

Modern Slavery Statement 2024 – 2025

Introduction

Genome Research Limited, including the Wellcome Sanger Institute, unequivocally opposes all forms of modern slavery, including slavery, servitude, forced or compulsory labour, and human trafficking. We are committed to conducting all our research activities, collaborations, and supply chain relationships ethically and with integrity, and we expect the same high standards from all those with whom we work.

This Modern Slavery Statement sets out the steps we took during the financial year ended 30 September 2025 to identify, assess, and address the risks of modern slavery within our organisation, our supply chain, and the wider research and collaborative networks in which we operate. It also reaffirms our commitment to strengthening our practices, enhancing transparency, and continually improving our approach to preventing modern slavery in all its forms.

Our Organisation

Genome Research Limited is a charity registered in England and Wales. We are a company limited by guarantee registered in England and Wales. Our sole member is the Wellcome Trust Limited.

We have one trading subsidiary (Genome Research Trading Limited) and are one of two members in another charitable company (Hinxton Hall Limited) that provides facilities for research and education at the Wellcome Genome Campus. This statement covers the three companies.

Our strategic objectives are to:

1. Advance understanding of biology using genome sequences and biodata
2. Apply genome science for human health and other societal benefits
3. Foster discussion of the scientific, medical and wider implications of genomes

Our work is overseen by our Board of Directors, which has ultimate responsibility for the organisation. The Sanger Leadership Team, led by Matt Hurles (Chief Executive and Institute Director), is responsible for leading the organisation and implementing its scientific vision and strategy.

Our Policies and Procedures

We maintain a range of policies and procedures that reflect our commitment to conducting all activities responsibly and to implementing effective systems and controls. The key policies and procedures that help minimise the risk of modern slavery and human trafficking within our organisation and supply chain include:

- Health, Safety and Wellbeing Policy – supports the health, safety, and wellbeing of all workers across GRL and the wider Sanger community, including staff, students, contingent workers, contractors, visitors, and members of the public.
 - HR Procedures – ensure that all staff have appropriate right-to-work documentation and are paid fairly and in line with legal requirements.
 - Procurement Policy – sets out requirements for all procurement activity to comply with relevant laws and be conducted ethically and sustainably. This is supported by our Sustainable Procurement Code of Ethics, which requires suppliers and employees to uphold fair labour practices, diversity and inclusion, and community engagement.
 - Anti-Fraud, Bribery and Corruption Policy – reinforces our commitment to honesty and integrity and enables staff to report any suspected fraudulent or corrupt behaviour.
 - Whistleblowing Policy – provides guidance on reporting significant misconduct, wrongdoing, or irregularity and offers multiple Speak Up channels, including an anonymous reporting tool available to all staff.
 - Safeguarding Guidance and Code of Conduct – outline our approach to safeguarding across the organisation and are supported by Designated Safeguarding Leads.
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Our Supply Chain

We work with a range of suppliers to support the operations of our organisation. The key categories in which we engage suppliers include:

- scientific equipment and specialist research services
 - information technology products and services
 - facilities management and related operational services
 - professional services primarily for non-scientific activity
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Our Supply Chain Due Diligence

The prevention of modern slavery is built into our procurement processes. Our procurement team aims to develop long-term relationships with suppliers, giving us greater confidence that we are working with organisations that follow responsible practices and minimise risks, including the risk of slavery and human trafficking. We build partnerships with our largest

and higher risk suppliers so that we can better understand their operations and maintain confidence in their approach to ethical practices.


During re-tendering, we also use the opportunity to confirm that these policies remain up to date and effective.

We are committed to continuous improvement. In the year ahead, the roll out of a modern Enterprise Resource Planning system, along with associated process redesign, will enable us to:

- automate and strengthen our supply chain due diligence, giving us better visibility and control across our supplier base
- develop a new Supplier Assurance Framework that enhances our risk based approach to supplier due diligence and reinforces our Environmental, Social and Governance standards
- expand staff training and awareness, particularly for those involved in procurement and contract management, supported by improved systems and clearer assurance processes

Statement Compliance

This statement is made pursuant to section 54 of the Modern Slavery Act 2015 and constitutes Genome Research Limited's modern slavery and human trafficking statement for the financial year 1 October 2024 to 30 September 2025.

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John-Arne Røttingen

Chair

Signed by:

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Professor Matt Hurles

Chief Executive and Institute Director

Date: 12 December 2025