Statement on Modern Slavery and Human Trafficking 2025

Vivos Technology Limited trading as Phastar and its subsidiaries (together, 'Phastar') is committed to do everything we can to ensure modern slavery does not exist in our business and in the supply chains which we work with. This statement outlines the steps we have taken to ensure compliance with the Modern Slavery Act 2015 and reflects our dedication to ethical business practices.

Our Business

Phastar is a global contract research organization ("CRO") specializing in providing biometrics services to pharmaceutical and biotech companies to support clinical trials.

We are head quartered in London, UK and have locations in the US, Australia, Kenya, Japan, India, China, Denmark, Canada and Germany. Phi Topco (UK) Limited is the smallest and largest group in which the accounts of Phastar are consolidated.

Supply Chain

Our supply chain consists of suppliers providing services essential to our biometric offerings, along with other supporting goods and services. Whilst Phastar is a global business operating in numerous locations throughout the world, we consider the risk of modern slavery for our business and supply chains to be low.

We are committed to acting ethically and with integrity in all our business relationships around the world. We expect our employees, consultants, contractors, suppliers and agents to avoid any practice that constitutes modern slavery in connection with their work for Phastar. We thoroughly vet all our suppliers to ensure they comply with the laws and regulations of their respective operating countries.

Our Policies and Training

Phastar have comprehensive anti-bribery, business ethics, child labour, human rights and employee code of conduct policies which set our commitment to upholding human rights and towards the eradication of bribery and our commitment to ensuring that Phastar conducts its business in a fair, professional, and legal manner.

As part of the training, all employees certify that they have read and understood the policy so they can identify behaviors which may violate our policies.

Our Due Diligence Processes and Risk Assessments

We have put processes in place to minimize any potential risks where slavery and human trafficking could occur, including in our supply chains.

All our employees and contractors are subject to background checks and verifications, including agency checks. Phastar processes ensure strict compliance checks are carried for all candidates it supplies. We verify the identity of each worker and their right to work before supply commences. We require all employees and contractors to be aligned with our values.

Our QA team conducts vendor assessments for all providers, starting with an initial risk evaluation that determines the need for further actions, which may range from requesting additional information from the vendor to conducting a comprehensive audit of facilities and services.

We have a Standard Operating Procedure (SOP) for vendor selection and oversight, which clearly incorporates modern slavery and human trafficking considerations. This SOP is mandatory for all departments involved in the procurement process.

All our commercial contracts are subject to assurances from third party organizations that require them to operate in an ethical and legal manner.

Reporting, investigations and corrective actions

At Phastar, we encourage and expect our employees to seek guidance and report any potential violations of our Code of Conduct, any policies, or the law. All Phastar employees have access to dedicated channels through which they may voice concerns, either through local reporting mechanisms or through the global whistleblowing procedure. Phastar is committed to protecting employees when disclosing malpractice and will ensure that all disclosures made in good faith will be treated confidentially and without fear of retaliation.

Phastar thoroughly investigates any concerns raised and takes timely and adequate actions based on the findings of the investigation.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for 2025.

Meirion Rees

Chief Financial Officer

10th January 2025