



## **MODERN SLAVERY STATEMENT OF ACM MEDICAL LABORATORY**

### **PURPOSE AND SCOPE**

This Statement applies to: ACM Medical Laboratory, Inc. and all of its subsidiaries, affiliates, partnerships, joint ventures (hereinafter referred to as “ACM”).

ACM is committed to respecting internationally recognized human rights throughout its global operations. Consistent with this commitment, ACM strives to prevent, identify, and eliminate modern slavery and human trafficking from its global operations.

### **OUR CORPORATE STRUCTURE & OPERATIONS**

ACM is a for profit organization inside of Rochester Regional Health (“RRH”), a non-profit organization providing an integrated health network system, which includes hospitals, home health programs, outpatient laboratories, rehabilitation programs and surgical centers, independent and assisted living centers and skilled nursing facilities. ACM and RRH headquarters are located in Rochester, NY, USA.

ACM Global Laboratories is a wholly-owned affiliate of RRH, which provides toxicology and clinical trial testing services, with facilities in Rochester, NY; Philadelphia, PA; United Kingdom; India; and Singapore.

Among other policies, these business operations are governed by our Code of Conduct, a core value of which is respect for internationally recognized human rights and compliance with the applicable laws.

### **OUR VENDORS**

Our Vendors are generally large multinational companies that directly provide to ACM equipment, laboratory supplies and general testing supplies. ACM also relies on other laboratories as reference labs.

We expect our Vendors to conduct all their business transactions in a manner that respects internationally recognized human rights, and in compliance with all applicable laws.

### **MODERN SLAVERY RISKS**

ACM is not aware of any situations in which modern slavery exists within its own operations, or in the operations of its Vendors.

As such, and in light of the actions described below, ACM believes the risk of modern slavery is low in its operations and those of its Vendors.

Because ACM's services and those of its Vendors are considered "essential" in many jurisdictions, the COVID-19 pandemic did not significantly change ACM's operations, and therefore, the risk of modern slavery was not significantly altered.

## **ACTIONS TAKEN TO ADDRESS MODERN SLAVERY RISKS**


- **Policies:** Our policies, including this Modern Slavery Statement, our Modern Slavery Policy and our Code of Conduct reflect our commitment to respecting internationally recognized human rights, and complying with all applicable laws and regulations, including those laws on human trafficking and modern slavery.
- **Questions and Reporting:** ACM encourages all its employees, Vendors, customers and other stakeholders to report any concerns and raise any questions they may have related to ACM's direct activities, or the vendor chains of ACM. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. ACM's reporting procedure is designed to make it easy for employees to make disclosures in full confidence without fear of retaliation, including but not limited to reporting to the site leader and/or HR leader.
- **Investigations/due diligence:** The HR department is responsible for investigations and due diligence in relation to known or suspected instances of modern slavery and human trafficking. ACM reserves the right to monitor and conduct audits of its direct Vendors, with whom it has contractual relationships. ACM also reserves the right to terminate relationships with those direct Vendors who engage in modern slavery or human trafficking, or are otherwise in violation of the Vendor Code of Conduct.
- **Training:** Employees receive annual training on our Modern Slavery Policy. In addition, we ensure a high level of understanding of the risks of modern slavery and human trafficking by providing relevant information to employees managing our vendor chains. In addition, ACM has a host of internal policies, procedures and training that addresses human rights issues and anti-bribery that may assist in identifying risks pursuant to this policy.
- **ACM as an Employer:** As a global employer, we have a broad base of employees working around the world in various functions. ACM is committed to respecting the internationally recognized human rights of its employees through our internal employment policies and practices. Fostering and encouraging diversity and inclusion is a cornerstone of our culture. Appropriate and competitive compensation and benefits play a critical role in our strategy to attract, retain and motivate our workforce. We are committed to providing competitive and equitable compensation for our employees, and benefits to support our employees' needs, as well as programs to support work-life balance.

For purposes of complying with Section 54 of the United Kingdom Modern Slavery Act of 2015, this statement constitutes the requisite annual “slavery and human trafficking statement” for the financial year ending 31 December 2021, and applies to the following entities:

- ACM Medical Laboratory, Inc.
- ACM Global Laboratory Operations Ltd.
- ACM Global Central Laboratory Private Ltd.
- ACM Global Singapore Holding Pte. Ltd.
- Toxicology Holdings Corp.

This Statement has been approved by the Board of Directors.

Date of approval: 09-10-2021

Signed: 

Print name: Brian H. Wright

Job Title: President

Date: 09-10-2021