



Modern Slavery Declarative Statement

2025

Cautionary Note

This Statement contains forward-looking statements regarding the Company's commitments, intentions, and expectations with respect to modern slavery prevention. These statements reflect the Company's current plans and expectations and are subject to risks, uncertainties, and assumptions, including those relating to the conduct and transparency of third-party suppliers and partners. Actual outcomes may differ from those described herein. This Statement is made for compliance purposes under the applicable statutes referenced in the Preamble and should not be interpreted as a representation or warranty that the Company's supply chain is free from modern slavery risk.

Preamble

SOPHiA GENETICS (the “Company”) publishes this statement for the purposes of complying with the obligations set out under the United Kingdom Modern Slavery Act 2015, the Australia Modern Slavery Act 2018, the Norwegian Transparency Act 2022, and the Canada Fighting Against Forced Labor in Supply Chains Act 2023. This statement relates to the fiscal year ending 31 December 2025.

SOPHiA GENETICS is committed to conducting its business activities lawfully, with integrity and transparency. The Company strictly prohibits any form of modern slavery, encompassing human trafficking, slavery, and forced or child labor within its operations, and is committed to taking reasonable steps to identify and address such risks within its broader value chain.

This statement sets out the steps taken by SOPHiA GENETICS during the reporting period to identify, prevent, and mitigate risks of modern slavery within its operations and supply chain, and outlines the key measures and controls currently in place to uphold SOPHiA GENETICS’ commitment to combating modern slavery. While the Company has implemented policies, controls, and due diligence processes designed to address such risks, no framework of controls can provide an absolute guarantee that instances of modern slavery will not occur. The effectiveness of these measures depends, in part, on the conduct and transparency of third-party suppliers and partners, over whom the Company may have limited direct oversight or control.

SOPHiA GENETICS Core Business Operations and Supply Chain Description

SOPHiA GENETICS is a cloud-native software technology public company in the healthcare space dedicated to establishing the practice of data-driven medicine as the standard of care and advancing research in life sciences. The Company is headquartered in Rolle, Switzerland, and operates in over 70 countries across five continents, serving more than 800 healthcare institutions and employing a global team of over 400 professionals.

SOPHiA GENETICS’ core activities consist of the development and operation of a cloud-native software platform for the analysis and interpretation of complex genomic and multimodal datasets, including next-generation sequencing (NGS) data, across healthcare institutions worldwide. These enable healthcare institutions to share knowledge and experiences and to build a collective intelligence.

The Company's business model is predominantly knowledge- and software-based, relying on a highly skilled scientific, clinical, and technical workforce, with limited physical manufacturing inputs or labor-intensive supply chain dependencies. Given these characteristics, SOPHiA GENETICS has assessed the risk of direct involvement in modern slavery practices within its own operations as low. This assessment reflects the information available to the Company as of the date of this Statement and is subject to revision as new information becomes available or as the Company's operations and supply chain evolve. Nevertheless, the Company acknowledges that potential modern slavery risks may arise indirectly through its global supply chains. These risks are particularly relevant in the sourcing of laboratory equipment, information technology hardware, and professional services. The Company is committed to identifying, assessing, and mitigating these risks through its supplier due diligence processes.

Policies and Procedures

We are committed to upholding the highest standards of human rights and ethical labor practices across our operations and value chain. This commitment is reflected in the following policies and controls:

- the SOPHiA GENETICS' **Code of Business Conduct**, which outlines the core values and ethical principles that all employees and contractors of SOPHiA GENETICS are expected to uphold in support of the Company's mission to democratize data-driven medicine;
- the **Environmental Social & Governance Policy**, which formulates our commitments and processes to apply the highest standards of human rights and ethical labor practices across our value chain;
- the **Supplier Code of Conduct** (Supplier Charter), integrating sustainable and ethical principles into the procurement process and suppliers' contracts to ensure that human rights considerations are embedded throughout our value chain and;
- the **Whistleblowing Procedure and Speak Up tool**, to promote a culture of transparency, openness, and trust, where all employees and contractors can raise concerns about any illegal or unethical behavior and potential violations of the Code of Business Conduct.

Supplier Due Diligence and Modern Slavery Risk Assessment

We acknowledge that potential modern slavery risks may arise through our global supply chains. In this context, we adopt the following measures to prevent and mitigate modern slavery risks across our operations and value chain:

- **Procurement and Supplier Management Process:** We carefully select and engage suppliers and contractors based on their alignment with our ethical standards as set out in the Code of Business Conduct and the Supplier Charter. As a general practice, new distributors and suppliers are subject to a risk assessment and due diligence process prior to engagement, and existing suppliers are periodically monitored in accordance with the Company's risk-based approach.

The risk assessment determines whether a business relationship may be established or whether additional mitigation measures are required. As part of this process, multiple risk factors are evaluated, including the adoption of ethical standards, the existence of measures to prevent modern slavery, exposure to adverse media, and compliance with applicable international sanctions. The due diligence efforts are primarily focused on direct suppliers and contractors. Visibility into the supply chains may be limited, and SOPHiA GENETICS cannot guarantee that modern slavery risks do not exist at a deeper level of the supply chain.

- **Modern Slavery Risk Assessment:** We conduct periodic slavery and child labor risk assessments across our operations and supply chain, with the objective of maintaining broad coverage of our supplier base. As part of this process, we seek to map relevant elements of our supply chain, including suppliers, subcontractors, and distributors (hereafter collectively defined as "contractors"). The assessment draws on data from reputable external sources, such as the United Nations, the Walk Free Foundation, and the International Labor Organization. For contractors operating in countries or sectors identified as potentially high-risk, SOPHiA GENETICS undertakes enhanced due diligences to assess and mitigate the risks of modern slavery. These measures may include requesting and reviewing relevant policies or statements relating to modern slavery and/or reviewing the existing contractual agreements to verify commitments and controls. The risk assessments rely, in part, on data and indices published by third-party organizations. While these sources are considered reputable, the Company does not independently verify the accuracy or completeness of such data and accepts no liability for any inaccuracies.

Trainings

SOPHiA GENETICS employees are required to complete training on the Code of Business Conduct as part of the Company's standard onboarding and ongoing compliance program, with the aim of ensuring that daily activities are carried out in alignment with our values, principles and ethical standards. In addition, targeted training is provided to internal procurement professionals, focusing on sustainable purchasing practices, incorporating human rights considerations into supplier selection and management processes. SOPHiA GENETICS modern slavery prevention relies on employee training, awareness and conduct, which the Company cannot fully control.

Statement of approval

The publication of this Statement has been approved by the SOPHiA GENETICS Audit Committee of the Board of Directors in January 2026.