

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 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

Following the incorporation of a new contract manufacturer in the previous financial year, Flexicare has continued to expand its business. Flexicare demands its 3rd 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 evaluations of its 3rd party contract manufacturers and suppliers.

Flexicare is pleased to report that for the previous financial year period it did not require any corrective action to be undertaken by any 3rd party contract manufacturer and/or supplier. However, Flexicare remains vigilant and aware that intermediaries in its supply chain face extraordinary pressures due to the continuing effects of the coronavirus pandemic.

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. As part of our continual efforts to improve processes and procedures, Flexicare will extend the provision of awareness training to non-UK staff. Non-UK staff perform many varied roles and by extending the training Flexicare will address the risk that non-UK staff do not report incidents due to a lack of awareness.

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.

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, 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. Key stakeholders within our business regularly meet to discuss and consider areas in which we can improve.

Future developments

Unfortunately, people remain vulnerable whilst the effects of the coronavirus pandemic continue to be felt. Restricted travel has diminished the ability to exercise in-person site audits at 3rd party contract manufacturers and suppliers. We remain dependent upon accurate and timely information from our supply chain and independent 3rd party auditors. As we noted last year, we acknowledge the risk inherent in relying on an entity to conduct a self-appraisal and continue to explore what additional or alternative methods can 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 2021. It was approved by the board on 26th May 2022.

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Managing Director

26th May 2022