

Modern Slavery Statement for SurgEase Innovations Ltd

Authors: Senior Management Team

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Introduction

SurgEase Innovations Ltd is committed to preventing acts of modern slavery and human trafficking from occurring within both its business and supply chain. This statement is made in compliance with s.54 of the Modern Slavery Act 2015 and sets out the steps taken by SurgEase Innovations Ltd during its financial year ending 31 December 2023 to prevent slavery and human trafficking from taking place in any of its supply chains or any part of its business.

Conducting business in an ethical and responsible manner is part of our corporate responsibility, and we expect the same high standards from our suppliers. This includes an expectation that they conduct their business lawfully and ethically, which includes adopting business practices that prevent or eliminate modern slavery and human trafficking within their onward supply chain.

Structure and Supply Chain

SurgEase Innovations Ltd operates within the medical technology sector in the UK. You can find out more about our organisation and what we do at www.surgease.com

We work with various third-party suppliers and service providers to support our operations. Whilst we procure some goods and services from third-party suppliers in the UK, our primary suppliers are selected through a rigorous process to ensure alignment with our values and legal requirements.

Policies

We have several standards and policies that demonstrate our commitment to preventing modern slavery and human trafficking, both for our business and for our business partners who assist us in our operations. Our commitment is defined in, among others:

- Human Rights Statement, highlighting that we do not tolerate the use or threat of violence, forced or exploitative labour, or any form of modern slavery. Employment relationships must be voluntary and fair in accordance with applicable laws.

- Code of Ethics and Business Conduct, which applies globally to all officers, directors, employees, contract workers, and agents of SurgEase Innovations Ltd. Amongst other things, it makes clear the standards of conduct expected when representing SurgEase Innovations Ltd and requires reporting of any actual or suspected violations of law, including those related to the Modern Slavery Act 2015.

- Supplier Code of Conduct, covering topics such as ethics, human rights, and labour conditions. It requires suppliers to take a clear stance against forced labour and exploitative child labour.

Code of Conduct

SurgEase Innovations Ltd adheres to a strict Code of Ethics and Business Conduct, which applies to every officer, director, employee, contract worker, and agent within the company. Among other things, this Code clarifies the standards expected and requires employees to report any violations of the law. Our business partners are also required to comply with our Supplier Code of Conduct, which ensures ethical practices throughout the supply chain.

We investigate all alleged breaches of our Code of Ethics and Business Conduct and take a zero-tolerance approach if a breach is established.

Compliance Action Line

We provide a confidential whistleblowing procedure for people within our operations and supply chain to report any concerns, anonymously if necessary. No overt cases of modern slavery have been reported to date, and on the one occasion where we felt the actions of a supplier was unethical on the grounds of harsh working conditions for a single employee, we investigated, escalated and immediately terminated all business relations with that supplier. All future cases will be thoroughly investigated and appropriately addressed in a similar fashion. This could include supplier audits (both scheduled and unannounced), training, or termination of business relationships. This process is supported by strict non-retaliation policies.

Conflict Minerals

Some of the materials used in our products may contain tantalum, tin, tungsten, and gold, which are commonly referred to as 'conflict minerals' due to their association with armed conflict in certain regions of central Africa. These minerals are often mined under conditions of forced labour or modern slavery. SurgEase Innovations Ltd is committed to maintaining a conflict-free supply chain and actively monitors and assesses our suppliers to ensure that these materials are sourced ethically.

We recognise that conflict minerals can also bring an increased risk of modern slavery, and we

are committed to ensuring that our supply chain is free from such risks. In doing so, we expect all of our suppliers to comply with our policies on conflict minerals, and we conduct due diligence on our supply chain to address these issues and offer advice and training when needed.

Due Diligence

SurgEase Innovations Ltd performs thorough and annual due diligence on third-party suppliers and partners to assess their suitability and ensure compliance with all relevant legislation, including the Modern Slavery Act 2015. We are committed to expanding these procedures to address the specific risks associated with modern slavery and human trafficking in our supply chain.

Risk and Compliance

Our supply chain primarily involves regulated sectors, and we source the majority of our goods and services from suppliers operating in countries with stringent compliance regulations. Based on our assessment, the risk of modern slavery within our supply chain is low; however, we remain vigilant and take immediate action if any evidence of non-compliance is discovered.

Training and Performance Indicators

We are committed to preventing modern slavery through employee training and performance measures. All employees must complete training on the Code of Ethics and Business Conduct annually, with participation monitored and reported to the board.

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