

OXFORD NANOPORE TECHNOLOGIES PLC

Modern Slavery Statement 2023

Modern Slavery Statement **for the financial year ended 31 December 2023**

The Modern Slavery Act 2015 is designed to tackle modern slavery in the UK and consolidates previous offences relating to trafficking and slavery. Modern slavery takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking. All forms of modern slavery deprive a person's liberty in order to exploit them for personal or commercial gain.

This Modern Slavery Statement is published in accordance with section 54 of the Modern Slavery Act 2015 and sets out the steps taken by Oxford Nanopore Technologies plc ("**Oxford Nanopore**" or "**we**") during the financial year ended 31 December 2023 to prevent modern slavery and human trafficking in its business and supply chains. This Modern Slavery Statement also identifies Oxford Nanopore's plans to continuously tackle any signs of modern slavery of which it may become aware.

This statement also applies to all subsidiaries of Oxford Nanopore whether incorporated inside or outside of the UK.

Organisational structure and supply chains

Our goal is to bring the widest benefits to society through enabling the analysis of anything, by anyone, anywhere. Oxford Nanopore has developed a new generation of nanopore-based sensing technology that is currently used for real-time, high-performance, accessible and scalable analysis of DNA and RNA. Our technology is used across a broad range of applications such as human genetics, disease surveillance, cancer research, biodiversity monitoring, agriculture, and food safety.

Oxford Nanopore has over 1200 employees across multiple disciplines including nanopore science, molecular biology and applications, informatics, engineering, electronics, manufacturing, corporate and commercialisation.

We sell to customers in more than 120 countries globally. Its head office is in Oxford, and it also has satellite offices in the UK, EU, US, China, Japan, Australia, Netherlands, UAE and Singapore. Oxford Nanopore has a manufacturing facility based in Harwell, UK which incorporates highly-automated production processes.

Oxford Nanopore has developed and implemented protocols that are designed to exclude slavery, human trafficking, child labour and any other abuse of human rights in its business and to the extent feasible its supply chain. Oxford Nanopore's suppliers may include the suppliers of the raw materials, electrical components and microchips for its products; suppliers

to its office premises including general office supplies, caterers and cleaners and professional services suppliers. As a rapidly growing company, it is continually evolving and integrating effective systems, controls and policies.

Supplier due diligence and risk assessment

We expect our suppliers to adhere to our own high ethical standards and asks request new suppliers to sign a business conduct statement which confirms, amongst other things, compliance with all applicable laws (including anti-corruption and anti-bribery legislation), respect for the human rights of employees, a prohibition of child labour, a commitment to ensuring the health and safety of all employees and obligations surrounding their own supply chain (including an obligation, where practicable, to direct their supply chain to adhere to the conduct statement). In addition to the business conduct statement, our standard terms for key suppliers imposes a contractual obligation on suppliers to comply with all applicable laws when carrying out their services and/or supplying products and a corresponding right to terminate with immediate effect if the supplier is found to be in breach of any applicable laws.

Oxford Nanopore assesses and monitors both prospective suppliers and its key suppliers using the Global Slavery Index alongside the Corruption Perceptions Index, to ensure that it is aware of any suppliers which would pose a heightened risk of modern slavery or human rights abuses or pose a higher risk for other reasons, such as operating in jurisdictions which have a reputation for bribery and corruption or have a reputation for facilitating financial crime.

Appropriate and proportionate measures are taken based on the results of the assessment which may range from refusing to engage with a prospective supplier, requesting additional information to be disclosed by the supplier, conducting audits and a more detailed review of the supplier's own supply chain. In the event of a serious breach of human rights and/or modern slavery legislation by a supplier, Oxford Nanopore would cease trading with such supplier as soon as reasonably possible.

We have due diligence software in place, used to undertake reviews of all publicly available information to assist in developing supplier risk profiles across several key categories (including modern slavery, human rights and labour).

To ensure that this risk is minimised, we risk profile our suppliers and only source components from high-risk suppliers/industries where the supplier is trusted and has been through their own audit and compliance processes. Oxford Nanopore does not knowingly use any suppliers who purchase from the "grey market" where products are sold in non-approved distribution channels. Oxford Nanopore also has a conflict minerals policy in place,

further cementing its commitment to sustainable and ethical sourcing throughout the supply chain.

Key suppliers are re-evaluated on an annual basis and asked to complete an annual compliance declaration form.

Compliance with our Code of Conduct

During 2023, Oxford Nanopore introduced a new Code of Conduct which is published on our website at <https://nanoporetech.com/sites/default/files/s3/terms/ONT-Code-of-Conduct-2023.pdf>.

The Code of Conduct applies to all directors, employees, consultants, and temporary workers of Oxford Nanopore, and applies principles to help guide us to act legally, ethically, and in line with stakeholder expectations.

Key Performance Indicators

For the next financial year, Oxford Nanopore has introduced three key performance indicators as part of its commitment to tackling modern slavery:

1. Perform sanctions checks on all Tier 1 suppliers
2. Review any issues escalated asserting any potential modern slavery issues using the Company's internal whistleblowing procedures and the Company's external hotline Safecall
3. Completion of modern slavery training for all employees, including new joiners

Policies and Training

Oxford Nanopore operates a number of internal policies to promote ethical and transparent practices in its business. These include a code of conduct, whistleblowing policy, anti-corruption and bribery policy, anti-bullying and harassment policy and equality and diversity policy.

Oxford Nanopore's whistleblowing policy includes a number of available resources which employees can use to report any modern slavery concerns. In addition to a variety of internal contact points for submitting a whistleblowing report, Oxford Nanopore uses an external provider, SafeCall, for any employees who feel more comfortable reporting to an independent third party. Oxford Nanopore did not receive any whistleblowing reports or complaints relating to modern slavery for this financial year, however, any whistleblowing reports will always be closely tracked and monitored.


Oxford Nanopore intends to fully comply with applicable human rights legislation in the countries in which it operates, which includes upholding freedom of association and the right to collective bargaining, equal remuneration and protection against discrimination.

Oxford Nanopore promotes a culture of encouraging anyone to speak up when they have a concern. It has a whistleblowing policy in place where people can raise any concerns in any area including modern slavery. Concerns can be raised either internally or externally via SafeCall, its confidential third-party whistleblowing service.

As part of Oxford Nanopore's employee onboarding programme, all new employees receive specific training in areas encompassing, among others, anti-bribery and corruption, anti-facilitation of tax evasion, modern slavery and whistleblowing.

All employees who engage in purchasing activities are trained on the Modern Slavery Act and both the company's and their own responsibilities. Oxford Nanopore will periodically review its training programme, including the provision of enhanced modern slavery training for those directly involved in purchasing.

The statement was approved by the Board on 14 March 2024.

Signed:  _____

Dr Gordon Sanghera
Chief Executive Officer