

MODERN SLAVERY ACT REPORT

Introduction

Paladin Labs Inc. (“**Paladin Labs**”, business number 100783950) is happy to share its first annual report (the “**Report**”) pursuant to section 11(1) of the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the “**Act**”) for its financial reporting year ended December 31, 2023. Paladin Labs is dedicated to maintaining the highest standards of ethical and legal integrity and is devoted to the recognition and preservation of human rights within its activities and supply chains.

Structure, Activities and Supply Chains

Paladin Labs is a wholly owned subsidiary of Endo International plc (“**Endo**”), a diversified specialty pharmaceutical company that sells a broad portfolio of branded pharmaceutical, sterile injectable and generic pharmaceutical products. With headquarters in Montréal, Québec, Paladin Labs operates in the pharmaceutical industry and is a leading speciality pharmaceutical company focused on acquiring and licencing emerging pharmaceuticals in the Canadian market. Paladin Labs is federally incorporated under the *Canada Business Corporations Act*.

Paladin Labs qualifies as an “entity” that is subject to the reporting requirements under the Act: (i) it has a place of business in Canada, does business in Canada and has assets in Canada; and (ii) it has at least \$20 million in assets for at least one of its two most recent financial years and has generated at least \$40 million in revenue for at least one of its two most recent financial years.

Paladin Labs sources its supplies primarily from within Canada and Australia, Belgium, Denmark, France, Germany, Greece, Ireland, Italy, Sweden, Switzerland, United States of America, United Kingdom with some products sourced from India. Notably, none of these countries have a high prevalence of modern slavery according to the Global Slavery Index.

Paladin Labs takes the following steps to prevent and reduce the risk of child and forced labour in its activities and supply chains:

- ***Requiring suppliers to have in place policies and procedures for identifying and prohibiting the use of forced labour and/or child labour in their activities and supply chains:*** The Supplier Code (defined below) requires suppliers to carry out due diligence on the source of critical raw materials to promote legal and sustainable sourcing and requires suppliers to use management systems to maintain business continuity, facilitate continual improvement and comply with the expectations of the principles enshrined therein.
- ***Developing and implementing anti-forced labour and/or -child labour standards, codes of conduct and/or compliance checklists:*** The Supplier Code (defined below) explicitly prohibits forced labour and child labour for all of its suppliers.
- ***Monitoring suppliers:*** The Supplier Code (defined below) expects suppliers to cooperate and remediate any issues identified.
- ***Engaging with supply chain partners on the issue of addressing forced labour and/or child labour:*** as described herein.

Policies and Due Diligence Processes

Paladin Labs' governance standards form the foundation of its policies to proactively identify and address emerging and existing risks of child and forced labour.

[Code of Conduct](#)

Endo's Code of Conduct (the "**Code**"), which explicitly applies to Paladin Labs, aims to educate team members about the policies and standards to which it holds itself and about how to raise issues or concerns, should they have them. All team members, full-time contractors and select part-time contractors and vendors are required to complete annual training on the tenets of the Code and certify that they will adhere to it.

While not specifically addressed in the Code, the principles enshrined in the Code exemplify Endo and Paladin Labs' commitment to preventing forced and child labour in its activities.

The Code remarks on Endo's partnership with external suppliers, noting that they are committed to operating in a responsible and ethical manner and respecting the rights of individuals. Further, the Code explicitly requires suppliers to operate in a manner consistent with its Supplier Code (as defined below) and the Pharmaceutical Supply Chain Initiative Principles for Responsible Supply Chain Management (the "**Principles**"). The Code commits to "know your supplier" practices, such as screening transactions against all applicable rules that prohibit improperly dealing with sanctioned countries, persons, or entities.

The Code also promotes speak up culture, whereby any person can raise concerns to directors or senior management, corporate compliance business leaders, human resources business partners or legal business partners. Endo also has a third-party administered Ethics Hotline through which reports can be made at any time, including anonymously (where permitted by local laws). Endo's non-retaliation policy prevents an employee who reports from being retaliated against or intimidated in any way. Moreover, individuals who violate the Code may be subject to disciplinary action, in line with local laws and procedures. Notably, misconduct includes failing to raise a known or potential issue.

Endo takes reports of alleged misconduct seriously, conducting prompt, fair, thorough and impartial investigations and taking appropriate corrective and remedial actions for violations of the Code.

[Supplier Code of Conduct](#)

Endo's Supplier Code of Conduct (the "**Supplier Code**") commits to the highest standards of ethical and social responsibility in all of its activities, its subsidiaries' activities and its supply chains' activities. The Principles, which are detailed below, serve as a foundation for the Supplier Code, demanding high standards of ethical, social and environmentally responsible behaviour from Endo, its subsidiaries and its suppliers.

In addition to complying with all applicable local laws and regulations, suppliers must meet Endo's specifications regarding human rights and labour. Here, the Supplier Code explicitly prohibits forced labour and child labour for all of its suppliers. Specifically, the Supplier Code states that Suppliers shall not use forced, bonded or indentured labour or involuntary prison labour, nor shall they use child labour. In relation to the employment of young workers below the age of 18, it shall only occur in "non-hazardous work and when young workers are above a country's legal age for employment or the age established for completing compulsory education".

The Supplier Code further requires suppliers to carry out due diligence on the source of critical raw materials to promote legal and sustainable sourcing.

The Supplier Code further requires suppliers to use management systems to maintain business continuity, facilitate continual improvement and comply with the expectations of the principles enshrined therein. Such management systems include:

- demonstrating a commitment to the concepts in the Supplier Code and allocating appropriate resources thereto;
- complying with applicable laws, regulations, standards and relevant customer requirements;
- having mechanisms to determine and manage risks in all areas addressed by the Supplier Code;
- maintaining documentation necessary to demonstrate conformance with the principles in the Supplier Code and applicable regulations;
- having a training program that achieves an appropriate level of knowledge, skills and abilities to address the expectations in the Supplier Code;
- setting performance objectives, executing implementation plans and taking necessary corrective actions for deficiencies identified by internal or external assessments, inspections and management reviews;
- encouraging workers to report concerns, illegal activities or breaches of the principles in the Supplier Code without threat of or actual reprisal, intimidation or harassment, and take corrective action if needed; and
- having effective systems to communicate the principles in the Supplier Code to workers, contractors and suppliers.

The Supplier Code expects suppliers to cooperate and remediate any issues identified.

[Pharmaceutical Supply Chain Initiative Principles for Responsible Supply Chain Management](#)

The Principles are a set of expectations and guidelines for suppliers of Pharmaceutical Supply Chain Initiative ("**PSCI**") member companies in the pharmaceutical and healthcare sector. Although not currently members of PSCI, Endo and Paladin Labs strive to uphold the high standards placed on suppliers in relation to human rights as contemplated in the Principles.

The Principles require PSCI members to be committed to respecting human rights of internal and external stakeholders—which includes suppliers. Mirroring the Supplier Code, the Principles

prohibit the use of any form of modern slavery, forced labour and child labour. The Principles require young workers (under the age of 18) to only engage in non-hazardous work and when they are above a country's legal age for employment or the age established for completing compulsory education.

The Principles demand high standards of governance from PSCI members, requiring them to use appropriate systems to conduct due diligence on risk and impact, monitor legislation, set priorities, assign responsibility, adopt risk-mitigation measures and facilitate continual improvement and compliance. Suppliers are required to carry out due diligence on their own supply chains, including traceability for sourcing raw materials to support legal and sustainable sourcing. Suppliers are further required to continually improve by setting performance objectives, executing implementation plans and taking necessary corrective actions for deficiencies identified by internal or external assessments, inspections and management reviews, including the recording and reporting of near-misses, incidents and incident prevention opportunities.

Forced Labour and Child Labour Risks

Paladin Labs has not identified any risks of forced or child labour in its activities or supply chains. Given the highly specialized, regulated, and qualified nature of the pharmaceutical industry, the risk of forced and child labour is minimal. Although no risks have been identified, Paladin Labs is confident any such risks that could exist have been mitigated by the outright prohibition on forced and child labour in the Supplier Code which its suppliers have signed or will sign on to the Supplier Code. Paladin Labs will continue monitoring its supply chains and activities for risks of child and forced labour.

Remediation Measures

Paladin Labs' Code and Supplier Code provide a robust reporting mechanism. However, Paladin Labs has not undertaken specific remediation measures in relation to forced or child labour, since no risks were identified in such areas.

Remediation of Loss of Income

Since Paladin Labs did not identify any instances of child or forced labour, no steps were undertaken to eliminate the use of forced or child labour. As such, Paladin Labs has not identified any loss of income to the most vulnerable families resulting from any measure taken to eliminate the use of child or forced labour.

Training

As noted above, the Code governing Paladin Labs educates team members about the policies and standards expected around ethics, integrity, and compliance, including how to report concerns. Training under the Code is provided on an annual basis. The principles enshrined in the Code and the Supplier Code exemplify Endo's and Paladin Labs' commitment to compliance with legislation governing supply chain labour, health and safety standards and responsible sourcing, all of which includes the prevention of forced and child labour.

Assessing Effectiveness

Paladin Labs is committed to reviewing the effectiveness of existing measures to mitigate the risks of forced and child labour in its activities and supply chains. Paladin Labs is currently considering ways of implementing measures to accurately and thoroughly assess its effectiveness.

Signed Attestation

This Report was approved by the Board of Directors of Paladin Labs Inc. on May 30, 2024.

In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in the report for the entity or entities listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.

DATED as of May 30, 2024.

I have the authority to bind Paladin Labs Inc.

by



Name: Livio Di Francesco

Title: Vice President and General
Manager Paladin Labs Inc.