

NIOX Group plc

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 prohibit all forms of forced, bonded, compulsory or child labour in our operations and supply chain.

NIOX recognises that modern slavery can occur in any country or industry. We are committed not only to compliance but also to continuous improvement of our practices to identify, prevent, and mitigate the risks of modern slavery across our operations and supply chain. We strive to promote fair treatment, ethical recruitment, and respect for workers' rights at every level of our value chain.

Although our turnover in the UK is below the £36m threshold, we publish this statement voluntarily in line with our commitment to transparency and good governance. We are committed to minimising the risk that modern slavery or human trafficking occurs within our operations or supply chain.

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 2025.

Governance and Accountability

Responsibility for modern slavery risk management sits with the Board, with operational oversight delegated to the Executive Directors. Procurement and Commercial teams are responsible for implementation within their respective areas.

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 products use patented technology to accurately measure fractional exhaled nitric oxide (FeNO).

The NIOX Group is headquartered in the UK. We employ around 105 people worldwide, and our 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.

We work with a limited number of strategic Tier 1 manufacturing partners and a broader network of component suppliers, logistics providers and distributors. Our modern slavery risk assessment primarily focuses on Tier 1 suppliers, while maintaining awareness of upstream risks where appropriate.

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.

While the medical device industry is subject to regulatory oversight, we recognise that regulatory compliance alone does not eliminate modern slavery risks within global 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 policies collectively prohibit and prevent all forms of forced, bonded, or child labour. Specifically, they ensure that:

- All workers have the freedom to leave employment and retain control of their identification documents.
- There is no use of compulsory overtime or restriction on freedom of movement or association.
- Access to remedy and compensation is available for any identified victims of modern slavery.
- Equal treatment and non-discrimination are core principles in all employment and supplier relationships.

These standards are embedded in our key policies, which include:

- Our **Code of Conduct** clearly sets out the behavioural standards expected from all individuals when representing or acting on behalf of the Group. The Code applies to all employees, officers, contractors, distributors and other business partners. It was updated during the year to strengthen provisions relating to the detection and prevention of modern slavery and human trafficking.
- 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.

They are also embedded in contractual clauses with third-party partners. Compliance is a mandatory condition of doing business with NIOX.

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.

All new material supplier contracts include representations and warranties regarding compliance with applicable anti-slavery and human trafficking laws. We reserve the right to request supporting evidence where appropriate.

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. Reports made via the Ethics Hotline are reviewed by the compliance function and, where appropriate, escalated to senior management and the Board.

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.

We undertake a structured, risk-based assessment of our supply chain, considering geographic risk indices, industry sector risk, labour intensity, and use of subcontracted labour. 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 reassess 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.

Where non-compliance is identified, we follow a defined escalation process including investigation, corrective action plans with defined timelines, follow-up verification and, where necessary, termination of the relationship.

Key performance indicators to measure effectiveness in combating 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 Code of Conduct is required to be undertaken by all members of staff at least annually.

In 2026, we intend to review our Code of Conduct to ensure continued alignment with evolving ESG expectations.

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 suppliers' 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 2025.

It was approved by the Board on 19 March 2026 and signed on its behalf by

A handwritten signature in black ink, appearing to read 'J C Emms', with a long horizontal line extending to the right.

Jonathan Emms

CEO

19 March 2026