

Vantive.com

UK Modern Slavery Act Statement: Financial Year 2025

INTRODUCTION AND STATUTORY REQUIREMENT

This Modern Slavery and Human Trafficking Statement is made by Vantive Limited under section 54 of the Modern Slavery Act 2015 for the financial year 2025. It describes the steps taken by Vantive Limited and, where relevant, the broader Vantive group of companies during the reporting period to prevent modern slavery and human trafficking in Vantive Limited's own operations and supply chains. For these purposes, "modern slavery" includes slavery, servitude, forced or compulsory labour, and human trafficking.

ORGANIZATION STRUCTURE AND BUSINESS

- Vantive Limited is the only legal entity within the Vantive group that operates in the United Kingdom and is the Vantive legal entity covered by this statement. Vantive Limited has one subsidiary, Vantive Limited Liability Company, which operates in Greece and has no UK operations.
- The business of Vantive Limited was formerly owned by Baxter. Vantive Limited was incorporated on July 5, 2023 (original name, BXT Renal Limited) and started operating on April 1, 2024.
- Vantive became a standalone group of companies on 1 February 2025. This is the first report filed by Vantive Limited, reflecting its MS measures and those of the Vantive group of companies.

ABOUT VANTIVE

Vantive is a global manufacturer and supplier of pharmaceutical products and medical devices. The Vantive group, including Vantive Limited, is committed to complying with applicable laws, rules and regulations and maintaining high standards of ethics and business conduct, including with respect to human rights. We do not tolerate any form of modern slavery in our operations or supply chains.

SUPPLY CHAINS

During the reporting period, Vantive Limited procured raw materials, products, equipment and services from Baxter and from a range of UK and non-UK suppliers. Those suppliers supported the manufacture, distribution and commercialization of pharmaceutical products and medical devices, as well as corporate functions such as logistics, facilities, professional services, technology and labour services. Vantive Limited was supported by supply arrangements established by Baxter and, as Vantive became a standalone group,

began transitioning to Vantive's own supplier management and responsible sourcing framework.

Our supply chain includes direct suppliers involved in product manufacture and distribution, as well as indirect suppliers that provide services necessary to our business operations. We recognize that modern slavery risks may arise at multiple tiers of a global supply chain, including through labour providers, logistics partners, raw material sourcing, and suppliers operating in higher-risk geographies or sectors.

In 2025, Vantive created a Supplier Code of Conduct to address sustainability and responsible business issues, including forced, bonded, indentured and child labour, employment standards, environmental requirements and business ethics. We expect suppliers to comply with the Supplier Code of Conduct, applicable law, and Vantive's human rights and ethical business expectations, and we seek to incorporate these expectations into supplier engagement and contracting processes where appropriate.

DUE DILIGENCE, RISK ASSESSMENT AND RISK MANAGEMENT

In 2025, Vantive began integrating its standalone supplier corporate responsibility strategy into its supplier management processes, including periodic assessments of key suppliers to evaluate cost, delivery, quality and risk. Vantive is developing a risk-based approach to modern slavery due diligence, prioritizing suppliers and categories by factors such as country risk, sector risk, product or material risk, use of labour intermediaries, workforce vulnerability, spend, criticality and prior compliance concerns.

We recognize that effective supply chain due diligence should focus on the areas of highest risk. We are committed to strengthening our risk assessment process by improving the quality of information we hold on supplier and sourcing risks, using information from supplier questionnaires, sustainability assessments, adverse media or sanctions checks, audits, supplier engagement and internal reporting. Where concerns are identified, Vantive will evaluate appropriate actions, which may include further due diligence, corrective action plans, enhanced monitoring, suspension of new business, or termination where a supplier is unwilling or unable to remediate serious issues.

Vantive's supplier sustainability programme is a key way in which we advance respect for human rights and address modern slavery risks. The programme includes surveying Vantive Limited's most critical suppliers to evaluate non-financial performance and conduct supplier corporate social responsibility risk assessments. The survey assesses whether participating suppliers have programmes to address human rights risks, including human trafficking, forced, bonded and child labour, and whether they have had relevant human

rights legislation violations, prosecutions, sanctions or other material compliance findings during the reporting year.

Vantive is working with EcoVadis, a globally recognized assessment platform, to assess participating suppliers' corporate responsibility programmes and performance in the areas of environment, labour and human rights, ethics and sustainable procurement. Through this programme, Vantive and participating suppliers can access scorecards identifying strengths, benchmark comparisons and improvement areas. We will use EcoVadis outputs and other due diligence information to develop corrective action plans for suppliers that fall below our performance standards and to determine when additional engagement or on-site audits are appropriate.

POLICIES AND STANDARDS

Vantive's Human Rights Policy sets out Vantive's overarching commitments on human rights, including the prohibition of modern slavery and respect for internationally recognized labour standards. Vantive's Code of Conduct defines the core principles that govern employee behavior and business conduct and provides tools and resources to help employees comply. These policies are supported by ethics and compliance procedures, procurement standards, supplier expectations and reporting channels.

Vantive Limited also maintains local processes to prevent illegal working, including right-to-work checks for employees. For contract workers, Vantive Limited uses preferred labour hire agencies. During the reporting period, these agencies were subject to Baxter's due diligence and review processes before and during the contractual relationship. As Vantive transitions to standalone operations, Vantive Limited will continue to review labour providers and other higher-risk suppliers against Vantive's standards and applicable legal requirements.

Vantive has incorporated rules against all forms of modern slavery into its mandatory Ethics and Compliance Standards for Suppliers. These standards prohibit suppliers from violating laws governing workers' human rights, trafficking and slavery and require suppliers to conduct business in a lawful, ethical and responsible manner.

EFFECTIVENESS AND KEY PERFORMANCE INDICATORS

Vantive monitors and intends to strengthen its assessment of the effectiveness of its modern slavery programme through qualitative and quantitative measures. These measures may include the number and proportion of key suppliers assessed through EcoVadis or equivalent processes, the number of supplier corrective action plans opened and closed, completion rates for relevant ethics and compliance training, the number of modern slavery or human rights concerns reported through the Ethics and Compliance

Helpline, and progress in integrating Vantive's standalone supplier corporate responsibility processes following separation from Baxter.

TRAINING AND AWARENESS

All Vantive employees are required to comply with Vantive's Code of Conduct. The company conducts mandatory ongoing training and maintains a Code of Conduct intranet site to keep employees informed of Vantive's ethics and compliance requirements and expectations. Vantive will continue to evaluate whether additional targeted training is appropriate for employees in higher-risk functions, including Procurement, Human Resources, Sustainability, Legal, Quality, Supply Chain and employees who manage supplier relationships or labour providers.

REPORTING AND GRIEVANCE MECHANISMS

Vantive's Ethics and Compliance Helpline is the primary channel for employees and others to raise concerns regarding any alleged contraventions of our integrity standards. The helpline enables employees to raise concerns, including concerns relating to human rights or modern slavery, confidentially and without fear of retaliation. External stakeholders, including suppliers and supplier workers, can also use the Helpline to report human rights concerns.

Vantive maintains a non-retaliatory environment and does not tolerate retaliation against anyone who reports, in good faith, observed or suspected illegal or unethical behaviour or violations. Reports are reviewed through established ethics and compliance processes and, where appropriate, escalated to relevant functions for investigation, response and remediation.

REMEDIATION

Vantive Limited did not identify any instances of modern slavery within its business or supply chain during the reporting period. If Vantive identifies modern slavery or a credible risk of modern slavery in its operations or supply chain, Vantive will seek to respond in a manner that prioritizes the safety, dignity and rights of affected individuals. Depending on the circumstances, this may include working with suppliers on corrective action, engaging appropriate expert or local support, reviewing contractual remedies, preserving access to grievance channels, and escalating matters to appropriate authorities where required or appropriate.

GOVERNANCE AND ACCOUNTABILITY

Vantive's approach to modern slavery risk is supported by cross-functional collaboration among Procurement, Human Resources, Sustainability, Legal, Quality, Supply Chain and

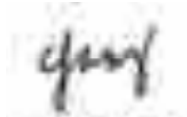
other relevant business functions. Vantive Limited's Board of Directors reviews and approves this statement, and relevant functions are responsible for implementing policies, supplier management processes, training, reporting and remediation activities within their areas of responsibility.

CONCLUSION

Vantive Limited is committed to continual improvement in its approach to managing modern slavery risk. This commitment requires cross-functional collaboration involving Procurement, Human Resources, Sustainability, Legal, Quality, Supply Chain and other relevant functions. During the next reporting period, Vantive Limited intends to continue integrating Vantive's standalone supplier corporate responsibility processes, expanding risk-based supplier assessments, strengthening corrective action and audit processes for higher-risk suppliers, reviewing the effectiveness of training and reporting channels, and enhancing the use of measurable indicators to evaluate progress.

This statement was reviewed and approved by the Board of Directors of Vantive Limited and will be published on Vantive's website with a prominent link from the relevant homepage or modern slavery statement page.

Signature:

A handwritten signature in black ink, appearing to read 'C. Boa', is placed over a faint rectangular grid background.

Name: Cassandra Boa

Title: Director

Date: June 30, 2026

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