

## **Anti-Slavery and Human Trafficking Transparency Statement for the financial year ended 31 December 2022**

Blue Earth Diagnostics Ltd is committed to ensuring there is transparency in our approach to tackling modern slavery, consistent with the disclosure obligations under the Modern Slavery Act 2015 (the Act). Our policies and procedures demonstrate our commitment to acting ethically and with integrity in all our business relationships.

### **1. Blue Earth Diagnostics' Business**

Our mission is to transform the clinical management of patients with cancer by developing and delivering innovative molecular imaging technologies to address unmet clinical needs, and reliably inform diagnosis and treatment decisions.

Blue Earth Diagnostics is headquartered in Oxford, UK and has two wholly owned subsidiaries: Blue Earth Diagnostics Ireland Ltd, based in Dublin, Ireland and Blue Earth Diagnostics Inc., based in New Jersey, USA. Blue Earth Diagnostics Ltd is a subsidiary of Bracco Horizons Ltd and an indirect subsidiary of Bracco Imaging S.p.A., a global leader in diagnostic imaging headquartered in Milan, Italy. Blue Earth Diagnostics Ltd has over 47 employees. For the financial period ending 31 December 2022 Blue Earth Diagnostics Ltd had a global annual turnover in excess of \$90M USD.

### **2. Blue Earth Diagnostics' Supply Chain**

#### *Manufactured goods*

The manufacture of intermediate materials takes place in China, UK and the European Economic Area. The manufacture and distribution of the finished product to hospitals and clinics is carried out exclusively in the European Union, the European Economic Area and the United States. Currently there is no manufacturing of the finished product in the UK. All manufacturing and distribution operations are outsourced to third parties.

#### *Business partnerships and business service providers*

We work closely with a range of bodies, some of which are also suppliers. They include research bodies, universities, healthcare providers and pharmaceutical companies. To carry out our activities efficiently, we use suppliers to support our business operations. The main areas in which we engage suppliers are:

- Materials suppliers for the manufacture of finished product
- Contract manufacturers of the finished product
- Distributors for finished product
- Information technology
- Clinical research organisations
- Marketing and public relations consultancy services
- Professional services
- Facilities management

### 3. Relevant Policies

During 2022, we continued to improve our existing policies and procedures by developing a procedure on third party ethical due diligence, to identify slavery and human trafficking risks in our supply chains as part of vendor onboarding.

This is in addition to existing policies and procedures that contribute to ensuring modern slavery does not occur in our organisation or supply chains:

- Diversity and Equality Policy - embodies our commitment to establishing a diverse workforce and create equal opportunity for all;
- Dignity at Work Policy - ensures that we create a safe and productive work environment where everyone is treated with dignity and respect;
- Anti-Fraud and Corruption Policy - requires employees to act at all times with integrity and to safeguard the company's resources for which they are responsible, ensuring Blue Earth Diagnostics conducts its business in an honest and ethical manner;
- Whistleblowing Policy - enables employees to raise concerns and disclose information internally and at a high level which the individual believes shows malpractice or impropriety;
- Disciplinary Policy - sets out formal disciplinary rules and procedures to promote healthy and orderly employment relations as well as fairness and consistency in the treatment of individual employees;
- Agreements - requiring counterparties to comply with the law (including in relation to modern slavery and human trafficking) and Bracco's Code of Ethics. We will not trade or partner with any business or organisation that refuses to include these clauses in agreements;
- Risk management – we seek to embed the identification and assessment of risk, and mitigation where required, into our strategic and operational decision-making activity;
- Health and Safety Policy – ensures as far as reasonably practicable, the health, safety and welfare of employees and others that may be affected by our activities. Blue Earth Diagnostics also complies with the Working Time Regulations (1998).

### 4. Due Diligence and Assessment of Risk

Every entity within the Bracco group of companies is committed to operating in line with the highest standards of ethical behaviour. Bracco's Code of Ethics outlines a set of principles, rights, duties and responsibilities that all recipients must comply with, including in the areas of human rights, staff relations, environment and anti-corruption as far as these apply to our supply chain. In addition, each recipient of the Code is obliged to notify any conduct that is inconsistent with the principles of the Code. In the reporting period, Blue Earth Diagnostics received no reports of modern slavery concerns.

Blue Earth Diagnostics operates in a highly technical and highly regulated area of the pharmaceutical marketplace, where product is painstakingly generated without the use of mass production methods and generated by a workforce with a high level of education and individual responsibility. Generally, therefore, the risks of modern slavery in the existing supply chain are low. We adopt a risk-based

approach to counterparty diligence and activities associated with higher risks will require more intensive due-diligence and monitoring activities.

## 5. Planned Activity for 2023

We will: (i) continue to review our approach to modern slavery and human trafficking and raise awareness across the organisation through training; (ii) strengthen the identification of modern slavery risks in our supply chains by implementing a revised procedure on third party ethical due diligence which will utilise automated screening tools to strengthen our vendor-onboarding procedures; (iii) implement a Human Rights Policy aimed at identifying and mitigating adverse human rights events in our operations and value chains.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 31 December 2022. It was approved by the board on 5 May 2023.



**David Gauden**

Director, Chief Executive Officer