

## **Anti-Slavery and Human Trafficking Statement**

Modern slavery is a crime and a violation of fundamental human rights. It can take many forms such as forced and compulsory labour, servitude, slavery, and trafficking. Healthcare 21 Group (hereinafter referred to as the “Company”) and all its associated business entities are committed to acting ethically and with integrity in all its business dealings, and relationships and are committed to efforts against Modern Slavery.

The Company acknowledges that its employees and employees of suppliers deserve the right to live and work with dignity and respect, in reasonable and safe conditions and earn a fair income. The Company has a responsibility to ensure respectable social and ethical practices within its own operations and within its supply chain.

This statement sets out the Companies actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its business and in its supply chains. The Company maintains relationships with many different organisations, suppliers, contractors, as well as with its own employees. The Company is committed to and compliant with the general law on employment and human rights and more specifically, the Modern Slavery Act 2015 (UK) and The Criminal Law (Human Trafficking) Act 2008, as amended by the Criminal Law (Human Trafficking) (Amendment) Act 2013 (Ireland).

### **Organisational Structure and Supply Chains**

This statement covers all the activities of the Company. It governs all its business dealings and the conduct of all persons or organisations with whom it contracts directly or who it appoints to act on its behalf.

The Company expects all who have, or seek to have, a business relationship with it, to familiarise themselves with this statement and to always act in a way which is consistent with it.

Under the Healthcare 21 Group, the UK legal entities are: Healthcare 21 (UK) Limited, Aquilant Limited, Aquilant Endoscopy Limited, Xograph (UK) Healthcare Limited. The legal entities in Northern Ireland and Republic of Ireland are Aquilant Northern Ireland Limited are Tools for Living (Ireland) Limited Trading as Healthcare 21 NI, Xograph Healthcare (Ireland) Limited, Primacy Healthcare 21 Limited, Aquilant Medical (ROI) Limited, Aquilant Scientific (ROI) Limited, O’Flynn Medical Limited and O’Flynn Innovations Limited. The Germany entity is Healthcare 21 (DE) Limited.

The Company sources both direct finished goods for resale, rent and indirect services. The business follows a standardised sourcing and ongoing review process for the identification, selection, and management of suppliers to the Company. This is risk managed via the Company supplier set-up, monitoring and off boarding process in conjunction with the supplier management team. As part of this process, and to ensure obligations are met under relevant legislation candidate suppliers must first meet pre-qualification criteria, to be considered for a commercial relationship. Criteria includes providing evidence of the existence of and implementation of an Anti-Modern Slavery statement, Environmental, Social and Governance review and be subject to audit on the implementation of this statement. This process is managed by the Company Procurement and Quality & Compliance departments to ensure ongoing compliance.

### **Responsibility**

The Quality & Compliance department ensures that all employees are aware and understand this statement and the Company’s stance on anti-slavery and human trafficking. The Company and its Procurement and Quality & Compliance departments are responsible for ensuring that all dealings with suppliers, whether contractual or not, comply with this statement.

The Company adheres to its Diversity and Equal Opportunities policy and fully supports the principles of equal opportunities in employment and opposes all forms of discrimination on the grounds of gender, race, ethnic origin, sex, marital & family status, age, sexual orientation, disability, political or religious belief and membership of the Travelling Community. Training on Diversity, Equality & Inclusion is mandatory for all employees.

All recruitment activities follow a detailed process to ensure every candidate is treated appropriately from a legal and welfare perspective. The Company has robust recruitment processes in line with employment law (as applicable), including “right to work” document checks, contracts of employment, and checks to ensure all employees are above minimum working age (16).

The Company conducts its own recruitment activities and only uses reputable third-party recruitment suppliers to source labour and conduct appropriate background checks. Where necessary and if required, the Company may request demonstration of compliance with this statement from its third-party recruitment suppliers.

The Company mandates that all employment is voluntary, in line with the Company Recruitment Policy. Market-related pay and reward is reviewed annually.

Where the Company deals with suppliers who manufacture products outside of the UK and Ireland, the Company ensures that these suppliers comply with all local legislation regarding Ethical Trading and Modern Slavery. This is identified through the pre-qualification criteria as part of the supplier sourcing and ongoing review process. All suppliers are expected to familiarise themselves with the Company's Anti-Slavery and Human Trafficking statement and to act in a way which is always consistent with this statement. If local legislation differs from this statement, the Company will encourage best practice and changes to supplier processes and offer support to the supplier on how it might achieve compliance.

The Company's response to and reporting of concerns raised in relation to suppliers from outside of the UK and Ireland will be tailored to the local circumstances, legislation, organisations, and support mechanisms present in that country.

The Company encourages all employees to report any concerns related to the direct activities of the organisation or its supply chain. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking.

The Company's confidential reporting procedure is designed to make it easy for employees to make disclosures, without fear of retaliation. Employees who have concerns can refer, confidentially, to the Chief Operations Officer and the Chief People Officer, or the Company's external whistleblowing service. The number is 0044 844 892 4413 and is available free of charge, 24 hours per day, 365 days a year.

#### **Due Diligence**

On an annual basis, the Company will review the progress of all required training on this statement. In addition, the Company will raise awareness of modern slavery issues by making it available on the Company website for customers and employees. The Company expects employees to refer to this mandatory statement and understand what is required of them in relation to modern slavery.

The Company has a number of further policies and documents which reflect its objective to act ethically and in line with legal and regulatory obligations regarding our employees, clients, and our business relationships.

- Employee Handbook
- Code of Conduct
- Protected Disclosure Policy (Whistleblowing)
- Ethical Business Practice policy

Healthcare 21 Group will make this statement available to members of the public and other interested parties on the Company's website <https://www.healthcare21.eu/>.



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Chief Executive Office  
Healthcare 21 Group

*Statement Updated July 2023*