



Modern Slavery Statement

Cyted Ltd., together with its subsidiary Cyted Health Ltd., (a UK-based healthcare “Group”) trading as Cyted Health, is focused on the early detection of gastrointestinal (GI) diseases, particularly Barrett’s oesophagus and oesophageal cancer. Through the development of innovative diagnostic technologies, Cyted Health aims to increase access to early-stage diagnosis, reduce the incidence of late-stage cancer, and ultimately improve patient outcomes. The Group is responsible for the development of EndoSign™ (a minimally invasive, non-endoscopic capsule sponge device, swallowed by the patient, to collect cellular samples which can detect early signs of oesophageal disease), and the integration of biomarker analysis into the diagnostic process.

This statement covers Cyted Health's UK operations and supply chain. While our US entity, Cyted Health inc. and operations are not currently included within the scope of this statement, we are committed to extending our risk assessment framework and modern slavery governance to our US entity in the next reporting period.

As this is the group’s first Modern Slavery Statement, it sets out the actions Cyted Group has taken to identify and mitigate modern slavery risks up to the date of publication. These actions span activities before and during our current financial year, including the establishment of internal governance, policy implementation, and supply chain assessments.

Section 54 of the UK Modern Slavery Act (2015) requires commercial organisations that operate in the UK and have an annual turnover above £36m to produce a slavery and Human Trafficking statement each year. The Cyted Group does not have an annual Turnover above £36m, so therefore are not required under this legislation to produce a yearly statement. However, the Group chooses to voluntarily produce a statement.

The Modern Slavery Act specifically states that any statement must include “the steps the organisation has taken during the financial year to ensure that slavery and human trafficking is not taking place in any of its supply chains, and in any part of its own business”. We cannot guarantee that the entire supply chain is slavery free and this is not a requirement, but we will demonstrate the steps we have taken to assess risk and mitigate these.

The Group is based in the east of England and employs around 50 people with broad experience across diagnostics, medical and technology sectors.

The Group has commissioned the services of recognised experts in the field of modern slavery and worked closely with them to produce a comprehensive modern slavery policy to assist in preventing or reducing the risk of modern slavery in our business and our supply chain. In addition, a modern slavery action plan has been created which will be driven by several key performance indicators (KPIs). Progress against the action plan and the KPIs will be reported to the Cyted Ltd board by the company’s Modern Slavery Champion (MSC) on a regular basis.



Our Commitment to Combatting Modern Slavery:

Modern slavery is a severe and pervasive violation of fundamental human rights, encompassing slavery, servitude, forced or compulsory labour, and human trafficking. It is estimated that over 50 million individuals worldwide are victims of modern slavery, with many cases going undetected due to the covert nature of the crime.

Cyted Group is committed to eradicating modern slavery in all its forms. We operate with a zero-tolerance approach and are dedicated to embedding ethical business practices throughout our operations and those of our partners. Our values underpin a corporate culture that prioritises respect for human dignity, equality, and lawful conduct.

Governance and Accountability:

Cyted Group has formally appointed a Modern Slavery Champion (MSC), a designated internal role. The MSC provides subject matter expertise and leads the company's strategic and operational approach to identifying, preventing, and mitigating modern slavery risks. The MSC's responsibilities include:

- Maintaining up-to-date knowledge of modern slavery legislation and best practice
- Drafting and submitting the annual Modern Slavery Statement
- Leading internal and supplier risk assessments
- Overseeing response protocols and staff training
- Reporting to the Board on identified risks, performance against KPIs, and remediation activities

The MSC collaborates closely with Procurement, HR, Legal, Compliance, and Operations to ensure a joined-up and robust approach to modern slavery risk management.

Business Risk Assessment:

A comprehensive risk assessment process has been undertaken and key risks to the company identified. Appropriate risk mitigation steps have been identified and will be implemented to reduce the risks where possible, including actions to develop and improve due diligence measures around purchasing, procurement and recruitment practices.

The overall assessment of the risk of modern slavery following implementation of our action plan is considered to be low.

Training:

Key managers and directors of the company have received in-depth training to understand what modern slavery is and how it can affect the business.

Ongoing training on modern slavery, our policy, and the risks that the company faces from modern slavery in our supply chains is being provided and will form part of the induction/onboarding process for all new staff.



Supply Chain and Procurement:

Cyted Group will not tolerate modern slavery in our business or our supply chain, and we recognise that high levels of integrity are required in the procurement of people, goods and services. We take a zero-tolerance approach to modern slavery and have examined our working practices to identify risks and implement effective controls, systems and procedures to prevent and reduce risk accordingly.

We are also committed to ensuring there is transparency in all our business operations and expect the same approach to be taken by all our suppliers, subcontractors and other business partners.

- Existing suppliers are being contacted to complete a Modern Slavery Questionnaire and agree to the Supplier Code of Conduct.
- All new suppliers must complete a Modern Slavery Questionnaire and agree to the Supplier Code of Conduct.
- Suppliers are risk scored on 18 parameters, including governance, policies, training, audits, and remediation processes.
- Suppliers are categorised into low, medium, or high risk, with appropriate follow-up actions taken based on the risk level of each.

We prioritise engagement and remediation over disengagement. Suppliers failing to demonstrate sufficient commitment to corrective action may have contracts terminated.

Wherever possible, we will seek to include a modern slavery clause in our contracts and service level agreements. These shall outline specific prohibitions against the use of forced, compulsory, or trafficked labour, or anyone held in slavery or servitude, whether adults or children. We expect our suppliers will hold their own suppliers to the same high standards.

Reporting and Victim Support:

Cyted Group has implemented a response protocol for identifying, reporting, and responding to suspected instances of modern slavery, as set out in our Modern Slavery Reporting and Response Guidelines. These guidelines are available to all staff and outline clear, actionable steps for escalation.

If a potential instance of modern slavery is suspected:

- Employees are instructed to report concerns immediately to their line manager or directly to the MSC.
- The MSC is responsible for triaging the report, assessing the nature of the risk, and determining the appropriate response pathway (e.g. internal investigation, external referral).
- In urgent situations, the victim is moved to a place of safety, with priority given to welfare, dignity, and confidentiality.

The guidelines include procedures for:



- Ensuring safe and discreet interviews with potential victims.
- Providing access to food, water, and warm clothing.
- Contact translation services if needed.
- Notifying the Modern Slavery & Exploitation Helpline (08000 121 700).
- Referring individuals to the National Referral Mechanism (NRM) for access to safeguarding and victim support services.

Where criminality is suspected, Cyted Group will liaise with the appropriate authorities, including the police, Gangmasters and Labour Abuse Authority (GLAA).

Our aim is to ensure a victim-centred response that prioritises safeguarding and upholds the legal and ethical obligations of our business.

KPI's

To monitor the effectiveness of the due diligence and mitigation steps we are taking to reduce the risk of modern slavery in our business and our supply chains, we have identified the following key performance indicators. These will be reviewed and reported against in our next annual modern slavery statement.

- 90% of employees trained on modern slavery
- 100% of critical suppliers assessed for modern slavery compliance
- 100% of critical suppliers signed code of conduct

Review

This statement has been prepared in compliance with the Modern Slavery Act 2015 for the year 2025 and approved by the board of Cyted Ltd.

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Marcel Gehrung