



MODERN SLAVERY POLICY

Introduction

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

Launch Diagnostics Ltd has a zero-tolerance approach to modern slavery. We are committed to acting ethically and with integrity in all our business dealings and relationships, and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

Although Launch Diagnostics falls below the threshold to be a relevant organisation in relation to section 54 *Transparency in supply chains* of the Modern Slavery Act 2015, we recognise that many of our customers and suppliers are relevant organisations for the purposes of this Act. We have therefore prepared this policy to lay out our own position and to provide the evidence needed by other organisations we deal with to fulfil their obligations under the Act.

This policy applies to all persons working for or with us in any capacity, including employees at all levels, directors, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners. This policy does not form part of any contract of employment and we may amend it at any time.

Context

Launch Diagnostics supplies *in vitro* diagnostic instruments and reagents to laboratories and hospitals in the United Kingdom, Republic of Ireland, France, and Belgium. We currently have two distribution centres, one in Sevenoaks, UK and the other in Houille, France. The products we supply are manufactured by organisations from all over the world. All are subject to supplier selection processes which incorporate Modern Slavery aspects and legal distribution agreements signed by company Directors. Service providers (including, but not limited to, recruitment agencies, cleaning services, payroll and IT support) are subject to checks in relation to this policy as a condition of continuing business operations with them.

Territorial application of this policy

This Modern (Anti) Slavery Policy and Statement applies equally in all territories in which Launch Diagnostics operations occur, whether specifically listed in the section above or not. The need to obtain assurances from any part of our supply chains is not limited by territory and applies globally.

Compliance with the policy

The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy. You must notify your line manager or a company Director as soon as possible if you believe or suspect that a conflict with this policy has occurred or may occur in the future within the organisation.

LAUNCH DIAGNOSTICS LIMITED
Ash House, Ash Road,
New Ash Green, Longfield,
Kent, DA3 8JD
Fax: 01474 872 388



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For further information please call
+44 (0) 1474 874 426
or visit our website:

LAUNCHDIAGNOSTICS.COM





You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business with any supplier at the earliest possible stage. If you believe or suspect a breach of this policy has occurred or that it may occur, you must notify your line manager or company Director as soon as possible. If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, raise it with your line manager or a company Director.

An employee who, in good faith, brings a concern (or assists another to do so) either under this policy or otherwise in relation to a modern slavery and human trafficking matter will not be disciplined, dismissed or otherwise victimised for having done so. Allegations which are found not to have been made in good faith will be regarded as a disciplinary matter.

In the event of a breach of the Modern Slavery Act 2015 being confirmed, either within the organisation or in any of our supply chains, we will, through the appropriate channels, inform all impacted customers without undue delay. Communication is to include at a minimum what breach was identified and what steps Launch Diagnostics are taking to address the situation.

Communication & awareness of this policy

Training on this policy, and on the risk our business faces from modern slavery in its supply chains, is provided for all individuals who work for us, and regular refresher training will be provided. Updates will be provided using established methods of communication between the business and you.

Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

Breaches of this policy

Any employee who breaches this policy may face disciplinary action. We may also terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

Responsibilities relating to this policy

The Company has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it. All employees must ensure they read, understand and comply with this policy.

You are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries are encouraged and should be addressed to the Quality and Regulatory Compliance Manager.

Signed:

Ian Jones, Joint Managing Director

Date: 31st January 2024

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