

Modern Slavery and Human Trafficking Statement

1. Introduction

Modern slavery is the illegal exploitation of people for personal or commercial gain. It takes various forms, such as slavery, servitude, forced and compulsory labour, debt bondage and human trafficking, often in horrendous conditions from which the victim cannot escape. 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.

Businesses have a key part to play in the effort to tackle this crime and protect vulnerable workers from exploitation. Hycor UK Limited has a zero-tolerance approach to modern slavery and human trafficking. 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 our supply chains.

The Company supports the principles of the UN Guiding Principles on Business and Human Rights and is committed to respecting internationally recognised human rights throughout its operations and supply chain.

Section 54 of the UK Modern Slavery Act (2015) requires commercial organisations that operate in the UK and have an annual turnover above £36m to produce a Slavery and Human Trafficking statement each year.

2. Statement

Although Hycor UK Limited is not currently required under Section 54 of the Modern Slavery Act 2015 to publish an annual statement, the Company voluntarily chooses to do so as part of its commitment to ethical business practices and supply chain transparency.

This statement relates to the company financial year ending 31st December 2025.

The Modern Slavery Act specifically states that any statement must include 'the steps the organisation has taken during the financial year to ensure that slavery and human trafficking is not taking place in any of its supply chains, and in any part of its own business'

We cannot guarantee that the entire supply chain is slavery free, and this is not a requirement, but we will demonstrate the steps we have taken to assess risk and mitigate those. The Company recognises that addressing modern slavery risks requires ongoing vigilance and continuous improvement across operations and supply chains.

3. Organisational Information

Hycor UK Limited is the UK subsidiary of Hycor Biomedical LLC, an international provider of in vitro diagnostic (IVD) solutions specialising in allergic disease testing. With origins in the United States, the wider organisation operates across multiple global markets, developing immunoassay systems, reagents, and consumables that support accurate and reliable laboratory diagnostics. Hycor UK Limited acts as the local commercial and support arm, working with NHS laboratories and private healthcare providers. The company supplies diagnostic platforms and associated consumables, alongside providing technical support, training, and customer service to ensure effective implementation and ongoing system performance within clinical settings. The organisation operates within a regulated medical environment, aligning its products and services with relevant quality and compliance standards.

4. Our Supply Chain and Procurement

Hycor UK Limited is committed to ensuring transparency across its operations and supply chain, with processes in place to identify and manage modern slavery risks at all stages of procurement. The current supply chain spans six countries; United Kingdom, Netherlands, Germany, France, United States, and China, reflecting a relatively concentrated and manageable footprint.

Hycor UK Limited are committed to ensuring transparency in our own business and our supply chains and expect the same due diligence and commitment from our suppliers, contractors and business partners.

When procuring goods or services we have processes in place to consider Modern Slavery risks.

The Company applies a risk-based supplier due diligence process. This includes:

- Robust supplier selection and policies
- Supplier questionnaire and audit
- Mapping of the supply chain to identify geographical areas of higher risk

5. Areas of risk identified within the business and supply chain

Supplier risk assessment:

We conduct an annual risk assessment of our suppliers in relation to Modern Slavery using the following process:

- The risk level is determined using the scale according to the global slavery index. <https://www.globalsslaveryindex.org>
- This is cross referenced with the list of goods from the US department of Labour that have been identified to be at higher risk of being produced by child or forced labour. <https://www.dol.gov/agencies/ilab/reports/child-labor/list-of-goods>
- [Then the sector is checked against the ILO's Global Estimates of Modern Slavery](#)

Findings:

Tier 1 = direct suppliers

A total of 8 suppliers have been assessed, with 88% classified as low risk and 12% as high risk. The majority of suppliers are based in low risk geographies, with higher risk exposure primarily linked to goods and industry specific factors in higher risk locations.

Based on the current assessment methodology, the overall residual risk within the Tier 1 supply chain is currently assessed as Low.

This risk level will be reviewed yearly and reported on.

Tier 2 = indirect suppliers/subcontractors

A total of 15 tier 2 suppliers have been assessed, with 86% classified as low risk and 14% identified as medium risk due to locality and industry specific markers.

Based on the current assessment methodology, the overall residual risk within the Tier 2 supply chain is currently assessed as Low.

This risk level will be reviewed yearly and reported on.

6. Policies and Processes relating to Modern Slavery

- Ethical Trading, Human Rights and Labour Standards Policy
- Supplier Code of Conduct
- Anti Bribery
- Whistleblowing

KPIs

We will use key performance indicators (KPIs) to measure how effective our actions are to identify and address modern slavery practices in any part of our operations and supply chains have been.

Below are the key performance areas that we assess:

- Governance & due diligence
- Procurement & supply chain
- HR practices, training & education

Against each of these focus areas we have developed KPIs that are used to assess the effectiveness of our actions. These include:

- Update of the Modern Slavery Statement and completion of the MSAT yearly
- Annual modern slavery risk assessment of suppliers conducted
- Completion rates for modern slavery awareness training

Over subsequent reporting periods, we will continue to review and enhance these KPIs and develop further metrics to assess the effectiveness of our actions, in line with continuous improvement.

7. Training of employees around Modern Slavery

Relevant employees receive annual awareness training relating to modern slavery risks, reporting obligations, and ethical supply chain expectations.

8. Reporting

If a case of Modern Slavery is suspected, then the following is advised.

A suspected victim of modern slavery is not to be confronted directly as this may endanger them.

If an immediate risk to life, then call the local emergency number (e.g. 911 in the US, 112 in Europe, 999 in the UK), then contact the national helpline or report it online.

Helplines and On-line Reporting

Country	Helpline	Phone	On-line
EU	Anti-trafficking hotline	See https://help.unhcr.org/hungary/wp-content/uploads/sites/86/2022/04/trafficking-hotlines.pdf	
UK	Modern Slavery Helpline	08000 232 700	https://www.modernslaveryhelpline.org/report
US	National Human Trafficking Hotline	1-888-373-7888	https://humantraffickinghotline.org/en/report-trafficking

Employees are required to take their suspicions to their line manager and there is a whistleblowing notice in place.

If there are concerns around modern slavery with any of our suppliers, we will first look to work with them to remedy the situation with an improvement action plan implemented and more rigorous auditing of the organisation.

If the response from any of our suppliers, seems inadequate and appropriate measures are not put in place to address coercion, threat, abuse, and exploitation of workers, then we would look to give that company more support, guidance and incentives to tackle the issue. This could include working with at-risk suppliers to provide training, messages and business incentives or guidance to implement anti-slavery policies.

If modern slavery is identified or suspected, and resolution is not possible with the supplier, then we will engage with local Non-Governmental Organisations, industry bodies, trade unions or other support organisations to attempt to remedy the situation. If warranted, we will contact local government and law enforcement bodies. Our approach will always consider the safest outcome for the potential victims while also remember the economic influence and control which the organisation holds over those who may be committing these crimes.

9. Breaches

Any employee who breaches our policies related to this statement will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

Any suppliers, individuals or organisations working with us, or on our behalf who breach our policies related to this statement may have their relationship or contract with us terminated.

10. Responsibility

Eric Whitters PhD
Director, Hycor UK Limited
Chief Operating Officer (COO), Hycor Biomedical LLC

11. Review and Communication

This statement will be reviewed by senior management, signed by a director and published on our website.
Internally it will be sent to all employees and sent to our supply chain and other interested stakeholders.

12. Board / Senior Management Approval

SIGNED: *Eric Whitters*
NAME: Eric Whitters
JOB TITLE: Chief Operating Officer
DATE: June 2, 2026