

## MODERN SLAVERY POLICY & STATEMENT

### STATEMENT

Genetic Signatures aims to engage fairly with suppliers, to source ethically and sustainably, and to advance the understanding of and respect for human rights in our operations and supply chains. We are committed to contributing to the elimination of modern slavery, which is a growing and complex problem, best tackled by collective action.

### 1. OBJECTIVES AND SCOPE

Genetic Signatures conducts its business in compliance with the law, including all applicable modern slavery laws, initiatives and guidelines. It takes a zero-tolerance approach to modern slavery within its operations and supply chains.

Accordingly, Genetic Signatures has adopted this policy to support human rights and circumvent modern slavery activities to the extent possible.

This policy is intended to outline Genetic Signatures' commitment to identify, prevent, mitigate and account for modern slavery risks or practices, and further to set out clear standards of conduct regarding responsibilities and reporting.

It applies to all employees (existing and prospective) acting for or on behalf of the Company at all levels and includes permanent, fixed-term or temporary employees, directors, executives, officers, consultants, secondees, contractors and agents.

### 2. WHAT IS MODERN SLAVERY

Modern slavery is a term used to describe a range of serious exploitation practices. Practices that constitute modern slavery can include:

- human trafficking
- slavery
- servitude
- forced labour
- debt bondage
- forced marriage, and
- the worst forms of child labour.

More generally, modern slavery may include circumstances where a person's freedom and ability to make choices has been significantly undermined or removed.

### 3. TYPES OF MODERN SLAVERY

Modern slavery can take many forms and some of them are often subtle and hard to identify. Below are some key types of modern slavery exploitation.

**Child labour** is the exploitation of children through any form of work that deprives them of their childhood, their potential, and their dignity.

**Debt-bondage** is work exchanged for a debt for no wages, or less than that required by law. Bonded labourers may be subjected to different forms of abuse, including long working hours, physical and psychological abuse, and violence.

**Deceptive recruiting for labour** or services are situations where a person is deceived into entering an engagement to provide labour or services for minimal pay, or which they cannot leave because they have been manipulated into a debt.

**Forced labour** is any compulsory labour that occurs, under threat of punishment. Almost all modern slavery practises contain some element of forced labour.

**Servitude** occurs when the person does not consider themselves free to cease providing their labour or services.

**Slavery** involves the exercise of power of ownership over a person, including the power to make them an object of purchase and use their labour in an unrestricted manner.

#### 4. WHO IS MOST AT RISK OF MODERN SLAVERY?

Modern slavery is widespread across vulnerable groups of individuals, including for example:

- **Temporary and migrant workers** that may not have sufficient understanding of their work rights or labour protections, and are therefore at risk of exploitation, or
- **Minority or socially excluded groups** that feel unsupported and may accept being subjected to unlawful work practices

#### 5. IDENTIFYING RISKS OF MODERN SLAVERY

Awareness of modern slavery is instrumental in mitigating against the risks of its existence in our organisation and supply chains, through identification and reporting. Some common signs of modern slavery or exploitation can include:

**Excessively low prices and fast turnaround** when compared with other suppliers.

**Suspicious payments to third parties** that appear to be unusual, such as a personal obligation to pay a third-party recruitment firm upon being awarded a job.

**Inappropriate identification documents** including for example right to work authorisations, or information relating to a person's identify is withheld or false.

**Inadequate work health and safety** standards for facilities, training, and policies. Or alternatively, if you are informed of poor living conditions or situations where staff feel unsafe, or that they are subject to unlawful workplace incidents such as bullying, harassment and discrimination.

**Undisclosed subcontracted work** that has limited process, or is lacking documentation, which affects visibility over the supply chain.

#### 6. RESPONSIBILITIES

The Company takes a zero-tolerance approach to all forms of modern slavery and is strongly committed to delivering accountability and transparency to all clients and stakeholders.

The Company also understands general obligations with respect to modern slavery and is committed to ensuring compliance with relevant legislative and regulatory requirements, including that it protects people who disclose such unlawful behaviour from victimisation.

Accordingly, in seeking to encourage ethical business practices and to prevent modern slavery activities to the extent possible, the following warranties are made:

- (a) the Company will comply with all applicable laws, statutes and regulations in force from time to time which relate to modern slavery
- (b) the Company will take reasonable steps to ensure that there is no modern slavery in its operations and supply chains
- (c) the Company will implement and maintain due diligence procedures in seeking to circumvent modern slavery
- (d) the Company will uphold good records regarding all goods and services provided and received. This enables the Company to identify and address modern slavery risks and maintain responsible and transparent supply chains
- (e) the Company is committed to assessing its suppliers and monitoring their internal approaches to risk management around modern slavery and human trafficking in their own operations and supply chains.

Further, it is the responsibility of every person to help detect, prevent and report instances of modern slavery or concerns they may have in relation to modern slavery including by complying with this policy, and avoiding any activity that might lead to, or suggest, a breach of this policy.

## 7. HOW TO RAISE A CONCERN

To the maximum extent practicable, a person who genuinely discloses an allegation or concern about modern slavery in breach of this policy, a law or other standard of behaviour ("Whistleblower") will be protected from any adverse action for having raised such allegations or concerns, even where they prove to be unsubstantiated or incorrect. Except that, a person who maliciously or vexatiously makes a disclosure or false allegations may be subject to disciplinary action.

This protection also applies to employees who participate or assist in an investigation concerning modern slavery.

### **Reasonable grounds**

Before making a disclosure, you must have reasonable grounds to suspect the relevant conduct has occurred or is happening.

Accordingly, all disclosures should provide specific, adequate and pertinent information with respect to, among other things, dates, places, persons, witnesses and the like, to enable a reasonable investigation to be conducted.

However, whistleblowing does not give you immunity from disciplinary or legal actions if found guilty of the same or similar misconduct.

### **Workplace policy**

For your own benefit, it is important that you do not 'blow the whistle' on any conduct before understanding your rights and obligations as a Whistleblower. You may not be protected by law if your allegation or concerns are not about reportable conduct that is protected.

Accordingly, you are encouraged to speak with an authorised Whistleblower Protection Officer, a member of the Executive Leadership Team, director or company secretary.

The Company recognises that maintaining appropriate confidentiality is crucial in ensuring that potential Whistleblowers make disclosures of modern slavery in an open and timely manner, and without fear of reprisal.

Accordingly, the Company will take all reasonable steps to protect the identity of the Whistleblower and will adhere to any statutory requirements in respect of the confidentiality of disclosures made. However, in

appropriate cases, disclosure of the identity of the Whistleblower, or the allegation made by them, may be unavoidable.

## 8. Compliance

It is your responsibility to understand and comply with this policy. You will not be excused for any breach of this policy because you were instructed or influenced to act in a way that constitutes a breach of this policy. Ignorance will not be accepted as justification for a breach.

If there is an alleged breach of this policy, it may be investigated. If an investigation discloses that a breach is substantiated, disciplinary action may be taken, which may include a formal warning, suspension, reassignment or demotion, or termination of employment.

## 9. Reporting

The following procedures should be observed in circumstances of a breach or suspected breach of this policy. These steps are guidelines only and different processes or steps for dealing with complaints may be taken on a case-by-case basis.

- a) Formally report the alleged breach to your supervisor, manager, human resource manager or a senior manager either by initiating a discussion or setting out the complaint in writing.

For this purpose, it is important that you keep a written record of the incident(s) including:

- day, date, time and location of the incident
- names of the people involved, including witnesses
- details of what happened.

- b) Once a disclosure has been received, the Company will consider the most appropriate action. This might include an investigation of the alleged conduct, either by an appropriate person or a group of people, such as a committee.
- c) Any investigation in relation to a disclosure will be conducted promptly and fairly, with due regard for the nature of the allegation and the rights of the persons involved in the investigation.
- d) Any evidence gathered during an investigation, including any materials, documents or records, must be held by the investigator, and held securely.
- e) During the investigation, the investigator will have access to all of the relevant materials, documents, and records. All involved persons must cooperate fully with the investigator.
- f) Following the investigation, a final report will be issued, and appropriate action taken where applicable. If appropriate a disclosure may be referred to law enforcement agencies.

If the Whistleblower was involved in the conduct, which was the subject of the disclosure, the fact that the Whistleblower has made the disclosure may be taken into account in determining the severity of the disciplinary measures, if any, that may eventually be taken against such Whistleblower.

## 10. FURTHER QUESTIONS

This policy does not cover every possible event or action. There will be circumstances where it is difficult to know what to do. In such cases you must exercise caution and common sense and comply with the underlying principles of this policy. If you have any questions or doubts about this policy please direct them to your supervisor, manager, people & culture or a member of the Executive Leadership Team.

## 11. DOCUMENT CONTROL

This policy will be reviewed on a two-yearly basis.

If at any time relevant legislation is updated, an operational requirement changes, or risk is reassessed or identified then an earlier review and relevant amendment will be made.

Printed versions of this policy are considered uncontrolled.