Modern Slavery Statement

NIOX is committed to protecting and respecting human rights and has a zero-tolerance approach towards modern slavery and human trafficking. We do not condone any usage of child or forced labour.

Although our turnover in the UK is below the £36m threshold, we are making this voluntary statement in the spirit of transparency. We are committed to ensuring that modern slavery and human trafficking is not present in any part of our business, including our supply chains.

This voluntary statement constitutes our modern slavery and human trafficking statement and is made pursuant to section 54(1) of the Modern Slavery Act 2015. The statement is made by NIOX Group plc and its subsidiaries, together known as the NIOX Group, for the financial year ending 31 December 2024.

Our business and structure

Our mission is to improve asthma diagnosis and management by providing greater access to FeNO testing. The Company's market-leading product, NIOX VERO®, uses patented technology to accurately measure Fractional exhaled Nitric Oxide (FeNO).

The NIOX Group is headquartered in the UK. We employ around 95 people worldwide, and our NIOX VERO® products are available in more than 50 countries.

NIOX Group plc (the ultimate parent company of the NIOX Group) is a holding company that does not provide goods or services. It is a public company limited by shares listed on the Alternative Investment Market (AIM) of the London Stock Exchange. We have operating subsidiaries incorporated in the UK, the US, China, Sweden, and Germany.

Supply chain

NIOX outsources several important functions to third parties, including product manufacture and distribution. We have contract manufacturing partners in Japan and Germany who make our NIOX VERO® products.

Our products are stored in NIOX-owned and operated warehouses in the US and Sweden. A small number of our products are stored by a third party in Shenzhen after being imported into China.

Our products are sold to market via our network of worldwide distribution partners and delivered by our freight forwarders.

Our industry is highly regulated and requires approval and licensing, which facilitates transparency in the supply chains.

Policies

We are committed to acting ethically in all social and environmental aspects and our policies, which are reviewed on a continual basis, reflect this.

Our key policies include:

Our **Employee Code of Conduct** clearly sets out the behavioural standards expected from all individuals when representing the Group. The Code was updated during the year to include a section on the detection and prevention of modern slavery.

Our **Distributor Code of Conduct** is a guide to working with NIOX. It emphasises NIOX's high standards, shared values and culture. NIOX promises to do the right thing as we conduct business, and we ask that our distributors make the same pledge. The Code is designed to promote honest and ethical conduct, affirm our commitment to avoiding and averting corruption and bribery, and complying with all the laws and regulations that affect the development, manufacturing, marketing and sale of our products in the countries and communities in which we do business and to be good global corporate citizens.

Our **Anti-Bribery and Corruption Policy** sets out NIOX's commitment to the highest standards of ethical conduct and integrity in our global business activities. NIOX has a zero-tolerance approach to any form of bribery by our employees, agents, consultants, or any other person or body acting on our behalf.

Due diligence processes

As part of our initiative to identify and mitigate modern slavery risks, we perform due diligence on potential suppliers and distributors.

Supplier premises located in geographic areas that are considered high risk for modern slavery and human trafficking are physically visited, inspected and audited prior to contracts being signed.

We conduct regular site visits and audits to check on our manufacturers and their facilities.

Our recruitment and onboarding process is robust. We ensure that all employees are eligible to work in their country of employment. Most of our workforce are employed directly, however where agency workers are utilised, we only engage with reputable employment agencies and ensure that the agents perform adequate checks.

Employees are required to report any actual or suspected incidents of conduct that do not align with Group policies. Whistleblowers, who can raise concerns anonymously through an externally provided reporting service, are protected.

Employees have access to an Ethics Hotline, which provides them with a secure way of seeking advice and guidance concerning any issues regarding modern slavery or human trafficking which may be affecting them.

Key risks

NIOX recognises that modern slavery risks are affected by external factors such as global macroeconomics, war and conflict, natural disasters and climate change. Consequently, the risks are constantly evolving and need to be continually monitored.

A high-level assessment of our supply chains and the potential for slavery and human trafficking has been completed. We recognise that some of our suppliers operate in regions and industries that are potentially higher risk as they involve relatively high levels of contracted labour.

We continue to review and re-assess the risks periodically and are committed to procuring goods and services in a manner which recognises the importance of human rights. We expect all our suppliers to honour and observe the same principles.

If there is evidence that a supplier is non-compliant with our policies and contractual requirements, we will address the issue, either through a performance improvement plan or, ultimately, through termination of the contract.

Key performance indicators to measure effectiveness in combatting modern slavery

We use the following key performance indicators (KPIs) to measure how effective we have been in ensuring that slavery and human trafficking is not taking place in any part of our business or supply chains:

- Vetting and screening of third-party suppliers and partners at the time of onboarding.
- Ongoing monitoring of third-party suppliers and partners on a risk-based approach.
- Inspections both on an ad-hoc and scheduled basis.
- Continued high levels of communication and personal contact with our suppliers and partners to reinforce their understanding of and compliance with our expectations.
- Corporate governance through building long-term trusted and open relationships throughout our supply chain.
- General awareness training for all employees and targeted training for relevant employees in key functions.
- Remedial action if any issues are identified.

The Board of NIOX continues to work with management to ensure the business is effective in combatting modern slavery and human trafficking. In the last 12 months:

- No slavery or human trafficking issues have been identified.
- No reports were made with respect to modern slavery and human trafficking.
- No remedial actions were required.

Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, refresher training on the Employee Code of Conduct is required to be undertaken by all members of staff at least annually.

Our legal function has a full understanding of the impact of modern slavery and human trafficking, together with the need for our business to closely adhere to the Act. Our legal function, including external advisers, ensures that our supplier's due diligence and standard terms and conditions are fit for purpose.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our Group's slavery and human trafficking statement for the financial year ending 31 December 2024.

It was approved by the Board on 26 March 2025 and signed on its behalf by



Ian Johnson

Executive Chairman

26 March 2025