LumiraDx Modern Slavery Statement

This statement has been published pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes LumiraDx’s slavery and human trafficking statement for the current financial year 2021. LumiraDx will continue to take positive steps to prevent modern slavery in its businesses and supply chains. Unless otherwise specified, all references to LumiraDx herein are references to the LumiraDx UK entities and LumiraDx globally.

Introduction

LumiraDx is committed to the highest standards of professionalism and ethical behaviour in all sections of our business and improving our practices to combat slavery and human trafficking. We recognise that slavery and human trafficking is a real yet hidden issue in our society. We will not tolerate slavery and human trafficking in our business or our supply chain. As a business with core ethical principles, we are committed to acting with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure that any form of slavery is not taking place in our supply chains or business.

Further information about LumiraDx, including information on the countries where we have a direct presence, can be found on our website. www.lumiradx.com

LumiraDx organisational structure and supply chain:

LumiraDx develops, manufactures and commercializes an innovative point-of-care diagnostic Platform technology. The LumiraDx Platform is designed to deliver lab comparable diagnostic results at the point of care in minutes. It is designed to be affordable and accessible for healthcare providers globally, and to strengthen community-based healthcare. Our ultimate parent company is LumiraDx Limited with our main corporate office based in England.

Modern Slavery

LumiraDx fully endorses the Modern Slavery Act 2015 aimed to eliminate all forms of human slavery, human trafficking and forced labour (“Modern Slavery”). LumiraDx acknowledges the importance of us and our supply chain and business partners companies working together to tackle such issues in our society and around the world. We condemn all forms of Modern Slavery including child, forced or compulsory labour. It is acknowledged by LumiraDx globally that we all have a responsibility to be aware of Modern Slavery. Employees and business partners are requested to speak up and report incidents if they believe that someone has done, is doing, or may be about to do something that violates this principle.

Policies and business controls

We operate and train our employees on a number of internal policies to ensure that we are conducting business in an ethical and transparent manner and in line with our LumiraDx Business Code of Conduct. We provide UK checks for all employees with an aim to safeguard against and minimize any risk of modern slavery and provide a safe and confidential environment for reporting non-compliance.

Our supply chains are based throughout the world and include suppliers of direct materials (including but not limited to product components, buffers, manufacturing and packaging), suppliers of indirect services, facilities, professional services, sales, marketing and distributors of our products.

It is possible that certain jurisdictions may have more stringent requirements and it is LumiraDx’s policy to comply with such more stringent requirements, where applicable and we conduct due diligence on all suppliers assessed by our Supply Chain, Legal and Quality Assurance Team as critical and major to our business before allowing them to become one of our suppliers. This due diligence includes but not limited to:

- assessing regulatory licences and certificates, compliance with such regulatory bodies, checks to determine the financial stability of the supplier where appropriate.
Further steps taken by LumiraDx globally to prevent Modern Slavery in our supply chains

1. Risk Assessment: Assess all new suppliers using the Global Slavery Index and ask them to certify that they have taken steps to eradicate modern slavery within their own organisation and supply chain;
2. Supply Chain: Notify all existing suppliers of our expectations and their obligations in relation to the prohibition of modern slavery;
3. Health and Safety: Suppliers shall provide a safe and healthy working environment, including for any company-provided living quarters.
4. Human Trafficking: Incorporate anti-slavery and human trafficking obligations into procurement agreements and subcontracting arrangements on a risk assessed basis;
5. Compliance Controls: Include appropriate measures in our due diligence processes for sourcing suppliers, subcontractors and acquisitions on a risk assessed basis, as well as carrying out supplier audits, where required;
6. UK and Global Training: Provide training to LumiraDx employees to ensure a high level understanding of the risks of modern slavery and human trafficking; and
7. Policies and Procedures: Where appropriate we will include reference to the Modern Slavery Act 2015 in our policies and procedures.

This statement has been approved by the Directors of LumiraDx UK Ltd on behalf of all LumiraDx entities

Veronique Aneye
Director