CLINUVEL PHARMACEUTICALS LIMITED
MODERN SLAVERY STATEMENT 2026

Introduction

CLINUVEL PHARMACEUTICALS LIMITED ACN 089 644 119 (CLINUVEL) is a public company, incorporated in Australia and listed on the Australian Securities Exchange (ASX:CUV). CLINUVEL's registered office is Level 22, 535 Bourke St, Melbourne, Victoria, 3000, Australia.

CLINUVEL has the following subsidiaries:

Name of Entity	% of Share Capital	Place of business/ Country of Incorporation
CLINUVEL (UK) LTD	100%	United Kingdom
CLINUVEL, INC	100%	United States of America
CLINUVEL AG	100%	Switzerland
CLINUVEL SINGAPORE PTE LTD	100%	Singapore
VALLAURIX PTE LTD	100%	Singapore
CLINUVEL EUROPE LIMITED	100%	Ireland
VALLAURIX MC SARL	100%	Monaco
A.C.N. 108 768 896 Pty Ltd	Deregistered in 2025	Australia

This is CLINUVEL's second modern slavery statement and sets out the actions the Company has undertaken to assess and address modern slavery risk in our operations and supply chains during the year ended 30 June 2026

Operations and supply chains

CLINUVEL is a global biopharmaceutical company focused on developing and delivering innovative therapies for patients with genetic, metabolic, and dermatological disorders. The Company's portfolio is centred around melanocortin peptides, with programs advancing in photomedicine and vitiligo. CLINUVEL is listed on the Australian Securities Exchange (ASX: CUV) and the Nasdaq Stock Market (Nasdaq: CUVL).

CLINUVEL's lead therapy, SCENESSE® (afamelanotide 16mg), is approved for commercial distribution in Europe, the USA, Canada, Israel, and Australia as the world's first systemic photoprotective drug for the prevention of phototoxicity (anaphylactoid reactions and burns) in adult patients with erythropoietic protoporphyria (EPP).

The principal activities of the Group were to:

- manufacture and commercially distribute its prescription pharmaceutical SCENESSE® in the jurisdictions specified above for the treatment of the rare, genetic metabolic disorder EPP;
- research and develop SCENESSE® as a medicinal therapy to treat a range of severe disorders, particularly vitiligo;

- develop and manufacture NEURACTHEL® (adrenocorticotropic hormone; ACTH) in different formulations, to target neurological, endocrinological, and degenerative disorders;
- research, develop, manufacture and pre-launch non-prescription, PhotoCosmetic products for individuals and populations at highest risk of exposure to ultraviolet (UV) and high energy visible (HEV) light, and in need of assistance in DNA repair and melanogenesis of the skin;
- develop and investigate new pharmaceutical formulations incorporating melanocortin technology for the treatment of a range of disorders; and
- expand the Group by identifying and attracting new professional talent.

CLINUVEL's supply chains include:

- Goods and services provided to deliver our research and development activities, such as pre-clinical and clinical trial support, expert regulatory, research and laboratory services.
- Goods and services provided to manufacture, store and deliver our commercial drug products required for the treatment of patients, such as pharmaceutical ingredients, packaging, transportation and warehousing.
- Goods and services provided to manufacture, store and deliver our commercial cosmetic products, such as cosmetic ingredients, packaging, transportation and warehousing.
- Goods and services provided to manufacture, store and deliver our exploratory drug and cosmetic products required for our clinical trial research and development programs, such as pharmaceutical ingredients, packaging, transportation and warehousing.
- Goods and services provided as support for corporate services, including IT, finance, tax, legal and human resources.

Risks of modern slavery practices in operations and supply chains

During the reporting period, we reviewed our operations and supply chains to identify and assess modern slavery risks and have assessed the following key areas.

<u>Workforce</u>

We acknowledge some less developed countries are associated with higher risks of modern slavery, due to relatively poor governance, weak rule of law, civil conflict, migrant flows and socio-economic factors like poverty.

CLINUVEL's direct operations and geographic footprint are in Australia, Singapore, Western Europe and the United States. We consider the risk of modern slavery in our directly employed workforce to be low, due to the developed nature of the economies and the regulated nature of the pharmaceutical industry in our countries of operation. Our employees are also highly educated and skilled and enjoy competitive remuneration packages and employment conditions which support flexible working arrangements to maintain work-life balance. In addition, the size of our workforce is relatively small atless than 100 people providing manageable visibility of their working conditions and experience.

CLINUVEL is committed to respecting the human rights and freedom of association of employees and exceeds the minimum labour standards expected of an employer. We are committed to equality of opportunity regardless of gender, gender identification, sexual orientation, race and ethnicity,

religion and beliefs, disability, age and socio-economic status and background. This has resulted in diversity in our workforce, a key indicator of an equitable and fair approach to employees.

Suppliers

The risk of modern slavery increases as we engage with third parties.

We recognise the potential risk of CLINUVEL contributing to modern slavery as a result of the geographic location of contract manufacturers or suppliers of ingredients and components used to manufacture our products and conduct clinical research activities and laboratory services. Most of CLINUVEL's suppliers of these goods and services are based in the regions of North America, Western Europe and Asia. Whilst no sector is immune to modern slavery risk, there are generally higher modern slavery risks in the manufacture of electronics, garments and consumables which are not procured by CLINUVEL, compared to the pharmaceuticals sector which requires higher educated and skilled workers.

CLINUVEL requires third party manufacturers to be compliant with the US Food and Drug Administration (FDA) Good Manufacturing Practice (GMP) procedures.

Actions taken to assess and address modern slavery risks

Actions taken during this first reporting period to assess modern slavery risks include:

- undertaking a high-level risk assessment of CLINUVEL's operations and supply chain;
- diligence on the facilities, organisations and of key suppliers in North America, Asia and Western Europe and visually inspected their working conditions and held discussions with key personnel; and
- undertaking internal reviews of suppliers particularly to assess their historical record of acceptable workforce relations.

CLINUVEL has increased its governance around modern slavery by developing a framework around the key areas: governance, risk assessment, monitoring, reporting and oversight.

CLINUVEL has a Whistleblower Policy, which is published on its website and provides an avenue for raising and addressing any concerns or risks, including in our supply chain.

The Company also has other corporate governance policies in place, including a Code of Conduct, Anti-bribery and Corruption, Risk Management policy and Company values, which are most relevant to preventing Modern Slavery.

CLINUVEL employees receive training on the corporate governance policies.

Effectiveness of actions taken

During this reporting period, CLINUVEL focused on gaining an understanding of our modern slavery risks and identifying the risks that may be present in our operations and supply chains. Our overall assessment is that the modern slavery risks associated with our business are relatively low in the developed jurisdictions in which we conduct business. They could potentially rise to moderate in less developed and regulated jurisdictions, however, in this regard, the visitations undertaken to key suppliers provide us insight into the acceptable nature of their conduct and engagement of their respective workforces. During these investigations, we recognise that our review and assessment of actions to identify and address modern slavery risks will be an ongoing process. We will continue to work on developing frameworks and processes to ensure we can review the effectiveness of actions we take to assess and address modern slavery risks in our operations and supply chains.

Consultation and approval

We consulted the relevant companies we own or control in the development of this Modern Slavery Statement.

This Modern Slavery Statement is made in accordance with the Modern Slavery Act 2018 (Cth). This statement was approved by the Board of Directors of CLINUVEL PHARMACEUTICALS LIMITED in their capacity as principal governing body of CLINUVEL PHARMACEUTICALS on 27 August 2026.