Twist Health Ltd

Modern Slavery and Human Trafficking Policy

Policy owner	Twist Health
Approved by	Board of Directors
Version	2.3
Effective date	10th January 2026
Next review	10th January 2027

1. Purpose

Twist Health Ltd ("Twist Health", "we", "our") is a full-service healthcare communications agency. 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 in any of our supply chains.

This policy sets out our approach to identifying, preventing and addressing the risk of modern slavery and human trafficking, and the responsibilities of everyone who works for or with us.

2. Scope

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, freelancers, contractors, external consultants, third-party representatives and business partners.

It also sets out the standards we expect of our suppliers, and which we assess when selecting and reviewing them.

3. What is modern slavery?

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, 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. This includes:

- **Slavery** where ownership is exercised over a person
- **Servitude** the obligation to provide services imposed by coercion
- **Forced or compulsory labour** work or services extracted under menace of any penalty and for which the person has not offered themselves voluntarily
- **Human trafficking** arranging or facilitating the travel of another person with a view to exploiting them

We recognise that modern slavery can occur in any sector, including professional services, and that indirect risk exists through suppliers such as print and production houses, IT hardware and cleaning, facilities and catering providers.

4. Our commitment

We have a zero-tolerance approach to modern slavery. We will:

- Comply with the **Modern Slavery Act 2015** and all applicable laws relating to slavery, servitude, forced labour and human trafficking
- Never knowingly engage with any organisation involved in modern slavery
- Ensure that everyone working for us does so freely, with fair pay and conditions, and with the right to leave employment on reasonable notice
- Take proportionate, risk-based steps to ensure our suppliers share our standards
- Encourage the reporting of concerns and protect those who raise them in good faith

5. Our business and supply chain

Twist Health is based in the United Kingdom and delivers strategy, creative, design, artworking, digital and data services to healthcare and pharmaceutical clients. Our workforce is predominantly skilled, salaried, UK-based professionals engaged directly, supplemented by freelancers and specialist contractors.

Our supply chain is relatively short and consists mainly of:

- Freelance creative, medical writing, digital and production specialists
- Print, packaging and physical production suppliers
- Software, cloud and IT hardware providers
- Recruitment agencies
- Office services, including facilities, cleaning and catering
- Travel, events and venue providers

We consider our overall exposure to modern slavery risk to be low, but not nil. We regard physical production, facilities services and recruitment as our higher-risk categories and focus our due diligence accordingly.

6. Due diligence

To identify and mitigate risk we:

- **Assess new suppliers** before onboarding, suppliers in higher-risk categories are asked to confirm their compliance with the Modern Slavery Act and, where applicable, provide their own modern slavery statement or policy
- **Include contractual protections** our standard supplier terms require compliance with anti-slavery laws, the right for us to audit compliance, and the right to terminate for breach
- **Verify right to work** all employees and directly engaged contractors are subject to right-to-work checks; we pay at least the National Living Wage and pay freelancers on agreed terms and within agreed timescales
- **Use reputable recruitment partners** we only engage recruitment agencies that operate lawfully and do not charge fees to candidates
- **Review periodically** key suppliers are reviewed at least annually, with higher-risk categories assessed against publicly available information and, where warranted, direct enquiry

- **Support client requirements** as a supplier to the pharmaceutical industry, we complete client procurement and compliance questionnaires honestly and cooperate with client audits

7. Responsibilities

The Board of Directors has overall responsibility for ensuring this policy complies with our legal and ethical obligations and that everyone under our control complies with it.

The policy owner has day-to-day responsibility for implementing the policy, monitoring its use and effectiveness, dealing with queries, and ensuring that training and communication are adequate.

Line managers are responsible for ensuring those reporting to them understand and comply with this policy, and for raising any concerns without delay.

All staff and those working on our behalf are responsible for preventing, detecting and reporting modern slavery in any part of our business or supply chain. You must avoid any activity that might lead to, or suggest, a breach of this policy.

8. Raising concerns

We encourage anyone to raise concerns about suspected modern slavery in any part of our business or supply chain at the earliest possible stage. Indicators may include:

- Workers who appear to be under the control of others, lack personal documents or are unable to speak freely
- Signs of physical or psychological abuse, or fear of authorities
- Multiple workers registered to a single address or bank account
- Workers who are unpaid, underpaid or have unexplained wage deductions
- Reluctance from a supplier to provide workforce or compliance information

Concerns should be raised with your line manager or the policy owner. Where that is not appropriate, concerns may be raised with any Director. Concerns may also be raised confidentially through our Whistleblowing Policy.

If you believe someone is in immediate danger, call **999**. The UK **Modern Slavery & Exploitation Helpline** is available on **08000 121 700** or at modernslaveryhelpline.org.

9. Protection for those who speak up

We aim to encourage openness and will support anyone who raises genuine concerns in good faith, even if they turn out to be mistaken. We will not tolerate any detrimental treatment of anyone as a result of raising a concern, including dismissal, disciplinary action, threats, or unfavourable treatment. Anyone who believes they have suffered such treatment should inform the policy owner or a Director immediately.

10. Breaches of this policy

Any employee who breaches this policy will face disciplinary action, which may result in dismissal for misconduct or gross misconduct. We may terminate our relationship with any freelancer, contractor, supplier or business partner who breaches this policy or is found to be

involved in modern slavery, and will report suspected criminal activity to the relevant authorities.

11. Training and communication

This policy is provided to all new starters at induction and is available to all staff. Staff involved in procurement, supplier management and recruitment receive additional guidance on identifying and responding to modern slavery risk. We communicate our expectations to suppliers at the outset of our relationship and reinforce them through our contractual terms.

12. Monitoring and review

The policy owner monitors the effectiveness of this policy and reports to the Board at least annually on:

- Supplier due diligence completed and any issues identified
- Concerns raised and how they were resolved
- Training delivered

This policy is reviewed annually, or sooner if there is a change in law, in our business or in our supply chain that warrants it. It does not form part of any employee's contract of employment and may be amended at any time.

Signed on behalf of the Board of Twist Health Ltd



Rebecca Sarson
Managing Director
10th January 2026