

**Pockit diagnostics Ltd**  
**T/A UPFRONT TIME IS LIFE**

## **Policy for prevention of Modern Slavery**

### **Principles**

#### **Our Commitment**

Pockit diagnostics is committed to operating ethically and with integrity. We believe that all individuals have the right to work freely and with dignity. We are committed to preventing and eradicating modern slavery and human trafficking from our supply chains and operations.

#### **Core Principles**

1. **Zero Tolerance:** We have a zero-tolerance approach to modern slavery and human trafficking.
2. **Due Diligence:** We will conduct robust due diligence on our supply chains to identify and mitigate risks of modern slavery.
3. **Ethical Sourcing:** We will source goods and services ethically, ensuring compliance with international labour standards and human rights.
4. **Transparency:** We will be transparent about our efforts to combat modern slavery, both internally and externally.
5. **Collaboration:** We will collaborate with suppliers, customers, industry peers, and civil society organizations to promote ethical business practices and address modern slavery risks.

### **Policies**

#### **Supplier Code of Conduct**

We have implemented a comprehensive Supplier Code of Conduct that outlines our expectations for suppliers, including:

- **Ethical Business Practices:** Adherence to all applicable laws and regulations, including labour laws, health and safety standards, and environmental regulations.
- **Labor Rights:** Respect for workers' rights, including the right to freedom of association, collective bargaining, and the elimination of forced labour, child labour, and discrimination.
- **Working Conditions:** Provision of safe and healthy working conditions, fair wages, and reasonable working hours.
- **Transparency and Accountability:** Commitment to transparency and accountability in supply chain practices.

#### **Due Diligence and Risk Assessment**

We conduct regular due diligence assessments to identify and mitigate risks of modern slavery in our supply chains. This includes:

- **Supplier Assessment:** Evaluating suppliers based on factors such as their size, industry, geographic location, and potential for labour exploitation.
- **Risk Rating:** Assigning risk ratings to suppliers based on the identified risks.

- **Risk Mitigation:** Developing and implementing strategies to mitigate identified risks, such as conducting on-site audits, requiring corrective action plans, or terminating relationships with non-compliant suppliers.

### Training and Awareness

We provide regular training and awareness programs for our employees to raise awareness of modern slavery and human trafficking issues. This includes:

- **Mandatory Training:** All employees, particularly those involved in procurement and supply chain management, are required to complete training on modern slavery and human trafficking.
- **Awareness Campaigns:** Conducting regular awareness campaigns to educate employees about the signs of modern slavery and how to report concerns.
- **Ethical Procurement Training:** Training procurement staff on ethical sourcing practices and how to identify and mitigate risks in the supply chain.

### Communication and Reporting

#### Internal Communication

We communicate our commitment to tackling modern slavery through various channels, including:

- **Regular Updates:** Providing regular updates to employees on our progress and achievements in combating modern slavery.
- **Open-Door Policy:** Encouraging employees to raise concerns or questions about modern slavery and human trafficking.

#### External Communication

We communicate our commitment to tackling modern slavery externally through:

- **Modern Slavery Statement:** Publishing an annual modern slavery statement that outlines our activities and performance in relation to modern slavery.
- **Website:** Providing information about our anti-slavery efforts on our corporate website.
- **Industry Engagement:** Participating in industry initiatives and collaborations to address modern slavery.

### Governance and Oversight

#### Board Oversight

The Board of Directors is responsible for overseeing our organization's efforts to combat modern slavery. This includes:

- **Reviewing Policies and Procedures:** Regularly reviewing our anti-slavery policies and procedures to ensure their effectiveness.
- **Approving the Annual Modern Slavery Statement:** Approving the annual modern slavery statement before publication.
- **Monitoring Progress:** Monitoring our progress in addressing modern slavery risks and implementing effective mitigation strategies.

#### Designated Responsibility

A dedicated team or individual is responsible for leading our anti-slavery efforts. This includes:

- **Implementing Policies:** Implementing and enforcing our anti-slavery policies and procedures.
- **Conducting Due Diligence:** Overseeing supplier due diligence and risk assessments.
- **Monitoring and Reporting:** Monitoring our supply chain and reporting on our progress in combating modern slavery.

Edoardo Gaude  
Director and CSO

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