

## MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

### Introduction

This statement sets out Inspiration Healthcare Group PLC's ("the Group") 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 own business and its supply chains. This statement relates to actions and activities during the financial year from 1<sup>st</sup> February 2020 to 31<sup>st</sup> January 2021.

The Group is a British based, global provider of medical technology solutions for use in acute care settings and infusion therapies. We recognise that we have a responsibility to take a robust approach to slavery and human trafficking, and we have continued to take our responsibility very seriously during the coronavirus pandemic.

Inspiration Healthcare is committed to the principles of the Modern Slavery Act 2015, preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

### Organisational Structure and Supply Chains

This statement covers the activities of the Inspiration Healthcare Group of Companies comprising Inspiration Healthcare Ltd, Viomedex Ltd, and SLE Ltd.

The Group's own brand of critical care products for neonatal intensive care span both invasive and non-invasive respiratory support in terms of capital equipment and disposable medical devices, and thermoregulation and patient warming products for new-borns through to adults in intensive care and the operating theatre, whilst its distribution business in the UK and Ireland supplies solutions to support infusion therapies.

The Group supplies a wide range of products that are manufactured in the United Kingdom and some other countries, with some supplied by third party manufacturers.

A more detailed description of Inspiration Healthcare's business operations and ambitions can be found in our annual report.

### Countries of Operation and Supply

Our operations are located in the UK across 5 sites with employees in a wide variety of roles including compliance, engineering, manufacturing, sales and marketing, clinical and technical support, supply chain and warehouse.

As an equal opportunities employer and, in the case of Inspiration Healthcare Ltd, a member of the Living Wage Foundation, we are fully committed to creating and ensuring a supportive environment in which our employees and workers can flourish and be treated with dignity, respect and without discrimination.

We have robust recruitment and people management processes and we ensure that anyone who works for us is legally entitled to work in the UK.

We aim to source our products from suppliers who are well known to us, none of which is known to be involved in modern slavery or illegal activities. Should we find out that any of our suppliers are involved in such activities, we will work closely with them to remedy the situation. If the malpractices continue despite our efforts to encourage anti-slavery activities, we will take steps to terminate all arrangements with them, and find different suppliers from which we are able to procure alternative products to ensure that supplies continue.

We take all reasonable steps to ensure that none of our activities is at high risk of slavery or human trafficking.

### Responsibility

Responsibility for our anti-slavery initiatives is as follows:

- **Policies:** The Group has policies on Recruitment; Induction; Standards of Conduct; Whistleblowing; Anti- Bribery, Corruption and Money Laundering; Equal Opportunities, and Dignity at Work, which are routinely reviewed and communicated by the Group Head of HR. Our Ethical Business Statement is reviewed and communicated by the Group CEO.
- **Training:** All employees within the Group are required to complete online training, which serves to educate them on modern slavery legislation, and how to identify and report suspected modern slavery practices.
- **Suppliers:** Our suppliers are managed by an experienced team, and critical suppliers to the business are audited regularly as part of our Quality Management System. These audits, which are being redesigned to include risk assessments of slavery and human trafficking in supplier operations, allow us to have access to the supplier on a regular basis to ensure that they keep up the high standards that we are determined to uphold and promote. We will also use our best endeavours to ensure that our procurement strategies and contract terms and conditions include references to modern slavery and human trafficking.
- **Distributors:** We have a distributor network spanning over 75 countries in key geographic areas, such as the USA, China, Japan and Russia, and, through legally binding distributor agreements, our International team now require our distributors to carry out their activities in a way that guards against slavery and human trafficking in their operations.

### Relevant Policies

We operate the following policies that describe our approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in our operations:

- **Whistleblowing Policy:** We encourage all of our workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, our Group. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. Our whistleblowing procedure is designed to make it easy for workers to make disclosures without fear of retaliation. Employees, customers or others who have concerns are encouraged to report any suspected wrongdoing to the relevant authorities.
- **Standards of Conduct Policy:** Our policy makes clear to employees the actions and behaviours expected of them when representing our Group. We strive to maintain the highest standards of employee conduct and ethical behaviour in all of our business activities.
- **Supplier Code of Conduct:** We are committed to ensuring that our suppliers adhere to the highest standards of ethics. Suppliers are now required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the laws governing their use of labour in their jurisdiction. Serious violations of our Supplier Code of Conduct may lead to the termination of the business relationship. Our supplier audits will now also include an assessment of the level of compliance with this Code.
- **Recruitment Policy:** We use only specified, reputable employment agencies to source labour and will seek the commitment of any new agency we are using to uphold the Modern Slavery Act 2015 before accepting workers from that agency.
- **Ethical Business Statement:** Our Ethical Business Statement sets out our commitment to conduct our business fairly, impartially, in an ethical and proper manner, and in full compliance with all laws and regulations. In conducting our business, integrity is the foundation of all Group relationships, including those with customers, suppliers, and among employees. The highest standards of ethical business conduct are required of all employees in the performance of their role responsibilities.

### Due Diligence

We have committed to undertake due diligence when considering taking on new suppliers, and regularly review our existing suppliers. Our due diligence and reviews will now include:

- mapping the supply chain broadly to assess particular product or geographical risks of modern slavery and human trafficking;
- evaluating the modern slavery and human trafficking risks of each new supplier;
- reviewing, on a regular basis, all aspects of the supply chain based on the supply chain mapping;
- identifying risks of slavery and human trafficking during our regular supplier audits or assessments through our own qualified staff;
- creating a risk profile for each supplier;
- using Kroll, where suppliers can be checked for their labour standards, compliance in general, and modern slavery and human trafficking in particular;
- invoking sanctions against suppliers that fail to improve their practices or seriously violate our Supplier Code of Conduct, including the termination of the business relationship.

### Performance indicators

We have reviewed our key performance indicators (KPIs), and we:

- are requiring all employees to have completed their Modern Slavery training as assigned to them;
- will continue to operate a system for supply chain verification whereby we evaluate potential suppliers before they enter the supply chain.
- will continue to review our existing supply chain in accordance with our business management system.

### Training

We require all staff within our Group to complete training on modern slavery; this will be a comprehensive course for those employees who are involved in supply chain management and our international business, and as a module within our broader Business Compliance training course for all other employees.

We require all staff to complete their online training course within one month of assignment.

Our modern slavery training covers:

- how to assess the risk of slavery and human trafficking in relation to various aspects of the business, including resources and support available;
- how to identify the signs of slavery and human trafficking;

- what initial steps should be taken if slavery or human trafficking is suspected;
- how to escalate potential slavery or human trafficking issues to the relevant parties within our Group;
- what external help is available, for example through the Gangmasters and Labour Abuse Authority (GLAA), National Crime Agency, Anti-Slavery International, Modern Slavery Partnership and One Family initiative.

In addition, employees who are involved in the management of our supply chain will receive training on:

- our business's purchasing practices, which influence supply chain conditions and which should therefore be designed to prevent purchases at unrealistically low prices or the provision of products by an unrealistic deadline;
- what steps our Group should take if suppliers or contractors do not implement anti-slavery policies in high-risk scenarios, including their removal from our supply chains.

**Awareness-Raising Programme**


As well as training staff, we are increasingly raising awareness of modern slavery issues by posting information on our Group employee engagement portal.

The information explains to staff:

- the basic principles of the Modern Slavery Act 2015;
- how employers can identify and prevent slavery and human trafficking;
- what employees can do to flag up potential slavery or human trafficking issues to the relevant parties within our Group;
- what external help is available, for example through the Modern Slavery Partnership.

**Board Approval**

This statement was approved on 25<sup>th</sup> June 2021 by our Board of Directors, who will review and update it annually.

Director's Signature:   
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Director's Name: Neil Campbell

Date: 29<sup>th</sup> June 2021