

MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

Financial Year Ending 31 March 2025

Organisation Structure and Business

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015. It sets out the steps that Avegen Ltd and its wholly-owned subsidiary, Avegen India Pvt Ltd, have taken to ensure that modern slavery and human trafficking are not taking place in our business or supply chains.

Avegen is a digital health company headquartered in London, UK, with engineering and operational teams located in Pune, India. We provide software platforms (such as HealthMachine®) to the NHS, pharmaceutical companies, and other healthcare providers.

Supply Chains and Risk Assessment

As a software and technology provider, our supply chains are relatively short and low-risk compared to manufacturing or retail sectors. Our procurement primarily consists of:

- Cloud hosting and infrastructure services (e.g., AWS, Microsoft Azure).
- Software-as-a-Service (SaaS) tools for internal operations.
- Professional services (legal, accounting).
- Office equipment and hardware.

We assess the risk of modern slavery within our direct business as **low**. Our most significant operational footprint outside the UK is our subsidiary in India. To mitigate risk here, we do not use third-party labour agencies for core development work. Instead, we employ staff directly under formal contracts that exceed local statutory requirements regarding pay, hours, and working conditions.

Our Policies and Principles

While we do not currently maintain a standalone Modern Slavery Policy, our commitment to ethical labour is embedded in our broader operational frameworks and Employee Handbooks in both the UK and India. We operate under the following principles:

- **Fair Pay:** We ensure all employees in the UK and India are paid above the applicable minimum wage and living wage standards.
- **Direct Employment:** We prioritize direct employment over outsourcing to minimize the risk of forced labour in hidden tiers of the supply chain.
- **Freedom of Association:** We respect the rights of employees to associate freely and bargain collectively in accordance with local laws.

Due Diligence Processes

To ensure our supply chain remains free of slavery, we take the following steps:

- **Internal Oversight:** We maintain complete visibility over our Indian subsidiary, *Avegen India Pvt. Ltd*, through daily operational integration and shared management structures. This ensures that our high standards for working conditions are applied globally.
- **Supplier Vetting:** We prioritize suppliers who are large, reputable technology providers (e.g., cloud hosts) that publish their own robust Modern Slavery Statements. For smaller suppliers, we conduct ad-hoc checks on their reputation and business practices before engagement.

Effectiveness and KPIs

We use the following key performance indicators (KPIs) to measure our effectiveness in combating modern slavery:

- **Zero Reports:** No reports of modern slavery or human trafficking were raised by employees, the public, or law enforcement regarding our business or supply chains in the 2024/25 financial year.
- **Payroll Compliance:** 100% of employees in the UK and India are paid directly into personal bank accounts, ensuring no wages are withheld or diverted by third parties.

Training

We ensure that our leadership and recruitment teams are aware of the Modern Slavery Act requirements. We commit to raising awareness among our broader staff to help them identify and report any concerns related to ethical labour practices.

This statement was approved by the Board of Directors of Avegen Ltd.

A handwritten signature in black ink, appearing to be 'Nayan Kalnad', with a large 'N' and a stylized flourish.

Signed:

(Signature)

Nayan Kalnad

CEO

Avegen Ltd

Date: 08 January 2026