## SYNCONA MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT 2024

This statement is made by Syncona Limited ("Syncona") and sets out the steps taken during the financial year ended 31 March 2024 to address modern slavery risks in our business and supply chain. While Syncona does not fall within the requirements of Section 54 of the Modern Slavery Act 2015 (the "MSA"), as a responsible investor we recognise the importance of these issues and have chosen to voluntarily report in line with those provisions.

## **Overarching statement**

Syncona has a zero-tolerance approach to modern slavery and human trafficking.

We are committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery and human trafficking throughout our supply chain and portfolio companies, consistent with the disclosure obligations under the MSA. We expect the same high standards from all our suppliers and portfolio companies. We expect that our suppliers and portfolio companies will hold their own suppliers to the same high standards.

We define modern slavery and human trafficking in line with the MSA:

- **Modern slavery**: knowingly holding a person in servitude for the purpose of sexual exploitation or forced or compulsory labour.
- **Human trafficking**: arranging or facilitating the travel of another person with a view to that person being exploited.

## Syncona's business

Syncona is a FTSE250 investor with a purpose to invest to extend and enhance human life, by creating, building and scaling companies to deliver transformational treatments to patients in areas of high unmet need. It is structured as a closed ended investment company.

Syncona is governed by its Board of Directors, all of whom are non-executive, and has no employees. Management of the investment portfolio is delegated to its investment manager, Syncona Investment Management Limited ("SIML"), which is a subsidiary of Syncona. SIML has approximately 40 employees and operates out of an office in London, United Kingdom and an office in Basel, Switzerland through SIML's subsidiary, SIML Switzerland AG. This statement covers the activities of Syncona, SIML and SIML Switzerland AG.

#### Our approach to modern slavery

Given the nature of our business, our suppliers (largely professional services businesses) and our portfolio companies (typically employing highly skilled biotech employees), we consider there is a low risk of modern slavery issues arising in our business, supply chains and portfolio companies, and this guides our approach to managing these risks. We recognise however that it is important that we keep this approach under regular review and respond to any areas of increased risk.

Everyone working in our business is responsible for preventing, detecting and reporting any existing or potential issues of modern slavery and human trafficking in our business and across our supply chains and portfolio companies. The Board of Syncona has overall responsibility for oversight of these issues, with responsibility for implementation of this approach sitting with the SIML team led by its Leadership Team.

Our approach is based on the following elements:

# Risk assessment and due diligence of our business and supply chain

There are around 40 employees in our business, operating from an office in London and an office in Basel. While we engage contractors from time to time, these are typically highly qualified individuals with expertise in science, clinical development or other relevant fields. We consider the risk of modern slavery in our business to be very low.

Our suppliers mainly consist of well-established professional services firms operating in the financial, legal and recruitment sectors. Other key suppliers relate to providing travel services, office leasing, insurance and facilities management. We have carried out due diligence on our significant suppliers (covering approximately 75% of total supplier spend) or those where we considered there could be a higher risk, including reviewing their most recent Modern Slavery Statements where relevant, requesting further information about practices where appropriate, and taking into consideration the supplier's industry, geographic location, and other factors. Following that review we consider there is a relatively low risk of modern slavery in the Syncona supply chain.

We aim to continue improving our practices and to explore on an ongoing basis any additional steps we can take in respect of our existing supply chain to minimise the risk of modern slavery issues arising.

## Internal policies

A modern slavery and human trafficking policy has been adopted by SIML and this sets out the objectives, requirements and controls around modern slavery and human trafficking across our business and supply chains.

SIML has also adopted other related internal policies, including ones for ethical procurement, whistleblowing, and diversity and inclusion. These are designed to create a healthy and inclusive workplace and promote ethical behaviours as well as encourage and protect anyone who wishes to raise any conduct related concerns within our business.

Responsibility for implementation and oversight of these policies sits with the Syncona Leadership Team.

#### Effective procurement practices

We aim to follow good practice procurement principles and have a policy in operation at SIML which sets out the approach to procurement, including suitable diligence on modern slavery and other ethical issues, and monitoring/engagement with any higher risk suppliers to identify risks and agree mitigating actions.

#### Training

We provide appropriate training to employees to raise awareness of modern slavery and to aid them in identifying any issues.

# Our portfolio companies

Syncona seeks to invest in portfolio companies that seek to deliver transformational treatments for patients in an area of high unmet medical need. We have had a Responsible Investment policy ("RI policy") in place since FY2021/22 and this was updated in March 2024.

The RI policy sets out our approach to responsible investment and outlines our commitment to integrate these issues into investment and management processes, with the right culture, values and expectations set at the beginning of the investment process. A key element of the RI policy is setting out our principles for high quality compliance and governance at our portfolio companies, including modern slavery. We have continued to support our portfolio companies during the year to implement compliance and governance policies as part of our ESG work.

### Incidents of modern slavery or human trafficking in the year

To our knowledge, no incidents of modern slavery or human trafficking occurred in our business or supply chain during the year.

## Monitoring and review

We will continue to monitor our supply chain and portfolio companies in relation to modern slavery and human trafficking through supplier reviews and portfolio company reviews.

This statement was approved by the Board on 18 June 2024.

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Melanie Gee, Chair