# \*\*Modern Slavery and Human Trafficking Statement\*\*

# \*\*INTRODUCTION\*\*

This statement is made on behalf of Fleetwood Healthcare Limited (FHC) in accordance with Section 54 of the Modern Slavery Act 2015. This statement serves as FHC's slavery and human trafficking statement for the financial year ending 30 September 2024.

At FHC, we are committed to ensuring that our management and operations implement systems, policies, and processes to identify any potential instances of exploitation. If any are found, we will work diligently to eradicate modern slavery in all its forms from our business and supply chain. FHC are taking appropriate steps to ensure that everyone who works for FHC benefits from a working environment that respects their fundamental human rights. FHC also expect anyone we do business with to uphold these principles.

## \*\*OUR BUSINESS\*\*

FHC is a specialist distributor of innovative surgical instrumentation and medical devices. FHC partner with global manufacturers to deliver clinically advanced technologies to healthcare providers across Ireland and Northern Ireland. With offices in Wicklow and Belfast, FHC are dedicated to improving patient outcomes and supporting healthcare professionals through reliable service, training, and ongoing technical support. FHC's team collaborates closely with hospitals and clinicians to ensure our solutions provide measurable clinical value and operational efficiency.

## \*\*OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING\*\*

FHC are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or any part of our business. FHC's Anti-Slavery and Human Trafficking Policy reflects our commitment to acting ethically and with integrity in all our business relationships. FHC implement and enforce effective systems and controls to prevent slavery and human trafficking in our operations and supply chains.

## \*\*DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING\*\*

As part of FHC's initiative to identify and mitigate industry and business transaction risks, we appoint senior representatives from various business units and functions, who report to the Compliance Team and the Managing Director.

FHC have established policies and systems throughout our business, trading partners, and supply chains to:

- Identify inappropriate employment practices

- Assess and monitor potential risk areas
- Mitigate the risk of slavery and human trafficking
- Protect whistleblowers
- Investigate reports of modern slavery

#### \*\*SUPPLIER ADHERENCE TO OUR VALUES AND ETHICS\*\*

FHC maintain a zero-tolerance policy towards slavery and human trafficking. To ensure that all entities in our supply chain and contractors align with our values, we operate under the principles of responsible sourcing, which include paying employees the prevailing minimum wage applicable in their respective countries. FHC have implemented a Supplier Code of Conduct that outlines our expectations, and relevant account managers are responsible for monitoring and enforcing compliance with this code.

#### \*\*TRAINING\*\*

To foster a thorough understanding of the risks associated with modern slavery and human trafficking within our business and supply chains, FHC provide relevant training to our colleagues. Under our Supplier Code of Conduct, FHC also require our business partners to conduct regular and relevant training for their staff and suppliers. All major suppliers must complete our Supplier Questionnaire and provide the necessary evidence as requested.

#### \*\*STATEMENT\*\*

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 and constitutes our Group's slavery and human trafficking statement, approved by the Directors of Fleetwood Healthcare Limited.