Version 1.0



MODERN SLAVERY
POLICY





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## 1. PURPOSE

- 1.1. Advanced Genomics and its subsidiaries (together referred to as 'the company') are committed to acting ethically and with integrity in all of our business dealings. We want to ensure that modern slavery is not taking place anywhere in our business or in our supply chains. We also want to ensure that there is transparency in our own business, and in our approach to tackling modern slavery throughout our supply chains.
- 1.2. Modern slavery is a crime and a violation of fundamental human rights. When we talk about modern slavery we mean when an individual is exploited by others, for personal or commercial gain, whether tricked, coerced, or forced, they lose their freedom.
- 1.3. The purpose of this policy is to:
  - 1.3.1. set out our responsibilities, and of those working for and on our behalf, in observing and upholding our position on modern slavery; and
  - 1.3.2. provide information to those working for and on our behalf on how to identify and report concerns regarding modern slavery.
- 1.4. In the UK, the act of human trafficking and modern slavery are set out in the Modern Slavery Act 2015.

## 2. SCOPE

- 2.1 This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, contractors, external consultants, third-party representatives and business partners.
- 2.2 This policy applies to Advanced Genomics Limited (AGL) and any of its subsidiaries (together referred to as 'the company').

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2.3 Where this policy refers to the company, such reference shall be read as including any and all of its subsidiaries (Nonacus, Informed Genomics and Advanced Genomics APAC).

## 3. REFERENCED DOCUMENTS

- 3.1 Anti-Bribery and Corruption Policy (AGL\_POL\_046)
- 3.2 Gift and Hospitality Policy (AGL\_POL\_48)
- 3.3 Whistleblowing Policy (AGL\_POL\_052)

#### 4. **DEFINITIONS**

**Modern slavery** includes but is not limited to human trafficking, forced labour and debt bondage. All forms of modern slavery involve the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

**Debt bondage** is the world's most widespread form of slavery and describes a situation where people are trapped in poverty to borrow money and are forced to work to pay off the debt, losing control over both their employment conditions and the debt.

**Human trafficking** shall mean the recruitment, transportation, transfer, harbouring or receipt of persons, by means of the threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control of another person, for the purpose of exploitation.

## 5. AUTHORITY

5.1 The AGL Board of Directors ('the Board') has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it. The Board has delegated its day-to-day operation of this policy to the Chief Executive Officer.

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- 5.2 The Chief Executive Officer has overall responsibility for the implementation of this policy. He will be assisted by:
  - 5.2.1 the Director of Operations in appointing suppliers in accordance with this policy;
  - 5.2.2 the Chief Financial Officer in ensuring internal control systems and procedures are audited to ensure they are effective in countering modern slavery; and
  - 5.2.3 the Legal Counsel in dealing with any queries about the content of this policy and ensuring appropriate contractual clauses are in place throughout the supply chain.
- 5.3 Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training (commensurate with their role) on the issue of modern slavery in supply chains.
- 5.4 It is a criminal offence to facilitate or assist in any form of modern slavery.

#### 6. YOUR RESPONSIBILITIES

- 6.1 You must ensure that you read, understand and comply with this policy.
- 6.2 Training on this policy, and on the risk our business faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work for us, and regular training for staff involved in the supply chain will be provided as necessary.
- 6.3 Preventing, detecting and reporting modern slavery in any part of our business or supply chains is the responsibility of all of us. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.
- 6.4 You must notify your line manager as soon as possible if you believe or suspect that a breach of this policy has occurred or may occur in the future.
- 6.5 You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage.

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- 6.6 If you are unsure about whether a particular act, the treatment of workers or their working conditions any of our supply chains constitutes modern slavery, raise it with your line manager or the Legal Counsel.
- 6.7 The company aims to encourage openness and will support anyone who raises genuine concerns in good faith under this policy. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting a suspicion in good faith that modern slavery is or may be taking place. Detrimental treatment means other unfavourable treatment connected with raising a concern. Dismissal, disciplinary action, or threats are examples of detrimental treatment. If you believe that you have suffered any detrimental treatment, you should inform the Chief People Officer or the Legal Counsel immediately.

# 7. COMPLIANCE

- 7.1 We are committed to addressing the issue of modern slavery in our business and supply chains and will ensure this is communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate on an ongoing basis. This includes, but is not limited to the inclusion of relevant terms of engagement in our supply agreements and publication of this policy on relevant websites.
- 7.2 Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.
- 7.3 We may terminate our relationship with other individuals and organisations working on our behalf who are in breach of this policy.