



Modern Slavery Act Statement

Introduction

The Modern Slavery Act of 2015 (the “Act”) is a significant step in ending labour exploitation and increasing labour practices in global supply chains. The Act has prompted Innovaccer to implement systems and controls within our corporate group to take steps to confirm that modern slavery is not taking place within our business or in any of our supply chains.

Innovaccer is in the process of inspecting our business and supply chains, addressing areas that are at high risk for modern slavery. This effort will help us review and rethink our existing controls and their effectiveness in guarding against modern slavery.

Based on our review, Innovaccer will put new risk-based controls into place and draw on industry experts' best practices. This statement is dated September 1, 2022. Innovaccer's UK subsidiary entity, Innovaccer Ltd, was registered on April 14, 2022, and we will continue to update this statement as our work progresses per UK law and best practices.

Internal Steps

At Innovaccer, we're guided by our Core Values and expect all employees to embody these values in all aspects of their work. Our Core Values are:

- Empathize
- Be Transparent
- Win as a Team
- Make our Customers Heroes
- Take Moon Shots

All Innovaccer employees and independent contractors hired by Innovaccer will be required to read and attest to Innovaccer's Anti-slavery and Human Trafficking Policy and Code of Conduct beginning in 2023 and continuing on an annual basis thereafter. They will also confirm that they will adhere to these policies when they begin with Innovaccer. Both documents emphasize Innovaccer's responsibility and each individual responsibility to maintain an environment free of modern slavery. Innovaccer's Code of Conduct and Anti-slavery and Human Trafficking Policy will be available within the Compliance Portal and accessible through the Innovaccer Intranet site.

Innovaccer encourages individuals to report any concerns or suspicion relating to modern slavery. They can directly report to the Compliance department at Compliance@Innovaccer.com or at Speakup.Innovaccer.com.

We are also taking steps to update our Procurement Policy by the end of the fiscal year 2022. This update will require our Suppliers to comply with the Procurement Policy and take necessary measures against modern slavery in their supply chains or business. Our Procurement team members will also receive training on Modern Slavery.



Preventing modern slavery in our supply chain

Innovaccer leans on our global supply chain to conduct business. Once our Procurement Policy is updated to reflect our obligations under the Modern Slavery Act and our vendor risk stratification is complete to evaluate their risk profiles, we may require select suppliers to acknowledge the relevant policies and procedures and/or to take necessary steps to prevent modern slavery in their own business and supply chain.

Should any Supplier be found to violate the Procurement Policy or their own substantially similar policy we work to take contractual remedies available to us up to and including the termination of the contract. Innovaccer may also take steps to engage with the supplier to assist them in remediation.

Innovaccer will implement a new procurement process in which relevant suppliers must answer the following question, *“Do you take steps to ensure that slavery and human trafficking are not taking place in your supply chains and any part of your own business?”*

We will review and retain a record of the responses; if the response is non-satisfactory or raises concerns, it will be escalated to the Compliance and Procurement Departments at Innovaccer for evaluation. We may decide not to engage with a supplier or terminate an agreement with a supplier if their actions are not aligned with Innovaccer policies and values.

We plan to continue refining the processes surrounding our supply chain to strengthen our tools and processes in place when dealing with suppliers.

Future Plans

In 2022 and 2023 adhering to the Act, Innovaccer will review relevant policies, map our supply chain, implement mandatory training for our procurement team, and raise awareness of reporting procedures when modern slavery is suspected.

We plan to notify our current suppliers by year-end of our stance against modern slavery and determine the future of our relationships with those suppliers based on their responses per Innovaccer policy.

We plan to continue monitoring our processes and policy to detect areas that require improvement in future years.