

Modern Slavery Statement

1. Introduction

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 to exploit them for personal or commercial gain.

Kebomed UK Ltd Management recognises we have a responsibility to our employees & customers to ensure we have a clear strategy around how we conduct our business in an ethical manner.

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

2. Statement

Section 54 of the UK Modern Slavery Act (2015) requires commercial organisations that operate in the UK and have an annual turnover above £36m to produce a Slavery and Human Trafficking statement each year.

We do not have an annual turnover above £36m, so therefore are not required under this legislation to produce a yearly statement. However, we choose to voluntarily produce a statement.

The Modern Slavery Act specifically states that any statement must include 'the steps the organisation has taken during the financial year to ensure that slavery and human trafficking is not taking place in any of its supply chains, and in any part of its own business'

We are committed to implementing and enforce effective systems and controls to ensure modern slavery is not taking place anywhere in the organisation itself, its global suppliers and other parties engaged through the whole supply chain.

We cannot guarantee that the entire supply chain is slavery free, and this is not a requirement, but we will demonstrate the steps we have taken to assess risk and mitigate those.

We pledge to ensure there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chain. We expect the same high standards from all our contractors, suppliers, and other business partners.

3. Organisational Information

Kebomed UK Ltd is a leading independent distributor of medical devices, with a primary focus in minimal Invasive Gynaecology, Urology, Enteral Feeding and General Surgery.

4. **Minimum labour standards:** -

1. **Adhere to local and national laws**

2. **Child labour** – Kebomed UK does not support the use of child labour.

1. No person is employed who is below the minimum legal age for employment.

3. **Forced Labour**– Kebomed UK does not support or tolerate forced or bonded labour including forced prison labour.

1. Kebomed complies with the Modern Slavery Act 2015.
2. Forced, bonded or compulsory labour is not used.
3. Employees are not required to lodge deposits of money or identity papers with their employer.
- All workers have the freedom to terminate employment after reasonable notice.

4. **Health and Safety** - Kebomed UK provides a safe and healthy working environment, in line with our health and safety policy. All suppliers, consultants and Sub-Contractors must also run a health and safety policy ensuring employees but not limited to: -

1. A healthy and safe working environment is provided for employees, in accordance with international standards and national laws. This includes access to clean toilet facilities, drinkable water and, if applicable, sanitary facilities for food storage.
2. When providing accommodation, it shall be clean, safe, and meet the basic needs of employees.
3. Appropriate health and safety information and training is provided to employees and a comprehensive health and safety policy is in place.

5. **Freedom of Association**

1. As far as any relevant laws allow, all employees are free to join or not to join trade unions or similar external representative organisations.
2. Provides access to remedy, compensation and justice for victims of modern slavery

6. **Discrimination** – Kebomed UK does not support any discriminating practices.

Kebomed UK has an Equal

1. opportunities Policy which is shown to all new employees at induction. No discrimination in hiring, remuneration, access to training, promotion, termination, or retirement based on race, national or social origin, class, religion, gender, sexual orientation, political belief, age, or other conditions that could give rise to discrimination.
2. Prohibits any threat of violence, harassment and intimidation

7. **Remuneration** – Kebomed UK complies with the national laws in the UK.
 1. All employers are to abide by their local and national labour laws in respect of employees' wages.
 2. Prohibits the use of worker-paid recruitment fees
8. **Working Hours** – Kebomed UK complies with the applicable laws on working hours and holiday entitlement.
 1. All employers are to abide by their local and national labour laws in respect of working hours and holiday entitlement.
 2. Prohibits compulsory overtime
9. **Disciplinary Practices**
 1. All employees are to be treated with dignity and respect.
 2. Shall not engage in or tolerate the use of corporal punishment, mental or physical force or verbal abuse of personnel. No harsh or inhumane treatment is allowed.

5. Policies

We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. These are also available upon request

These include the following:

- Ethical trading, Human Rights & Labour standards policy
- Subcontractors and Supplier policy
- Supplier code of conduct
- Whistleblowing policy

We make sure our suppliers are aware of our policies and adhere to the same standards.

6. Our Supply Chain and Procurement

As a UK distributor we have a large number of global suppliers on our approved supplier list who provide the product we supply in the UK.

When procuring goods or services we have processes in place to consider Modern Slavery risks.

We ensure we carry out supplier due diligence.

This includes:

- Robust supplier selection and policies
- Supplier questionnaire and audit
- Mapping of the supply chain to identify areas of higher risk

Our due diligence procedures aim to:

- Identify and action potential risks in our business and supply chains.
- Monitor potential risks in our business and supply chains
- Reduce the risk of slavery and human trafficking occurring in our business and supply chains.
- Provide protection for whistleblowers.

We require our suppliers, as part of the selection process and auditing, to confirm adherence to our Ethical Trading, Human Rights and Labour Standards Policy and we have a Supplier Code of Conduct in place.

7. Risk and compliance

The Company has evaluated the nature and extent of its exposure to the risk of slavery and human trafficking occurring in its UK supply chain through:

Evaluating the slavery and human trafficking risks of each new supplier.

We do not consider that we operate in a high-risk environment because the majority of our supply chain is based in the UK and EU.

We do not tolerate slavery and human trafficking in our supply chains. Where there is evidence of failure to comply with our policies and procedures by any of our suppliers, we will seek to terminate our relationship with that supplier immediately.

8. Effectiveness

The Company uses Key Performance Indicators (KPIs) to measure its effectiveness and ensure that slavery and human trafficking is not taking place in its business and supply chains. These KPIs are as follows:

- We will train our staff about modern slavery issues and increase awareness within the Company.
- Email Suppliers with our supplier questionnaire which outlines our requirements of supply.

9. Training our staff

The Company requires its staff to complete comprehensive training and refresher courses every 2 years.

10. Areas of risk identified within the business and supply chain

Supplier risk assessment:

- The risk level is determined using the scale according to the global slavery index. <https://www.globallslaveryindex.org>
- This is cross referenced with the list of goods from the US department of Labour that have been identified to be at higher risk of being produced by child or forced labour. <https://www.dol.gov/agencies/ilab/reports/child-labor/list-of-goods>
- [Then the sector is checked against the ILO's Global Estimates of Modern Slavery](#)

Assessment Criteria:

- 0 or 1 Risk factors – Low Risk
- 2 Risk factors – Medium Risk
- 3 Risk factors – High Risk

Findings:

- 4 suppliers identified as medium risk
- 0 High Risk suppliers

All of our core suppliers have the risk indicator of manufacturing, if there are no other indicators these are categorised as low risk.

In our medium risk suppliers 3 suppliers are in manufacturing, an identified risk factor and they also have a medium vulnerability score.

1 supplier has a risk factor relating to temporary workers.

Tier 1

The nature of the organisational structure means that the risk within the business and supply chain for Tier 1 is identified as overall low.

For our core product suppliers, we conduct a self-assessment questionnaire:

- Annually for medium and high-risk suppliers
- Every 2 years for low-risk suppliers

The additional suppliers in the UK are continually reviewed as part of our ISO 9001 Quality Certification within our internal audit process and is also documented in our management review meetings minutes. This risk level will be reviewed yearly and reported on.

Tier 2

We currently have not mapped our Tier 2 suppliers and this is an organisation identified opportunity for improvement.

11. Policies and Processes relating to Modern Slavery

We have the following supporting documents in place, which have been shared and are available to all within Kebomed UK and our Supply chain.

- Ethical Trading, Human Rights and Labour Standards Policy
- Supplier Sustainability Audit
- Supplier Code of Conduct
- Whistleblowing Policy

KPIs

We will use key performance indicators (KPIs) to measure how effective our actions are to identify and address modern slavery practices in any part of our operations and supply chains have been.

Below are the key performance areas that we assess:

1. Governance & due diligence
2. Procurement & supply chain
3. HR practices, training & education

Against each of these focus areas we have developed KPIs that are used to assess the effectiveness of our actions. These include:

- 1 a. The number of modern slavery cases identified and remediated
- 1 b. Update of the Modern Slavery Statement & completion of the MSAT yearly
2. Number of suppliers completing our supplier self-assessment audit with the inclusion of modern slavery questions
3. Completion rates for modern slavery awareness training

Over subsequent reporting periods, we will continue to review and enhance these KPIs and develop further metrics to assess the effectiveness of our actions, in line with continuous improvement. This will be captured and logged within our Management Reviews.

12. Training of employees around Modern Slavery

We provide third party independent training on Modern Slavery through 'Tick the Box Compliance Solutions' to all employees.

The training covers:

- The ILOs Forced labour indicators
- The training ensures that recipients understand
 - Indicators of modern slavery
 - How to report suspicions of modern slavery
 - The modern slavery statement requirements
 - How to consider modern slavery risks in procurement
 - How to be better equipped to undertake modern slavery due diligence for the organisation

The training is delivered via e-learning and participants are required to pass the course using a competency-based exam.

The training is mandatory and is provided on induction and then every 12 months.

13. Reporting

If a case of Modern Slavery is suspected, then the following is advised.

A suspected victim of modern slavery is not to be confronted directly as this may endanger them.

If an immediate risk to life, then call local emergency (e.g. 911 in the US, 112 in Europe, 999 in the UK).

If there is no immediate risk to life, then contact the national helpline or report it online.

Helplines and On-line Reporting

Country	Helpline	Phone	On-line
EU	Anti-trafficking hotline	See https://www.europeanfreedomnetwork.org/hotline/	
UK	Modern Slavery Helpline	08000 232 700	https://www.modernslaveryhelpline.org/report
US	National Human Trafficking Hotline	1-888-373-7888	https://humantraffickinghotline.org/en/report-trafficking

Employees are required to take their suspicions to their line manager.

If there are concerns around modern slavery with any of our suppliers, we will first look to work with them to remedy the situation with an improvement action plan implemented and more rigorous auditing of the organisation.

If the response from any of our suppliers, here in the UK or abroad, seems inadequate and appropriate measures are not put in place to address coercion, threat, abuse, and exploitation of workers, then we would look to give that company more support, guidance and incentives to tackle the issue. This could include working with at-risk suppliers to provide training, messages and business incentives or guidance to implement anti-slavery policies.

If modern slavery is identified or suspected abroad, and resolution is not possible with the supplier, then we will engage with local Non-Governmental Organisations, industry bodies, trade unions or other support organisations to attempt to remedy the situation. If warranted, we will contact local government and law enforcement bodies. Our approach will always consider the safest outcome for the potential victims while also remember the economic influence and control which the organisation holds over those who may be committing these crimes.

If, after receiving support, the supplier is not taking the issue seriously, and it remains unresolved, then we will reconsider our commercial relationship with that supplier. These actions would then be included in the next statement produced.

14. Breaches

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

Any suppliers, individuals or organisations working with us, or on our behalf who breach this policy may have their relationship or contract with us terminated.

15. Responsibility

The Managing Director has overall responsibility for this policy.

16. Review and Communication

This statement will be reviewed by senior management, signed by a director or equivalent and then published on our website, and also uploaded to the following registers:

- <https://modern-slavery-statement-registry.service.gov.uk>
- <https://tiscreport.org>

Internally it will be sent to all employees and sent to our supply chain and other interested stakeholders.

17. Board / Senior Management Approval

SIGNED: *Gordon Laws*

NAME: Gordon Laws

JOB TITLE: Managing Director

DATE: 1/07/2025