



Modern Slavery and Human Trafficking Statement

Modern Slavery Statement
Revision 1 – 17/01/2023

Introduction

This Modern Slavery and Human Trafficking Statement is drawn up in compliance with Section 54 of the Modern Slavery Act 2015. It has been prepared by Tim Carter, COO - Purple Surgical, and is updated on an annual basis. The Statement is made on behalf of all companies within the Purple Surgical Group.

Publishing an annual statement allows Purple Surgical to demonstrate transparency and openness in the way we conduct our business, providing assurance to our stakeholders and the wider public that we seek at all times to act ethically and in line with best practices. It allows us to set out how modern slavery can affect a business such as ours and the steps we take to try to ensure that no aspect of modern slavery or human trafficking occurs within our organisation or wider supply chain.


Our efforts in this regard sit in line with our broader corporate social responsibility, labour standards and ethics policies and practices as well as our adoption of the Ethical Trading Initiative. As a British-based global healthcare business we feel a strong responsibility to look after and benefit the communities we engage with, both in the UK and internationally. We endeavour to act in a manner which promotes respectful relationships with our customers, suppliers and their communities, as well as working to protect the environment by implementing sustainable business practices and reducing our carbon footprint.

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Company & Workforce

Purple Surgical is a leading independent British manufacturer of high quality, cost-effective, single-use surgical instrumentation and devices. We partner with global healthcare providers to improve treatment standards and enhance patient outcomes. Our products seek to reduce clinical variation, improve the efficiency and productivity of clinical departments and lower costs.

The Purple Surgical Group comprises the following operating entities:

			
Purple Surgical UK	Purple Surgical International	Purple Surgical Manufacturing	Purple Surgical South Africa
<i>Established in 1909.</i> <i>Head Office London.</i> <i>Support NHS & Private Hospitals.</i>	<i>Established in 2000.</i> <i>127 distributors worldwide.</i> <i>Presence in 61 countries.</i>	<i>Established in 2002.</i> <i>60,000 sq. ft. facility</i> <i>Manufactures & distributes globally.</i>	<i>Established in 2013.</i> <i>Head Office Johannesburg.</i> <i>Supports hospitals across South Africa.</i>

Purple Surgical values our workers as key assets of our company. Workers' rights and equitable treatment are of central importance to us. This extends not only to our direct employees but also to the subcontractors, agency workers and other workforces contributing to our business and supply chain.

The majority of the company's workers are full-time long-term employees on permanent contracts of employment. From time to time, fluctuations in demand for Purple Surgical's products necessitate the use of temporary staff and occasionally a small number of agency workers at the company's production site. The company has established relationships with a selected group of agencies for this purpose.

Supply Chain

The company operates an extensive global supply chain in order to manufacture and supply its product portfolio to the healthcare market. Where it can, Purple

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Surgical sources raw materials and other supplies for its UK manufacturing facility from UK and EU based suppliers. However, some of the components and finished products within Purple Surgical's portfolio require procurement from lower cost manufacturing destinations – predominantly China – in order to maintain economic viability.

The company has spent considerable time over many years building long-term, stable and mutually beneficial supplier relationships. This is particularly true in the case of components and finished products because our suppliers must comply with the relevant requirements of the European medical device regulations.

Potential suppliers undergo a vetting process performed by the company's senior management, production, procurement and regulatory teams. Risk assessments are undertaken based upon country risk, as defined by the Global Slavery Index and the World Bank Governance Indicators, and also based on the volume of supply and the inherent product risk based on the manufacturing processes and industry risks.

Where higher risks are identified, the company works to put more robust controls in place through ongoing monitoring, site visits and our supplier assessments and agreements. Efforts are made to procure directly from manufacturers, avoiding the use of intermediaries or multiple tiers of suppliers. The company takes steps to reduce the chance that its procurement practices could create pressure on suppliers that might lead to modern slavery. We consider modern slavery and human trafficking throughout our procurement processes and lifecycles, from needs identification to end of contract review.

Policies & Practices

Purple Surgical operates globally with a commitment to adhering to legislative as well as social responsibilities and duties. We respect the Human Rights Declaration of the United Nations and comply with the International Labour Organization (ILO) Fundamental Principles of Rights at Work as well as the Ethical Trading Initiative (ETI) Base Code.

Our Modern Slavery and Labour Standards Policy, along with our Supplier Code of Conduct and our employment and recruitment procedures, provide the

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framework and describe our approach and commitments when it comes to labour standards within both our own organisation and those of our suppliers.

The minimum standards we require include the following:

- Employment is freely chosen
- Freedom of association and the right to collective bargaining are respected
- Working conditions are safe and hygienic
- Child labour shall not be used
- Living wages are paid
- Working hours are not excessive
- No discrimination is practised
- Regular employment is provided
- No harsh or inhumane treatment is allowed.

Identifying, Assessing & Managing Risk

Over the next 12 months we intend to focus on the following areas in terms of strengthening our awareness of risks:

- Relationships: strengthening our supplier engagement process.
- Feedback: establishing mechanisms and channels for worker feedback to allow for raising issues, making suggestions and reporting slavery and human trafficking.
- Knowledge: improving our knowledge base by collecting relevant data.
- Measurable change: developing verifiable KPIs to measure progress.
- Supplier collaboration: encouraging suppliers to collaborate to address slavery and human trafficking issues.

Our efforts to monitor labour standards in our supply chains will include:

- Publicising modern slavery and associated labour standards issues throughout our company and supply chain.
- Providing awareness training to relevant members of staff to increase the chance that risks and incidents of modern slavery are more easily identified.

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- Conducting supplier assessments.
- Initiating audits when appropriate based on risk.
- Collaborating with suppliers to develop an improvement plan to address new and previously identified slavery and human trafficking issues, if relevant.
- Putting in place an anonymous whistleblower mechanism to facilitate confidential reporting of potential improprieties.

Key Performance Indicators

Purple Surgical monitors the following KPIs in order to measure aspects of its activity in this area:

- Staff training levels
- Policies & procedures
- Risk assessments
- Due diligence
- Number of slavery incidents reported in the supply chain
- Number of supplier assessments issued and analysed
- Number of audits completed.

Training

As part of our efforts to increase awareness of the risks of modern slavery and human trafficking in our business and supply chain we make training and supporting materials available to relevant employees.

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Approval

This statement was approved by the Senior Management Team on 30th of November 2022, who review and update it annually.

Signed:



Tim Carter, COO

Date: 17th January 2023

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