

## Modern Slavery Act Statement

### Introduction

As a privately owned, manufacturer and supplier of medical devices in the healthcare sector, we recognise the importance of the human rights of all those involved in the design, manufacture, and distribution of our products.

### Flexicare Group Structure

Flexicare (Group) Limited is the UK parent company of the following subsidiaries: Flexicare Australia PTY Ltd, Flexicare GmbH, Flexicare Srl, Flexicare Korea Co. Ltd, Flexicare Medical (India) PVT Ltd, Prisma Flexicare SDN BHD, Flexicare BV, Wymedical Ltd, Flexicare Medical Limited, Flexicare Incorporated, Flexicare Deutschland GmbH, Flexicare Medical Mexico SA de CV and Flexicare Medical (Switzerland) GmbH collectively “Flexicare”.

Flexicare is a global manufacturer and provider of medical devices in the healthcare sector. Our head office is in the United Kingdom and is responsible for the management and oversight of our supply chain network. Our Respiratory, Airway Management and Urology medical devices are distributed in over 105 countries, including the US, Australia, China, Germany, Italy, India, Korea, the Netherlands, Japan, and Malaysia.

### Our Values

Our vision is to be the preferred and most trusted healthcare manufacturer of medical devices through inspired innovations designed to enhance clinical outcomes. We are committed to sourcing goods and materials for the manufacture of our medical devices through suppliers who share our values and standards.

### Supply Chain

Flexicare has continued to expand its business across the globe. Flexicare demands its third party contract manufacturers and suppliers undertake their activities in accordance with its ethical and labour standards policies to ensure that no individual is exploited or discriminated. In demonstration of this commitment, Flexicare conducts periodic audits of its third party contract manufacturers and suppliers.

Flexicare is pleased to report again that it did not require corrective action to be undertaken by any third party contract manufacturer and/or supplier. However, Flexicare remains vigilant and aware that intermediaries in its supply chain face extraordinary pressures due to the legacy effects of the coronavirus pandemic and the emergent geopolitical/economic crises.

### Our Policies

We have various policies that have the effect of minimizing the risk of modern slavery in our business. Our Supplier Whistleblowing Policy and Ethical Policy, Labour Standard Manual and Labour Standards Assurance System (certified by our notified body) reflects our commitment to ensure that we procure all goods and materials from suppliers who respect the rights of their employees with regards to freedom of association, payment of a fair wage, working hours, equal opportunities, freedom from intimidation and a safe and healthy working environment.

### Training

Awareness and understanding are critical tools in the fight against modern slavery and human trafficking. Awareness training is provided to all our UK staff to ensure that they act with integrity and in accordance with our core values and are encouraged to raise any concerns that they may have including potential violations of our policies and/or the laws of the countries in which we operate. The expansion of awareness

training to non-UK staff was delayed in the reporting period due to various limiting factors but Flexicare will re-prioritise this commitment due to the variety of roles performed by non-UK based staff.

### Risk assessments, monitoring, and due diligence

We manufacture and supply medical devices that involve different suppliers in different locations. We recognise the complexity of our supply chain and the heightened risks that such complexity may carry. Accordingly, we use systems and tools, managed by the UK Compliance team, to:

- identify and assess potential risks in our supply chain;
- mitigate the risk of slavery and human trafficking occurring in our supply chains;
- monitor potential risk areas in our supply chains; and
- protect whistle blowers.

Our UK Compliance team consists of Managers from the Quality, Supply Chain, Logistics and HR areas.

Independent third-party certification may be required to ensure that our suppliers can objectively demonstrate their commitment to our values.

### Effectiveness

As a manufacturer and supplier of medical devices to, amongst others, the NHS we are audited each year by our notified body. Part of such audits include an assessment of the effectiveness of our compliance systems and tools in relation to our supply chain.

We acknowledge that independent assessment of our systems and tools is only one way in which success can be measured. For this reporting period, we have devised some preliminary key performance indicators (presented in the table below) but our key stakeholders within the business continue to examine how to expand those KPIs to ensure we better understand whether our approach is effective in the management of modern slavery risks.

### KPIs

KPI	Relevance	FY21 (and previous reporting periods)	FY22
Number of modern slavery incidents identified within our operations or supply chain	To identify incidents and capture the effectiveness of our reporting requirements	0	0
Percentage of non-UK staff receiving training and awareness on modern slavery	To track our progress in expanding knowledge and awareness across the Flexicare group	N/A	0%
Percentage of critical suppliers that have a whistle-blowing mechanism	To develop an understanding of the extent of our supply chain that have effective processes to manage modern slavery risks and identify those	N/A	76%

	that may pose a greater risk		
Percentage of critical suppliers whose labour standards have been independently audited/certified by a third party (not instructed by Flexicare)	To validate our evaluations of the risks in our supply chain and identify those that may pose a greater risk	N/A	32%

**Future developments**

Whilst the effects of the coronavirus pandemic lessen, and travel is no longer restricted, we are conscious of our commitment to reduce our carbon footprint in accordance with our carbon reduction plan. Regular long-distance travel will need to be conducted with appropriate environmental countermeasures to ensure we do not deviate from our sustainability commitments. Notwithstanding periodic in-person audits, an inherent aspect of our operation is that we remain dependent upon accurate and timely information from our supply chain and independent third party auditors. As noted in previous years, we acknowledge that risk and continue to explore what additional or alternative methods may be implemented to ensure that our tools and systems remain effective in the prevention of modern slavery and human trafficking in our global business and supply chain.

As a result of the above, we are ever more vigilant to ensure that our suppliers and partners continue to operate in a transparent and ethical manner.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 30 November 2022. It was approved by the board on 26<sup>th</sup> May 2023



**Khashayar Poormand**  
 Managing Director

26<sup>th</sup> May 2023