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ALIVECOR LIMITED
ANTI-SLAVERY AND HUMAN TRAFFICKING POLICY

1. Policy Statement

1.1 AliveCor's mission is to save lives and transform cardiology by delivering intelligent, highly personalized heart data to clinicians and patients anytime, anywhere. As a global entity, we design, manufacture, and promote medical devices and services. Our products are typically distributed directly, or through intermediaries, to hospitals, physicians, and consumers, positioning us as the last link in the supply chain before these products reach the end user. In 2023, our focus was centered around the core cardiology business, where we crafted technologies and services to assist healthcare professionals and consumers in diagnosing and managing cardiovascular disease.

1.2 Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

1.3 We have a zero-tolerance approach to modern slavery and are committed to acting ethically and with integrity in all our business dealings and relationships.

1.4 We continually assess, implement and enforce effective systems and controls to ensure that modern slavery is not taking place anywhere in our own business or in any of our supply chains.

1.5 We are also dedicated to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with the disclosure obligations under the Modern Slavery Act 2015, regardless of whether we are required to, or if we choose to voluntarily, make such disclosures.

1.6 We expect the same high standards from all of our contractors, suppliers and other business partners and, as part of our contracting processes, we strive to include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.

1.7 Regardless of whether the requirements and obligations set out of this policy are strict legal requirements, there are serious consequences, from legal to reputational, for not ensuring ethical and transparent practices in our business. Our customers and business partners are increasingly looking for us to demonstrate compliance as part of our procurement and customer onboarding processes.

1.8 If you have any concerns or questions about this policy, please contact support@alivecor.com ensure that you are clear on the commitments we are making as part of this policy and our modern slavery statement.

2. About this Policy

2.1 The purpose of this policy is to:

(a) set out our responsibilities, and those of our partners, in observing and upholding our position on modern slavery and human trafficking; and

(b) provide information to those partnering with us on how to identify and report concerns regarding modern slavery and human trafficking.

2.2 This policy applies to all persons working with us in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.

2.3 This policy does not form part of any employee's contract of employment, and we may amend it at any time.

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3. Responsibility for the Policy

3.1 The board of directors has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

3.2 Bill Jacobs, Director of AliveCor Limited, has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

3.3 Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.

3.4 Comments, suggestions and queries are encouraged to improve our processes, systems and controls. Therefore, if you have any comments or any suggestions of ways in which this policy might be improved please send these to support@alivecor.com.

4. Your Responsibilities and How to Raise a Concern

4.1 You must ensure that you read, understand and comply with this policy.

4.2 The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all of our personnel and business partners. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.

4.3 You must notify your manager as soon as possible if you believe or suspect that a breach of this policy has occurred, or may occur in the future.

4.4 You are encouraged to raise concerns about any issues or suspicions of modern slavery in any parts of our business or supply chains at the earliest possible stage.

4.5 If you believe or suspect that a breach of this policy has occurred, or that it may occur, you must notify your manager as soon as possible.

4.6 If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, raise it with your manager.

4.7 We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken.

4.8 We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains.

4.9 Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the individual listed in Section 3.2 immediately.

5. Training and Communication

5.1 Training on this policy, and on the risk our business faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work for us, and regular training will be provided as necessary.

5.2 Our zero-tolerance, and commitment to addressing the issue, of modern slavery in our business and supply chains should be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate on an ongoing basis. All contracts with any such partners should contain appropriate and proportionate clauses to address, and ensure our commitment to, the prevention of modern slavery.

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6. Breaches of this Policy

6.1 Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

6.2 We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

DocuSigned by:

Bill Jacobs

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Bill Jacobs

Director, AliveCor Ltd.