

GARDAMED'S ANTI-SLAVERY POLICY STATEMENT

This statement sets out the steps Gardamed Limited has undertaken, and is continuing to take, to ensure modern slavery or human trafficking is not taking place within our business or supply chain.

Gardamed Limited has zero tolerance to slavery and human trafficking in our business and supply chains. We recognise that slavery and human trafficking is a real yet hidden issue in our society. We are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure that any form of slavery is not taking place in our own business or supply chains.

COMPANY ACTIVITY, STRUCTURE AND SUPPLY CHAINS

Gardamed is a medical device distributor with its head office in England. We import medical devices from Italy, The Netherlands, and Israel and we supply NHS and private hospitals and clinics as well as retail pharmacies, pharmaceutical wholesalers and directly to our customers.

Relevant policies

We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:

- **Recruitment** – we operate a robust recruitment policy, including conducting eligibility to work in the UK checks for all employees to safeguard against human trafficking or individuals being forced to work against their will.
- **Supplier code of conduct** - We operate this policy to ensure our suppliers operate in full compliance with the laws, rules and regulations of the countries in which they operate, and seek similar commitments across their own supply chains.
- **Whistleblowing** – our whistleblowing policy ensures that all employees know that they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisal.
- **Staff code of conduct** – We are committed to the fair treatment of all employees. Our staff code of conduct reflects our core values and expected behaviours. The code of conduct makes it clear that we have a zero-tolerance approach to modern slavery.
- **Procurement policy** – We want to make sure that potential suppliers are committed to ensuring that slavery and human trafficking is not taking place within their own supply chains. Our procurement policy and supporting procedures set out controls and checks to help verify this.
- **Health and safety** – this policy sets out our approach to ensure we provide a healthy working environment for our staff and contractors that work out of our premises.

Our supply chains

Our supply chains are based in the UK, Europe and Israel and include suppliers of direct materials (medical device manufacturing and packaging), suppliers of indirect services (professional services, facilities, sales and marketing agencies).

We conduct due diligence on all suppliers assessed by our Quality Team as critical and/or major to the business before allowing them to become one of our suppliers.

External policies

1. Suppliers and their subcontractors must comply with Gardamed's Supplier's Code of Conduct which includes compliance with the Modern Slavery Act 2015, a prompt payment commitment and ethical behaviour.

Further steps

We intend to take the following further steps to combat slavery and human trafficking:

1. Risk assess all new suppliers using the Global Slavery Index and ask them to certify that they have taken steps to eradicate modern slavery within their own organisation and supply chain;
2. Notify all existing suppliers of our expectations and their obligations in relation to the prohibition of modern slavery;
3. Include appropriate measures in our due diligence processes for sourcing suppliers, subcontractors and acquisitions on a risk assessed basis;
4. Where appropriate we will include reference to the Modern Slavery Act 2015 in our policies and procedures.

Approval for this statement

This statement is made pursuant to section 54(1) of the *Modern Slavery Act 2015* and constitutes Gardamed's slavery and human trafficking statement for the financial year ending 31 March 2024.

This statement was approved by the Board of Directors on 16 January 2023 and signed by Mandy Wright CEO.

Following approval this statement is published on the government's Modern Slavery Statement Registry and on our UK website.

Gardamed Limited

Signature



Name

Mandy Wright

Position

CEO

Date

16th January 2023