Modern Slavery statement

Pursuant to section 54 (1) of the Modern Slavery Act 2015, Clinisupplies Limited ("Clinisupplies") publishes this Modern Slavery Statement. This statement has been approved in respect of the financial year ending 31st March 2025. Modern slavery is a crime and 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 ("Modern Slavery").

Commitment

We have a zero-tolerance approach to Modern Slavery, and we are committed to the detection and prevention of Modern slavery within our business and within our supply chain. It is our policy to conduct all business activities with honesty and integrity at the highest ethical standards. We are fully committed to implementing effective systems and controls to combat Modern Slavery.

Organisation and its structure

Clinisupplies is a manufacturer and distributor of consumable medical devices, specialising in urine collection, catheters, and other continence care products. Clinisupplies distributes to hospitals and on prescription through our home delivery service ("Nightingale") and local pharmacies. Clinisupplies' headquarters are in Watford, UK, and operates in the UK, Europe, and Asia, employing over 714 staff. The Clinisupplies group are 100% owned by Kohlberg Kravis Roberts & Co. ("KKR") and has a turnover more than £36m in the financial year stated.

Policies

This policy and all supporting policies reflect Clinisupplies' commitment to detecting and preventing Modern Slavery and human trafficking in our organisation and supply chains. This policy applies to all persons working for Clinisupplies or on our behalf in any capacity. These policies are regularly reviewed and approved by the Clinisupplies Executive Leadership Team ("ELT"). These include but are not limited to:

- **Recruitment** – Clinisupplies operates a robust recruitment policy, which includes conducting right-to-work checks for all directly employed staff and ensures agencies on approved contracts are audited to provide reassurances that pre-employment clearance has been obtained for agency staff; all aimed at safeguarding against human trafficking and forced labour.

- **Equal opportunities –** a series of controls are in place to protect staff from poor treatment and exploitation, in compliance with relevant laws and regulations. These include the provision of fair pay, fair terms and conditions of employment, as well as access to training and development.

- **Whistleblowing –** this policy aims to ensure all employees feel confident that they can raise concerns without fear of reprisal, regarding the treatment of staff, customers, or suppliers, and regarding any concerning practices within our organisation or supply chain.

- **Anti-corruption** – this is designed to prevent bribery from occurring, avoid the appearance of wrongdoing and enable the company to respond promptly and effectively to any enquiries about its conduct.

Modern Slavery is overseen by the ELT, which has the authority and responsibility of Clinisupplies for the detection and prevention of any unethical practices within the organisation or its supply chain. Responsibility for this policy rests with the Clinisupplies Procurement team. All credible reports of suspected misconduct or breaches of this policy are reported to and investigated by the Clinisupplies Chief Clinical & Regulatory Officer and Chief People Officer using the same process as outlined in our Whistleblowing policy. Outcomes of such investigations are reported to the ELT. Colleagues are encouraged to raise concerns, in confidence, about possible suspicions of Modern Slavery within our organisation or supply chain.

Accreditation

Clinisupplies are audited annually against NHS Supply Chain's Labour Standards Assurance System ("LSAS"), which are a condition of commercial public sector contracts in specific high-risk and product categories. Clinisupplies is an LSAS Level 3 approved supplier during the relevant period and demonstrates that good labour standards are driven throughout our supply chain.

To demonstrate the same standards to our public sector partners, Clinisupplies completes the Government modern slavery risk identification and management tool ("MSAT") annually. Many of the aspects of LSAS and MSAT align with the 6 key areas outlined in the Home Office's statutory guidance for Modern Slavery.

Clinisupplies are also members of the British Healthcare Trades Association ("BHTA") and subscribe to the BHTA Code of Practice.

Supply chain

To promote compliance in our supply chain regarding our commitments to Modern Slavery, Clinisupplies has a framework of measures to assess and monitor supplier conduct. These include specific prohibitions against the use of Modern Slavery in our onboarding and re-evaluation process.

Clinisupplies screens suppliers using our supplier onboarding process, which includes compliance questionnaires and a declaration asking for confirmation that they are adhering to our Ethical Trading Initiative ("ETI") policy and all its provisions. We re-evaluate and address risks

of slavery and human trafficking in our supply chain on an annual basis, ensuring suppliers comply with these provisions and hold their own suppliers to the same high standards. We also plan to extend this framework to our contracting process, both in our terms of purchase and our supplier agreements. By doing so, we believe we will have a stronger contractual basis for commitment by suppliers.

Due diligence

As part of our re-evaluation process, Clinisupplies proactively conduct due diligence and using a series of systems and tools to:

- Identify and assess potential risks in our supply chain.
- Mitigate the risk of slavery and human trafficking occurring in our supply chain.
- Monitor potential risk areas in our supply chain.
- Protect whistle-blowers.

Our procedure includes supplier audits with specific provisions for adherence to our policies and relevant international standards relating to Modern Slavery. These audits are conducted remotely by a qualified auditor on a regular basis.

Clinisupplies recently strengthened its supply chain visibility, ability to assess and manage risk, report outcomes, and comply with sustainability legislation by partnering with Sedex. This has benefits for key supplier relationships, particularly those in high-risk countries or product categories.

Training and awareness

We expect all employees comply with the law and act in an ethical manner in the performance of their duties. To continuously improve our ability to detect and prevent Modern Slavery in our organisation and supply chains, Clinisupplies trains all employees on the following topics:

- Compliance – which includes Bribery and Corruption
- Modern Slavery and Human Trafficking

For those employees working directly with suppliers in our supply chain, we invest in and ask them to complete Ethical Procurement and Supply training through the Chartered Institute of Procurement and Supply (“CIPS”). The aim being to ensure that employees who may be at higher risk of identifying issues of Modern Slavery are fully equipped to handle these situations appropriately and in line with company policy.

Effectiveness

To date, no reports have been received to indicate that there have been any breaches of Modern Slavery law. Clinisupplies acknowledges this does not mean there is zero-risk and will continue

to invest in policies, processes and resources that will support better identification and reporting.

During the relevant period, 1 supplier was screened and successfully onboarded, evidencing compliance with Clinisupplies policies. 14 suppliers have been successfully re-evaluated and 127 employees completed compliance training, either on induction or revalidation; and 219 employees completed Modern Slavery and Human Trafficking training.

Clinisupplies' Modern Slavery Statement is approved by Clinisupplies' Board of Directors, and its Chief Executive Officer and is signed, delivered, and takes effect on the date stated below.

Approved by Clinisupplies Limited **Executive Leadership Team** in the presence of:)



Signature

Paul Cook

Name

9 February 2026

Date

Clinisupplies' compliance with legal requirements

This statement is updated annually and is approved by Clinisupplies Board of Directors and Chief Executive Officer. It is published on the government Modern Slavery statement registry and on Clinisupplies website.

Version control

Version	Change	Author	Date
0.1	Document created.	Bali Josen	17/01/2023
0.2	Initial draft sent to line manager for review.	Bali Josen	03/03/2023
0.3	Draft sent to department Director for review.	Bali Josen/Simon Grant	16/03/2023
0.4	Further revisions/information added.	Bali Josen/Simon Grant	05/04/2023
0.5	Revisions following HR/C&R review.	Bali Josen/Simon Grant	14/04/2023
1.0	Revisions following ELT review.	Bali Josen/Simon Grant	25/04/2023
1.1	Logo change following re-brand.	Simon Grant	24/10/2023
1.2	Updated for year to 31st March 2024	Simon Grant	29/05/2024
1.3	Updated for year to 31st March 2025	Simon Grant	25/06/2025