

## **Shandon Diagnostics Limited Modern Slavery Act Statement for the financial year ending 31st March 2026**

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 Epreia Holdings Corporation, a member of the PHC Group. For the purposes of this Statement, Shandon Diagnostics Limited shall be referred to as “**Epreia**”.

### **INTRODUCTION**

Epreia 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. Epreia 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. We are committed to acting ethically and respecting human rights throughout our organisation and in our business relationships.

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

PHC is a global healthcare company employing more than 8,000 people across a number of subsidiaries worldwide. As a member of the PHC Group, Epreia develops, manufactures and supplies instruments and consumables for precision cancer diagnostics with the mission to improve patients’ lives. We serve customers globally through a network of distributors and intercompany sales channels. In the United Kingdom, Epreia employs more than 200 employees.

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.

We categorise our suppliers into three tiers according to their proximity to Epreia and their potential risk profile. Tier 1 suppliers are direct suppliers with whom Epreia has a contractual relationship. Tier 2 suppliers are any indirect suppliers. Tier 3 suppliers are all other suppliers further removed from Epreia.

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 direct suppliers to be our primary area of risk from a forced labour perspective. In relation to these risks, Epreia has introduced new processes to assess its key suppliers against corporate social responsibility requirements, with actions taken as required.

### **OUR PROCUREMENT**

Epreia is a global business which procures goods and services from more than 1000 direct and indirect suppliers across the world. In FY 25/26, Epreia spent over \$127 Million with these suppliers. We maintain a robust Procurement governance structure that provides oversight of activities with suppliers, helping to minimise risks.

With a global footprint, we have an opportunity to continue to leverage our suppliers for positive impacts in Environmental, Social and Governance (ESG) priorities. Since our previous Modern Slavery Act statement, we have strengthened this approach by further investing in ESG, demonstrating the importance of human rights oversight.

Epreia recognises that purchasing practices, pricing pressures and delivery expectations can influence labour conditions within supply chains. To mitigate these risks, procurement decisions are not based solely on cost considerations and are supported by supplier due diligence, risk assessments and ongoing supplier engagement.

### **OUR POLICIES**

Our management approach, and applicable policies and standards, including our third-party due diligence policies and processes, updated Code of Conduct, and recently updated Third-Party Code of Conduct, place 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.

## Code of Conduct

As part of the PHC Group, we subscribe to the values and principles set out in the PHC Group Code of Conduct. These include acting with integrity and ethical behaviour at all times, and complying with the expected standards of honesty, fairness, and transparency.

In accordance with the Code of Conduct, we are committed not only to preventing direct human rights violations within our business activities, but also to identifying, mitigating, and preventing potential adverse human rights impacts arising through our supply chain and other business relationships. We therefore prohibit all forms of exploitative labour practices, including child labour, forced labour, bonded labour, and human trafficking, and are committed to promoting fair, safe, and ethical working conditions throughout our operations and supply chains.

## Human Rights Policy

To further strengthen our commitment to human rights and the prevention of modern slavery, the PHC Group has adopted a dedicated Human Rights Policy. The Policy governs human rights across our operations and value chain, including the prohibition of forced labour, child labour, human trafficking, discrimination, harassment, and other forms of exploitative or abusive practices. It also sets expectations for suppliers and business partners, supported by training, reporting mechanisms, and appropriate remediation processes.

## Third Party-Code of Conduct

Additionally, the PHC Group has developed a Third-Party Code of Conduct. Third parties include suppliers, contractors, distributors, and other business partners. The Code was developed in alignment with internationally recognised frameworks, including the OECD Due Diligence Guidance for Responsible Business Conduct and the UN Guiding Principles on Business and Human Rights.

The Code covers a range of topics, as detailed in the Third-Party Code of Conduct, including:

- Compliance with applicable laws, regulations, and collective bargaining agreements
- Risk-based due diligence to identify, prevent, and address adverse impacts across operations and supply chains
- Labour and human rights, including the prohibition of forced labour and child labour
- Fair employment practices, including wages, benefits, working hours, non-discrimination, and freedom of association
- Occupational health and safety, including emergency preparedness, workplace safety, and worker wellbeing
- Ethical business conduct

Third parties are expected to comply with this Code and promote comparable standards across their supply chains and business relationships.

## Principles

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

- Compliance with Applicable Laws: We seek to 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.

To communicate these policies internally, EpreDia provides training as described below. To improve further, we are developing an internal Human Rights Policy to explicitly address modern slavery and other human rights risks. The policy will clearly outline the standards of behaviour expected from our employees and will support our commitment to conducting business responsibly and ethically.

## **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.

In accordance with our standard contract terms, if we were ever made aware of a supplier's failure to adhere to, or implement, the principles above, we would be entitled to terminate the contract with the relevant supplier.

## **DUE DILIGENCE PROCESSES**

As part of our standard terms and conditions for the purchase of goods and services across EMEA and APAC, suppliers are required to comply not only with the laws and regulations applicable in the jurisdictions in which they operate, but also with internationally recognised labour standards, including the principles established by the International Labour Organization (ILO). These contractual requirements address issues including wages and benefits, working hours, working conditions, social protections, and freedom of association. Suppliers are also required to prohibit the use of forced labour, child labour and human trafficking within their own operations and, where applicable, throughout their supply chains and subcontracting arrangements.

Beyond contractual requirements, 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 offences 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.

To date, Epreia has not identified or received any reports of modern slavery, forced labour or human trafficking within its operations or supply chain. We remain committed to continually monitoring and assessing potential risks through our due diligence processes and supplier engagement activities.

## MEASURING EFFECTIVENESS

To ensure Epreia 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 Epreia 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 Epreia's commitment to combat modern day slavery and human trafficking throughout our organisation 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.

## EXTERNAL LINKS

For additional information regarding the matters outlined above, you may refer to the links provided below.

### Corporate Information

- PHC Group Corporate Overview  
<https://www.phchd.com/global/about/overview>
- Epreia Company Overview  
<https://www.epredia.com/about>

### Policies and Governance

- PHC Group Code of Conduct  
<https://www.phchd.com/en/phchd/sustainability/governance/code-of-conduct>
- PHC Group Third Party Code of Conduct  
<https://www.phchd.com/en/phchd/news/2026/1001>
- PHC Group Human Rights Policy  
<https://www.phchd.com/global/sustainability/social/humanrights>
- Epreia Conditions of Purchase  
<https://www.epredia.com/terms-of-purchase>

### Reporting and Speak-Up Mechanisms

- PHC Group Compliance Helpline  
<https://www.phchd.com/global/sustainability/governance/helpline>
- Epreia Compliance Reporting Portal  
<https://www.epredia.com/report-a-compliance-incident>

## CONCLUSION

Epreia 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. In accordance with the UK Government's Transparency in Supply Chains guidance, this Statement has been updated to provide more detailed information on the matters identified as relevant to modern slavery risk management and to enhance transparency across our operations and supply chains. We recognise that preventing modern slavery requires continuous improvement and ongoing engagement with our business partners.

We continue to provide information and training to employees and communicate our expectations to suppliers and business partners to support compliance with our policies and standards.

We will report any further progress, as applicable, through subsequent versions of this Statement on a yearly basis.

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

on **20 October** 2026.

 Electronically signed by: Ian Weir  
Reason: Approver  
Date: Oct 21, 2026 08:26:12  
GMT+1

Ian Weir  
Director, Shandon Diagnostics Limited

# Shandon Diagnostics Modern Slavery Act Statement FY 2026 - clean

Final Audit Report

2026-10-21

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