

## 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 Medical Limited, Flexicare Incorporated, Flexicare B.V., Flexicare GmbH, Flexicare Australia PTY Ltd, Flexicare Korea Co. Ltd and Flexicare Medical (India) PVT Ltd 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 throughout the world, including the US, Australia, China, Europe, India, Korea, the Middle East and Malaysia.

### Our Values

Our vision is to be the preferred and most trusted healthcare manufacturer of medical devices that enhance patient care. 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

Our main contract manufacturer is in Guangdong Province, China and like many of our other supply chain suppliers located elsewhere, has had a longstanding relationship with Flexicare. However, regardless of location and relationship, each manufacturer’s and supplier’s site of operation is required to demonstrate continued compliance with, and an understanding of, Flexicare’s ethical and labour standards policies.

In 2020, we incorporated a new contract manufacturer located in Sri Lanka into our supply chain network. Prior to the commencement of any activities on our behalf, they were required to demonstrate an awareness and understanding of the standards we continually expect to be upheld to ensure no individual is exploited or discriminated.

### Our Policies

We have various policies that have the effect of minimizing the risk of modern slavery in our business, in particular our Supplier Whistleblowing Policy and Ethical Policy, whilst our Labour Standard Manual and Labour Standards Assurance System certification 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. We provide awareness training 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.

## 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 continue to utilise effective 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.

To ensure that our suppliers can demonstrate their commitment to our values certification by an independent third party may be required.

## Effectiveness

As a manufacturer and supplier of medical devices to the NHS, inter alia, 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. Key stakeholders within our business regularly meet to discuss and consider areas in which we can improve.

## Future developments

We recognise that people remain vulnerable, and that the coronavirus pandemic continues to have a significant impact on the global economy. The inability to travel to inspect supply chain sites in person places greater importance that our supply chain and local 3<sup>rd</sup> party auditors provide accurate and timely information. Reliance on an entity to conduct a self-appraisal carries its own inherent risks. Accordingly, we are working this year to explore what additional or alternative methods can be incorporated 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 2020. It was approved by the board on 28<sup>th</sup> April 2021.



**Khashayar Poormand**  
Managing Director

6<sup>th</sup> May 2021