MODERN SLAVERY STATEMENT

This annual statement is made in accordance with Section 54(1) of the UK Modern Slavery Act 2015 (“the Act”). It sets out the steps Indivior has taken and will be taking to prevent modern slavery and human trafficking in its business and supply chain. It has been submitted to the UK government’s Modern Slavery Registry. This statement covers Indivior PLC and its relevant subsidiaries*. It is designed to assist stakeholders in searching for statements, and to compare the actions that businesses subject to the requirements of the Act are taking to identify and address the risks of modern slavery in their operations and supply chains.

About Indivior

Our vision is that the millions of people across the globe suffering from substance use disorders (SUD) and serious mental illness will have access to evidence-based treatment to change lives.

Building on its global portfolio of opioid use disorder (OUD) treatments, Indivior has a pipeline of product candidates designed to both expand on its heritage in this category and potentially address other chronic conditions and co-occurring disorders of SUD, including opioid overdose treatment, alcohol use disorder and cannabis use disorder. Headquartered in the United States in Richmond, Virginia, Indivior employs more than 1,000 individuals globally and its portfolio of products is available in 39 countries worldwide.

Indivior’s UK locations include offices in Slough and London. Indivior also operates a Fine Chemical Plant which manufactures buprenorphine and separately located research and development facilities in Hull, UK. Indivior also has US-based research and development facilities in Fort Collins, Colorado. Indivior maintains offices in several European countries, Canada, Australia and Israel.

Indivior maintains a premium listing on the London Stock Exchange where it is a member of the FTSE250 index. In September 2022, the Company received shareholder approval to facilitate an additional listing in the US, which is expected to take place in June 2023. Indivior has chosen NASDAQ as its U.S. trading venue. The additional listing is expected to elevate Indivior’s profile in its largest market and to attract a broader group of biopharma-focused investors and analysts.

Policy and Codes

Indivior believes that human rights are an absolute and universal standard. It is opposed to all forms of human slavery and trafficking and will not do business with any organisation that it knows to be involved in these activities.

The Group’s Code of Conduct, Doing The Right Things Right, includes a specific commitment to adhere to the provisions of the United Nations Universal Declaration of Human Rights and the Convention on the Rights of the Child, the OECD Guidelines for Multinational Enterprises and the UK Modern Slavery Act 2015. All employees receive induction training about these requirements before commencing work.

Indivior published its first Supplier Code of Conduct in 2021 and this is available for download at the Group’s website (www.indivior.com). It aligns the prohibition of forced and child labour and slavery with the responsible business standards that it expects from its suppliers. It also specifically refers to the UK Modern Slavery Act 2015 and stipulates that adherence to the Act is a mandatory supplier requirement.
Supply chain

Indivior’s supply chain consists of businesses involved in the manufacture, assembly, and distribution of its products. It also includes organisations and individuals that supply Indivior with a variety of business, transport and administrative services. Indivior’s manufacturing operations are performed at the Fine Chemical Plant in Hull and at contract manufacturers that are based in the United Kingdom and the United States. Both countries have strictly regulated business environments, with strong enforcement of anti-slavery laws. Consequently, Indivior believes that the risk of unidentified non-compliant behaviour by its supply chain manufacturing partners is low.

Indivior Global Integrity & Compliance Program

The main tenets of the Indivior Global Integrity & Compliance Program (IGICP) are ‘Learn, Adjust, Prevent’. This approach helps ensure that risks are promptly identified and mitigated proactively. It is further enabled by both an annual Risk Assessment and Mitigation Plan (RAMP) process and a focus on RiskIQ (i.e. risk awareness and application) as critical inputs of enterprise-wide functional business strategy and related execution.

Key IGICP elements are:

- Optimization of written policies, procedures, and standards of conduct;
- Training and educating the workforce;
- Maintaining open lines of communication;
- Completing the annual RAMP process;
- Monitoring and auditing;
- Promoting the EthicsLine (see below) for reporting of inquiries and concerns, and the related internal investigation process;
- Providing coaching and disciplinary processes, as well as corrective action to enhance the program, and
- Meeting the requirements of the 2020 Resolution Agreement between Indivior Inc, and Indivior PLC and the United States Attorney’s Office for the Western District of Virginia and the United States Department of Justice’s Consumer Protection Branch.

Further information can be found on pages 22 to 26 of the Indivior Sustainability Report 2021 which is available for download at the Group’s website (www.indivior.com).

Compliance reporting

Indivior has in place various resources that enable employees, suppliers and other stakeholders to raise ethics questions and compliance concerns about Indivior’s business activities or the conduct of its employees and contractors. Questions or concerns can be raised directly with the Chief Integrity & Compliance Officer at Compliance@indivior.com.

Another resource is the Indivior EthicsLine, an external telephone and web-based resource available 24 hours a day, seven (7) days a week. Any matter reported to Integrity & Compliance or through the EthicsLine is treated as confidentially as possible and is shared only with workforce members who need to know about these matters for the purposes of an investigation and, if appropriate, corrective action.
Risk and response

Indivior’s Enterprise Risk Management (ERM) process is designed to identify, assess, manage, report and monitor risks and opportunities that may impact the achievement of the Group’s strategy and objectives. This includes adjusting the risk profile in line with the Group’s risk appetite and tolerances to respond to new threats and opportunities. Further information about Indivior’s ERM can be found on pages 56 to 66 of Indivior’s 2022 Annual Report.

Indivior considers that the risk that slavery and human trafficking is taking place within its business or supply chain is low and has uncovered no evidence to indicate otherwise. Indivior will act immediately to redress any matter that indicates that this sort of activity is taking place.

Responsibility

The Directors and Executive Committee of Indivior are ultimately responsible for;

- Implementing this statement;
- Providing adequate resources and investment to minimize the risk of slavery and human trafficking taking place within the business or its supply chain;
- Ensuring Indivior’s approach is regularly reviewed, and
- Ensuring that the commitments outlined in this statement are adhered to.

Review publication and feedback

This statement is reviewed and published annually. Indivior welcomes feedback from any of its stakeholders concerning this statement and its approach to the issues that it addresses. This can be submitted through the contact details provided on the Indivior global website (www.indivior.com).

Approval

This statement was approved by the Board of Directors on May 4, 2023

Mark Crossley
Chief Executive Officer
Indivior PLC

* Indivior Global Holdings Limited, Indivior UK Limited and RBP Global Holdings Limited