

# Adora Digital Health

## Anti-Slavery Policy

### Introduction:

Adora Digital Health (Adora) is committed to maintaining the highest standards of ethical conduct and integrity in its business activities in the UK and overseas. This policy outlines our position on preventing and prohibiting all forms of modern slavery and human trafficking. Adora will not tolerate any form of slavery or human trafficking by, or of, its employees, agents, consultants, or any person or body acting on its behalf. Senior management is committed to implementing effective measures to prevent, monitor, and eliminate modern slavery in all its operations.

This policy does not form part of your contract of employment and we reserve the right to amend or withdraw it at any time.

### Scope:

This policy applies to all employees and officers of Adora, and to temporary workers, consultants, contractors, agents, and subsidiaries acting for, or on behalf of, Adora within the UK and overseas. Every employee and associated person acting for, or on behalf of, Adora is responsible for maintaining the highest standards of business conduct. Any breach of this policy is likely to constitute a serious disciplinary, contractual, and criminal matter for the individual concerned and may cause serious damage to our reputation and standing. Adora may also face criminal liability for unlawful actions taken by its employees or associated persons under the Modern Slavery Act 2015. All employees and associated persons are required to familiarize themselves and comply with this policy, including any future updates that may be issued from time to time.

### This policy covers:

- The main areas of liability under the Modern Slavery Act 2015;
- The responsibilities of employees and associated persons acting for, or on behalf of, Adora; and
- The consequences of any breaches of this policy;
- Modern Slavery Act 2015

Adora is committed to complying with the Modern Slavery Act 2015 in its business activities in the UK and overseas. Modern slavery includes slavery, servitude, forced and

compulsory labour, and human trafficking. These serious crimes deprive people of their liberty and dignity for personal or commercial gain. A criminal offence will be committed if:

- An employee or associated person acting for, or on behalf of, Adora is involved in any aspect of modern slavery; and
- Adora does not have the defence that it has adequate procedures in place to prevent slavery and human trafficking by its employees or associated persons.

### **What is Prohibited?**

- Employees or associated persons are prohibited from engaging in, condoning, or encouraging any form of modern slavery. This includes but is not limited to:
- Forced labour: Any work or service which people are forced to do against their will under the threat of punishment.
- Debt bondage: Where people borrow money they cannot repay and are required to work to pay off the debt, losing control over both their employment conditions and the debt.
- Human trafficking: Arranging or facilitating the travel of another person with a view to that person being exploited.
- Child labour: Any work that deprives children of their childhood, their potential and their dignity, and that is harmful to their physical and mental development.

## Records

Employees and, where applicable, associated persons, are required to ensure that all records are accurately maintained in relation to any contracts or business activities, including details of suppliers, clients, and recruitment processes. Due diligence should be undertaken by employees and associated persons prior to entering into any contract, arrangement, or relationship with a potential supplier of services, agent, consultant, or representative in accordance with our procurement and risk management procedures.

## Working Overseas

### **Principle**

Employees and associated persons conducting business on behalf of Adora outside the UK may be at greater risk of being exposed to unethical labour practices than UK-based employees. Employees and associated persons owe a duty to Adora to be extra vigilant when conducting international business.

## Procedure

Employees and associated persons are required to cooperate with our risk management procedures and to report suspicions of modern slavery to Kirsty Smith. While any suspicious circumstances should be reported, employees and associated persons are required particularly to report:

- Close family, personal, or business ties that a prospective agent, representative, or joint-venture partner may have with known exploiters or traffickers;
- A history of poor labour practices in the country in which the business is being undertaken.
- Requests for unusual payment arrangements, for example via a third party;
- Lack of transparency in employment contracts or worker documentation; or
- A lack of standard invoices and proper financial practices.

If an employee or associated person is in any doubt as to whether or not a potential act constitutes modern slavery, the matter should be referred to Kirsty Smith.

## Corporate Social Responsibility

Adora is committed to ensuring that there is transparency in its own business and in its approach to tackling modern slavery throughout its supply chains. As part of our contracting processes, we include specific prohibitions against the use of forced, compulsory, or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.

## Risk Management

### Principle

Adora has established detailed risk management procedures to prevent, detect, and prohibit modern slavery. We will conduct risk assessments for each of its key business activities on a regular basis and, where relevant, will identify employees or officers of Adora who are in positions where they may be exposed to modern slavery.

### Procedure

Adora will identify high-risk areas, for example projects undertaken in high-risk countries, procurement processes involving high-risk suppliers, and those working on high-value

projects. Employees and associated persons are required to complete a modern slavery risk assessment form with Kirsty Smith when commencing a new project.

We will:

- Regularly monitor "at risk" employees and associated persons;
- Regularly communicate with "at risk" employees and associated persons;
- Undertake extensive due diligence of third parties and associated persons; and
- Communicate our zero-tolerance approach to modern slavery to third parties, including actual and prospective customers, suppliers, and joint-venture partners.
- Reporting Suspected Modern Slavery

## **Principle**

Adora depends on its employees and associated persons to ensure that the highest standards of ethical conduct are maintained in all its business dealings. Employees and associated persons are requested to assist Adora and to remain vigilant in preventing, detecting, and reporting modern slavery.

Employees and associated persons are encouraged to report any concerns that they may have to Kirsty Smith as soon as possible. Issues that should be reported include:

- Any suspected or actual instances of modern slavery;
- Concerns that other employees or associated persons may be being exploited; or
- Concerns that other employees or associated persons may be exploiting third parties.

## **Procedures**

A form is available from Kirsty Smith to allow employees to record any incidents of suspected modern slavery. Any such reports will be thoroughly and promptly investigated by Adora's Founders in the strictest confidence. Employees and associated persons will be required to assist in any investigation into possible or suspected modern slavery.

Employees will also be required to comply with our whistleblowing policy. Employees or associated persons who report instances of modern slavery in good faith will be supported. We will ensure that the individual is not subjected to detrimental treatment as a consequence of their report. Any instances of detrimental treatment by a fellow employee because an employee has made a report will be treated as a disciplinary offence. An instruction to cover up wrongdoing is itself a disciplinary offence. If told not to raise or pursue any concern, even by a person in authority such as a manager, employees and associated persons should not agree to remain silent. They should report the matter to Adora's Founders.

When an individual reports suspected instances of modern slavery, we will process any personal data collected in accordance with our data protection policy. Data collected from the point at which the individual makes the report is held securely and accessed by, and disclosed to, individuals only for the purposes of dealing with the report of modern slavery.

## Action by Adora

We will fully investigate any instances of alleged or suspected modern slavery. Employees suspected of involvement in modern slavery may be suspended from their duties while the investigation is being carried out. We will invoke its disciplinary procedures where any employee is suspected of modern slavery, and proven allegations may result in a finding of gross misconduct and immediate dismissal. We may terminate the contracts of any associated persons, including consultants or other workers who act for, or on behalf of, Adora who are found to have breached this policy.

We may also report any matter to the relevant authorities, including the police and other law enforcement bodies. We will provide all necessary assistance to the relevant authorities in any subsequent prosecution.

## Review of Procedures and Training

Adora will regularly communicate its anti-slavery measures to employees and associated persons. We will set up training sessions where applicable. Kirsty Smith is responsible for the implementation of this policy. Kirsty Smith will monitor and review the implementation of this policy and related procedures on a regular basis, including reviews of internal financial systems, recruitment practices, and supply chain management.

Employees and those working for, or on behalf of, Adora are encouraged to contact Kirsty Smith with any suggestions, comments, or feedback that they may have on how these procedures may be improved.

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