

## **Shandon Diagnostics Limited Modern Slavery Act Statement for the financial year ending 31st March 2025**

This statement (“**Statement**”) is made pursuant to Section 54 of the United Kingdom Modern Slavery Act 2015 (the “**Act**”), and sets out the approaches Shandon Diagnostics Limited has adopted to prevent slavery and human trafficking in our supply chains and in any part of our business. Shandon Diagnostics Limited is a fully owned subsidiary of EpreDia Holdings Corporation, a member of the PHC Group. For the purposes of this Statement, Shandon Diagnostics Limited shall be referred to as “**EpreDia**”.

### **INTRODUCTION**

EpreDia seeks to combat the risks of modern slavery and human trafficking within our supply chains and operations. We expect our contractors, suppliers, and other business partners to provide their services ethically and to the same high standards of integrity. EpreDia supports and endeavours to adhere to the Act and equivalent anti-slavery and human trafficking laws in effect in the countries where we operate and provide our products.

### **OUR STRUCTURE AND SUPPLY CHAINS**

As part of our mission to improve patient lives, EpreDia manufactures and sells instruments and consumables for precision cancer diagnostics worldwide through distributor and intercompany sales channels. We are committed to acting ethically and respecting human rights throughout our organization and in our business relationships.

The supply chain that supports our business comprises a wide range of suppliers, from small/medium enterprises (SMEs) to global corporates, including products and services from manufacturing, IT hardware and software, maintenance, recruitment agents, and cleaning services.

The range of products/services in our supply chain and the wide range of jurisdictions in which these are sourced mean that we consider the tiers below our immediate suppliers to be our primary area of risk from a forced labour perspective. In relation to this risk, EpreDia has introduced new processes to assess its key suppliers against corporate social responsibility requirements, with actions taken as required.

### **OUR PROCUREMENT**

EpreDia is a global business which procures goods and services from more than 600 suppliers across the world. In 2024, EpreDia spent over \$140 Million with these suppliers. We maintain a robust Procurement governance structure that provides oversight of activities with suppliers, helping to minimise risks and maximise opportunities, to address shared impacts.

With a global footprint, we have an opportunity to continue to leverage our suppliers for positive impacts in Environmental, Social and Governance priorities.

Our management approach, and applicable policies and standards, including our Third-Party Due Diligence and recently updated Code of Conduct, place particular importance on supply chain sustainability and resilience. To support these policies we work with a third-party vendor to identify, assess, and mitigate risks including terrorism and trafficking risk, and human rights risk.

### **DUE DILIGENCE PROCESSES**

EpreDia endeavours to develop and monitor its policies and procedures aimed at enhancing integrity and ethical behaviour to be consistent with the contemporary state of applicable laws and regulations, as well as good industry practice. Additionally, our standard contracts with suppliers and business partners include provisions that all parties will comply with all applicable laws. EpreDia also implements third party due diligence screenings of certain new and current suppliers, distributors, and other business partners to confirm none have been convicted of offenses related to modern day slavery or human trafficking, and to assess whether suppliers, distributors, and other business partners have appropriate policies in place.

EpreDia encourages all workers to report any suspected violations and concerns in the workplace without threat of reprisal, intimidation, or harassment. We require suppliers to investigate and take corrective action on reported concerns if needed.

### **RISK ASSESSMENT AND MANGEMENT**

In addition to the aforementioned policies, EpreDia performs factory audits as necessary and when working with a new supplier. During these audits, which are conducted in conjunction with engineering and supplier quality, EpreDia reviews whether suppliers can demonstrate compliance with the principles set forth above.

## OUR POLICIES

To uphold and embed our commitment to respecting human rights throughout our organisation and in our business relationships, EpreDia adheres to the following principles when conducting its business activities and expects its suppliers to abide by the same:

- Compliance with Applicable Laws: We comply with all applicable laws, regulations, rules, guides, ordinances, and legal standards.
- Child Labour: We do not employ or use under-aged labour as described in Minimum Age Convention 138 and Worst Forms of Child Labour Convention 182 of the International Labour Organization.
- Forced Labour/ Prison Labour/ Trafficking in Persons:
  - We do not make use of forced or compulsory labour as described in Article 2 in the Forced Labour Convention 29 and Article 1 in the Abolition of Forced Labour Convention 105 of the International Labour Organization.
  - We comply with all applicable labour laws, rules, and regulations, including but not limited to, all laws forbidding the solicitation, facilitation, or any other use of slavery, servitude, forced or compulsory labour or human trafficking, or sex trafficking, as those terms are used in the US laws, California Transparency in Supply Chains Act of 2010, California Civil Code, section 1714.43, the UK Modern Slavery Act 2015, and FAR 52.222-50, Combating Trafficking in Persons.
  - We do not retain or withhold any worker's original identity documents or restrict access to such documents or require workers to pay any monetary deposits for the purpose of obtaining employment. If any personal loans are offered to workers as part of their compensation or pursuant to company policy, the repayment terms should not be construed as debt bondage or forced labour.
- Fair Treatment: We provide a workplace free of harsh and inhumane treatment, including any sexual harassment, sexual abuse, corporal punishment, mental or physical coercion or verbal abuse and no threat of any such treatment (taking into account the UK's new legal duty to take reasonable steps to prevent sexual harassment and create a safe working environment).
- Wages, Benefits and Working Hours: We pay workers according to applicable wage laws, including minimum wages, overtime hours and mandated benefits. We communicate with workers in a timely manner regarding the basis on which they are being compensated, whether overtime is required, and the wages to be paid for such overtime.
- Freedom of Association:
  - We encourage open communication and direct engagement with workers to resolve workplace and compensation issues.
  - Workers are able to communicate openly with management regarding working conditions without threat of reprisal, intimidation or harassment.
  - We respect the rights of workers, as set forth in local laws, to associate freely, join labour unions, join workers' councils, and seek representation.

We respect, within the framework of local laws and established practices, the principles of Article 2 in the Freedom of Association and Protection of the Right to Organize Convention 87 and Articles 1 and 2 in the Right to Organize and Collective Bargaining Convention 98 of the International Labour Organization.

## MEASURING EFFECTIVENESS

To ensure EpreDia and its business partners are committed to protecting and advancing human rights, we:

- review our current supply chains and re-evaluate risks;
- conduct audits where suppliers demonstrate their adherence to EpreDia policies;
- maintain a robust internal reporting system through a compliance helpline, which is readily available to all employees; and
- expect our suppliers 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.

## TRAINING

As part of EpreDia's commitment to combat modern day slavery and human trafficking throughout our organization and supply chains, we provide regular trainings to personnel to ensure that our values are fully communicated and followed, including training on our refreshed Code of Conduct.

## CONCLUSION

EpreDia is committed to upholding the highest respect for human rights throughout its business operations and supply chains. As part of PHC Holdings Corporation, a continuous improvement company, we will update and improve our policies and procedures on an ongoing basis. This includes updates to reflect the UK Government's recent guide about transparency in supply chains. We will also report on our progress through subsequent versions of this Statement on a yearly basis.

This Statement has been reviewed and approved by the Shandon Diagnostics Limited Board.

on **24 June** 2025.



*Electronically signed by: Ian  
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Date: Jun 24, 2025 09:11  
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Ian Weir  
Director, Shandon Diagnostics Limited