coalition for Epidemic Preparedness Innovations (CEPI). It features the letters 'C', 'E', 'P', and 'I' in a white, sans-serif font. The letter 'E' is stylized with a white dot in its center. The background is a dark blue gradient with two large, overlapping circular shapes in shades of red and orange on the left and right sides.

CEPI

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