

OXFORD NANOPORE TECHNOLOGIES PLC

Modern Slavery Statement 2022

Modern Slavery Statement **for the financial year ended 31 December 2022**

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**") during the financial year ended 31 December 2022 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.

Organisational structure and supply chains

Oxford Nanopore makes a sensing platform with the potential to analyse a range of molecules. The sensing platform combines nano-scale proteins called nanopores with sophisticated, scalable electronics. Nanopore sensing may be used to elucidate digital information about molecules that include: small molecules (small biological molecules that may regulate biological processes, for example metabolites or pharmaceuticals); larger biological molecules such as proteins or nucleic acids (DNA/RNA); or inorganic molecules. Oxford Nanopore technology provides rich data, is fast, accessible and easy to use. The technology is used across a broad range of applications such as human genetics, disease surveillance, cancer research, agriculture and food safety.

Oxford Nanopore has over 1000 employees across multiple disciplines including nanopore science, molecular biology and applications, informatics, engineering, electronics, manufacturing, corporate and commercialisation.

Oxford Nanopore sells 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

Oxford Nanopore expects its suppliers to adhere to its own high ethical standards and asks new suppliers to sign a business conduct statement which confirms, amongst other things, compliance with all applicable laws (including anti-corruption and 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, Oxford Nanopore's standard terms for key suppliers imposes a contractual obligation on suppliers to comply with all applicable laws when carrying out its services and/or supplying its 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.

In 2022, Oxford Nanopore introduced a new component to its due diligence process, the implementation of market leading risk software. This software is 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). Going forward, Oxford Nanopore will be able to use this software to capture more data points from its suppliers and proactively monitor modern slavery risks through recurring reviews.

To ensure that this risk is minimised, Oxford Nanopore risk profiles its suppliers and only sources components from high-risk suppliers/industries where the supplier is trusted and has been through its 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. In 2022, Oxford Nanopore introduced a conflict minerals policy, 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.

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. Ensuring all new suppliers enter into the business conduct statement;
2. Completion of modern slavery training for all employees; and
3. Undertaking enhanced due diligence on all key suppliers.

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 31 March 2023.

Signed: _____

Dr Gordon Sanghera
Chief Executive Officer